

DOWNNEY

# SUPPORTING PLANNING STATEMENT

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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 Supporting Planning Statement, on behalf of the applicant, Gerard Gannon Properties, to accompany 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.

This application is accompanied by a comprehensive range of documentations which specifically seek to address the requirements of the Planning and Development (Housing) and Residential Tenancies Act 2016, the Planning and Development (Strategic Housing Development) Regulations 2017, items raised by the Planning Authority and An Bord Pleanála during the pre-application consultations, national and regional planning policy and guidelines, the Wexford County Development Plan 2013-2019, and the Gorey Town and Environs Local Area Plan 2017-2023.

The proposed development subject to this SHD application provides for construction of 421 no. residential dwellings, comprising of 133 no. houses, 228 no. apartments, and 60 no. duplexes. The proposed development also provides for 1 no. childcare facility, 2 no. community rooms with 2 no. retail units, a large parkland and numerous pocket parks across the subject lands, car and cycle parking spaces, and all associated ancillary site development infrastructure works necessary to facilitate the development.

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, with respect to the unique site setting properties and topography. 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. Thus, sense of place announces the entrance to the emerging community.

Design and materials will be of a high quality and there will be a mixture of unit configurations across the site to avoid a homogenous block appearance and to facilitate the various type of family units that will ultimately occupy the units. It is proposed to provide a mix of one, two, and three bed apartments and duplexes, and three and four bed houses providing for a diverse mix of units.

This Supporting Planning Statement outlines the context of the subject site, the background and rationale of the proposed development and provides a summary as to how it complies with the relevant planning policy and guidelines. It should be read in conjunction with the accompanying detailed documents prepared by the design team.

The scheme has been prepared by a multi-disciplinary design team and has been subject to pre-planning consultation with the local authority and An Bord Pleanála. The proposed scheme has evolved and improved as a result of Stage 1 and Stage 2 meetings and numerous internal design team meetings. This has ensured that a well-considered and appropriate form of development can be developed that will help to integrate with the future development of the wider Gorey area. The design team is as follows:

- Downey Planning - Planning Consultants
- Connolly Architects - Project Architects

- Courtney Deery Heritage Consultancy - Archaeologists
- The Tree File Consulting Arborists Ltd. - Arborist Consultants
- RMDA Landscape Architects + Consultants - Landscape Architects
- Waterman Moylan – Engineers
- Bruton Consulting Engineers – Road Safety Auditors
- DKP<sub>EV</sub> Environmental - Scientists/Specialist Consultants
- Dr. Pamela Bartley Hydro-G - Hydrogeologist
- Digital Dimensions - Photomontages/CGI Consultants
- Openfield Ecological Services & Brian Keeley - Ecologists
- Sabre Electrical Services Ltd. - Public Lighting Consultants
- Enviroguide Consulting – Operational Waste Consultants

It is submitted that the proposed development offers an efficient use of appropriately zoned lands, in a highly accessible location within the development boundary of Gorey. The application site is located c. 2km to the west of the railway station, circa 1.5 km to the southwest of Gorey Town Centre between the Kilnahue Lane and Carnew Road which leads from the town centre. The site is also located 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.

This report sets out the planning rationale and justification for the proposed development and demonstrates how it accords with the proper planning and sustainable development of the area. This Statement should be read in conjunction with the plans, drawings, and documentation submitted as part of the overall planning pack.

## 2.0 SITE LOCATION & DESCRIPTION

The subject site is located to the south-west of Gorey Town Centre between the Kilnahue Road and Carnew Road (R725) from the town. The application site is currently a greenfield site and extends to approximately 15.3 ha, and 19.17 ha in area when including the off-site proposed upgrade works. The site is bounded by Kilnahue Lane to the northeast, the eastern boundary abuts a number of greenfield lands that abut one-off residential dwellings which front Carnew Road (R725). A section of the application site fronts the Carnew Road to the south-west of the application site. Agricultural farmland bounds the subject site along its western perimeter boundary.

The surrounding area is characterised by detached dwellings on single plots, as well as smaller-scale residential developments in a variety of designs and layouts, particularly along Carnew Road, the R725. The site slopes gently from west to east, towards the town and from north to south. The site's boundaries comprise of native hedgerows with a number of trees interspersed throughout.

Residential development in the immediate vicinity generally consists of detached dwellings. Kilnahue Lane is a local access road serving several detached houses, two primary schools and a motor service

unit. It has a footpath and a cycle path along its northern side for approximately 300m from the junction with Carnew Road which provide access to the schools. Carnew Road is a recently upgraded regional road. From the junction with Kilnahue lane it has a footpath, cycle path and layby parking for the first 80m of its northern edge. Beyond this, a footpath continues on its southern edge. A 50 kph speed limit applies in this general area.



