

**D C W N E Y**

**STATEMENT OF CONSISTENCY  
WITH PLANNING POLICY**

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**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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## 1.0 INTRODUCTION

Downey, Chartered Town Planners, 29 Merrion Square, D02RW64, have prepared this Statement of Consistency with Planning Policy, 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. The proposed development, as per the description contained within the statutory planning notices, provides for:

*“Gerard Gannon Properties intend to apply to An Bord Pleanála for permission for a strategic housing development on lands at Kilnahue & Gorey Hill, Carnew Road (R725) & Kilnahue Lane (L10112), Gorey, Co. Wexford.*

*The development will consist of the demolition of all existing, derelict structures on site and the construction of a mixed-use development comprising of 421 no. residential units (133 no. houses, 228 no. apartments, and 60 no. duplexes); with 1 no. childcare facility, 2 no. retail units and 2 no. community rooms, all of which will be provided as follows:*

- *133 no. two-storey houses (a total of 115 no. 3 beds consisting of 106 no. 3-bed, terraced houses; 8 no. 3 bed, semi-detached houses; and 1 no. 3 bed, detached house; and a total of 18 no. 4 bed, terraced houses), all with associated car parking;*
- *52 no. hybrid duplex units (26 no. 2 bed units and 26 no. 3 bed units) in 13 no. three storey buildings, and all units provided with private balconies/terraces, with car parking, bike storage and bin stores;*
- *Apartment Block A containing a total of 24 no. units comprising of 10 no. 1 bed units, 14 no. 2 bed units, in a building three storeys in height over lower-level access cores, and all apartments provided with private balconies/terraces, with car parking and bicycle spaces, and bin stores;*
- *Apartment Block B containing a total of 24 no. units comprising of 10 no. 1 bed units, 14 no. 2 bed units, in a building three storeys in height over lower-level access cores, and all apartments provided with private balconies/terraces, with car parking and bicycle spaces, and bin stores;*
- *Apartment Block C containing a total of 24 no. units comprising of 10 no. 1 bed units, 14 no. 2 bed units, in a building three storeys in height over lower-level access cores, and all apartments provided with private balconies/terraces, with car parking and bicycle spaces, and bin stores;*
- *Apartment Block D containing a total of 24 no. units comprising of 10 no. 1 bed units, 14 no. 2 bed units, in a building three storeys in height over lower-level access cores, and all apartments provided with private balconies/terraces, with car parking spaces and bicycle spaces, and bin stores;*
- *Apartment Block E containing a total of 28 no. units comprising of 8 no. 1 bed units, 19 no. 2 bed units, and 1 no. 3 bed unit, in a building four storeys in height over undercroft parking, and all apartments provided with private balconies/terraces, with car parking and bicycle spaces, and bin stores;*
- *Apartment Block F containing a total of 28 no. units comprising of 8 no. 1 bed units, 19 no. 2 bed units, and 1 no. 3 bed unit, in a building four storeys in height over undercroft parking, and all apartments provided with private balconies/terraces, with car parking and bicycle spaces, and bin stores;*

- *Apartment Block G containing a total of 28 no. units comprising of 8 no. 1 bed units, 19 no. 2 bed units, and 1 no. 3 bed unit, in a building four storeys in height over undercroft parking, and all apartments provided with private balconies/terraces, with car parking and bicycle spaces, and bin stores;*
- *Apartment Block H containing a total of 28 no. units comprising of 8 no. 1 bed units, 19 no. 2 bed units, and 1 no. 3 bed unit, in a building four storeys in height over undercroft parking, and all apartments provided with private balconies/terraces, with car parking spaces and bicycle spaces, and bin stores;*
- *Duplex Block J containing a total of 8 no. units comprising of 4 no. 1 bed units and 4 no. 3 bed units, in a building three storeys in height, and all units provided with private balconies/terraces, with car parking and bicycle spaces, and bin stores;*
- *Block EAB containing a total of 10 no. apartments comprising of 7 no. 2 bed units and 3 no. 3 bed units, in a building three storeys in height, and all apartments provided with private balconies/terraces, with car parking and bicycle spaces, and bin stores;*
- *Block XAB is a mixed-use block containing a total of 10 no. apartments comprising of 4 no. 1 bed units, and 6 no. 2 bed units, and all apartments provided with private balconies/terraces; with 2 no. community rooms and 2 no. small retail units at ground floor level, all in a building three storeys in height, with car parking and bicycle spaces, and bin stores; and,*
- *1 no. childcare facility in a two-storey split level building with associated outdoor play areas; car parking and set down area; bicycle spaces; pram/buggy storage; and bin stores.*

*The development provides for a total of 759 no. car parking spaces and 480 no. bicycle spaces. The development also provides for two vehicular accesses and one pedestrian/cyclist crossing and associated road upgrade works, all on Kilnahue Lane (L10112); one vehicular access on Carnew Road (R725) and associated road upgrade works; proposed upgrades to public realm including footpaths and cycle lanes, with proposed upgrade of the Carnew Road/Kilnahue Lane junction to a signalised junction; landscaping including a neighbourhood park, a playground and MUGA with associated neighbourhood parking; pocket parks; boundary treatments; public lighting; and all associated engineering and site works necessary to facilitate the development including proposed new sewer and associated upgrade works to existing engineering infrastructure on Carnew Road, Kilnahue Lane, Main Street and Esmonde Street.*

*The application contains a statement setting out how the proposal will be consistent with the objectives of the Wexford County Development Plan 2013-2019 and Gorey Town and Environs Local Area Plan 2017-2023.*

*The application contains a statement indicating why permission should be granted for the proposed development, having regard to a consideration specified in section 37(2)(b) of the Planning and Development Act, 2000, as amended, notwithstanding that the proposed development materially contravenes a relevant development plan or local area plan other than in relation to the zoning of the land.*

*An Environmental Impact Assessment Report (EIAR) has been prepared in respect of the proposed development.”*

This Statement of Consistency with Planning Policy has been prepared in accordance with Section 8 (1)(a)(iv) of the Planning and Development (Housing) and Residential Tenancies Act 2016 and in accordance with the requirements of the Planning and Development Regulations 2001-2017 (as amended by Planning and Development (Strategic Housing Development) Regulations 2017) and the “*Strategic Housing Development: Section 4 Applications to An Bord Pleanála - Guidance for Applicants*” issued by An Bord Pleanála.

This Statement demonstrates that the proposed development is consistent with the relevant national, regional, and local planning policy and guidelines issued under Section 28 of the Planning and Development Act, 2000 (as amended). This Statement should be read in conjunction with the accompanying detailed documentation prepared by the design team.

For details of compliance with the quantitative standards for residential units of adopted “*Sustainable Urban Housing: Design Standards for New Apartments*”, “*Quality Housing for Sustainable Communities Best Practice Guidelines for Delivering Homes Sustaining Communities*”, the “*Wexford County Council Development Plan 2013-2019*” and the “*Draft Wexford County Council Development Plan 2021-2027*”, please refer to the Housing Quality Assessment prepared by Connolly Architects which is included as part of the architectural planning pack.

## 2.0 NATIONAL POLICY AND GUIDELINES

The key provisions of the national planning policy, including Section 28 Guidelines, as it relates to the proposed development are now set out in the following sections. The key national policy and guidance documents of relevance include:

- Project Ireland 2040: National Planning Framework
- Project Ireland 2040: National Development Plan 2021-2030
- Rebuilding Ireland, An Action Plan for Housing and Homelessness (2016)
- Housing for All: A New Housing Plan for Ireland
- Affordable Housing Act 2021 & Housing Circular 28/2021
- Residential Densities in Towns and Villages (Circular Letter: NRUP 02/2021)
- Sustainable Residential Development in Urban Areas and Best Practice Urban Design Guidelines (2009)
- Delivering Homes, Sustaining Communities: Statement on Housing Policy (2007)
- Delivering Homes, Sustaining Communities Best Practice Guidelines – Quality Homes for Sustainable Communities (2007)
- Sustainable Urban Housing: Design Standards for New Apartments (December 2020)
- Urban Development and Building Heights Guidelines for Planning Authorities (December 2018)
- Childcare Facilities: Guidelines for Planning Authorities (2001)
- Childcare facilities operating under the Early Childhood Care and Education (ECCE) Scheme (Circular Letter: PL 3/2016)
- Retail Planning Guidelines (2012) and Retail Design Manual (2012)
- Smarter Travel: A Sustainable Transport Future

- Design Manual for Urban Roads and Streets (DMURS)
- National Cycle Manual (June 2011)
- EIA Directive
- Bird and Habitats Directive - Appropriate Assessment
- All-Ireland Pollinator Plan 2021-2025
- A Guide for Landowners to Managing Roadside Trees
- The Planning System and Flood Risk Guidelines (2009)
- National Adaptation Framework: Planning for a Climate Resilient Ireland
- Climate Action Plan (2019)

## 2.1 Project Ireland 2040: National Planning Framework

The National Planning Framework is *“the Government’s high-level strategic plan for shaping the future growth and development of our country out to the year 2040”*. It is a Framework to guide public and private investment, to create and promote opportunities for our people, and to protect and enhance our environment- from our villages to our cities and everything in between. It is stated within the National Planning Framework that supporting an increasing population and the future economic growth of the country as a whole, it is considered that a more strategic and managed approach is to be taken to ensure that targeted growth is to be accommodated within the boundaries of existing settlements.

According to the National Planning Framework, existing settlements need to accommodate a greater proportion of the growth it generates within their development boundaries and offer improved housing choice, transport mobility and quality of life. Achieving critical mass is crucial to Ireland’s competitiveness.

The NPF states that *“the long-term vision for Ireland’s housing future aims to balance the provision of good quality housing that meets the needs of a diverse population, in a way that makes our cities, towns, villages and rural areas good places to live now and in the future.”*

It is outlined within the Plan that future homes are required to be located where people have the best opportunities to access a high standard quality of life. In Ireland, the location of housing has taken on a dispersed and fragmented character which has led to people living further away from their jobs and often being at a sizeable remove from important services such as education and healthcare. It is stated that it is important to *“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”*.

The overarching emphasis of the NPF is on renewing and developing existing settlements, rather than continual expansion and sprawl of cities and towns out into the countryside, at the expense of town centres and smaller villages. In this regard, 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 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.

Located as part of the Southern Region, The National Planning Framework 2040 states that, *"the big challenge for this Region in the period to 2040, will be to position its cities as more significantly scaled, while also more compact and attractive, acting as metropolitan drivers for the region as a whole and as effective complements to the economic strength of Dublin. Ensuring a balanced approach in activating and realising much underutilised potential in wider rural towns and dispersed communities will also be a priority"*.

It is an objective (Objective 1a) of the NPF that *"the projected level of population and employment growth in the Eastern and Midland Regional Assembly area will be at least matched by that of the Northern and Western and Southern Regional Assembly areas combined."* In this regard, targets for growing the Southern Region (Objectives 1b and 1c) means planning for *"340,000 - 380,000 additional people i.e. a population of almost 2 million and around 225,000 additional people in employment i.e. 880,000 (0.875m) in total."*

The National Planning Framework 2040 also indicates that in terms of facilitating development within Ireland's towns; *"In all cases, regional and local planning authorities must consider the varied growth potential of different types of settlement in accordance with National Policy Objective 7, as well as rural areas, and tailor a strategy to balance this accordingly. It is not expected that all towns, large or small, will each target the same level of growth to 2040 and targets set in accordance with the Framework and the Regional Spatial and Economic Strategies will be reviewed based on performance, by 2027. But all towns can and must grow over this period and some will be identified as having capacity for higher than average levels of growth"*.

The NPF has a number of national policy objectives which are relevant to this application, which include the following:

**National Policy Objective 3a** - *Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.*

**National Policy Objective 7** - *Apply a tailored approach to urban development, that will be linked to the Rural and Urban Regeneration and Development Fund, with a particular focus on:*

- *Dublin;*
- *The four Cities of Cork, Limerick, Galway and Waterford;*
- *Strengthening Ireland's overall urban structure, particularly in the Northern and Western and Midland Regions, to include the regional centres of Sligo and Letterkenny in the North-West, Athlone in the Midlands and cross-border networks focused on the Letterkenny-Derry North-West Gateway Initiative and Drogheda-Dundalk-Newry on the Dublin-Belfast corridor;*
- *Encouraging population growth in strong employment and service centres of all sizes, supported by employment growth;*

- *Reversing the stagnation or decline of many smaller urban centres, by identifying and establishing new roles and functions and enhancement of local infrastructure and amenities;*
- *Addressing the legacy of rapid unplanned growth, by facilitating amenities and services catch-up, jobs and/or improved sustainable transport links to the cities, together with a slower rate of population growth in recently expanded commuter settlements of all sizes;*
- *In more self-contained settlements of all sizes, supporting a continuation of balanced population and employment growth.*

**National Policy Objective 11:** *In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.*

**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.*

**National Policy Objective 35:** *Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.*

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.*



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. Outlined in the NPF, 7 out of 10 households in the State currently consist of three people or less, with an average household size of 2.75 people. This is expected to decline to around 2.5 people per household by 2040. Therefore, Downey are of the considered opinion that the proposed residential development adheres to the core principles of the National Planning Framework and will provide multiple accommodation types for specific housing needs.

Out of the total 421 no. residential units proposed, 228 no. apartments and 60 no. duplexes are to be delivered as part of the development. The National Planning Framework 2040 envisages increased apartment provision to be provided as part of residential proposals, particularly in urban areas. It is stated that, *“to more effectively address the challenge of meeting the housing needs of a growing population in our key urban areas, it is clear that we need to build inwards and upwards, rather than outwards. This means that apartments will need to become a more prevalent form of housing, particularly in Ireland’s cities.”* The National Planning Framework also states that *“this is underpinned by ongoing population growth, a long-term move towards smaller average household size, an ageing and more diverse population, greater mobility in the labour market and a higher proportion of households in the rented sector.”*

In addition to encouraging sustainable residential development within settlement boundaries, it is evident that there is a strong emphasis placed on increased building heights in appropriate locations within existing urban settlement boundaries. As such it is respectfully submitted that the proposed building heights in this case ranging from 2 storeys to 4 storeys through the introduction of apartments and duplex units is in line with Government guidance and evolving trends for sustainable residential developments within the urban development boundary. The proposed residential development is located within the development boundary of Gorey and forms a natural extension to the town.

The National Planning Framework also states that *“while apartments made up 12% of all occupied households in Ireland and 35% of occupied households in the Dublin City Council area in 2016 (census data)”*, it is evident that Ireland is a long way behind European averages in terms of the numbers and proportion of households living in apartments, especially in our cities and larger towns. It is stated within the Project Ireland 2040 plan that *“in many European countries it is normal to see 40-60% of households living in apartments.”*

Apartment developments have become an increasingly attractive and desirable housing option for a range of household types and tenures, building on and learning from experience to date, and that the economic and regulatory conditions are such that apartment development attracts investment that will result in greater delivery of apartments in Ireland’s cities and towns and other appropriate locations. It is evident that apartment developments are required in urban areas to meet the current demand for housing. It is therefore considered that the provision of 228 no. apartment units and 60 no. duplex units as part of the proposed development will assist in achieving the objectives of the National Planning Framework.

## 2.2 Project Ireland 2040: National Development Plan 2021-2030

Project Ireland 2040 National Planning Framework (NPF), which sets the overarching spatial strategy for the next twenty years, includes the National Development Plan, which sets out the ten year investment strategy. The recent Review of the NDP was led by the National Investment Office in the Department of Public Expenditure and Reform and was structured in two phases with associated outputs. The review was founded upon a strongly evidence based approach, building upon the extensive data and analyses that have been produced by the NIO and by the work of IGEEES and other policy units across other Government Departments and agencies, including other newly commissioned and targeted research. The NDP sets out funding to underpin key Government priorities. Specifically, allocations will support the realisation of critical goals laid out in Housing for All and will enable a step-change in investment to ameliorate the effects of climate change.

Outlined in the NDP, the key achievements of NPF over 2018-2021 and in relation to housing includes delivery of over 63,000 homes and 26,256 new social housing homes. To underpin NPF population targets, a detailed assessment of structural housing demand identifies demand for almost 400,000 new homes in Ireland between 2020 and 2031, or 33,000 new homes per annum. At city and county level, this is broken down to form a Housing Supply Target (HST) for each local authority area, to guide planning for future development.

The NPF housing supply target has been refined to reflect recent (2020) ESRI research based on NPF population growth, taking into account both existing demand and a legacy of undersupply to date. There is now a need to accommodate around 600,000 new households by 2040, with the Department of Housing planning to deliver an average of 33,000 homes per annum to 2030 including an average of 10,000 new social homes each year and an average of 6,000 affordable homes each year.

Set out in the NDP, public capital investment must, as a top priority, support the delivery and location of the homes that society will need over the next decade and beyond, while also ensuring that in the future the pattern of housing development underpins the development of more compact higher-density cities, towns and other areas. It is also a priority to enable infill development, with up to 50% of future housing in our cities and major urban centres and 30% elsewhere to be provided within existing built-up areas serviced by existing facilities and along high-capacity public transport corridors.

The proposed development will provide for a sustainable residential development on appropriately zoned lands, in a highly accessible location within the development boundary of Gorey, which would promote compact urban growth and a good quality of life. Furthermore, the proposed development provisions for a total of 421 no. residential units comprising 133 no. houses, 228 no. apartments, and 60 no. duplex units, as well as 1 no. childcare facility and retail and community uses. This will support compact growth of the town, and assist in achieving the objectives of the National Development Plan.

Gorey is an attractive, vibrant urban centre for people to live and work in, and is supported by high-quality physical and social infrastructure, as well as vast recreational amenities and the various sports clubs and centres within the area. Therefore, the proposed development will benefit from the built environment within the surrounding area of Gorey. The proposed development will also include 2 no. community rooms with 2 no. retail units to cater for the influx of population arising from the proposed

development. In light of the above, it is submitted that the proposed development is consistent with the National Development Plan in this instance.

### 2.3 Rebuilding Ireland, An Action Plan for Housing and Homelessness (2016)

'Rebuilding Ireland, an Action Plan for Housing and Homelessness', provides a multi-stranded, action-oriented approach to achieving many of the Government's key housing objectives. The overarching aim of the Plan is to ramp up delivery of housing from its current undersupply across all tenures to help individuals and families meet their housing needs, and to help those who are currently housed to remain in their homes or be provided with appropriate options of alternative accommodation especially those families in emergency accommodation.

The Action Plan comprises of 5 key pillars which are addressing homelessness, accelerating social housing, building more homes, improving the rental sector and utilising existing housing. The Action Plan sets ambitious targets to double the annual level of residential construction to 25,000 homes and deliver 47,000 units of social housing in the period to 2021, while at the same time making the best use of the existing housing stock and laying the foundations for a more vibrant and responsive private rental sector.

Achieving the aim of accelerated delivery will contribute to the following core objectives:

- *Addressing the unacceptable level of households, particularly families, in emergency accommodation;*
- *Moderating rental and purchase price inflation, particularly in urban areas;*
- *Addressing a growing affordability gap for many households wishing to purchase their own homes;*
- *Maturing the rental sector so that tenants see it as one that offers security, quality and choice of tenure in the right locations and providers see it as one they can invest in with certainty;*
- *Ensuring housing's contribution to the national economy is steady and supportive of sustainable economic growth; and,*
- *Delivering housing in a way that meets current needs while contributing to wider objectives such as the need to support sustainable urban and rural development and communities and maximise the contribution of the built environment to addressing climate change.*

The provision of 421 no. residential units on the subject site will help the Government to achieve the objectives of the Housing Action Plan. Therefore, it is submitted that the proposed development is consistent with the policy in this regard.

### 2.4 Housing for All: A New Housing Plan for Ireland

The Housing for All: A New Housing Plan for Ireland states 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. As per, Housing for All provides four pathways to achieving four overarching objectives:

- *Supporting Homeownership and Increasing Affordability;*

- *Eradicating Homelessness, Increasing Social Housing Delivery and Supporting Social Inclusion;*
- *Increasing New Housing Supply; and*
- *Addressing Vacancy and Efficient Use of Existing Stock.*

Outlined in the Plan, the State must act decisively to increase supply of both private and public housing. An average of 33,000 homes must be provided every year between now and 2030. Increased housing output is needed in all sectors - private, affordable, and social - to meet the needs of people in a wide variety of circumstances.

It is submitted that provision of 421 no. residential units on the subject site will help the Government to achieve the objectives of the Housing for All Plan. Therefore, it is considered that the proposed development is consistent with the development framework in this regard.

## **2.5 Affordable Housing Act 2021 & Housing Circular 28/2021**

In July 2021, the Affordable Housing Act 2021 was published, aiming to address problems associated with the high cost of housing for the portion of the population that do not qualify for social housing. Coming to effect from 3<sup>rd</sup> September 2021, the Housing Circular 28/2021, amends Part V of the Planning and Development Act 2000. The Programme for Government contained commitments in relation to expanding Part V to encompass affordable purchase and cost rental units and introducing affordable homes requirements to Part V. Part 6 of the Affordable Housing Act 2021, which was enacted on 21 July 2021, gives effect to this commitment.

The principal change to Part V made by these amendments is to increase the Part V contribution for new housing developments from 10% social housing to a mandatory 20% requirement, at least half of which must be applied to social housing provision and up to half of which may be applied to affordable and cost rental housing.

It is noted that these changes to Part V primarily apply to land purchased on or after 1 August 2021. Any new planning permissions for housing development on that land will have a 20% Part V requirement. However, a 10% Part V requirement will apply where land already has planning permission or was purchased between 1 September 2015 and 31 July 2021 and planning permission is granted before 31 July 2026.

It is considered that the proposed development is consistent with the Affordable Housing Act 2021, Housing Circular 28/2021, and the requirements under Part V of the Act as it is proposed to provide 20% of the housing units for social and affordable housing in this case. For further details, please refer to the enclosed Part V Validation Letter from Wexford County Council with associated indicative costings and layout.

## **2.6 The Housing Agency Statement of Strategy 2022-2024**

Launched in late January of 2022, the Housing Agency's Statement of Strategy, outlines how more affordable housing, increasing the supply of social and private homes and addressing social inclusion issues such as homelessness and ageing will be the priorities for the work of The Housing Agency over 2022-2024. The Statement of Strategy frames the work of The Housing Agency under three broad themes:

- Being a centre for housing knowledge;
- Bridging housing supply and demand; and,
- Building capacity for housing.

It also outlines how, over the coming years, the Housing Agency will use research, informed policy insights and data to work “to achieve a housing system that meets the housing needs of the nation and promotes viable, sustainable communities”.

The Housing Agency’s Strategic Plan 2022-2024 has been framed in the context of supporting Housing for All, the Government’s housing plan for Ireland and key trends in the housing system including:

- Diverse and changing housing needs for people living in Ireland.
- Long-term government policy and strategic planning for the Irish housing system.
- A continuing focus on building inclusive, sustainable communities.

It is submitted that provision of 421 no. residential units on an appropriately zoned land under Wexford County Development Plan 2013-2019 would help utilising an existing capacity within the built-up area of Gorey, and facilitate meeting the housing target for the area and the overall County. Therefore, it is considered that the proposed development is consistent with the foregoing Strategy in this regard.

## 2.7 Residential Densities in Towns and Villages (Circular Letter: NRUP 02/2021)

The purpose of this Circular, issued on 21<sup>st</sup> April 2021, is to provide clarity in relation to the interpretation and application of current statutory guidelines, in advance of issuing updated Section 28 guidelines that will address sustainable residential development in urban areas, later in 2021. It is considered important to address this matter in the context of both the need for significantly increased and more sustainable housing supply throughout Ireland, and national recovery from the Covid-19 pandemic.

Outlined in the Circular, while the *Sustainable Residential Development Guidelines* clearly encourage net densities in the 35-50 dwellings per hectare range within cities and larger towns, net densities of 30-35 dwellings per hectare may be regarded as acceptable in certain large town contexts and net densities of less than 30 dwellings per hectare, although generally discouraged, are not precluded in large town locations.

These “outer suburban” provisions apply to cities and larger towns, and the *Sustainable Residential Development Guidelines* define larger towns as having a population in excess of 5,000 people. Large towns therefore range from 5,000 people up to the accepted city scale of 50,000 people. Given the very broad extent of this range and variety of urban situations in Ireland, it is necessary for An Bord Pleanála and Planning Authorities to exercise discretion in the application and assessment of residential density at the periphery of large towns, particularly at the edges of towns in a rural context.

Accordingly, the full range of outer suburban density, from a baseline figure of 30 dwellings per hectare (net) may be considered, with densities below that figure permissible subject to Section 5.12 of the Sustainable Residential Development Guidelines. It is also clarified that in certain circumstances,

the neighbourhood or district referred to in Section 5.12, may comprise a significant portion of a rural town.

Considering that the Census 2016 recorded a population of 9,822 people for Gorey, the town stands within the larger towns category, contributing to the development of the south-east region. Therefore, the proposed development of the subject lands is submitted to be consistent with the aforementioned Circular, which reinforces the strategic role of Gorey in the settlement hierarchy. The proposed development in this instance provides for a net density of c. 38 units per hectare, which is submitted to be appropriate and in accordance with the foregoing Circular.

## 2.8 Sustainable Residential Development in Urban Areas and Best Practice Urban Design Guidelines (2009)

This document reviews and updates the Residential Density Guidelines (1999), and its aim is to assist both planning authorities and developers in meeting certain standards in the design of residential development. The main objective of the '*Sustainable Residential Development in Urban Areas Guidelines*' is to produce high-quality sustainable developments through providing:

- *Quality homes and neighbourhoods;*
- *Places where people actually want to live, to work and to raise families; and,*
- *Places that work - and will continue to work - not just for us, but for our children and for our children's children.*

The Guidelines state that sustainability is about the integration of schools, community facilities, employment, transport, and amenities with the housing development process in a timely, cost-effective way.

In terms of planning for sustainable neighbourhoods, there is focus on "*planning at the district or neighbourhood scale within larger towns and cities, whether on brownfield or green-field sites*". The Guidelines state that, "*national policy makes it clear that sustainability is not confined to the physical environment. Sustainability also includes the concept of stable, integrated communities, and planning for such communities must embrace both tangible issues - such as the timely provision of school places - and the intangible, such as people's perception of what constitutes an attractive, secure environment in which to rear children. Planning objectives at the district/neighbourhood scale can thus be grouped under four main themes:*

- (a) Provision of community facilities;*
- (b) Efficient use of resources;*
- (c) Amenity/quality of life issues; and*
- (d) Conservation of the built and natural environment."*

The document goes on to state that, "*sustainable neighbourhoods require a range of community facilities, and each district/neighbourhood will need to be considered within its own wider locality, as some facilities may be available in the wider area while others will need to be provided locally*". It then outlines the importance of the provision of schools, community centres, healthcare facilities and district/neighbourhood centres use to the sustainability of communities.

The subject site is a Tiered 1 Serviced Zoned land within Gorey LAP lands, and is located c. 2km to the west of the railway station, southwest of Gorey Town Centre between the Kilnahue Lane and the Carnew Road which leads from the town centre. Gorey Town Centre is characterised as a vibrant centre providing for high-quality physical and social infrastructure, as well as vast recreational amenities and the various sports clubs and centres within the area. The proposed development also provides for 2 no. community rooms and 2 no. retail units, which among other surrounding amenities will further support the required level of community amenities. The proposed scheme itself provides for 1 no. childcare facility with an overall area of 565 sqm catering to c. 89 children. This is considered to cater for the influx of population arising from the proposed scheme and its wider context. For further information, please refer to the enclosed *Childcare Provision Assessment Report* prepared by Downey.

Therefore, the existing level of services within the surrounding area, and the capability of the site, as a Tier 1 Serviced Zoned Land, to be connected to the existing development services, and inclusion of a creche facility within the proposed development are considered to provide for an efficient use of resources leading to a sustainable development of the lands.

In relation to amenity/quality of life issues, *“public open space can have a positive impact on physical and mental well-being as it provides spaces to meet, interact, exercise, and relax. It needs to be appropriately designed, properly located, and well maintained to encourage its use. It is one of the key elements in defining the quality of the residential environment. Apart from the direct provision of active and passive recreation, it adds to the sense of identity of a neighbourhood, helps create a community spirit, and can improve the image of an area (especially a regeneration area). Well-designed open space is even more important in higher density residential developments”*. The proposed development provides for a large parkland with an overall area of 2.8 ha within the residential scheme whilst being in close proximity to Gorey Town & District Park, Ramsfort/Creagh Woods, all located within 2-3 km distance from the subject lands. The proposed parkland is suggested to be a great amenity to be delivered by the applicant.

Furthermore, the proposed development would provide for a hierarchy of green open space within and around the development site with respect to distinct setting and topography of the site. This includes a range of open space categories comprising of a parkland, a number of pocket parks, communal and habitat spaces to amplify the design and improve the level of amenity and quality of life within the subject lands and the wider area.

In terms of the development itself, the aim of the Guidelines is to set out the key planning principles which should be reflected in development plans and local area plans and which should guide the preparation and assessment of planning applications for residential developments in urban areas. The Guidelines support a plan-led approach to development in accordance with the Planning and Development Act, 2000 (as amended) and state, *“the scale, location and nature of major new residential development will be determined by the development plan, including both the settlement strategy and the housing strategy”*.

Under Gorey Town and Environs Local Area Plan 2017-2023, the subject site is designated as “R - Residential” zoning objective, where residential, childcare, and retail facilities are considered

appropriate land uses under these designations. This is further discussed in the Local Policy and Guidelines section of the following report.

The Guidelines also support increased residential densities particularly for sites located in “*Outer Suburban/Greenfield*” sites, particularly for such sites on the periphery of cities or larger towns, stating, “*the greatest efficiency in land usage on such lands will be achieved by providing net residential densities in the general range of 35-50 dwellings per hectare and such densities (involving a variety of housing types where possible) should be encouraged generally*’.

The application site is characterised with a unique setting which appears as both an opportunity to deliver a distinct development fused with topographical feature of the site, and a constraint which restricts the quantum of developable land to provide for housing and directly associated uses. This has been addressed through creating a balance of residential and open green spaces with respect to site setting properties in order to deliver an efficient use of the lands. Given this distinct site setting and the requirements of relevant planning and policy guidelines, the application site will achieve a net density c. 38 units per hectare. This has been calculated as per the provided guidance on the Appendix A of the Guidelines.

- Overall Site Area Subject to this SHD<sup>1</sup>: 19.17 ha
- Net Site Area: 11.15 ha
- Net Density: 421 units ÷ 11.15 ha = 37.8 uph

This is considered to provide for an efficient use of a Tier 1 Serviced Lands, facilitating sustainable development of the lands, and therefore, accords with the requirements of the “*Sustainable Residential Development in Urban Areas and Best Practice Urban Design Guidelines*”.

The design of the proposed development has placed considerable emphasis on the context of the site and location as well as the surrounding built environment. The proposed development successfully incorporates the criteria of the ‘*Urban Design Manual - A Best Practice Guide*’ and its 12 criteria, including: *Context, Connections, Inclusivity, Variety, Efficiency, Distinctiveness, Layout, Public Realm, Adaptability, Privacy/Amenity, Parking, and Detailed Design*, of which Planning Authorities are recommended to assess planning applications. It is evident that the form, layout, and architectural and landscaping design of the proposed development have been informed by the development’s place and time. Well-designed homes in the right locations are fundamental to building strong, sustainable communities. Such communities will ensure Ireland’s continued success in attracting and generating investment and improving the quality of life for residents.

Downey are of the considered opinion that the proposed development represents a development that has been carefully and appropriately designed, addressing unique site setting properties with respect to its wider context which would integrate successfully with its environs. The proposed development has had regard to the surrounding environment and carefully assesses the proposal in light of same. The development positively contributes to the character and identity of the surrounding

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<sup>1</sup> It is noted that the overall land area within the ownership of the applicant is 15.3 ha, and the application site also includes proposed engineering works to Carnew Road, Kilnahue Lane, Main Street and Esmonde Street.



neighbourhood. The proposed scheme is also considered to be of an appropriate density which will help to support efficient public transport. It is submitted that the proposed development would be a positive addition to the surrounding built environment of Gorey and to the identity of the locality. Furthermore, it is considered that the proposed buildings will meet the aspirations of a range of people and the design and layout of such allows easy access by all. For further information on the proposed development's consistency with the "*Urban Design Manual*", please refer to the Architectural Statement (Architects Report) prepared by Connolly Architects.

## **2.9 Delivering Homes, Sustaining Communities: Statement on Housing Policy (2007)**

The Department's policy statement '*Delivering Homes, Sustaining Communities*' provides the overarching policy framework for an integrated approach to housing and planning. The statement notes that demographic factors will continue to underpin strong demand for housing, which in turn will present considerable challenges for the physical planning of new housing and the provision of associated services. The quality of the housing environment is recognised as being central to creating a sustainable community. Sustainable neighbourhoods are areas where an efficient use of land, high-quality design, and effective integration in the provision of physical and social infrastructure combine to create places people want to live in.

The '*Delivering Homes, Sustaining Communities*' policy statement is accompanied by Best Practice Guidelines entitled '*Quality Housing for Sustainable Communities*'. The purpose of these Guidelines is to promote high standards in the design and construction and the provision of residential units and services in new housing developments. Best use of land is encouraged and optimal utilisation of services and infrastructure in the provision of new housing; point the way to cost effective options for housing design that go beyond minimum codes and standards; promote higher standards of environmental performance and durability in housing construction; seek to ensure that residents of a new housing scheme enjoy the benefits of first-rate living conditions in a healthy, accessible and visually attractive environment; and provide homes and communities that may be easily managed and maintained.

This Strategic Housing Development application is accompanied by the Architectural Statement and a Housing Quality Assessment (HQA) prepared by Connolly Architects, which demonstrates the proposed development is compliant with the relevant standards in the '*Quality Housing for Sustainable Communities*' document, Wexford County Development Plan 2013-2019, the Gorey Town & Environs Local Area Plan 2017-2023.

## **2.10 Delivering Homes, Sustaining Communities Best Practice Guidelines – Quality Homes for Sustainable Communities (2007)**

The aim of these Guidelines is to identify principles and criteria that are important in the design of housing and to highlight specific design features, requirements and standards that have been found, from experience to be particularly relevant. The guidelines set out some recommended standards in terms of space provision and room sizes, etc.

The proposed scheme has been cognisant of the need to facilitate a high standard of living for future occupants, while representing a proposal that is conducive to complimenting and augmenting the established residential character of the surrounding area. In this regard it is noted that all of the residential units have been designed to comply with the room standards as set out in these Guidelines, as well as in the County Development Plan. Connolly Architects have also prepared an Architectural Statement for this scheme and is submitted under a separate cover. This outlines the rationale behind the design of the scheme and how it will contribute to a positive and attractive residential scheme.

This SHD planning application is accompanied by a Housing Quality Assessment (HQA) document, which has been prepared Connolly Architects, which illustrates how the proposed development will comply with the required standards that have been set out in this assessment.

## **2.11 Sustainable Urban Housing: Design Standards for New Apartments (December 2020)**

The ‘Sustainable Urban Housing: Design Standards for New Apartments’ build on the content of the 2015 and 2018 apartment guidance, much of which remains valid, particularly with regard to design quality safeguards such as internal space standards for apartments, internal storage and amenity space. The Guidelines state that, *“in the longer term to 2040, the Housing Agency has identified a need for at least 45,000 new homes in Ireland’s five cities (Dublin, Cork, Limerick, Galway and Waterford), more than 30,000 of which are required in Dublin City and suburbs, which does not include additional pent-up demand arising from under-supply of new housing in recent years”*. It is also stated that it is *“critical to ensure that apartment living is an increasingly attractive and desirable housing option for a range of household types and tenures.”*

The Guidelines also state that, *“aspects of previous apartment guidance have been amended and new areas addressed in order to:*

- *enable a mix of apartment types that better reflects contemporary household formation and housing demand patterns and trends, particularly in urban areas;*
- *make better provision for building refurbishment and small-scale urban infill schemes;*
- *address the emerging ‘build to rent’ and ‘shared accommodation’ sectors; and*
- *remove requirements for car-parking in certain circumstances where there are better mobility solutions and to reduces costs.”*

The Guidelines state that Ireland is a long way behind European averages in terms of the numbers of households living in apartments, especially in our cities and larger towns. Given the gap between Irish and European averages in numbers of households living in apartments and the importance of addressing the challenges of meeting the housing needs of a growing population in our key cities and towns and by building inwards and upwards rather than outwards, apartments need to become the norm for urban housing solutions.

The Guidelines state that, *“ongoing demographic and societal changes mean that in addition to families with children, the expanding categories of household that may wish to be accommodated in apartments include:*

- *Young professionals and workers generally;*
- *Those families with no children;*
- *'Downsizers'; and,*
- *Older people, in both independent and assisted living settings."*

The Guidelines identify types of locations that may be suitable for apartment developments. In this regard, it is considered that the proposed development falls within "(3) *Peripheral and/or Less Accessible Urban Locations*" as it meets the criteria for this location in that the site is located approximately within circa 1.5km of Gorey Town Centre and is located within the town's development boundary and as such is suitable for a net density of c. 38 units per hectare.

The Guidelines also have specific planning policy requirements (SPPRS), which include:

***Specific Planning Policy Requirement 1:*** *Housing developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms. Statutory development plans may specify a mix for apartment and other housing developments, but only further to an evidence-based Housing Need and Demand Assessment (HNDA), that has been agreed on an area, county, city or metropolitan area basis and incorporated into the relevant development plan(s).*

***Specific Planning Policy Requirement 3:*** *Minimum Apartment Floor Areas:*

- *Studio apartment (1 person) 37 sqm*
- *1-bedroom apartment (2 persons) 45 sqm*
- *2-bedroom apartment (4 persons) 73 sqm*
- *3-bedroom apartment (5 persons) 90 sqm*

In this regard, the proposed development at Gorey (subject to this Strategic Housing Development application) provides for a total of 421 residential units comprising 133 no. houses (115 no. 3 beds and 18 no. 4 beds), 228 no. apartment units (76 no. 1 beds, 145 no. 2 beds, and 7 no. 3 beds), 60 no. duplex units (4 no. 1-bed apartment units, 26 no. 2-bed apartment units, and 30 no. 3-bed houses), all with associated car and bicycle parking spaces, areas of amenity space including a large parkland and indeed upgrades to the public realm on Kilnahue Lane and the R725 Carnew Road, 1 no. childcare facility, and 2 no. community rooms with 2 no. retail units. The proposed development also provides residents with the required level of amenity as outlined within the Guidelines, and therefore, Downey are of the professional opinion that the proposed development complies with the SPPRS of the '*Sustainable Urban Housing: Design Standards for New Apartments*'.

This Strategic Housing Development application also includes a Housing Quality Assessment (HQA), and a Building Lifecycle Report, in accordance with Chapter 6 of the Guidelines. The proposed development will help to meet the current demand for apartment type developments. For further information in this regard, please refer to the enclosed architectural drawings, Architectural Statement, and Housing Quality Assessment (HQA) prepared Connolly Architects, which provide

confirmation that the proposed development is consistent with the design standards of these Guidelines.

The Guidelines also note the following with regard to the aspect of units under Specific Planning Policy Requirement 4 which states:

*“In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply:*

- (i) A minimum of 33% of dual aspect units will be required in more central and accessible urban locations, where it is necessary to achieve a quality design in response to the subject site characteristics and ensure good street frontage where appropriate.*
- (ii) In suburban or intermediate locations, it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme.*
- (iii) For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 33% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects.”*

The development in this instance is located in a suburban location on appropriately zoned lands within the development boundary of Gorey. In this regard, the minimum requirement for dual aspect units is 50%. The proposed development provides for minimum of 58.6% dual aspect units and therefore accords with the aforementioned guidelines.

In terms of Children’s Play areas, the proposed development has considered the recreational needs of children and incorporates children play equipment as part of the communal amenity space within the scheme. As stated within the Guidelines, *“Children’s play needs around the apartment building should be catered for:*

- within the private open space associated with individual apartments;*
- within small play spaces (about 85-100 sqm) for the specific needs of toddlers and children up to the age of six, with suitable play equipment, seating for parents/guardians, and within sight of the apartment building, in a scheme that includes 25 or more units with two or more bedrooms; and,*
- within play areas (200-400 sqm) for older children and young teenagers, in a scheme that includes 100 or more apartments with two or more bedrooms.”*

The proposed development comprises of a range of green open spaces, including playgrounds. A large size play area is to be provided in the Parkland and the Public Realm to the north-western section of the subject lands, capable of catering for plus 2-year olds children and teenagers. This includes a variety of play features and amenities, including embankment slide, swings, wheelchair carousel, Playhouse, Inclusive Jumper, a large play structure, etc. This playground is co-located with the playing pitch, MUGA, natural playing elements and a woodland walk. Several kickabout areas have also been

provisioned as part of the proposed scheme. As such, it is submitted that the proposed development is consistent with the Guidelines in this instance. Please refer to the enclosed landscape drawings and Landscape Rationale Report prepared by RMDA Landscape Architects + Consultants for further information in this regard.

In relation to bicycle and car parking requirements, the proposed development subject to this SHD planning application provides a total of 759 no. car parking spaces and a total of 480 no. bicycle spaces, in high quality, safe and accessible locations throughout the scheme. This is considered to be acceptable and in accordance with the requirements of the Guidelines and the pertaining Development Plan standards.

On quality of delivering the car parking requirements, the Guidelines state, *“parking can be provided in an on-curtilage arrangement or in a grouped format depending on the type of layout proposed. In the latter case, it should be well overlooked by adjacent dwellings and appropriately landscaped. Underground parking should be considered in higher density developments and should be well lit and ventilated. It also avoids the visual dominance of large surface car parks. Where possible, designers should seek to create child- and pedestrian-friendly car-free areas, especially in higher density schemes, through the careful location of access streets and parking areas”*.

In this instance, different arrangements have been provisioned to accommodate the required car parking spaces, also creating for a pedestrian- and cycle-prioritised design. The on-street parking spaces are proposed to be screened by soft landscaping and planting. This is considered to be acceptable and in accordance with the requirements of the Guidelines and the pertaining Development Plan standards. For further details on the provision and layout of car parking spaces, please refer to Traffic and Transport Assessment report prepared by Waterman Moylan Consulting Engineers and Landscape Rationale Report prepared by RMDA Landscape Architects + Consultants.

Specific Planning Policy Requirement	Compliance
SPPR1 <i>(Housing Mix)</i>	In compliance
SPPR2 <i>(Building Refurbishment and Urban Infill Development on sites up to 0.25ha)</i>	Not Applicable; SPPR1 applies to the entire development
SPPR3 <i>(Minimum Apartment Floor Areas)</i>	In compliance with the standards
SPPR4 <i>(Dual Aspect Ratios)</i>	In compliance with the requirements
SPPR5 <i>(Floor to Ceiling Height)</i>	In compliance with the requirements
SPPR6 <i>(Lift and Stair Cores)</i>	In compliance with the required quantum
SPPR7 <i>(Specific BTR Developments)</i>	Not Applicable
SPPR8 <i>(Qualified as BTR Developments)</i>	Not Applicable

Table 1. Compliance with Specific Planning Policy Requirements

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

The “*Urban Development and Building Heights, Guidelines for Planning Authorities*” are intended to set out national planning policy guidelines on building heights in relation to urban areas, building from the strategic policy framework set out in the National Planning Framework 2040 (NPF). This document recognises that in recent years local authorities, through the statutory plan processes, have begun to set generic maximum height limits. However, such limits if inflexibly and unreasonably applied can undermine national policy objectives to provide more compact urban forms as outlined in the National Planning Framework and instead can continue unsustainable patterns of development.

The guidelines reinforce that “*a key objective of the NPF is therefore to see that greatly increased levels of residential development in our urban centres and significant increases in the building heights and overall density of development is not only facilitated but actively sought out and brought forward by our planning processes and particularly so at local authority and An Bord Pleanála levels*”.

The document states that it is critically important that development plans identify and provide policy support for specific geographic locations or precincts where increased building height is not only desirable but a fundamental policy requirement. Locations with the potential for comprehensive urban development or redevelopment (e.g. brownfield former industrial districts, dockland locations, etc.) should be identified where, for example, a cluster of higher buildings can be accommodated as a new neighbourhood or urban district or precinct.

In light of the above, the guidelines go on to further state that “*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*”. As part of these guidelines, it is proposed to introduce a number of Strategic Planning Policy Requirements including:

**“SPPR2** – *“In driving general increases in building heights, planning authorities shall also ensure appropriate mixtures of uses, such as housing and commercial or employment development, are provided for in statutory plan policy. Mechanisms such as block delivery sequencing in statutory plans could be utilised to link the provision of new office, commercial, appropriate retail provision and residential accommodation, thereby enabling urban redevelopment to proceed in a way that comprehensively meets contemporary economic and social needs, such as for housing, offices, social and community infrastructure, including leisure facilities”.*

The proposed development seeks to provide for a mixed tenure type development, including housing and apartments, some of which would be social houses under Part V of the Planning and Development Act, 2000 (as amended). The development will support the existing commercial uses that are available in the surrounding area and community, and thus is in accordance with SPPR 2 of the Guidelines.

*“SPPR 3: It is a specific planning policy requirement that where; 1. an applicant for planning permission sets out how a development proposal complies with the criteria above; and 2. the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the National Planning Framework and these guidelines; then the planning authority may approve such development, even where specific objectives of the relevant development plan, local area plan or planning scheme may indicate otherwise”.*

This planning application has taken into consideration and outlined through appropriate documentation and plans, how the proposed development accords with the assessment criteria outlined in SPPR3, including daylight/shadow studies, EIAR, archaeological assessments, landscape design rationale, ecological assessments, Housing Quality Assessments, DMURS and also with national planning policy including that of the NPF.

This document outlines how the proposal is consistent with the relevant national and local planning policy as it pertains to the site and area and as such the development accords with SPPR 3. This application has adhered to the Development Management Criteria set out within the Guidelines, which outline the specific criteria a planning must meet when proposing increased height. Within section 3.0 *Building Height and the Development Process* four criteria are set out in 3.2 *Development Management Criteria* which the applicant must demonstrate to the Planning Authority/An Bord Pleanála when making a planning application, this application satisfies that:

**1. At the scale of the relevant city/town**

- The site is within the development boundary of Gorey and is served by various public bus routes and a rail service.
- This development has been carefully modulated to respect the character of the area and residential amenity of neighbouring properties. It successfully integrates and enhances the public realm of the locality having regard to the surrounding area and existing residential developments. All such considerations have been made during the design process which has involved a multi-disciplinary team, which includes Ecologists, Architects, Landscape Architects, Engineers, Archaeologists, etc.
- A positive contribution has been made towards achieving densities within this locality, which is predominantly characterised by low density suburban style development. The unit mix provides a good choice for future residents and caters for a broad range of housing requirements within the housing market, namely first-time buyers, singles, downsizers, and retirees.

**2. At the scale of district/ neighbourhood/ street**

- The proposed height will help to create and add visual interest in this area, while protecting views in the wider area, as confirmed within the Landscape/LVIA chapter of the EIAR.
- It is respectfully considered that the proposal introduces a high-quality development at an underutilised, zoned site. The proposed development responds appropriately to the massing and scale of the residential pattern and

scale in the town of Gorey and creates a strong sense of place through the introduction of key buildings at the entrances at Carnew Road and Kilnahue Lane.

- A positive contribution has been made towards integrated and cohesive house and apartment design in this emerging area of Gorey.

### 3. At the scale of the site/building

- As submitted within the Specific Site Assessments, the form, massing and height of proposed development has been carefully modulated to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light.
- The design of the houses, duplexes and apartments is bespoke for this site in terms of the palette of materials and provision of public and communal open space to create an attractive public realm.
- It is important to note that the scale and height of the proposed buildings do not exceed any height specifications within the Development Plan or LAP.

*“SPPR 4: 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 “Sustainable 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 in this instance provides for a net density of c. 38 units per hectare, which is in accordance with relevant national and local policy guidelines. Furthermore, there is an appropriate mix of housing typologies and heights ranging from two storey houses, and three to four storey apartment and duplex units, some over undercroft parking. The development is therefore in accordance with SPPRs of these Guidelines, and it is considered that the proposed development is consistent with the aforementioned guidelines.

## 2.13 Childcare Facilities: Guidelines for Planning Authorities (2001)

Government policy on childcare is to increase the number of childcare places and facilities available and to improve the quality of childcare services for the community. These Guidelines for Planning Authorities on Childcare Facilities provide a framework to guide both local authorities in preparing development plans and assessing applications for planning permission, and developers and childcare providers in formulating development proposals.

The following definition of Childcare is included in the Guidelines:

*“In these Guidelines, “childcare” is taken to mean full day-care and sessional facilities and services for pre-school children and school-going children out of school hours. It includes*



*services involving care, education, and socialisation opportunities for children. Thus services such as pre-schools, naíonraí (Irish language playgroups), day-care services, crèches, playgroups, and after-school groups are encompassed by these Guidelines. Conversely childminding, schools, (primary, secondary and special) and residential centres for children are not covered by these Guidelines.”*

For housing schemes, the Guidelines provide a benchmark provision of 1 no. 20 space childcare facility per 75 dwellings. The threshold for provision should be established having regard to existing location of facilities and the emerging demography of the area where new housing is proposed. The recommendations provided within the Guidelines must be considered in the context of the ‘Sustainable Urban Housing: Design Standards for New Apartments’ (Dec. 2020), which state that:

*“Notwithstanding the Planning Guidelines for Childcare Facilities (2001), in respect of which a review is to be progressed, and which recommend the provision of one child-care facility (equivalent to a minimum of 20 child places) for every 75 dwelling units, the threshold for provision of any such facilities in apartment schemes should be established having regard to the scale and unit mix of the proposed development and the existing geographical distribution of childcare facilities and the emerging demographic profile of the area.”*

As recommended in the Guidelines, 1 no. childcare facility may be required as part of the proposal to cater for the influx of population arising from the proposed scheme. It is worth noting that as stated within the apartment guidelines, “one-bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision and subject to location, this may also apply in part or whole, to units with two or more bedrooms”. A Childcare Provision Assessment Report has been prepared by Downey and submitted with this Strategic Housing Development Application which demonstrates that there is sufficient capacity within Gorey Town to cater for the proposed development and that the proposed childcare facility with an overall area of 565 sqm which is capable of catering for c. 89 no. children will sufficiently provide an appropriate level of childcare facilities to serve the future residents of the scheme and its wider area.

The Childcare Provision Assessment Report provides a detailed assessment of the existing childcare facilities within the subject area, thus assessing the current capacity of the surrounding environs as well as whether the proposed childcare facility would be sufficient to cater for the proposed development. The proposed childcare facility would provide c. 89 no. childcare spaces to cater for the proposed residential scheme. It is considered that given the demographics of the area within which the subject site is located, as well as the current characteristics and trends as per data from the CSO results and the childcare facilities survey as set out within the report, the construction of 1 no. childcare facility on site is justified in this instance. Please refer to the enclosed report for further details.

In light of the above, it is submitted that the current provision of childcare facilities in the area, coupled with the proposed facility, is consistent with the Childcare Facilities Guidelines.

## 2.14 Childcare facilities operating under the Early Childhood Care and Education (ECCE) Scheme (Circular Letter: PL 3/2016)

The purpose of this Circular, issued on 31<sup>st</sup> March 2016, is to revise the Childcare Facilities Guidelines for Planning Authorities 2001, and having regard to the extension of the ECCE scheme and the associated increased demands on childcare facilities with effect from September 2016, planning authorities are hereby requested to:

- Expedite all pre-planning application consultation requests from Childcare facility providers in relation to proposals to extend opening hours, to increase capacity or to provide new facilities.
- Expedite, insofar as is possible, consideration of all planning applications or Section 5 declaration submissions in respect of childcare facilities in order to facilitate the expansion of required capacity as appropriate.

The Childcare Facilities Guidelines for Planning Authorities 2001 outline general planning related standards for childcare facilities. Planning Authorities are advised that the Child Care (Pre-School Services) Regulations 2006 set out a range of childcare related standards for childcare facilities as stipulated by the Department of Children and Youth Affairs. The Child and Family Agency, also known as Tusla, is responsible for inspecting pre-school services under, and enforcing compliance with, the afore-mentioned 2006 Regulations.

In light of the foregoing, planning authorities are requested to exclude matters relating to childcare facility standards outlined in Appendix 1 of the Childcare Facilities Planning Guidelines 2001 - including the minimum floor area requirements per child - from their consideration of planning applications relating to childcare facilities and to solely focus on planning related considerations that fall within the remit of the Planning and Development Act 2000, as amended, in the determination of such planning applications.

At the Section 247 meeting, which was held with Wexford County Council on 2<sup>nd</sup> September the need for neighbourhood and community facilities in the development was identified. A new 'Landmark' building has been designed to meet this requirement which will be located at the intersection of Kilnahue Lane and the Middle Avenue.

The crèche was relocated in the revised scheme and completely re-designed to provide a building which responds well to the difficult topography and the new streetscape. The building visually integrates with Kilnahue Lane and to the new public domain in the development and is enhanced by careful landscape design and planting. The new location and layout of the crèche and its external elements ensure that, while it is located on primary pedestrian and vehicular links, it will not result in a traffic hazard.

The crèche's location also provides ease of access to the areas of open space within the development in addition to that provided for the crèche. It is expected that some of the childcare users will come from outside the Kilnahue development. This has been considered in completing the design for the facility.

In accordance with the DoECLG statutory guidelines, childcare facilities must be provided for 20 children per 75 dwellings. One bedroom units may be excluded from the calculations, and provision is therefore required for c. 90 children. This is calculated as follows:

$$((421 - 80) \div 75) \times 20 = 90$$

The proposed building has been designed to ensure that any excess demand generated by the nearby schools can be accommodated. It is submitted that the proposed childcare facility provides for adequate capacity to cater for the influx of population arising from the proposed development. Also, its location and design are the outcomes of planning considerations achieved through consultation with the Local Authority. Therefore, it is suggested that the proposed development is consistent with Circular PL 3/2016.

## 2.15 Retail Planning Guidelines (2012) and Retail Design Manual (2012)

The Retail Planning Guidelines, which were first issued in 2000 and subsequently revised in 2005, and subsequently the third iteration of the Guidelines were published in 2012 accompanied by the Retail Design Manual (2012), providing the strategic policy framework for the spatial distribution of new retail development. Therefore, the Guidelines provide a comprehensive framework to guide both local authorities in preparing development plans and assessing applications for planning permission, and retailers and developers in formulating development proposals.

The guidelines specifically state that local retail units such as corner shops or shops located in local or neighbourhood centres serving local residential districts perform an important function in urban areas. Where a planning authority can substantiate the local importance of such units in defined local centres, they should safeguard them in development plans, through appropriate land-use zoning. Development management decisions should support the provision of such units, particularly where they encompass both food-stores and important non-food outlets such as retail pharmacies, and have significant social and economic functions in improving access to local facilities especially for the elderly and persons with mobility impairments, families with small children, and those without access to private transport. The guidelines identify five key objectives, of equal weight, which are as follows:

- to ensure that in future all Development Plans incorporate clear policies and proposals for retail development,
- to facilitate a competitive and healthy environment for the retail industry of the future,
- to promote forms of development which are easily accessible, particularly by public transport and in a location which encourages multi-purpose shopping, business and leisure trips,
- to support the continuing role of town and district centres, with
- a presumption against large retail centres located adjacent or close to existing, new or planned national roads/motorways.

The Guidelines clearly acknowledge that it is critical for the proper planning and sustainable development of an area that new retail development is located at the optimum location having regard to the type of retail offering and the context of the existing environs.

With respect to the final Section 247 meeting with Wexford County Council in September 2021, it is submitted that the proposed development now provides for 2 small no. retail units to cater for the local needs of this new community as discussed during that meeting but that the provision is not at a scale which would compete with the retail offering within Gorey. This is considered to be consistent with the foregoing Guidelines.

## 2.16 Smarter Travel: A Sustainable Transport Future

In summary, 'Smarter Travel: A Sustainable Transport Future' states that, "to achieve the vision of a sustainable transport system, individual lifestyles will have to change and collectively we will have to work progressively on a range of solutions which deal with apparently conflicting goals: economic growth, reduced emissions, less use of motorised transport and better accessibility."

The 5 key goals of this transport policy are as follows:

- *Improve quality of life and accessibility to transport for all and, in particular, for people with reduced mobility and those who may experience isolation due to lack of transport;*
- *Improve economic competitiveness through maximising the efficiency of the transport system and alleviating congestion and infrastructural bottlenecks;*
- *Minimise the negative impacts of transport on the local and global environment through reducing localised air pollutants and greenhouse gas emissions;*
- *Reduce overall travel demand and commuting distances travelled by the private car; and,*
- *Improve security of energy supply by reducing dependency on imported fossil fuels.*

It is considered that the proposed development complies with "Smarter Travel: A Sustainable Transport Future".

The subject lands are strategically located circa 1.5 km of Gorey Main Street and 2 km of the Gorey railway station, within cycling and walking distance of the Local Link Wexford 389 bus service. Additionally, with the proposed vehicular access routes onto Carnew Road and Kilnahue Lane, accessibility of the site to the wider area and its internal permeability is expected to notably be enhanced. These routes provide direct access to the proposed parkland to the north-western section of the lands. There are also proposals to include improved pedestrian and cycle connections to the town centre and within the application site itself.

Moreover, the proposed development is to provide considerable secure, covered bicycle parking for future residents and visitors, particularly to residents of the apartment blocks, where it will encourage use of sustainable modes of transportation.

Therefore, it is considered that the proposed development is consistent with this national transport policy and will assist in its implementation. Please refer to the enclosed Traffic and Transport Assessment prepared by Waterman Moylan Engineering Consultants for further details in this regard.

## 2.17 Design Manual for Urban Roads and Streets (DMURS)

The '*Design Manual for Urban Roads and Streets*' (DMURS) 2013 and as updated in 2019, sets out design guidance and standards for constructing new and reconfigured existing urban roads and streets. It also sets out practical design measures to encourage more sustainable travel patterns in urban areas. The transport documentation prepared by Waterman Moylan Engineering Consultants provide further details in respect of the compliance of the proposed development with the provision of DMURS. Please refer to the pertaining documents prepared by Waterman Moylan Engineering Consultants for further information in this regard.

## 2.18 National Cycle Manual (June 2011)

The '*National Cycle Manual*' 2011 embraces the Principles of Sustainable Safety as this will offer a safe traffic environment for all road users including cyclists. It offers guidance on integrating the bike in the design of urban areas. The Manual challenges planners and engineers to incorporate cycling within transport networks more proactively than before.

Outlined in the Manual, many residential and access streets already offer a high quality of service to cycling. Cycling two-abreast on quiet, interesting, well-surfaced streets and roads can be attractive to cyclists. In many cases there is no physical infrastructure involved, other than the self-evident and self-enforcing nature of the environment.

The Manual also gives guidance on the minimum number of spaces which should be provided initially at new private and public facilities in urban areas. For housing developments, this is stated to be:

- 1 no. private secure bicycle space per bed space (note - design should not require bicycle access via living area), minimum 2 spaces; and
- 1 visitor bicycle space per two housing units.

The following gives an overview of the varying characteristics of parking at residential areas that should be considered in determining the most appropriate parking facility.

- Convenience is essential for frequently used bicycles, and preferably not via living areas;
- Private parking should accommodate residents and visitors; and,
- Shared parking facilities can be suitable for multiple dwellings (e.g. apartment complex).

It is submitted that the proposed development would provide for full pedestrian and cycle links to the local area network, and these will provide safe access to the nearby primary and secondary schools which will serve the residents. Secure Bicycle Parking will be provided for each unit in the development in compliance with Section 4.17 of the Design Standard for New Apartments (December 2020). This will be within the curtilage of house and duplex units and in lockable bicycle stores for each apartment block. Please refer to the enclosed Traffic and Transport drawings and documentation prepared by Waterman Moylan Engineering Consultants for further details in this regard.

## 2.19 EIA Directive

The EIA Directive 85/337 EEC, as amended, is the key legislation in EU Environmental Policy. The EIA Directive aims to determine the likely significant effects of a project on the environment. Screening is

the first stage in the EIA process required by Article 4 of the EIA Directive and this process determines whether an EIA is required for a specific project. The Directive outlines in Article 4(1) 24 Annex 1 projects that require a mandatory EIA. Article 4 (2) outlines Annex 2 projects that require consideration for EIA further to a case by case examination or through thresholds and criteria set out by Member States. In an Irish context, projects requiring a mandatory EIA or consideration for EIA further to a case by case examination or thresholds are listed in Schedule 5 of the Planning and Development Regulations.

Development projects requiring an Environmental Impact Assessment Report (EIAR) are set out in Schedule Five of the Planning and Development Regulations, 2001 (as amended). Part 1 of this schedule lists those projects that require a mandatory EIA irrespective of size in any EU Member State whereas Part II identifies the threshold limits for projects that require a mandatory EIA in Ireland. Article 10(b) (i) of Part II 'Infrastructure Projects' indicates that an EIA is required for the construction of more than 500 dwellings.

Another threshold is the size of the development site and in this regard, Article 10(b)(iv) requires that an EIAR be prepared for urban developments which would involve an area greater than 2 hectares in the case of a business district, 10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere.

Furthermore, having regard to Annex III of the EIA Directive 2014/52/EU and the guidance contained in the Department's Environmental Impact Assessment Guidance for Consent Authorities regarding Sub-Threshold Development (2003), and in particular:

- The size and design of the whole project;
- Cumulation with other existing and/or approved projects;
- The use of natural resources, in particular land, soil, water, and biodiversity;
- The production of waste;
- Pollution and nuisances;
- The risk of major accidents and/or disasters which are relevant to the project concerned, including those caused by climate change, in accordance with scientific knowledge; and,
- The risks to human health (for example due to water contamination or air pollution).

In this instance, given the nature of the lands, that 421 no. units are proposed and indeed noting that the application site extends to c. 19.17 hectares within what can be considered a built-up area, an Environmental Impact Assessment has been undertaken as part of the proposed application. In this regard, an EIAR has been prepared and is enclosed with this planning application. Please refer to the enclosed EIAR which assesses the overall development and is enclosed with this SHD application for the consideration of the An Bord Pleanála.

## **2.20 Bird and Habitats Directive - Appropriate Assessment**

The proposed development has been screened for Appropriate Assessment in accordance with the requirements of Article 6(3) of the EU Habitats Directive (92/32/EEC). OPENFIELD Ecological Services

has prepared a report for Screening for Appropriate Assessment for the proposed development. This screening report has evaluated the proposed development to determine whether or not significant negative impacts on Natura 2000 sites are likely to arise by virtue of its construction and use. The screening concludes that no significant effects are likely to arise to any Natura 2000 site either alone or in combination with other plans or projects. For further information in this regard, please refer to the Appropriate Assessment Screening Report prepared by OPENFIELD Ecological Services. It is also noted that Brian Keeley has undertaken bat and badger surveys of the site which are included as part of this planning application to An Bord Pleanála.

### **2.21 All-Ireland Pollinator Plan 2021-2025**

The All-Ireland Pollinator Plan is a shared plan of action which is to bring about a landscape where pollinators can flourish over 2021-2025. To achieve this, the Plan sets out six objectives; (1) Making farmland pollinator friendly, (2) Making public land pollinator friendly, (3) Making private land pollinator friendly, (4) All-Ireland Honeybee Strategy, (5) Conserving rare pollinators, and (6) Strategic coordination of the Plan.

The proposed development has taken into consideration the All-Ireland Pollinator Plan, reflecting the relevant guidelines and proposed measures by retention of some of the existing hedgerows partially enhanced by woodland buffer planting, native plant material, and provision for wildflower meadow areas and habitat areas, in particular within the proposed parkland. This is further complemented by an integration of public realm and natural context through providing for natural play areas. Please refer to the Landscape Rationale Report prepared by RMDA Landscape Architects + Consultants for further details on inclusion of the Plan guidelines within the proposed landscape of the scheme.

### **2.22 A Guide for Landowners to Managing Roadside Trees**

The Tree Council of Ireland has released a publication entitled, A Guide for Landowners to Managing Roadside Trees, in October 2021. It provides basic information on the many benefits of trees as well as guidance on how to assess risk associated with them. It describes common defects in trees including dieback, unstable leans, splits and cracks, decay, and cavities supported by photographs of these common defects. Advice is provided on how to plan and carry out tree maintenance work and the importance of record keeping is emphasised.

Set out in six steps, the document guides the landowner through the responsibilities associated with ownership of roadside trees. These steps include: (1) recognise the benefits of trees, (2) understand your responsibilities, (3) check your trees, (4) prioritise the work, (5) carry out the work, and (6) keep records.

The document acknowledges the widespread nature of Ash Dieback being confirmed to be present in all counties in the Republic of Ireland, stating that roadside ash is evidently becoming increasingly impacted by ash dieback disease.

This is also the case at the application site, with the majority of the existing trees being of the Ash species. Thus, whilst the proposal removes such trees to facilitate the development, these trees would die in the near future.

### 2.23 The Planning System and Flood Risk Guidelines (2009)

These Guidelines require the planning system at all levels to avoid developments in areas at risk of flooding, particularly floodplains, except where there are no suitable alternative sites available in areas at lower risk that are consistent with the objectives of proper planning and sustainable development. Where such development has to take place, in the case of urban regeneration for example, the type of development has to be carefully considered and the risks should be mitigated and managed through location, layout and design of the development to reduce flood risk to an acceptable level. Applicants are advised to carefully examine their development proposals to ensure consistency with the requirements of these Guidelines including carefully researching whether there have been instances of flooding or there is the potential for flooding on specific sites and to carry out a site-specific flood risk assessment.

In accordance with these Guidelines, Waterman Moylan Engineering Consultants have carried out a flood risk assessment of the subject site. The site has been assessed in accordance with the Flood Risk Management Guidelines, with appropriate mitigation measures proposed. Therefore, it is considered that the proposed development is consistent with the requirements of this national flood risk management policy. For further information in this regard, please refer to the enclosed Flood Risk Assessment prepared by Waterman Moylan Engineering Consultants.

### 2.24 National Adaptation Framework: Planning for a Climate Resilient Ireland

In accordance with the *'Climate Action and Low Carbon Development Act 2015'*, this National Adaptation Framework (NAF) specifies the national strategy for the application of adaptation measures in different sectors and by local authorities in their administrative areas in order to reduce the vulnerability of the State to the negative effects of climate change and to avail of any positive effects that may occur. This NAF and its successors will set out the context to ensure local authorities, regions and key sectors can assess the key risks and vulnerabilities of climate change, implement climate resilience actions and ensure climate adaptation considerations are mainstreamed into all local, regional and national policy making.

The *'Built Environment and Spatial Planning'* section within this Framework recognises that, *"climate change considerations need to be taken into account as a matter of course in planning-related decision making processes and that the deepening of adaptation considerations in the planning and building standards processes is considered the most appropriate way of increasing the resilience of the built environment"*. Furthermore, *"effective planning reduces vulnerability to the negative effects of climate change by integrating climate considerations into decision making in order to avoid inappropriate forms of development in vulnerable areas and promoting compact development in less vulnerable areas"*. It is important to mention that this Framework envisions *'flood resilience'* and *'access to wildlife and green space'* as no-regret benefits of effective adaptation which would continue to be worthwhile regardless of future climate scenarios.

As such, the proposed development has taken into consideration the context of the site and it can be noted that an assessment of Flood Risk has been prepared by Waterman Moylan Engineering Consultants, with appropriate mitigation measures proposed. Thus, the proposed development with access to high-quality green communal space and introduction of best practice energy efficiency



measures as required to meet the Energy Strategy and Building Regulations and promoting a compact urban form for 'less vulnerable areas' is consistent with this national framework.

## 2.25 Climate Action Plan (2019)

Climate disruption is already having diverse and wide-ranging impacts on Ireland's environment, society, economic and natural resources. The Climate Action Plan 2019 sets out an ambitious course of action over the coming years to address this issue. The Plan clearly identifies the nature and scale of the challenge. It outlines the current state of play across key sectors including Electricity, Transport, Built Environment, Industry and Agriculture and charts a course towards ambitious decarbonisation targets. The Plan sets out governance arrangements including carbon-proofing policies, establishment of carbon budgets, a strengthened Climate Change Advisory Council and greater accountability to the Oireachtas.

The Plan clearly recognises that Ireland must significantly step up its commitments to tackle climate disruption. The leadership role both the Government and public bodies can play in taking early action on climate is fundamental to achieving our decarbonisation goals. The Plan notes that the built environment accounted for 12.7% of Ireland's greenhouse gases in 2017. It is important that we improve the energy efficiency of our buildings, including our homes, workplaces, and schools by meeting higher energy performance standards and by increasing retrofit activity. This will not only reduce Ireland's dependence on fossil fuels, but will also improve our living standards by making our buildings more comfortable, healthier, safer, and less costly to heat.

Our buildings are 70% reliant on fossil fuels, including oil fired boilers; over 80% of our homes and other buildings assessed for their BER have a rating of C or worse; and the current annual retrofit activity for existing stock is far too limited (approximately 23,000, mainly shallow, retrofits). A hierarchy of the most cost effective investments underpin this, including:

- Improving the fabric of buildings
- District heating in commercial buildings
- Switching from oil burners to heat pumps
- Setting new building standards.

All homes in the development will be designed to achieve a Building Energy rating of at least A2 to comply with the EU Nearly Zero Energy Building (NZEB) Regulations and meet the challenges of climate change. As such, the proposed development has taken into consideration the Climate Action Plan and measures have been included within the design of the development to reduce carbon emissions in line with the requirements of the Action Plan.

## 3.0 REGIONAL POLICY AND GUIDELINES

The key provisions of the regional planning policy as it relates to the proposed development are now set out in the following sections. The key regional policy of relevance includes:

- Regional Spatial & Economic Strategy for the Southern Region 2019-2031; and,
- Transport Spatial and Economic Strategy for the Southern Region.

### 3.1 Regional Spatial & Economic Strategy for the Southern Region 2019-2031

The Regional Spatial and Economic Strategy (RSES) was published by the Southern Regional Assembly. The RSES outlines the long-term regional level strategic planning and economic framework in support of the National Planning Framework for the period 2019-2031. The RSES identifies regional assets, opportunities, pressures and constraints and provides a framework for investment to better manage spatial planning and economic development throughout the Southern Region. The RSES is tasked with the development of planning policy for future housing needs in the region upon consideration of the availability of land, resources, environment, and infrastructure capacity.

In conjunction with NPF, the RSES innovative approach to ensure managing the growing population in a sustainable way is securing long-term transformational and rejuvenation-focused city growth through Metropolitan Strategic Area Plans (MASPs) and the identification of Key Towns. The Regions network of Key Towns strengthens the urban structure across our Region, align with NPO 7 of the NPF and are a complement to the three pillars of our cities and metropolitan areas which are the primary drivers of population and employment growth in the Region.

It is envisaged that the Key Towns will be a focus for significant growth, i.e., planning for a population growth of more than 30% by 2040. The nature, scale and phasing of this growth will be determined by local authorities depending on a capacity analysis of each town. As stated in the RSES, the Key Towns are defined by either, “*large population scale urban centre functioning as self-sustaining regional drivers*”, or “*strategically located urban centres with accessibility and significant influence in a sub-regional context*”. In order to combat and provide for compact residential development, the RSES outlines a number of key Regional Policy Objectives that pertain to the NPF targets. The key Regional Policy Objectives applicable to the development proposal are the following:

**“Regional Policy Objective (RPO) 11-a** - *Local Authorities are supported in targeting growth of more than 30% for each Key Town subject to capacity analysis and sustainable criteria under Section 3.3 A Tailored Approach, RPO 3 Local Authority Core Strategies and the sustainable requirements under the following sub sections of RPO 11 Key Towns. The appropriate level of growth is to be determined by the Core Strategy of Development Plans.”*

**“Regional Policy Objective (RPO) 11-d** - *To support and promote vibrant, culturally-rich and revitalised Key Towns with enhanced social inclusion, engaged and active voluntary, non-profit and social enterprise sectors, sustainable neighbourhoods and a high level of environmental quality to ensure an excellent quality of life for all.”*

**“Regional Policy Objective (RPO) 11-k.** *To plan increasing population growth in all Key Towns on a phased basis in collaboration with Irish Water, the local authority and other stakeholders to ensure that the assimilative capacity of the receiving environment is not exceeded and that increased wastewater discharges from population growth does not contribute to degradation of water quality and avoids adverse impacts on the integrity of water dependent habitats and species within the Natura 2000 network.”*

With respect to its strategic location with access to the M11/N11 which connects it to Dublin (<90km), Wexford Town (52km) and Rosslare Europort (68km), the RSES identifies Gorey as a large-scale “Key Town” playing a significant sub-regional role in strengthening the urban structure of the Region. Based on capacity analysis (including historic growth levels), it is envisaged that local authorities will also plan for significant growth in these Key Towns. The proposed development in Gorey will provide for a sustainable residential development on appropriately zoned lands, in an accessible location within the development boundary of Gorey which promotes a balanced mix of residential development and public amenity.

It is submitted that the provision of a high quality and medium density residential development consisting of 421 no. residential units (133 no. houses, 228 no. apartments, and 60 no. duplex units) with 2 no. community rooms and 2 no. retail units, a large parkland and 1 no. childcare facility will assist in achieving the aforementioned objectives and it also complies with the pertaining policies and standards. For further details on how the proposed development is in accordance with these policies, please refer to the Housing Quality Assessment (HQA) and the Architectural Statement prepared by Connolly Architects which is included as part of the architectural planning packs.

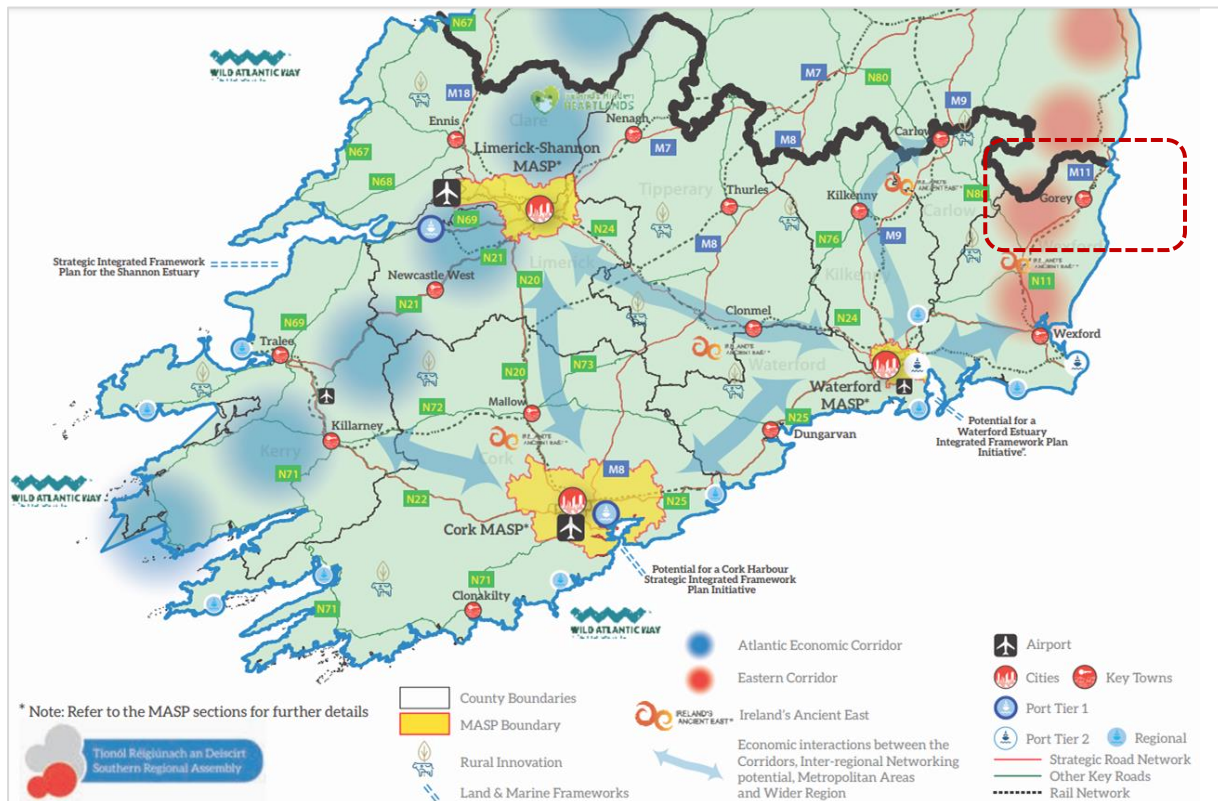


Figure 1. Application Site Location within Gorey Key Town area under the RSES (Southern Regional Assembly)

In relation to Settlement Strategies, Regional Policy Objectives (RPO) 25-f and 25-g of the RSES set out the rationale and basis for preparing these strategies. RPO 25 states:

**“Regional Policy Objective (RPO) 25-f - To support the delivery of the infrastructural (including education, amenity, social and cultural) requirements identified for Gorey to keep pace with population growth.”**

*“Regional Policy Objective (RPO) 25-g - To support the delivery of the infrastructural requirements identified for Gorey subject to the outcome of the planning process and environmental assessments.”*

The proposed scheme in Gorey will also contribute to the delivery of the infrastructural requirements of Gorey growth. This includes developing an interlinked development connected to its context by a new vehicular access route to Carnew Road, and new vehicular access routes to Kilnahue Lane, all facilitating access to the town centre.

The proposed large parkland to the north-western section of the lands is also a notable element of the scheme serving both the proposed development and its wider area, further supporting the infrastructural development of the town.

It is submitted that the proposed development on appropriately zoned lands will adhere with the policies and objectives of the Regional Spatial and Economic Strategy for the Southern Regional Assembly area and will contribute to providing additional housing units within the region.

### **3.2 Regional Transport Strategy of RSES for the Southern Region**

The Regional Transport Strategy section of the RSES addresses the role of transport networks to improve the sustainable movement of people and goods. Objectives in this section address the NPF’s National Strategic Outcomes of Enhanced Regional Accessibility, Sustainable Mobility and High-Quality International Connectivity. Transport investment in the Region aims to meet the following objectives:

- *To reduce the environmental impact of travel on the Region;*
- *To provide for the integrated development of sustainable transport infrastructure, including walking, cycling (including emerging e-modes) and public transport to accommodate the necessary switch from the private car, for the travel needs of all individuals in the Region, in line with the stated government transport policy;*
- *To manage sustainably the existing and future demand for travel, in particular by private car and other passive travel modes, primarily through appropriate integrated land use planning to reduce the distance between origin and destination of the greatest proportion of trips generated;*
- *To support improved strategic and local connectivity;*
- *To expand attractive public transport and other alternatives to car transport;*
- *To reduce congestion;*
- *To cater for the demands of longer-term population and employment growth, in a sustainable manner;*
- *To provide reliable and resilient connectivity to international and domestic markets;*
- *To provide for the safe and most efficient movement of people and goods; and,*
- *To ensure value for money.*

Also, a few of the relevant principles to inform the integration of land use and transport planning in the Region over the period of the RSES is:

- *Supporting compact and smart growth through the achievement of mutual consistency between land use and transport planning, investment, and service provision;*
- *Developing a comprehensive network of safe cycling routes in the three cities and their metropolitan areas and to provide similar facilities in other towns and villages where appropriate; and,*
- *Ensuring that future developments are planned and designed to maximise their accessibility by public transport, walking and cycling.*

Outlined in the RSES and in relation to integration of land use and transport, RPO 151(d) states:

*“Regional Policy Objective (RPO) 151-d New employment and residential development will be consolidated and intensified in a manner which renders it serviceable by public transport and ensures that it is highly accessible, by walking, cycling and public transport. Within the Metropolitan Areas of Cork, Limerick-Shannon and Waterford, except in limited planned circumstances, trip intensive developments or significant levels of development will not occur in locations which are not well served by existing or proposed high capacity public transport”*

Also, RPO 152 sets out local planning objectives, of which the most relevant to the proposed scheme are as the following:

*“Regional Policy Objective (RPO) 152 It is an objective to:*

*New development areas will be permeable for walking and cycling and the retrospective implementation of walking and cycling facilities shall be undertaken where practicable in existing neighbourhoods, to a give competitive advantage to these modes; and,*

*Where possible, developments will provide for filtered permeability. This will provide for walking, cycling, public transport and private vehicle access but at the same time will restrict or discourage private car through trips.”*

In this instance, the proposed development will provide for full pedestrian and cycle links to the local area network, and these will provide safe access to the nearby primary and secondary schools which will serve the residents. The internal road network links the R725 Carnew Road to Kilnahue Lane and provides well planned and safe vehicular access and connectivity within the development. There is a clear hierarchy of vehicular routes with appropriate safety and identity by means of traffic calming measures and use of varied surfaces. Therefore, it is considered that the proposed development is consistent with the objectives of the Regional Transport Strategy of the RSES.

## 4.0 LOCAL PLANNING POLICY

This section of the report provides an account of the relevant local planning policy framework pertaining to the application site and proposed development, all of which is contained within the Wexford County Development Plan 2013-2019 (as extended), the Gorey Town and Environs Local Area Plan 2017-2023 and the Creagh Neighbourhood Framework contained therein.

It is submitted that the draft Development Plan has recently been published, and that it will be adopted in due course. Therefore, the Draft Development Plan has also been explored under a separate sub-section, however the Draft Development Plan does not propose changes in the context of the proposed development.

## **4.1 Wexford County Development Plan 2013-2019**

### **4.1.1 Overarching Considerations**

The subject site is located within the functional area of Wexford County Council. The development of the site is therefore informed by the policies and objectives of the Wexford County Development Plan. The policies and objectives of the adopted Development Plan are underpinned by the following:

- *“A sustainable spatial development strategy to guide the location of development;*
- *Clear guidance on the future use of land and the pattern of development over the next six years;*
- *A framework for the future investment in physical and social infrastructure;*
- *A framework for developing the county’s economy;*
- *Management and control by indicating standards to be achieved in new developments;*
- *Ways to conserve and enhance the urban and rural environment and to protect the diversity of the natural and cultural landscape;*
- *Guidance for public and private investors in relation to land use and development; and,*
- *A framework for developing tourism in the county.”*

### **4.1.2 Core Strategy**

The purpose of the Core Strategy is to articulate a medium-to-longer term quantitatively based strategy for the spatial development of the area of the Planning Authority and in doing so, to demonstrate that a Development Plan and its policies and objectives are entirely consistent with national and regional policies and strategies.

Gorey has been identified as a Larger Town in the Development Plan. The County Development Plan notes that Gorey has a good location for economic development, supporting the northern part of the County along Enniscorthy. The Development Plan confirms a considerable population increase across the County, in particular around the wider Enniscorthy and Gorey areas. In conjunction with the SERPGs and to achieve the strategic aims of the Core Strategy, the Development Plan considers an aggregate of 40% of the County's population growth over 2011-2022 to be allocated to the three larger towns of Enniscorthy, New Ross, and Gorey. Outlined in the Development Plan and with regards to the SERPGs, Enniscorthy and Gorey have recently experienced high levels of population growth and that they will continue to be attractive locations for new residential development. However, it is cautioned that care must be taken to ensure the continued expansion of these urban areas is regulated to ensure that community, social and retail developments keep pace with recent rapid phases of mainly residential development.

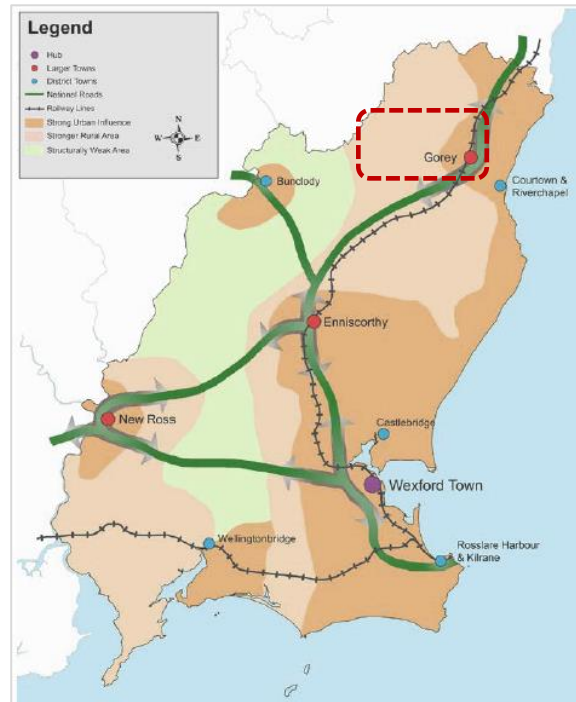


Figure 2. Gorey within the Core Strategy Map (extracted from the Development Plan)

Set out in the Development Plan, “the designated roles of Larger Towns are either:

(a) target for growth, or

(b) more measured growth in a manner that allows community, social and retail development to catch up with recent rapid phases of mainly residential developments.”

According to the Development Plan, “the development approach for Gorey Town is to accommodate more measured growth in the town, consolidating the existing pattern of development. The focus will be on encouraging and facilitating the further development of physical and social infrastructure for the town.”

	Core Strategy Population Allocation <sup>1</sup>	Housing Requirement (Ha) <sup>2</sup>	Housing Yield (Units) <sup>3</sup>	Existing Zoning (Ha) <sup>4</sup>	Housing Yields (Units) <sup>5</sup>	Shortfall/ Excess (Ha) <sup>6</sup>
County (Total)	15,754	787.49	9,344.1	1,118	22,360	+330.51
Wexford Town	5,028	180.68	2,409.11	398	7,960	+217.32
Larger Towns						
Enniscorthy	2,101	92.75	1,060.04	379	7,580	+286.25
New Ross	2,101	87.12	995.75	39	780	-48.12 <sup>7</sup>
Gorey	2,101	89.46	1,022.48	121	2,420	+31.54
District Towns						
Bunclody	251	11.61	132.63	75.5	1,510	+63.89
Castlebridge	134	7.91	90.16	NA	NA	NA
Rosslare Harbour and Kilrane	244	11.55	131.9	11.8	236	+0.25
Courtown	355	20.95	238.78	NA	NA	NA
Wellingtonbridge	88	3.44	39.28	NA	NA	NA
Strong Villages, Smaller Villages and Rural Areas	3,351	282.02	3,223.97	93.7	1,874	-188.32 <sup>8</sup>

Figure 3. Gorey within the Core Strategy Population Allocation and Housing Land over 2013-2019 (extracted from the Development Plan)

**Objective SS05** of the Development Plan seeks:

*“To encourage new residential developments to occur in the Hub, Larger Towns and District Towns in accordance with the Core Strategy and Settlement Strategy and subject to adequate capacity being available in the relevant wastewater treatment facilities in the interests of protecting water resources in the area.”*

**Objective SS14** of the Development Plan seeks:

*“To encourage new residential development to occur in the Larger Towns in accordance with the Core Strategy and Settlement Strategy and subject to compliance with normal planning and environmental criteria including the availability of adequate waste-water treatment capacity and drinking water capacity and the development management standards contained in Chapter 18.”*

**Objective SS15** of the Development Plan seeks:

*“Ensure the zoning of lands for residential use in the Larger Towns is in accordance with the Core Strategy and Settlement Strategy. The development of this zoned land is subject to adequate capacity being available in the relevant wastewater treatment facilities in the interests of the protecting water resources in the area and subject to compliance with normal planning and environmental criteria and the development management standards contained in Chapter 18.”*

It is submitted that the proposed development will provide for a high-quality residential development on Tiered 1 Serviced Lands within the existing development boundary of Gorey Town, which complies with the objectives of the Development Plan to encourage sustainable residential development. The provision of 421 no. residential units will seek to ensure the objectives for Gorey as a Larger Town are



achieved and efficiently contribute to the Core Strategy housing supply target set out in Wexford County Development Plan 2013-2019.

#### 4.1.3 Housing Strategy (incl. Volume 6 of Development Plan)

Outlined in **Objective HP05** of the County Development Plan seeks:

*“To ensure that any plan/project and any associated works for the provision of residential development required to accommodate the objectives of this section or the Housing Strategy contained in Volume 6, individually or in combination with other plans or projects, are subject to Appropriate Assessment Screening to ensure there are no likely significant effects on the integrity (defined by the structure and function) of any Natura 2000 site(s) and that the requirements of Article 6(3) and 6(4) of the EU Habitats Directive are fully satisfied. Where the plan/project is likely to have a significant effect on a Natura 2000 site it shall be subject to Appropriate Assessment. The plan/project will proceed only after it has been ascertained that it will not adversely affect the integrity of the site or where in the absence of alternative solutions, the plan/project is deemed imperative for reasons of overriding public interest, all in accordance with the provisions of article 6(3) and 6(4) of the EU Habitats Directive.”*

Moreover, the **Objective HP09** of the County Development Plan seeks:

*“To implement the objectives of the Housing Strategy contained in Volume 6 in accordance with the requirements of the Planning and Development Act 2000 (as amended) and the Housing (Miscellaneous) Act 2009 and having regard to the amendments to Government policy outlined in the Housing Policy Statement issued in June 2011.”*

Therefore, the following provides an overview of the Wexford Council’s Housing Strategy provided within the adopted County Development Plan.

The Housing Strategy of the Development Plan informs of emergence of new development patterns across the County. In this instance, the west of Gorey traditionally experiences a low density of housing than to the east. However, an examination of the granted planning permissions since 2005 indicates that this has been changed with the western side experiencing significant pressure for development. Outlined in the Development Plan, the sustainable use of serviced land and resources means that it is appropriate to permit higher residential densities at appropriate locations. Such locations include town centres, brownfield sites and in the vicinity of public transport nodes and corridors.

**Objective HP08** of the Development Plan seeks:

*“To ensure the density of residential developments is appropriate to the location of the proposed development to ensure that land is efficiently used. In deciding on the appropriate density for a particular location the Council will have regard to the existing grain and density of the settlement, the proximity of the site to the town or village centre or public transport nodes, the availability of existing services, the Sustainable Residential Development in Urban Areas and the accompanying Urban Design Manual-A Best Practice Guide (DEHLG, 2009) and subject to normal planning and environmental criteria and the development management standards contained in Chapter 18.”*

The subject site is located on appropriately zoned lands within Gorey LAP lands, to the west of the railway station, c. 2km to the southwest of Gorey Town Centre between Kilnahue Lane and Carnew Road, which provides for convenient access to the town centre. The context of which the subject site is located within is characterised by medium-density residential estates, and a range of community amenities and facilities, including a variety of educational facilities, a Lonsis service station, and a number of local parks. There is also a Tesco Extra located c. 2.1 km of the subject site. Therefore, the locational attributes of the subject site support the proposed development and also comply with the planning policy framework of the County.

With regards to the Housing Strategy as set out within the Development Plan, there are a number of objectives which inform and guide the future development of Gorey which are as follows:

**Objective HP02** of the Development Plan seeks:

*“To ensure that all new housing developments represent ‘Sustainable Neighbourhoods’ which are inclusive and responsive to the physical or cultural needs of those who use them, are well located relative to the social, community, commercial and administrative services which sustain them and are integrated with the community within which it will be located.”*

**Objective HP03** of the Development Plan seeks:

*“To ensure that new housing developments contribute to the social or recreation infrastructure of the community in which they will be located either through the provision of amenities or through financial contribution.”*

**Objective HP04** of the Development Plan seeks:

*“To ensure that new housing development minimises the use of natural resources and impacts on natural assets. Locations selected for residential developments should maximise the potential for the use of sustainable modes of transport such as walking, cycling and the use of public transport to reduce dependence on fossil fuels. The design of the individual dwellings and associated services should minimise the use of natural energy and water.”*

**Objective HP06** of the Development Plan seeks:

*“To ensure that all new housing developments provide a high quality living environment with attractive and efficient buildings which are located in a high quality public realm, and which are serviced by well-designed and located open spaces.”*

It is submitted that the proposed development will provide for a high-quality residential development with 1 no. childcare facility, 2 no. community rooms with 2 no. small retail units, and ample open space, including a large Parkland and numerous pocket parks. The proposed scheme is driven by the unique properties and topography of the site setting, so to better blend the proposed development within its natural context. The provision for 421 no. residential units is set out to form various character areas around provisioned facilities and amenities so to create high quality environment and neighbourhoods. The network of proposed green spaces is defined by the anchor Parkland to the

western section of the lands, utilised with children playground and a range of facilities. This is further supported by numerous pocket parks and trails complemented by native planting, provision for wildflower meadow areas and habitat areas. The arrangement of surface car parking spaces is to mitigate adverse impact on the visual amenity of the scheme, which is further reinforced by soft landscaping and tree planting. As part of the proposed scheme, improvements proposed for Kilnahue Lane and Carnew Road provide links to local schools and amenities. Conversely, the layout provides appropriate access for all to the new Public Park. The permeability throughout the site is also provided by provision for an interlinked layout and avoidance of cul-de-sac as possible. Therefore, the proposed scheme complies with the aforementioned policies and objectives of the Development Plan.

Moreover, **Objective HP07** of the Development Plan seeks:

*“To require all developments over 10 houses to be accompanied by an Urban Design Statement showing how the matters detailed in Chapter 17 have been taken into account in the design of the development.”*

It is submitted that an Architectural Statement prepared by Connolly Architects is enclosed with the proposed application. This is suggested to be read in conjunction with the Landscape Rationale Report prepared by RMDA Landscape Architects + Consultants.

In terms of social housing, **Objective HP10** of the Development Plan seek:

*“To require that 20% of all land zoned for residential use, or for a mixture of residential and other uses, be reserved for the purposes of Part V of the Act Section 94(4)(a)(i) and 4(a)(ii) with the exception of the exemptions provided for in Section 4 of the Housing Strategy contained in Volume 6 and the Planning and Development Act 2000 (as amended).”*

This is complemented by the **Objective HP11** of the Development Plan which seeks:

*“To review the Housing Strategy contained in Volume 6 when Part V of the Planning and Development Act 2000 (as amended) is revised to take account of the new economic and policy contexts.”*

Coming into effect from 3<sup>rd</sup> September 2021, the Housing Circular 28/2021, amends Part V of the Planning and Development Act 2000. The Programme for Government contained commitments in relation to expanding Part V to encompass affordable purchase and cost rental units and introducing affordable homes requirements to Part V. Part 6 of the Affordable Housing Act 2021, which was enacted on 21 July 2021, gives effect to this commitment. The principal change to Part V made by these amendments is to increase the Part V contribution for new housing developments from 10% social housing to a mandatory 20% requirement, at least half of which must be applied to social housing provision and up to half of which may be applied to affordable and cost rental housing.

It is considered that the proposed development is consistent with the Housing Strategy contained within the adopted Development Plan and the requirements under Part V of the Act as it is proposed to provide 20% of the housing units for social and affordable housing in this case.

Regarding the provision for a mix of house types, **Objective HP15** of the Development Plan seeks:

*“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.”*

The proposed 421 no. residential units comprises of a variety of in a variety of two, three and four bedroomed houses together with one, two and three bedroomed apartments and duplex units. Further to the variety of unit types with multiple bed spaces, there is also a significant amount of diversity in terms of size, layout, storage, aspect, room dimensions, etc. within the proposed scheme. This is to ensure that the proposed development provides for various needs of its future residents. For further details on the design, unit mix and a detailed breakdown of the proposed development, please refer to the enclosed Housing Quality Assessment prepared by Connolly Architects.

**Objective HP20** of the Development Plan seeks:

*“To ensure that a minimum of 20% of dwellings in all new housing estates of five dwellings or more are suitable to accommodate or are adaptable to provide accommodation for people with disabilities. Developers will be required to show an accessible route to the residential units from the boundary of the property. Proximity and access to local services must also be considered relative to the units which are accessible.”*

The proposed development has been designed to ensure that the design of buildings and the layout of developments incorporate measures that facilitate increased accessibility, such as the provision of apartments at ground floor level with own door access. The proposed application also ensures that accessibility complies with the following criteria: Part M of the Building Regulations and the requirement for Disability Access Certificates (DACs); Buildings for Everyone: A Universal Design Approach (National Disability Authority, 2012); Sustainable Residential Development in Urban Areas: Guidelines for Planning Authorities and its companion document Urban Design Manual (DEHLG, 2008).

For further information, please refer to the Housing Quality Assessment and Architectural Statement prepared by Connolly Architects.

**Objective HP 21** of the Development Plan seeks:

*“To require an Access Statement to be carried out for significant developments in accordance with Appendix 6 of Buildings for Everyone: A Universal Design Approach (National Disability Authority, 2012).”*

In preparation of the site layout for the development the design principle of Universal Access for all has been incorporated. The SHD design layout is intended throughout to be usable with a minimum physical effort by all. Moreover, the particular access issues which arose as a consequence of the site topography have been carefully addressed. Public footpaths generally are from level up to a slope of 1 in 20. Where possible all main routes run with the natural contours to ensure use and access for all throughout the development. The internal routes have been carefully linked to surrounding roads, footpaths and sightlines will be linked to ensure that accessibility continues beyond the site boundaries. The use of varied visual and tactile surfaces as well clearly identifiable dropped kerbs

throughout the scheme will assist all users in reading and traversing the development. Communal recreation and active open space areas have where practicable been located within areas of level ground with suitable access to prevent segregation of users based on ability. For further information regarding the Access Statement, please refer to the Architectural Statement prepared by Connolly Architects.

**Objective HP24** of the Development Plan seeks:

*“To promote best practice and innovation with regard to ongoing management and maintenance of all Council housing stock and the associated public realm.”*

The proposed apartments within the scheme will be privately managed by the establishment of a management company. This management company will be responsible for maintaining the external appearance of the apartments, maintaining the internal and external communal spaces, bins management, etc. It is also important to note that the public parkland and main roads are proposed to be taken in charge by Wexford County Council.

In light of the above, it is considered that the proposed development accords with the aforementioned objectives and it also complies with the pertaining policies and standards of the adopted County Development Plan.

#### 4.1.4 Climate Change

Outlined in the Development Plan, everyone can play a part in tackling climate change by improving energy efficiency, investing in renewable energy and adopting sustainable transport and development practice. In this regard, **Objective CC09** of the Development Plan seeks:

*“To promote and encourage new developments to mitigate against, and adapt to, where possible the impacts of climate change through the location, layout and design of the development.”*

As mentioned earlier, the proposed development comprises of a large parkland extending to 2.8 ha, along with several pocket parks, communal and habitat spaces, all inter-linked with pedestrian and/or cycle connections. Furthermore, the landscape proposals have focused on natural interventions, retention of some of the existing hedgerows and trees, woodland planting, and extensive tree planting, i.e. bringing nature into the urban realm so that the residents may have a sense of value and place in the location in which they reside. It is suggested that this landscape strategy is contributing to better integration of the scheme within the green infrastructure of the context.

This is suggested to contribute to a number of environmental health benefits and reduce the likelihood of flooding, improve air quality and provide cooling and shade. These co-benefits would address both the symptoms of several chronic diseases and associated risk factors along with the environmental and health impacts of climate change.

The approach towards surface water run-off integrated within landscape solutions in the SuDS requirements was also another component of the scheme contributing to the need to mitigate and offset issues associated with urban development. It was considered very important to be able to manage the water and more extreme weather and rainfall patterns. The use of natural falls, existing

ditches, woodland planting, and extensive tree planting have been adopted as part of this new landscape and is considered to a positive visual impact upon the landscape and the environment.

Furthermore, providing for an appropriate level of permeability throughout the subject site along with encouraging active modes of transport by provision for walking and cycling linkages throughout, it is expected for the scheme to positively contribute a reduced level of carbon footprint.

#### 4.1.5 Green Infrastructure, Landscape & Natural Heritage

In relation to green infrastructure, landscape and natural heritage, the Development Plan contains a number of objectives in this regard:

***Objective GI06** To require proposals for medium to high-density residential schemes to have regard to the recommendations of the ‘Green City Guidelines’ (UCD Urban Institute of Ireland, 2008) when designing such schemes and to demonstrate this in the planning application.*

***Objective GI07** To require proposals for significant development to submit a Green Infrastructure Plan as part of the planning application.*

***Objective L09** To require developments to be sited, designed and landscaped in manner which has regard to the site specific characteristics of the natural and built landscape, for example, developments should be sited, designed and landscaped to minimise loss of natural features such as mature trees and hedging and built features.*

***Objective NH05** To ensure that traditional field boundaries, ponds or small woods which provide important ecological networks are protected. Where such features exist on land which is to be developed the applicant should demonstrate that the design of the development has resulted in the retention of these features insofar as is possible and that the existing biodiversity value of the site has been protected and enhanced.*

***Objective NH08** To ensure, where appropriate, applications for development include proposals for native planting and leave a suitable ecological buffer zone between the development works and areas or features of ecological importance. Where hedgerows are required to be removed, the applicant/developer will be required to reinstate the hedgerows with a suitable replacement of native species to the satisfaction of the Council.”*

It is submitted that the proposed development is consistent with these policies and objectives of the Development Plan and indeed the Green City Guidelines (2008). It is intended that the site shall retain much of the existing native trees and hedgerows on the main peripheral site boundaries. Any trees and hedgerows required to be removed will be reinstated in the form of significant replacement planting of native species. It is acknowledged that there is widespread ash dieback being confirmed in all counties, with roadside ash evidently becoming increasingly impacted by the ash dieback disease. This is also the case at the application site, with the majority of the existing trees being of the Ash species. Thus, whilst the proposal removes such trees to facilitate the development, these trees would die in the near future. Considering the pathological issues relating to the site’s Ash population, it is possible that the new trees will offer improved sustainability over time.

On completion of the residential development, it shall be landscaped to a very high standard, with tree planting and paving that characterise the external open spaces and feature a high standard of landscape development. The open spaces across the scheme shall contain green areas, paths, play areas and extensive tree, woodland and ecological buffer zone, meadow, and bulb planting. This green infrastructure plan is demonstrated in the drawings and documentation prepared by RMDA Landscape Architects + Consultants.

A link along Kilnahue Lane on the north-eastern boundary shall be provided for in the form of a public path and cycleway into both the development and proposed public park. The paths within the park will connect to the rest of the development to the south and shall bring a unique character to the scheme. The open space to the north of the development, as well as open spaces within the development, shall be made available to the public from the wider area and the adjoining housing developments to the east, i.e. Gorey Hill and Creagh Hill respectively.

The soft landscape proposals shall compliment the development aesthetically and functionally and shall tie in with the existing and surrounding landscape. The proposed and existing trees, hedges and shrubs shall position the development into the landscape and provide a large element of screening. It is intended to tie in with and blend the development into the local landscape befitting of its natural context merging into an established urban background. Please refer to the drawings and report prepared by RMDA Landscape Architects + Consultants for further information in this regard.

#### 4.1.6 Transportation

In relation to movement and infrastructure, the Development Plan states that improvements to quality of life and economic competitiveness in County Wexford are dependent on a range of transport options being available which are effective, efficient, affordable, safe, appealing to use and sustainable.

According to the Development Plan, it is the objectives of the Council to:

**Objective T01:** *To support the sustainable transport principles outlined in Smarter Travel: A Sustainable Transport Future (Department of Transport, 2009).*

**Objective T02:** *To integrate land use and transport in the development and application of land use planning objectives in a manner which reduces reliance on car-based travel and promotes more sustainable transport choices.*

**Objective T03:** *To ensure that all proposed plans or projects relating to transportation (including walking, cycling, rail, bus, airports, ports and roads) and any associated improvement works, individually or in combination with other plans or projects, are subject to Appropriate Assessment Screening to ensure there are no likely significant effects on the integrity (defined by the structure and function) of any Natura 2000 site(s) and that the requirements of Articles 6(3) and 6(4) of the EU Habitats Directive are fully satisfied. Where the plan or project is likely to have a significant effect on a Natura 2000 site it shall be subject to Appropriate Assessment. The plan or project will proceed only after it has been ascertained that it will not adversely affect the integrity of the site or where in the absence of alternative solutions, the project is deemed imperative for reasons*

*of overriding public interest, all in accordance with the provisions of Articles 6(3) and 6(4) of the EU Habitats Directive.”*

The Development Plan also emphasises on the walking and cycling as the cheapest and healthiest means of transport, particularly for shorter journeys. Both are environmentally friendly in respect of low carbon emissions and contribute to the creation of quieter, safer, pollution-free and more sociable local environments. Under **Objective T10** of the Development Plan introduces a range of measures to encourage walking and cycling by all sections of the community. These include:

*“- Promoting walking and cycling as sustainable transport modes and healthy recreation activities throughout the county;*

*- Promoting cycling and pedestrian friendly development layouts, provide facilities at public transport nodes, towns and villages, plan for and make provision for the integration of cyclist and pedestrian needs when considering new development proposals;*

*- Promoting cycling and walking facilities as integral to the provision of vehicular traffic facilities;*

*- Requiring the provision of drop kerbs at all junctions and central island refuges to facilitate ease of access for elderly and mobility restricted people;*

*- Requiring that proposed developments are sited and designed in a manner which facilitates and encourages safe walking and cycling;*

*- Supporting the installation of infrastructure measures (for example new/wider pavements, road crossings and cycle parking facilities), retrofitted if necessary, which facilitates and encourages safe walking and cycling;*

*- Supporting the preparation of walking and cycling audits for the settlements in the county;*

*- Ensuring that the needs of walkers and cyclists are given thorough consideration in all planning documents, including town development plans, local area plans, village design statements and public realm plans produced by or in conjunction with the Council;*

*- Ensuring that the needs of walkers and cyclists are given full consideration in proposals to maintain and upgrade public roads, in undertaking traffic calming and proposals to maintain or change local speed limits in all town, village and rural locations.”*

Also, under **Objective T23** of the Development Plan, the Council seeks:

*“To require that a Traffic and Transportation Assessment (TTA) is undertaken for larger proposed developments in order to assess the implications for the capacity and efficient operation of national roads and to ensure that the national road links and junctions in the vicinity of the development are adequate to accommodate the proposed development without causing additional delays to existing and future road based traffic.*

*The TTA shall be prepared having regard to the Traffic and Transport Assessment Guidelines (NRA, 2007) and the Guidelines for Planning Authorities on Spatial Planning*



*and National Roads (DECLG, 2012). The Council will have regard to the threshold and sub-threshold guidance within the Traffic and Transport Assessment Guidelines in the determination of whether a TTA is required. The TTA should include a Mobility Management Plan which promotes sustainable travel.”*

Also, under **Objective T24** of the Development Plan, the Council seeks:

*“To require that a Road Safety Audit (RSA) be undertaken for development proposals which require new or significant changes to an existing access/egress point to a national road in order to fully assess implications for safety on national roads. The RSA shall be prepared in accordance with the Design Manual for Roads and Bridges (NRA, 2010).”*

Set out under the Development Plan, the Council also seeks:

**Objective T32:** *To promote and encourage road safety having regard to the National Roads Safety Strategy (RSA, 2007) and to exercise its functions with regard to the maintenance and improvement of all regional and local roads in a manner which has regard to the safety of all potential users of those roads including agricultural vehicles, cyclists, pedestrians and public transport and to protect the biodiversity and amenity value of roadside landscaping.*

**Objective T33:** *To assess the detailed siting and design of proposals for new or intensified use of existing accesses to roads on their merits having regard to the objectives of this chapter and the development managements standards contained in Chapter 18.*

**Objective T38:** *To ensure that traffic noise levels are considered in the assessment of all significant development proposals. This assessment will have regard to noise maps for national and major non-national roads to be prepared by the NRA and the Council further to Environmental Noise Regulation S.I. No. 140 of 2006.”*

It is submitted that the proposed development is consistent with these policies and objectives. The completion of this area of the Gorey Town & Environs LAP lands will ensure walking and cycling are viable options for the community, with the area also well served by existing public transport infrastructure all of which will ensure that the future population utilise sustainable public transport and active travel options rather than car transport.

The development has been designed to provide the best and most appropriate connections to existing movement routes. Improvements proposed for Kilnahue Lane and the Carnew Road entrances provide links to local schools and amenities. Conversely, the layout provides appropriate access for all to the new Public Park. It is recognised that much of the travel from this edge of town site will be by means of motor car in the short term. The layout accommodates this need without diminishing the character and promotes cyclists and walkers. Clearly defined walking and cycle paths connect throughout the development and link to existing infrastructure.

These are outlined further in the enclosed Traffic and Transport Assessment (incl. Road Safety Audit/Quality Audit) prepared by Waterman Moylan Engineering Consultants. Also, refer to the Chapter 9 of the Environmental Impact Assessment Report (EIAR) enclosed with the application.

#### 4.1.7 Development Management Standards

Chapter 18 of the Wexford County Development Plan sets out development standards and criteria that from the policies and objectives of the Development Plan to ensure that development occurs in an orderly and efficient manner and that it is in accordance with proper planning and sustainable development. The following section assesses the main set of standards and criteria required for high-quality, sustainable development:

Table 2. Compliance with Chapter 18 - Development Management Standards

Criteria	Compliance
<b>18.0 Development Management Standards</b>	
<b>18.2 Pre-Planning</b>	<p>On 10/10/2017, Downey and the applicant engaged in a pre-application consultation meeting with representatives of Wexford County Council regarding the proposed Strategic Housing Development on lands at Kilnahue &amp; Gorey Hill, Carnew Road &amp; Kilnahue Lane, Gorey, Co. Wexford. Subsequent meetings were held on 15/08/2018.</p> <p>On 08/03/2019, Downey and the applicant engaged in a pre-application consultation meeting with representatives of An Bord Pleanála and Wexford County Council regarding the proposed development as part of a Stage 2 consultation meeting. On 19/03/2019, An Bord Pleanála issued the notice of pre-application consultation opinion for the proposed development, under case reference ABP-303583-19. In addition, Downey and the applicant engaged in a final Section 247 meeting with Wexford County Council in 02/09/2021.</p> <p>For the detailed response to this opinion and to source the requested information within the application documentation, please refer to the “Statement of Response to An Bord Pleanála’s Pre-Application Consultation Opinion” prepared by Downey.</p>
<b>18.3 Development Contributions and Bonds</b>	<p>In accordance with the provisions of Section 48 of the Planning and Development Act 2000 (as amended), a Council may when granting permission for a development include conditions requiring the payment of a contribution in respect of public infrastructure and facilities benefiting the development in the area of the Council that is provided or that is intended will be provided by or on behalf of the Local Authority.</p> <p>The applicant acknowledges that these are typical contributions and will liaise with Wexford County Council on same, should the scheme be granted planning permission.</p>
<b>18.4 Appropriate Assessment</b>	<p>The Wexford Development Plan 2013-2019 states that any plan or project and any associated works, individually or in combination with other plans or projects, are subject to Appropriate Assessment Screening to ensure there are no likely significant effects on the integrity (defined by the structure and function) of any Natura 2000 site(s) and that the requirements of Article 6(3) and 6(4) of the EU Habitats Directive are fully satisfied.</p> <p>An Appropriate Assessment Screening report has been carried out by Pádraic Fogarty of Openfield Ecological Services as part of this Strategic Housing Development Planning Application. Please refer to the enclosed Appropriate</p>

	<p>Assessment Screening Report prepared by Openfield Ecological Services for further details.</p>
<b>18.5 Environmental Impact Assessment</b>	<p>Given that 421 no. units are proposed and indeed noting that the application site extends to c. 19.17 hectares within what can be considered a built-up area, an Environmental Impact Assessment Report has been prepared as part of the proposed application. Please refer to the enclosed EIAR which assesses the overall development and is enclosed with this SHD application for the consideration of the Board.</p>
<b>18.6 Flood Risk Management</b>	<p>The Wexford Development Plan 2013-2019 states that all development proposals within or incorporating areas at moderate to high risk of flooding will require site specific and appropriately detailed Flood Risk Assessments.</p> <p>Please refer to the Flood Risk Assessment prepared by Waterman Moylan Consulting Engineers for further information in this regard.</p>
<b>18.7 Sustainable Drainage Scheme (SuDS)</b>	<p>The Wexford Development Plan 2013-2019 states that the Council will require the use of SuDS in the design of new developments in the County. Accordingly, all new developments should be designed to ensure:</p> <ul style="list-style-type: none"> <li>- The on-site collection of surface water separates from foul water;</li> <li>- Surface water is appropriately collected on site to prevent flow onto the public roadway, adjoining properties or into the public foul sewer/sewage treatment plant;</li> <li>- The appropriate on-site disposal of surface water where the scale and amount of water generated makes this feasible for example through soak pits. For larger scale developments, it may be necessary to demonstrate through soil and subsoil tests that the site is capable of absorbing the surface water generated;</li> <li>- Where on-site disposal is not feasible and discharge to surface waters is necessary, that the system has been designed in accordance with Sustainable Urban Drainage measures (SuDS) and in particular, that run-off has been attenuated to green field conditions;</li> <li>- Discharges to water courses shall be channelled through adequately sized filters /interceptors for suspended solids and petrol/ oils prior to discharge.</li> </ul> <p>Please refer to the pertaining documents and drawings prepared by Waterman Moylan Consulting Engineers demonstrating compliance in this regard.</p>
<b>18.8 Accessibility</b>	<p>It is noted that the design of buildings and the layout of developments incorporate measures to ensure accessibility. Outlined in the County Development Plan, developers must have regard to or comply with (as appropriate) the following criteria in the preparation of development proposals:</p> <ul style="list-style-type: none"> <li>- Part M of the Building Regulations and the requirement for Disability Access Certificates (DACs)</li> <li>- Buildings for Everyone: A Universal Design Approach (National Disability Authority, 2012)</li> <li>- Sustainable Residential Development in Urban Areas: Guidelines for Planning Authorities and its companion document Urban Design Manual (DEHLG, 2008)</li> </ul>

	<p>The proposed development in its layout and design, is accessible, understandable, and usable to the greatest extent possible by all people, regardless of their age, size, ability, or disability. The proposed development is designed in accordance with the recommendations of ‘Buildings for Everyone’ 2002 published by the National Disability Authority and Technical Guidance Document M Access and Use of the Building Regulations 2010.</p> <p>For further information in this regard, please refer to the pertaining drawings and the Architectural Statement prepared by Connolly Architects.</p>
<p><b>18.9 Community Facilities</b></p>	<p>The Wexford Development Plan 2013-2019 states that the Council recognises the importance of providing a diverse range of community facilities to ensure the development of sustainable local communities.</p> <p>The proposed development seeks to provide for a sustainable residential development on appropriately zoned lands, in a highly accessible location within the development boundary of Gorey, which would promote compact urban growth and a good quality of life. In this regard, specific considerations are given to available community infrastructure and their capability to cater for the influx of population arising from the proposed development. A detailed Community &amp; Social Infrastructure Audit, Childcare Provision Assessment, and School Provision Assessment have been prepared by Downey and is submitted under separate covers as part of this planning application to An Bord Pleanála.</p> <p>It is noted that the proposed development also provides for a large public park and numerous pocket park with dedicated play areas across the scheme, 1 no. childcare facility with a gross floor area of 565 sqm, and 2 no. community rooms and 2 no. small retail units. Furthermore, the retail provision within the scheme is anticipated to serve the needs of local residents and will assist in enhancing the retail provision within Gorey town.</p>
<p><b>18.10 Residential Development in Towns and Villages</b></p>	
<p><b>18.10.1 The Setting</b></p>	<p>Given the unique site setting and topography, the design, layout and massing of the proposal is effectively informed by the context and its natural features. The design and layout optimise natural ventilation and minimise glare and excess solar gain, avoiding large areas of glazing and providing an appropriate balance between solid and void elements.</p> <p>The form and buildings envelope of the proposed residential scheme will be two to four storeys which has been designed for an appropriate variation from the surrounding residential areas, to create for a legible development with various character areas, regarding the unique site setting properties and topography. In response to the issues arising from the severely sloped character of the site, the higher buildings have been located where they will have the least visual impact while contributing to the urban character which is being created. This is anchored around an “entrance building” located strategically off the Carnew Road, evoking a strong image of the scheme by its height, mass, and physical characteristics. And a “Landmark” building designed adjoining Kilnahue Lane.</p> <p>There is also a range of open space areas provided throughout the application site, comprising of a large Parkland, numerous pocket parks, communal and habitat spaces, and amenity walks.</p>

<p><b>18.10.2 Access and Transport</b></p>	<p>The accessibility of the site is reinforced by provision for a new vehicular access onto Carnew Road (R725) and two new vehicular access points onto Kilnahue Lane, which facilitate pedestrian, cycle, and vehicular access to the lands.</p> <p>A route hierarchy was established to distinguish each unique character area of the scheme and provide for permeability of the site. It is noted that the provisioned hierarchy of street network is also designed to have regard to its full range of functions and not just its movement capacity.</p> <p>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).</p> <p>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 proposed car parking as part of the overall scheme may be considered a possible material contravention of the Development Plan.</p>
<p><b>18.10.3 Density</b></p>	<p>The subject site extends to approximately 19.17 ha, however, the development area, having excluded the Neighbourhood Park, central distributor road, and un-buildable/severely sloped lands, is 11.15 hectares. The proposal provides for 421 Residential Units at a density of c. 38 units per hectare. This is submitted to be consistent with the Development Plan policy/objectives in this regard.</p>
<p><b>18.10.4 Public Open Space</b></p>	<p>A wide range of green open spaces have been provisioned within the scheme, which are designed to not only promote the quality of life within the scheme, but also provide for better integration of the lands within its wider context. The hierarchy of open spaces within the scheme comprises of a large Parkland, numerous pocket parks, communal and habitat spaces, and appropriately sized shared green spaces all interlinked with amenity walks, trails, and/or pedestrian /cycling connections.</p> <p>The proposed amenity spaces also benefit from passive surveillance from the proposed residential units and are carefully screened to permit visual transparency between the buildings while maintaining security for residents.</p>
<p><b>18.10.5 Landscaping</b></p>	<p>It is intended that the site shall retain much of the existing native trees and hedgerows on the main peripheral site boundaries. On completion of the residential development, it shall be landscaped to a very high standard, with tree planting and paving that characterise the external open spaces and feature a high standard of landscape development. The open spaces shall contain, green areas, paths, play areas and extensive tree, woodland, meadow, and bulb planting.</p> <p>A link along Kilnahue Lane on the north-eastern boundary shall be provided for in the form of a public path and cycleway into both the development and proposed public park. The paths within the park will connect to the rest of the development to the south and shall bring a unique character to the scheme.</p>

	<p>The open space to the north of the development, as well as open spaces within the development, shall be made available to the public from the wider area and the adjoining housing developments to the east, i.e. Gorey Hill and Creagh Hill respectively.</p> <p>The soft landscape proposals shall compliment the development aesthetically and functionally and shall tie in with the existing and surrounding landscape. The proposed and existing trees, hedges and shrubs shall position the development into the landscape and provide a large element of screening. It is intended to tie in with and blend the development into the local landscape befitting of its natural context merging into an established urban background.</p> <p>Please refer to the drawings and report prepared by RMDA Landscape Architects + Consultants for further information in this regard.</p>																								
<p><b>18.10.6 Local Facilities</b></p>	<p>A detailed Community &amp; Social Infrastructure Audit, Childcare Provision Assessment, and School Provision Assessment have been prepared by Downey and is submitted under separate covers as part of this planning application to An Bord Pleanála.</p>																								
<p><b>18.10.7 Design of Dwelling Houses</b></p>	<p>Outlined in the County Development Plan, the Council will require all new dwellings to meet the minimum target standards on overall and room sizes as set out in Table 5.1 of ‘Quality Housing for Sustainable Communities: Best Practise Guidelines for Delivering Homes and Sustaining Communities’ (DEHLG, 2007), with particular regard to the internal floor areas indicated in Table No. 36.</p> <p style="text-align: center;"><i>Figure 4. Minimum Internal Space in a Dwelling</i></p> <table border="1" data-bbox="557 1124 1351 1326"> <thead> <tr> <th>No of bedrooms</th> <th>Minimum Overall size</th> <th>Minimum main living room</th> <th>Aggregate living area</th> <th>Aggregate Bedroom Area</th> <th>Internal storage (excl loft)</th> </tr> </thead> <tbody> <tr> <td>2</td> <td>80m<sup>2</sup></td> <td>13m<sup>2</sup></td> <td>30m<sup>2</sup></td> <td>25m<sup>2</sup></td> <td>4m<sup>2</sup></td> </tr> <tr> <td>3</td> <td>100m<sup>2</sup></td> <td>15m<sup>2</sup></td> <td>37m<sup>2</sup></td> <td>36 m<sup>2</sup></td> <td>5m<sup>2</sup></td> </tr> <tr> <td>4</td> <td>110m<sup>2</sup></td> <td>15m<sup>2</sup></td> <td>40m<sup>2</sup></td> <td>43m<sup>2</sup></td> <td>6m<sup>2</sup></td> </tr> </tbody> </table> <p>The development proposal adheres with the “Quality Housing for Sustainable Communities; Best Practice Guidelines for Delivering Homes and Sustaining Communities (DEHLG, 2007)” and “Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (DEHLG, 2020)” when assessing proposals for residential development. Please refer to the drawings, Housing Quality Assessment, and the Architectural Statement prepared by Connolly Architects for compliance in this regard.</p>	No of bedrooms	Minimum Overall size	Minimum main living room	Aggregate living area	Aggregate Bedroom Area	Internal storage (excl loft)	2	80m <sup>2</sup>	13m <sup>2</sup>	30m <sup>2</sup>	25m <sup>2</sup>	4m <sup>2</sup>	3	100m <sup>2</sup>	15m <sup>2</sup>	37m <sup>2</sup>	36 m <sup>2</sup>	5m <sup>2</sup>	4	110m <sup>2</sup>	15m <sup>2</sup>	40m <sup>2</sup>	43m <sup>2</sup>	6m <sup>2</sup>
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<p><b>18.10.8 Private Open Space</b></p>	<p>As set out in the County Development Plan, the Council will require 1 and 2 bed dwellings to have a minimum provision of 60sqm useable private open space and 3, 4 and 5 bed dwellings to have a minimum provision of 75sqm of useable private open space. In general a minimum distance of 22m should be achieved between opposing first floor windows at the rear of dwellings.</p> <p>It is noted that each residential unit benefits from the provision of adequately sized private open space in the form of gardens, balconies, or patios/terraces (designed in accordance with quantitative and qualitative standards), with the units at ground floor level provided with appropriate boundary treatments to ensure privacy and security whilst also providing visual interest and distinction</p>																								

	<p>between spaces. There has been slight deviation from the Development Plan standards in this regard as not all units meet the minimum private open space requirements. This is detailed in the enclosed Material Contravention Statement prepared by Downey.</p> <p>Appropriate separation distances have been provided between buildings to ensure privacy without compromising internal residential amenity of the apartments. For further information on the private open space proposed as part of this Strategic Housing Development application, please refer to the Housing Quality Assessment, the Architectural Statement and associated drawings prepared by Connolly Architects. Also, please refer to the enclosed landscape drawings and report prepared by RMDA Landscape Architects + Consultants for further information in this regard.</p>
<p><b>18.10.9 Boundary Treatments</b></p>	<p>Outlined in the County Development Plan, the following criteria should be taken into consideration in relation to private open space:</p> <ul style="list-style-type: none"> <li>- The boundaries of rear gardens shall be 1.8m-2m in height and shall be formed by high quality boundary treatments such as concrete block walls or concrete post and rail fencing. The use of post and wire fencing, or timber fencing will not be permitted.</li> <li>- Two metre high concrete walls shall be provided between all areas of public open space and gardens to the rear of dwellings. The walls shall be suitably rendered and capped in a manner acceptable to the Council.</li> </ul> <p>Please refer to the enclosed landscape drawings and report prepared by RMDA Landscape Architects + Consultants for further information in this regard.</p>
<p><b>18.10.10 Comfort, Privacy and Security</b></p>	<p>Set out in the County Development Plan, homes should be designed to be as secure and comfortable as possible. Natural light reaching internal spaces should be maximised and there should be ease of access to private amenity space. Good quality noise insulation should be provided. Durable boundary treatments should be proposed which do not adversely affect visual amenities or public safety. Where the overall design concept proposes home frontages close to a public footpath, front garden spaces of a minimum 1m wide should be provided.</p> <p>In this regard, the applicant engaged Waterman Moylan Consulting Engineers to prepare a Daylight and Sunlight Assessment report for the proposed development which confirms that the proposed development complies with the aforementioned guidelines and accords with the proper planning and sustainable development of the area.</p>
<p><b>18.10.11 Accessibility/Adaptability</b></p>	<p>Set out in the County Development Plan, the Council will require that 20% of dwellings in all new housing estates of five dwellings or more are suitable to accommodate or are adaptable to provide accommodation for people with disabilities.</p> <p>In this regard, all residential units are in compliance with the requirements of TGD: Part M in respect of access, circulation and sanitary facilities. Also, in accordance with Objective HP 20 of the County Development Plan, 20% of all residential units are suitable to accommodate or are adaptable to provide accommodation for people with disabilities. For further information in this regard, please see the enclosed Architectural Statement &amp; pertaining drawings</p>

	prepared by Connolly Architects, which confirm that the proposed development complies with the aforementioned guidelines.
<b>18.10.12 Energy Efficiency</b>	All homes in the development will be designed to achieve a Building Energy rating of at least A2 to comply with the EU Nearly Zero Energy Building (NZEB) Regulations and meet the challenges of climate change. All buildings will achieve the appropriate ratings. For further information in this regard, please see the enclosed Architectural Statement prepared by Connolly Architects.
<b>18.10.13 Refuse/Recycling/Fuel</b>	In this regard, appropriate recycling facilities and bin stores are provided to every residential unit. For further information in this regard, please see the enclosed drawings and Architectural Statement prepared by Connolly Architects.
<b>18.10.14 Access</b>	Set out in the County Development Plan, the Council will discourage vehicular access points in excess of 5m wide and excessive hard standing areas on home frontages. Parking areas at the side of houses should be considered for semi-detached and detached developments. Safe pedestrian access shall be provided to the rear of terraced houses. The scheme has been designed in accordance with DMURS. Access to all residential units and the Crèche will comply with the requirements of Technical Guidance Document Part M. All houses and own door apartment units will be provided with level access thresholds in accordance with the guidelines contained in the National Disability Authority’s Buildings for Everyone 2012. For further information in this regard, please see the enclosed drawings and Architectural Statement prepared by Connolly Architects, and engineering drawings and documentation prepared by Waterman Moylan Consulting Engineers.
<b>18.10.15 Materials</b>	The detailed design of the buildings incorporates materials and finishes which are in common use in development in the environs of Kilnahue and will ensure a high-quality low maintenance environment into the future. External finishes for houses will be primarily finished in clay brickwork, with some selected coloured render. Apartment and duplex buildings will be finished in brickwork and stone panelling thus reducing maintenance. This will be combined within proprietary-coloured panels to provide variation in colour and reduce maintenance. Roofs to these buildings will be metal clad in an appropriate colour to maintain visual consistency. Some timber or proprietary cladding is used to define service and utility areas. Balcony guarding will generally be of frameless glass with an aluminium base frame. Ancillary fixtures such as rainwater goods will be colour coated metal which will be visually complimentary to the uPVC windows and external doors. For information in this regard, please see the enclosed pertaining drawings and Architectural Statement prepared by Connolly Architects.
<b>18.10.16 Taking in Charge</b>	The proposed apartments within the scheme will be privately managed by the establishment of a management company. This management company will be responsible for maintaining the external appearance of the apartments, maintaining the internal and external communal spaces, bins management, etc. It is also important to note that the public parkland and main roads are proposed to be taken in charge by Wexford County Council. For information in



	this regard, please see the enclosed pertaining drawing prepared by Connolly Architects.												
<b>18.11 Design Criteria for Apartments</b>													
<b>18.11 Apartments</b>	<p>The Development Plan requires that all apartment and duplex units meet certain standards and thresholds when providing for internal space and private open spaces.</p> <p><i>Figure 5. Internal space and private open space requirements for apartments</i></p> <table border="1"> <thead> <tr> <th>No of Bedrooms</th> <th>Minimum total internal space</th> <th>Minimum private open space/ balcony space (new build)</th> </tr> </thead> <tbody> <tr> <td>1 and 2</td> <td>75m<sup>2</sup></td> <td>7m<sup>2</sup></td> </tr> <tr> <td>3</td> <td>86m<sup>2</sup></td> <td>9m<sup>2</sup></td> </tr> <tr> <td>4</td> <td>105m<sup>2</sup></td> <td>11m<sup>2</sup></td> </tr> </tbody> </table> <p>There has been slight deviation from the Development Plan standards in this regard. This is detailed in the enclosed Material Contravention Statement prepared by Downey. An Architectural Statement has been prepared by Connolly Architects which sets out the proposed development's compliance with the 12 Urban Design criteria. Please refer to the enclosed Architect and Urban Designer's Statement and associated drawings prepared by Connolly Architects for further information in this regard. Please also refer to the detailed landscape drawings and reports prepared by RMDA Landscape Architects + Consultants.</p>	No of Bedrooms	Minimum total internal space	Minimum private open space/ balcony space (new build)	1 and 2	75m <sup>2</sup>	7m <sup>2</sup>	3	86m <sup>2</sup>	9m <sup>2</sup>	4	105m <sup>2</sup>	11m <sup>2</sup>
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## 4.2 Gorey Town and Environs Local Area Plan 2017-2023

### 4.2.1 Overarching Considerations

The Gorey Town and Environs Local Area Plan 2017-2023 sets out the strategies and objectives for the future development of the area. The LAP is informed by the policies and objectives of the Wexford County Development Plan 2013-2019, in particular where it is to adhere to the objectives and development management standards set out therein. The vision for Gorey Town under the Local Area Plan is to achieve the following:

*“By 2023 Gorey Town will be a high quality, green, well connected town with a compact, walkable urban form. It will have a network of sustainable neighbourhoods that are socially inclusive and desirable places to live. Gorey Town will have high quality sustainable jobs and it will be an attractive place to live in, to visit and to enjoy its high-quality public realm, its vibrant arts and culture and its bustling town centre and premier retailing services.”*

The key principles for achieving the vision of the Local Area Plan are underpinned by the following considerations:

- *“Require high quality and people friendly design.*
- *Continue to develop Gorey as a thriving and attractive town with a vibrant mix of uses.*
- *Continue to develop the town as a premier retail destination.*
- *Continue to improve the public realm so that the town is an attractive place to live, work and visit.*

- *Prioritise local economic and employment development.*
- *Continue to ensure that adequate provision is made for childcare, educational and recreational facilities.*
- *Improve the movement, connectivity and legibility within the plan area for users of all forms of transport, in particular pedestrians and cyclists.*
- *Require high quality accessible public open spaces and continue to provide a network of public open spaces at appropriate locations in the plan area.*
- *Protect natural, built and cultural heritage*
- *Maximise the benefits of biodiversity and enhance the green infrastructure network in the area."*

#### 4.2.2 Land Use Zoning

Under the current Gorey Town and Environs Local Area Plan, the majority of the lands are zoned as "R - Residential" zoning objective, however, a portion of the lands located along the north-western boundary of the site is zoned as "OS - Open Space & Amenity" zoning objective. Outlined in the LAP, these zoning objectives seek the following:

**R - Residential Zoning Objective:** *To protect and enhance the residential amenity of existing and developed communities and to provide for new residential development, associated residential services and community facilities.*

**OS - Open Space & Amenity Zoning Objective:** *To protect and provide for recreation, open space and amenity areas."*

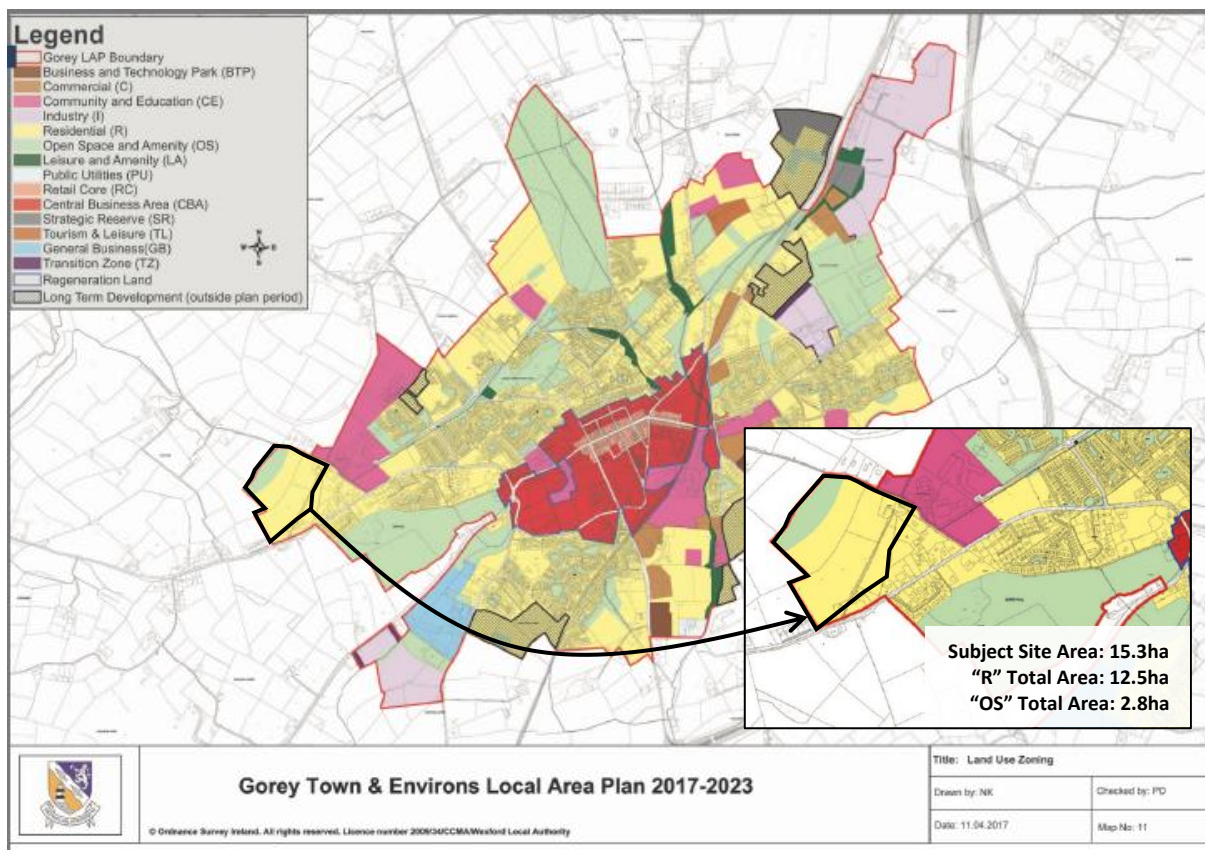


Figure 6. Land Use Zoning Map (application site outlined in black)

Outlined in the LAP, the primary purpose of “R - Residential” zoning objective is *“to provide for new residential development and associated uses. While housing is the primary use in this zone, recreation, education, childcare facilities, community buildings, sheltered housing and local services will also be considered subject to the preservation of neighbouring residential amenity”*.

In relation to “OS - Open Space & Amenity”, primary purpose of this objective is *“To retain and protect all existing open spaces, both passive and active”*.

Set out under the “Land Use Zoning Matrix” provided in the adopted LAP, the proposed development comprising of 421 no. residential units, 1 no. childcare, as well as the 2 no. community units with 2 no. retail units, and a large parkland with a number of pocket parks, are permitted or open for consideration uses and therefore are considered appropriate uses as designated under Zoning Objectives “R” and “OS”, and in accordance with the zoning objectives and the necessary social and physical infrastructure for the area.

With respect to the final Section 247 meeting with Wexford County Council in September 2021, 2 small no. retail units have now been provided within the scheme to cater for the local needs of this new community, as discussed during that meeting, but that the provision is small and is not at a scale which would compete with the retail offering within Gorey and as such a Retail Impact Assessment is not required, as per the requirements of the Wexford Development Plan (section 18.17.1).

#### **4.2.3 Housing & Social Infrastructure Delivery**

In conjunction with the adopted Development Plan, developing sustainable communities lies at the heart of the LAP and this is echoed in the vision for the plan area. While the main purpose of the LAP is to plan for the future growth and development of the plan area and to set out the objectives which will guide and regulate this development, it focuses on identifying and meeting the needs of the local community.

The Core Strategy of the Wexford County Development Plan 2013-2019 projects a population increase of 2,769 people for Gorey by 2022, which would indicate 30% increase since 2011. A similar population allocation has been applied for the final year of the LAP until 2023. This results in a total population allocation of 2,991 persons between the years 2011 and 2023. The Core Strategy population allocation equates to an additional 1,372 residential units<sup>2</sup>. The LAP states that between April 2011 and the end of 2015, it is estimated that 50<sup>3</sup> residential units were constructed in the plan area which reduces the required figure to 1,320 units.

Following on from the housing demand figures outlined above, the LAP states that the number of units would require a total of 99 hectares of residential zoned land, including the 50% headroom to allow for market choice. The LAP states that there are approximately 101 hectares of ‘Residential’ zoned

<sup>2</sup> An average household size of 2.7 is used up to 2015. An average household size of 2.55 is used for 2017-2023.

<sup>3</sup> This figure is based on commencement notices received by the Planning Authority during this time.

lands for development during the lifetime of the Local Area Plan with a further 34 hectares reserved for future development beyond the period of the LAP.

**Objective H01** of the LAP seeks:

*“To ensure that all new residential developments in the plan area provide a high quality accessible living environment with attractive and efficient dwellings located in a high quality public realm and served by well-designed and located open spaces.”*

The proposed development consisting of 421 no. high quality designed mix of residential units on a development site totalling 19.17 hectares in area (including the off-site upgrade works), where associated complementary land-uses such as a childcare facility and retail and community spaces is to be provided will represent a sustainable development at an appropriate location that will facilitate in the sequential development of Gorey Town where it will provide additional housing units to meet the requirements of the targeted increase in population as indicated under the provisions of the Regional Spatial & Economic Strategy for the Southern Region 2019-2031, Wexford County Development Plan 2013-2019 and the Gorey Town and Environs Local Area Plan 2017-2023. For further information, please refer to the Housing Quality Assessment and Architectural Statement prepared by Connolly Architects.

**Objective H02** of the LAP seeks:

*“To provide social housing and housing supports in accordance with the Social Housing Assessment of Needs.”*

The Council will continue to implement the Housing Strategy (Volume 6 of the CDP) and to use Part V to assist with the delivery of social housing in the plan area. It is considered that the proposed development is consistent with the Housing Strategy of the adopted County Development Plan and the requirements under Part V of the Act, as it is proposed to provide 20% of the housing units for social and affordable housing in this case.

**Objective H03** of the LAP seeks:

*“To facilitate new residential development in accordance with the Core Strategy and to require physical, social and community infrastructure to be provided either prior to or in tandem with this new residential development. No dwelling within that residential development shall be occupied until the required infrastructure has been provided. The required infrastructure which is identified on Maps 3 and 4 and in Appendix 1 Neighbourhood Framework Plans and Appendix 2 Implementation and Infrastructure Delivery Schedules includes wastewater and water supply, public lighting, footpaths, cycleways, play-ground/play facilities, parks and schools.”*

It is submitted that the proposed development is consistent with the above objective. The proposed scheme will ensure an appropriate level of access to community services, and this includes providing for 1 no. childcare facility catering for circa 89 children which is considered to be above the requirements of the relevant planning policy. The proposed development also provides for 2 no. community rooms and 2 no. small retail units, which contributes to the community infrastructure at the local level.

The proposed development also will ensure walking and cycling are viable options for the community, with the area also very well served by existing public transport infrastructure (Gorey Railway and the Local Link Wexford 389 bus service located within circa 1.5km of the application site), all of which will ensure that the future population utilise sustainable public transport and active travel options rather than car transport. For further details on compliance with the appendix 1 and 2 of the LAP, please refer to the sub-sections 4.3 and 4.4 of the following report.

**Objective H04** of the LAP seeks:

*“To require planning applications for residential developments to demonstrate how the scheme complies with the Neighbourhood Framework Plan which the subject lands are located in. It must be demonstrated how the development complies with the layout, form, density, linkages and accessibility and open space provision. Where a deviation from the framework is proposed, the application must demonstrate that this deviation does not compromise the delivery of the Framework and is equally permeable and proposes a positive relationship with adjacent existing and proposed development, including public open spaces and linkages.”*

It is submitted that the proposed development is consistent with these policies and objectives of the Neighbourhood Framework Plan. For further details on compliance with the NFP, please refer to the sub-section 7.3 of the following report.

**Objective H05** of the 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.”*

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. Compliance Check of the Proposed Mix of Units Statistics*

Unit Type	Percentage (%)	Compliance
1 Bedroom dwellings	18.9	Not Applicable
2 Bedroom dwellings	40.4	In compliance with the requirement
3 Bedroom dwellings	35.9	In compliance with the requirement
4 Bedroom dwellings	4.3	No compliance with the requirement

As the Table 3 above indicates, the proposed mix of units including two and three bedroom dwellings are in compliance with the policies and objectives of the LAP, however, the proposed no. of four bedroom units is below requirements of the adopted LAP, and therefore, the proposed development 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, National, and Regional planning policy to cater for existing and changing population requirements in a given context. 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. For further information in this regard and all potential material contraventions, please refer to the enclosed Material Contravention Statement enclosed prepared by Downey and submitted as part of this application.

**Objective H06** of the LAP seeks:

*“To ensure that the phased development of a residential scheme delivers the quantum of public open space commensurate to the number of dwellings in that particular phase. Planning applications for residential schemes of 25 or more dwellings shall be accompanied by a detailed phasing schedule detailing the number of dwellings, amount of public open space and infrastructure which will be developed as part of each phase.”*

It is submitted that the proposed development will be constructed in four phases, including: (1) The site will be opened from the R725 Carnew Road and the first phase will comprise the Public Park and 71 Residential Units. (2) This phase will incorporate the completion of the Park Avenue, connection to Kilnahue Lane and construction of 120 Residential Units Community and Retail facilities and the Childcare building. (3) In this phase the Lower and Middle Avenues will be completed and 158 Residential Units comprising three final Urban Blocks and three Apartment Buildings, and (4) The final phase will be the completion of the Lower Apartment Buildings and completion of Taking-in charge works and procedures.

Please refer to the enclosed Phasing Schedule prepared by Connolly Architects as part of the Architectural Statement, and also refer to the landscape drawings and Landscape Rationale Report prepared by RMDA Landscape Architects + Consultants for further information in this regard.

#### **4.2.4 Urban Design**

Regarding the Urban Design Strategy, the adopted LAP seeks to bring together the social, economic, and environmental dimensions and aspirations of urban planning and places them within an integrated, spatial strategy. And therefore, **Objective UD03** of the LAP seeks:

*“To encourage innovation in the built environment and to ensure that high quality urban design and architecture is carried out in accordance with the guidelines contained in this LAP along the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, its companion document Urban Design Manual (DEHLG, 2009), the Design*

*Manual for Urban Roads and Street (DTTS and DECLG, 2013), the Architectural Heritage Protection - Guidelines for Planning Authorities (DAHG, 2011) and the National Disability Authority (NDA) Buildings for Everyone: A Universal Design Approach.”*

It is submitted that the proposed development is consistent with these policies and objectives. Please refer to the enclosed Architectural Statement prepared by Connolly Architects for further information in this regard.

#### **4.2.5 Access & Movement Strategy**

In relation to movement and transport and with particular respect to the proposed development, the LAP is focused on:

- *“Providing optimum levels of accessibility, connectivity and permeability, particularly for pedestrian and cyclists. In general every street should lead to a street.*
- *Providing new connections between existing and new developments in selected locations to address issues of local level access and permeability.*
- *Ensuring the provision of footpath and cycle paths in new developments and developing new and improved accessible routes.*
- *Ensuring new development complies with the requirements of DMURS.”*

Some of the policies and objectives in this regard include:

**Objective AMS01** of the LAP seeks:

*“To ensure the design of all streets and roads in the plan area complies with the objectives and guidelines in the Design Manual for Urban Roads and Streets (Department of Transport and Department of the Environment, Community and Local Government, 2013) and the Urban Design Strategy, the Access and Movement Strategy and the Urban Design Guidelines contained in Appendix 1 of the LAP.”*

**Objective AMS02** of the LAP seeks:

*“To secure the provision in tandem with new developments, or provide subject to available resources, the footpath and pedestrian linkage objectives detailed on Map 3.”*

**Objective AMS04** of the LAP seeks:

*“To secure the provision in tandem with new developments, or provide subject to available resources, the cycle objectives detailed on Map 4.”*

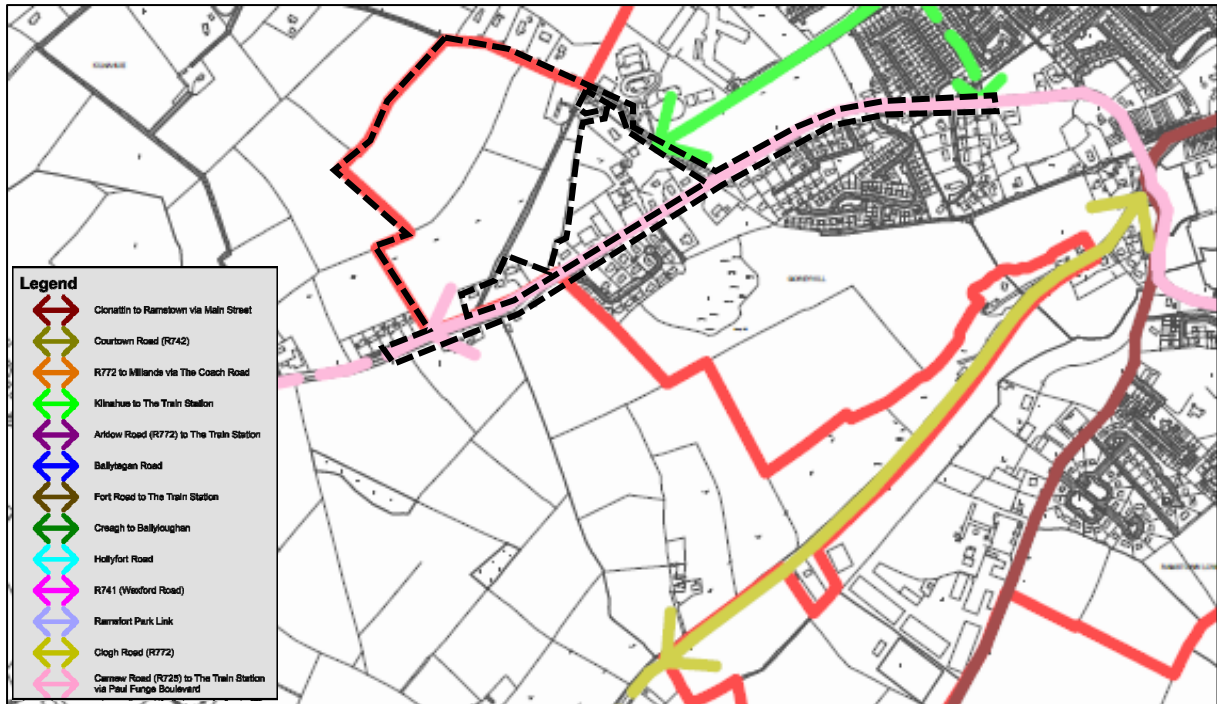


Figure 7. Existing and Proposed Footpath Map extracted from LAP (approximate boundaries of the subject site dashed in black)

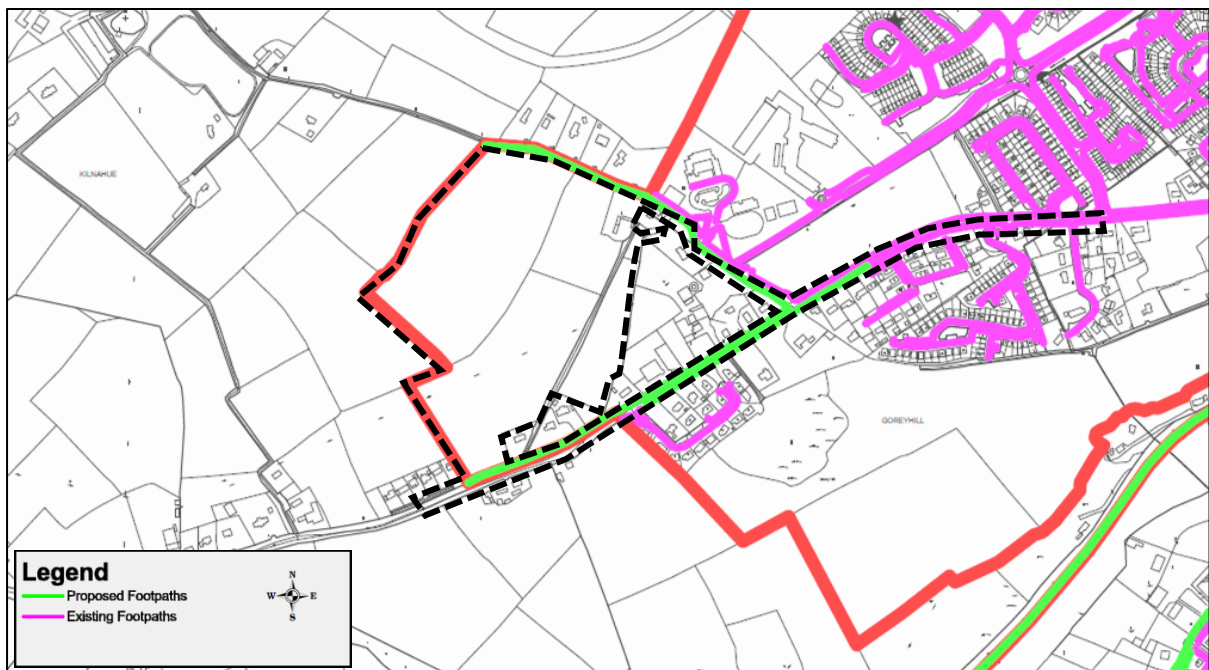


Figure 8. Proposed Cycling Network extracted from the LAP (approximate boundaries of the subject site dashed in black)

It is submitted that the proposed development comprises a new vehicular access route to Carnew Road and new vehicular access routes to Kilnahue Lane, so it would effectively increase the connectivity of the subject lands with Gorey Town Centre. As illustrated in the Figure 9 below, there are 1 no. vehicular access point to the Carnew Road located to the most southern corner of the subject site, while 2 no. vehicular access points are proposed along the Kilnahue. In addition, 1 no. pedestrian and cycle crossing point on Kilnahue Lane is provided.





Figure 9. Proposed Access Points from Subject Site linking the Lands to its wider Surrounding and the Town Centre



Figure 10. Proposed Layout of Road Hierarchy in the Scheme

As illustrated in the Figure above, the proposed street network within the subject lands provides for an appropriate level of accessibility from the subject site to its wider context, as well as an appropriate level of permeability and ease of access within the subject site. therefore, it is considered that the proposed development is consistent with these policies and objectives. Please refer to the enclosed Traffic and Transport Assessment report prepared by Waterman Moylan Consulting Engineers for further information in this regard.

#### 4.2.6 Open Space, Recreation and Green Infrastructure Strategy

In terms of Open Space and Green Infrastructure Strategy, the LAP seeks to ensure that Gorey Town and Environs has a high quality network of open spaces, recreation facilities and Green Infrastructure, which together will contribute to the making the town an attractive place to live, work and visit. As per, **Objective OS02** of the LAP seeks:

*“To require a 15% provision of the overall site area for use as public open space in new residential schemes. This open space shall be provided as set out in Sections 5.3.2 Neighbourhood Parks and 5.3.3 Pocket Parks.”*

It is submitted that the proposed development provides for an overall of approximately 5.6 ha green space, comprising of a large Parkland of c. 2.80 ha located along the north-western boundary of the subject site and c. 2.82 ha of public open space is also being provided throughout the application site, which exceeds the 15% of the overall site area required under Objective OS02 of the Gorey & Environs LAP. Please refer to the enclosed landscape drawings and Landscape Rationale Report prepared by RMDA Landscape Architects + Consultants for further information in this regard.

#### 4.2.7 Heritage

Heritage is defined as including monuments, archaeology, heritage objects, architecture, flora, fauna, wildlife habitats, landscapes, seascapes, wrecks, geology, heritage gardens and parks and inland waterways. It is the duty of the Planning Authority to protect Wexford’s heritage in the interest of the proper planning and sustainable development of the area.

##### **Archaeological Heritage**

**Objective ARH01** of the LAP seeks:

*“To have regard to the Record of Monuments and Places (RMP) and the newly-identified sites identified on Map 9 when dealing with planning applications for development or threats to recorded items. Development shall be controlled in the vicinity of a recorded feature where it detracts from the setting of the feature or where it is injurious to its integrity, cultural or educational value. The Council shall consult with the National Monuments Service in the Department of Arts, Heritage and the Gaeltacht where appropriate.”*

**Objective ARH02** of the LAP seeks:

*“To have regard to the Zone of Archaeological Potential within Gorey town when dealing with planning applications for all development, including local authority own development. This area is identified on Map 9. Where permission for such proposals is granted, the applicant will have due regard to the recommendations of the National Monuments Service and the Heritage and Planning Division in the Department of Arts, Heritage and the Gaeltacht. This may involve the employment of a licensed archaeologist at the expense of the developer to record any archaeological remains uncovered and to supervise all excavation works.”*

As shown on the Figure 11, a recorded monument (WX006-062 - Holy Well, Kilnahue) abuts the SHD application site located along the north-eastern perimeter boundary. Part of the application site also includes upgrade works to existing engineering infrastructure under the road on Main Street within the town, with the town designated under WX007-033. The Local Area Plan states that where, “the owner or occupier of a property, or any other person proposes to carry out, or to cause, or to permit the carrying out of work at or in relation to, or near a monument which is included in the RMP, they are required to give notice in writing to the Minister with responsibility for heritage two months before commencing work’. The proposed SHD application demonstrates compliance with the requirements of these policies and objectives, with detailed archaeological assessment included within the EIAR which accompanies the application.

Connolly Architect have also prepared a report on the derelict structures to be demolished to facilitate the development, which the Board is invited to refer to. It is submitted that the proposed development has taken into consideration the requirements of the guidelines and has been designed to provide for protection of the architectural heritage in the vicinity of the application site.

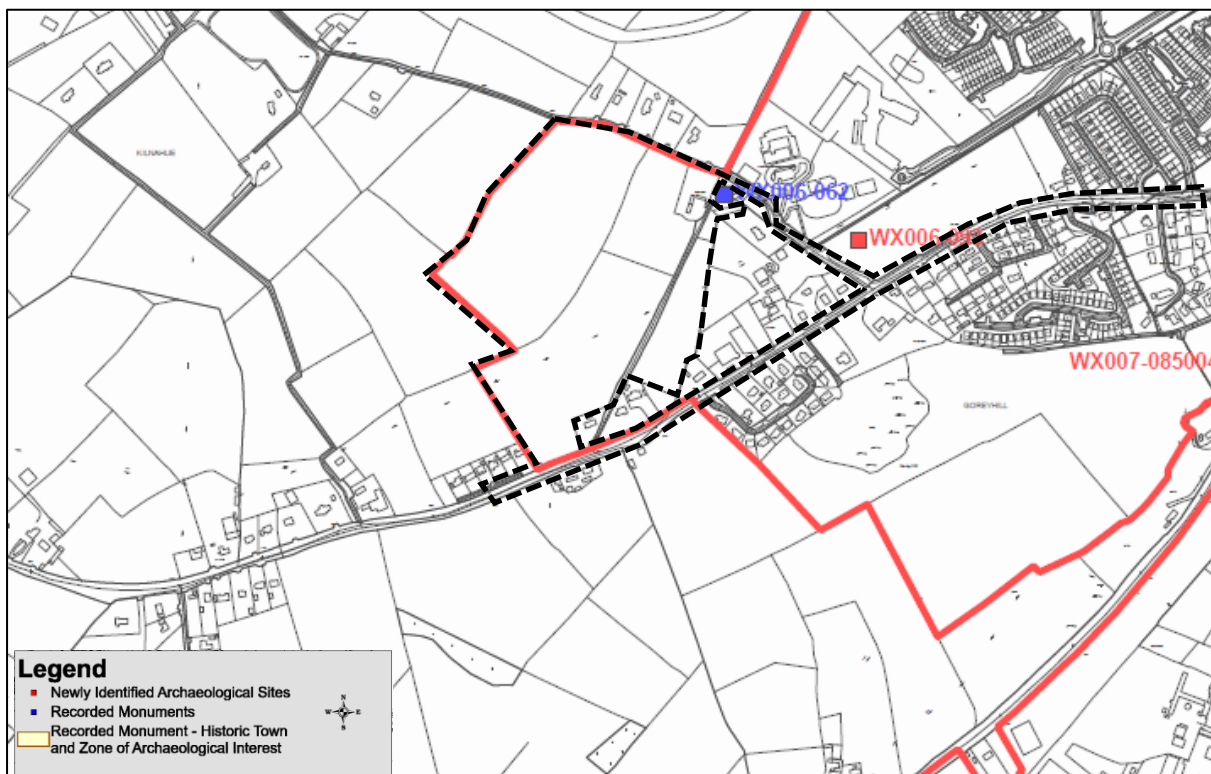


Figure 11. Archaeological Heritage within context of site extracted from LAP (approximate boundaries of the subject site dashed in black)

### Natural Heritage

Outlined in the adopted LAP, there are no Natura 2000 sites within or adjoining the LAP boundary. However, it does confirm that there is one SPA and three SAC sites located within a 15km radius of the plan area. Set out in the LAP, the Council will ensure that all plans and projects and associated works in the plan area are subject to Appropriate Assessment Screening / Appropriate Assessment to ensure that they do not give rise, either individually or in combination with other plans or projects, to significant effects on the integrity of any Natura 2000 site(s). As per, **Objective AA01** of the LAP seeks:

*“The Council will ensure that any plan/project and any associated works, individually or in combination with other plans or projects, are subject to Screening for Appropriate Assessment to ensure there are no likely significant effects on any Natura 2000 site(s) and that the requirements of Article 6(3) and 6(4) of the EU Habitats Directive are fully satisfied. Where a plan/project is likely to have a significant effect on a Natura 2000 site or there is uncertainty with regard to effects, it shall be subject to Appropriate Assessment. The plan/project will proceed only after it has been ascertained that it will not adversely affect the integrity of the site or where, in the absence of alternative solutions, the plan/project is deemed by the competent authority imperative for reasons of overriding public interest.”*

**Objective NH01** of the LAP seeks:

*“To protect existing ecological networks and wildlife corridors and provide for new and enhanced connections, where necessary, between fragmented areas. In this regard, the Council will carry out an ecological survey of the plan area and map the identified ecological networks and wildlife and any gaps therein.”*

**Objective NH02** of the LAP seeks:

*“To promote best practice in the control of invasive species and support measures for the prevention and/or eradication of invasive species as appropriate and as opportunities and resources allow.”*

**Objective NH03** of the LAP seeks:

*“To raise awareness in relation to invasive species, including making landowners and developers aware of best practice guidance in relation to the control of invasive species and encouraging them to adhere to same and, to ensure, in so far as possible, that proposals for development do not lead to the spread of invasive species.”*

**Objective NH04** of the LAP seeks:

*“To ensure that proposals for development do not lead to the spread or introduction of invasive species. If developments are proposed on sites where invasive species are or were previously present, the applicants will be required to submit a control and management program for the particular invasive species as part of the planning process.”*

Consistent with the policies and objectives of the LAP and in order to meet the requirements of Natural Heritage objectives, an Appropriate Assessment Screening report prepared by Padraic Fogarty of OPENFIELD Ecological services, together with an Environmental Impact Assessment Report, are enclosed with this SHD application.

### 4.3 Creagh Neighbourhood Framework Plan

Gorey Town and Environs Local Area Plan 2017-2023 provides for a *Town Centre Framework Plan* and number of *Neighbourhood Plans*, including the “Creagh Neighbourhood Framework Plan”. As shown in the Figure below, the Creagh NFP area includes a combination of developed and undeveloped lands immediately north/north-west of the town centre, extending from Kilnahue townland at the R725 to Ramsfortpark Forest to the east. This also includes the application lands.

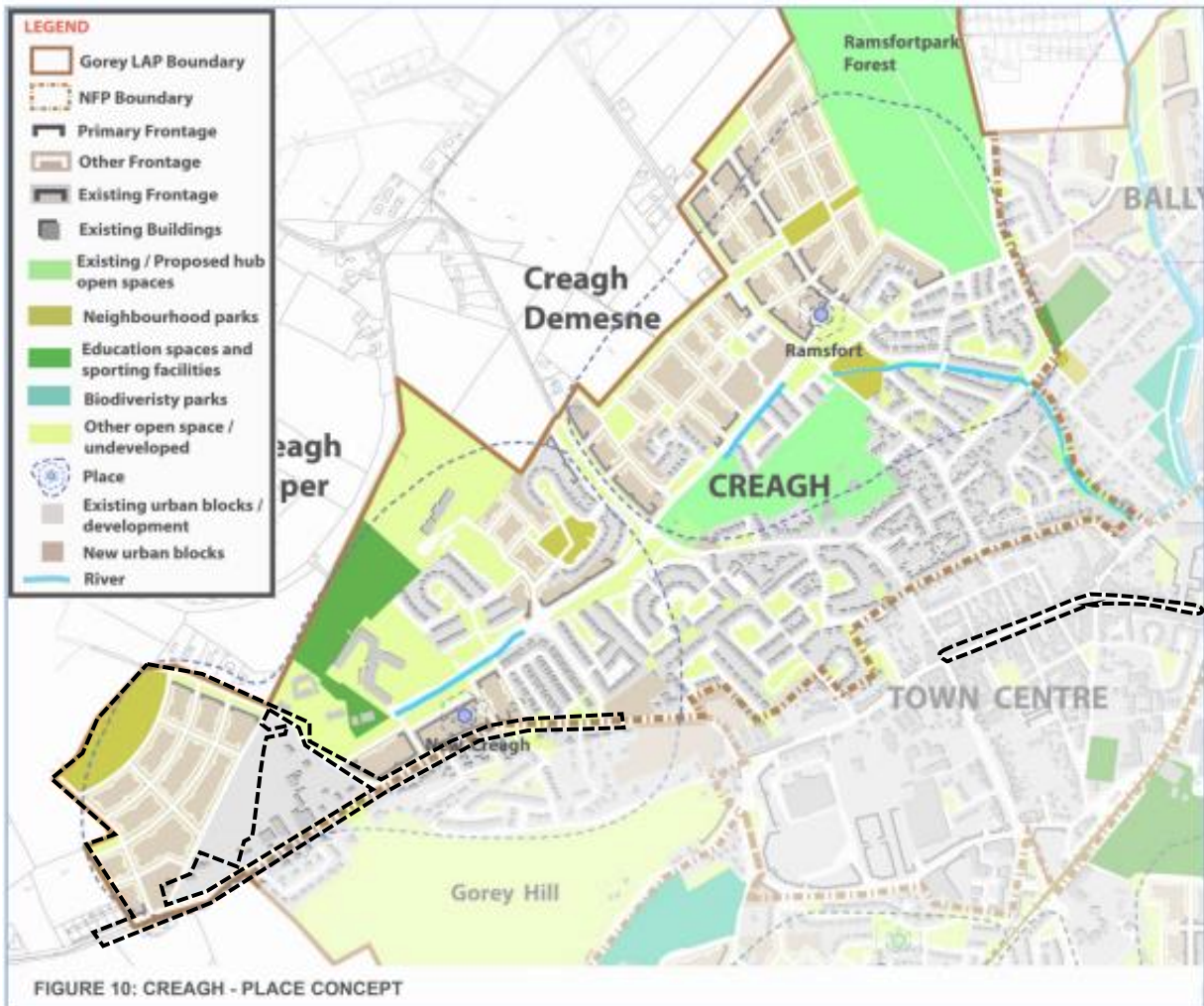


Figure 12. Creagh Place Concept extracted from the LAP (approximate boundaries of the subject site is dashed in black)

The NFP is based around three concepts: “place concept”, “route concept”, and “landscape concept”, which are further specified through a series of Key Objectives and Key Components in order to assist in the delivery of a sustainable neighbourhood.

Table 4. Key Objectives of the NFP extracted from the LAP

(1) To provide new local community spaces for the main development areas of Ramsfort and New Creagh.	(2) To complete the orbital connection between the radial country roads, currently provided by the Inner Relief Road and to upgrade its layout and design to provide a new avenue (Creagh Avenue).
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(3) To provide new connections between existing and new developments in selected locations in the area to address issues of poor local level access and permeability.	(4) To enhance the current role of the country roads as green routes, by retaining established landscape features and adding new pedestrian and cyclist facilities.
(5) To require more attractive, functional and permeable street and space layouts in new development, with careful attention paid to all aspects of street and space design, in accordance with the Design Manual for Urban Roads and Streets (Department of Environment, Community and Local Government, 2013).	(6) To provide a new, connected green infrastructure of local corridors and hubs, to provide for improved quality and connectivity of biodiversity, amenity (including a neighbourhood park and play areas) and local water management.
(7) To support the development of Gorey Town Park and Ramsfortpark Forest for high level recreational and amenity uses.	(8) To respect locally-distinctive landscape features such as tree lines and field boundaries in the new urban structure and to enhance these as part of an improved and integrated green infrastructure network
(9) To provide for small scale local services and community uses at the local community spaces and to require an element of flexible building typology.	(10) To facilitate the design of new development areas using robust urban block structures, with a presumption in favour of a perimeter block typology
(11) To encourage a variety of building types and densities which reflect the function and hierarchy of routes and spaces in the area, with the new avenues and focal spaces providing for greater continuity and scale of building form and the secondary streets and spaces providing for lower scale and density	

Table 5. Key Components of the NFP extracted from the LAP

(1) Creagh Avenue (comprising the upgrade of the existing Inner Relief Route and the completion of remaining sections).	(2) Upgraded Gorey Town Park. The Park will have upgraded landscape and layout, enhanced local facilities and services, furniture and lighting and improved local biodiversity.
(3) New local community spaces at New Creagh and Ramsfort. These will comprise new open spaces enclosed by mixed residential typologies including townhouses and apartments and including local services and local community facilities (e.g. childcare/local health facilities/GP/pharmacy, local shop and livework).	(4) Development of a forest park in Ramsfortpark in consultation with Coillte and local interest groups.

<p>(5) New green routes at Kilnahue local road, Hollyfort Road and Fort Road local roads including new pedestrian and cycle facilities.</p>	<p>(6) Rehabilitated Creagh tributary stream as a green infrastructure corridor.</p>
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The Framework Plan makes provision for Key Infrastructure such as the new avenue, main roads and streets and new local community spaces (this typically lies within the range of 15 and 25% of the total parcel area). Set out under the NFP, all Local Area Plan and County Development Plan development management standards around layout, open space, car parking and local infrastructure and services will need to be satisfied in new proposals.

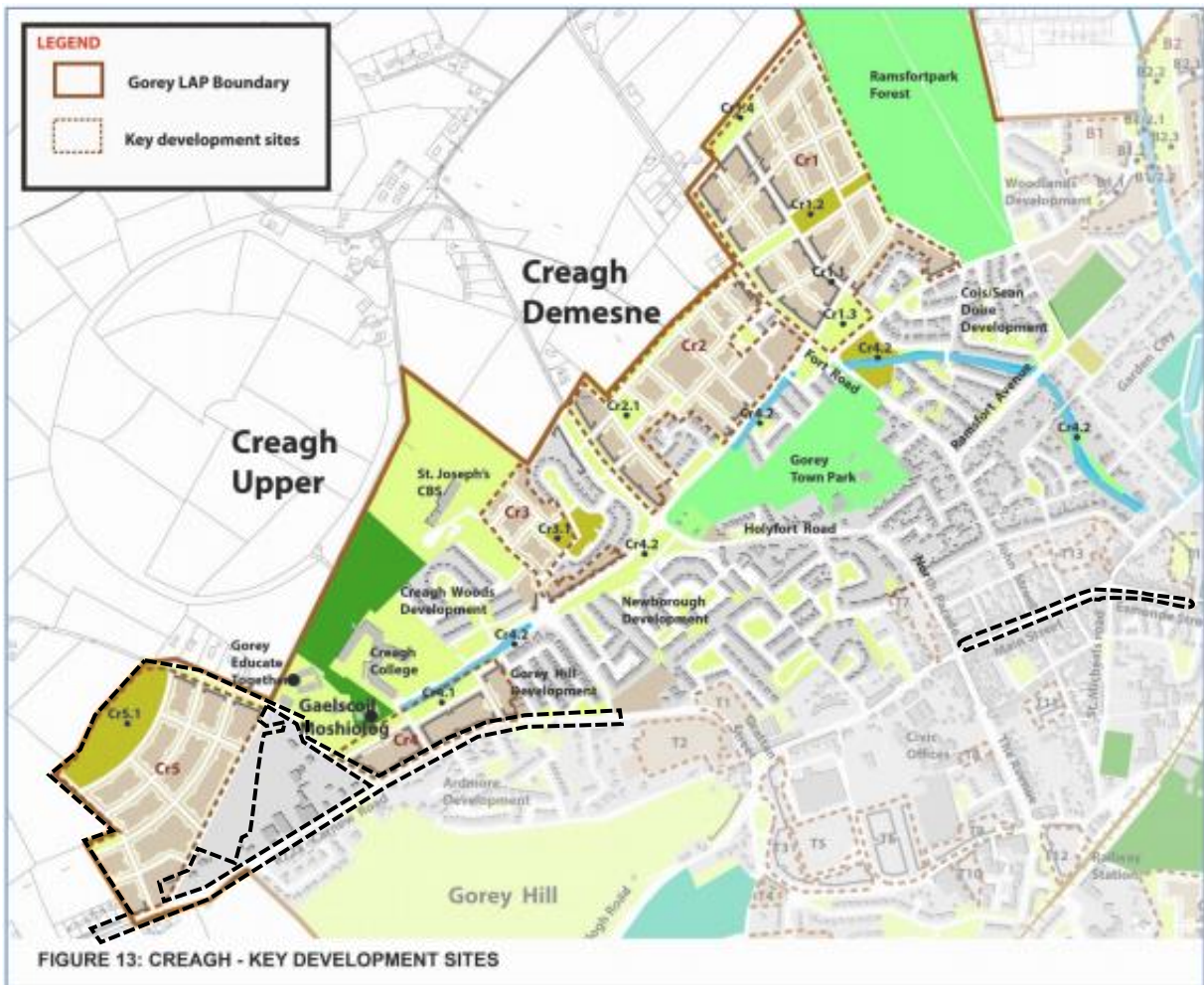


Figure 13. Key Infrastructure Map extracted from the LAP

As illustrated on the Figure 13 above, one of the provisioned key development sites within the NFP is located within the application site. Accordingly, the “Cr5” is to provide for “Open Space” and as per, “Cr5.1: Open Space” is a 2.8 ha site provisioned for “new local open space incorporating SUDS”. It is noted that the “Cr5.1” site is located on a section of the application site which is zoned as “OS - Open Space” along the western boundary of the subject site.

It is submitted that the proposed development is informed by the key objectives and components of the Creagh Neighbourhood Framework Plan, and adherence to the 12 criteria set out in Sustainable Development in Urban Areas. The principal restrictions and limitations to achieving these objectives in the design include: (1) Site Topography, (2) Appropriate Scale, (3) Traffic Management and Safety, and (4) Car Parking Standards. The proposed design layout is therefore reflective of the conceptual maps of framework plan.

The landscape and urban design response for the subject lands aims to efficiently utilise the unique characteristics of the lands setting within the design process to add to the distinctiveness of the scheme, and create a novel residential quarter.

The accessibility of the site is reinforced by provision for a number of access points along both Carnew Road and Kilnahue Lane, which facilitate pedestrian, cycle, and vehicular access to the lands. A route hierarchy was established to distinguish each unique character area of the scheme and provide for permeability of the site. This includes a new vehicular access onto Carnew Road (R725), and new vehicular accesses onto Kilnahue Lane, all with associated road upgrade works.

Legibility and wayfinding have been carefully considered, and strong edges have been emphasised along the primary routes and onto key open spaces. Furthermore, the whole scheme is anchored around an “entrance building” located strategically off the Carnew Road, evoking a strong image of the scheme by its height, mass, and physical characteristics.

The wide range of green open spaces which further ties the scheme to its distinct context appears as the special quality of the scheme. These range of spaces comprising of a large Parkland, numerous pocket parks, communal and habitat spaces are to amplify the design and create an environment in which the future residents and other users would feel comfortable and want to the experience.

All new public open spaces within the development are overlooked by surrounding homes so that safety of residents is paramount. Within the provisioned parkland and other major green spaces, a network of circulation paths will be created which would provide a significant amenity for the site and its wider context. This is reinforced by a communal open space provisioned in the triangular corner of the site along southern boundary of the lands.

The proposed mix of dwelling types with houses, duplexes and apartments facilitates a variety of future residents ranging from families to young professionals to older people who would like to downsize to an apartment close to Gorey Town Centre. Further to the variety of unit types with multiple bed spaces, there is also a significant amount of diversity in terms of size, layout, storage, aspect, room dimensions, etc. within the proposed scheme. This is to ensure that the proposed development provides for various needs of its future residents catering for all age group demographics, also adaptable and flexible for their changing needs of the population.

All homes in the proposed development will be designed to achieve a Building Energy rating to comply with the EU Nearly Zero Energy Building (NZEB) Regulations and meet the challenges of climate change.

Design and materials specified for the buildings and landscaping have been chosen for durability, quality and low maintenance. The landscape design and execution will ensure useability of public



spaces from the first occupation of the residential units. Public lighting has been designed to reinforce sense of place and safety and facilitate use by all. For further information on this, please refer to the Architectural Statement prepared by Connolly Architects and Landscape Rationale Report prepared by RMDA Landscape Architects + Consultants. These reports also outline site analysis, design rationale, landscape rationale, and compliance with the 12 Urban Design Criteria guidance (2008 Manual).

#### **4.4 Draft Wexford County Development Plan 2021-2027**

Under Section 20 of the Planning and Development Act 2000 (as amended), Wexford County Council being the Planning Authority for the area had given notice that they have prepared a Draft County Development Plan for Wexford. The Draft Wexford County Development Plan (2021-2027) comprises a written statement and maps and is accompanied by an Environmental Report on the likely significant effects on the environment of implementing the Draft Plan, prepared by the Planning Authority in accordance with the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (as amended). A Natura Impact Report pursuant to Part XAB of the Planning and Development Act 2000 (as amended) and in accordance with Article 6 of the Habitats Directive was also prepared.

The Draft Wexford County Development Plan (2021-2027) was available for public display from Monday, 28<sup>th</sup> September 2020 to Wednesday, 9<sup>th</sup> December 2020. It is noted that Wexford County Council proposed to advance a new Development Plan at the earliest possible date. At the time of preparing this SHD application, the Draft Development Plan has not been formally ratified by the Elected Members. Until such time as this new Development Plan is prepared and adopted, the current Wexford County Development Plan 2013-2019 (As Extended) will continue to have effect. It is submitted that the proposed development is consistent with the emerging policies and objectives of the Draft Development Plan.

#### **5.0 CONCLUSION**

This Statement demonstrates that the proposed development is in compliance with relevant national, regional and local planning policy. The proposed development will provide an appropriate form of development on the subject lands that are zoned for residential, open space, community and retail use, where the zoning designation permits in principle complementary land uses such as the proposed creche. The proposed development will provide for an effective, efficient, sustainable use of what is a suburban greenfield site in an accessible location within the development boundary of Gorey Town.

The nature, form and extent of the proposed development has been informed and guided by pre-application consultation with An Bord Pleanála and the planning authority's internal departments, and the final section 247 consultation meeting with the planning authority in September 2021 prior to the finalisation of this Stage 3 Strategic Housing Development application.

In light of the above, it is respectfully submitted that the proposed development is consistent with the proper planning and sustainable development of the area in which it is located as expressed in national, regional and local planning policy and Guidelines issued under Section 28 of the Planning and Development, 2000 (as amended), and as such, it is considered that the proposed development represents a high-quality Strategic Housing Development proposal which is now being submitted to An Bord Pleanála.