Figure 1. Aerial View of the Location of the Subject Site (approximate boundaries of the subject site outlined in red)



Figure 2. Aerial View of the Entire Application Site Boundary (outlined in red)



### 3.0 PLANNING HISTORY

Downey Planning have carried out an examination of the planning history of the subject site which determined that there have been a number of planning applications made on the subject lands. The most relevant planning history is as follows:

- **Reg. Ref. 20160623 (ABP Ref. PL26.248159)** - By order dated 20<sup>th</sup> February 2017, Wexford County Council granted permission to Gerard Gannon Properties for a residential development consisting of: 219 no. dwelling units (10 no. 2-bedroom semi-detached units, 64 no. 3-bedroom semi-detached units, 20 no. 3-bedroom detached units, 90 no. 4-bedroom semi-detached units, and 35 no. 4-bedroom detached units), a creche building c. 523 sqm and associated play areas, a new vehicular access/exit onto R725 Carnew Road, the upgrade and improvement of a portion of the existing Kilnahue Lane including the provision of 2 no. vehicular access/exits, together with a playground area, a new connection to existing foul and storm water services, underground attenuation tanks, the removal of an existing dilapidated structure and all associated site works on a site of 15.3 hectares (37.8 acres). Subsequently, an appeal was lodged on 14<sup>th</sup> March 2017 and a decision to refuse permission was made by An Bord Pleanála on 17<sup>th</sup> July 2017.
- **Reg. Ref. 20140557** - By order dated 3<sup>rd</sup> November 2014, Wexford County Council refused permission to Gerard Gannon Properties for a residential development consisting of: 206 dwelling units, creche, 1 no. vehicular access/exit onto R725 and upgrading/improvement of Kilnahue Lane including provision of 2 no. vehicular access exits. The development will consist of 1 no. creche c. 523 sqm, 56 no. 3-bed two-storey semi-detached units, 80 no. 4-bedroom semi-detached units, together with a new connection to existing foul and storm water services, underground attenuation tanks and all associated site works on a site of 15.3 hectares (37.8 acres).
- **Reg. Ref. 20073736 (ABP Ref. PL26.227346)** - By order dated 10<sup>th</sup> December 2007, Wexford County Council refused permission to Gerard Gannon Properties for a residential development consisting of: 247 dwelling units, retail units, and creche/community building, 1 no. vehicular access/exit onto R725 Carnew Road and upgrading/improvement of Kilnahue Lane including provision of 2 no. vehicular access/exits. The development will consist of 2 no. type retail units of c. 120 sqm each, 1 no. creche/community building c. 1,150 sqm, 8 no. type C 3-bed two-storey semi-detached units, 14 no. type C1 3-bed two-storey end of terrace units, 14 no. type D 2-bed two-storey terrace units, 12 no. type E 4-bed three-storey detached units, 12 no. type F 3/4-bed three-storey split level semi-detached units, 2 no. type G 1-bed apartment units, 2 no. type G1 3-bed apartment units, 12 no. type H 3-bed two-storey terrace units, 2 no. type I 1-bed apartment units, 4 no. type J 1-bed apartment units, 6 no. type K 4-bed terrace units, 1 no. type L 2-bed apartment units, together with all associated site works on a site of 15.3 hectares (37.8 acres).

### 4.0 ADDRESSING REFUSAL REASONS ON PREVIOUS APPLICATION

As outlined in the planning history section, the last planning application on the subject site (Reg. Ref. 20160623 - ABP Ref. PL26.248159) was refused.

The grounds for the refusal and how these have been addressed in the proposed application are as follows:

**Reason 1 for Refusing the Previous Application:**

*“The site of the proposed development is located within the development boundary of Gorey Town and Environs Local Area Plan 2017-2023 on lands partly zoned ‘Residential’ and on lands partly zoned ‘Open Space and Amenity’ with the objective “to protect and provide for recreation, open space and amenity area”. Having regard to the siting of a significant component of the residential development on lands zoned for open space and amenity, it is considered that the proposed development would materially contravene the development objective indicated in the Local Area Plan for the zoning of part of the site for open space and amenity purposes and would, therefore, be contrary to the proper planning and sustainable development of the area.”*

**Applicant’s Response in the Proposed Development:**

Under the current Gorey Town and Environs Local Area Plan 2017-2023, 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.”*

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 either 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. It is important to note that no residential development is proposed on the portion of lands zoned as “OS”, and all development is proposed on the appropriately zoned land.

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).

Noteworthy to mention that the timing of adoption of the Gorey Town & Environs LAP also impacted the previous application as well. Wexford County Council in their assessment of the application have confirmed that the proposed development has been assessed under the Gorey Local Area Plan 2010 which was the statutory policy document for the lands at the time. Although there was a Draft Gorey Town & Environs Local Area Plan 2017-2023 prepared for the area, it remained in draft format as it had not yet been adopted at the time of assessing the application. Nonetheless, Wexford County Council had confirmed that the proposed development was broadly in line with the principles and objectives of the Draft Gorey Town & Environs LAP 2017-2023 noting that the lands remain designated for residential development and the proposal provides a considerable quantum of high quality open space which is also identified as a requirement for the lands within the Draft Plan. However, with the adoption of the Gorey Town & Environs LAP 2017-2023 in April 2017, the Council's grant decision was subsequently refused by An Bord Pleanála in July 2017.

Furthermore, 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 total 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 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 Local Area Plan. This also exceeds the open space threshold provisioned in County Development Plan at a rate of around 1 hectare per 150 dwellings or 10% of the site area.

It is important to note that the Parkland is within the portion of the lands which under the adopted Local Area Plan is zoned as "OS - Open Space", however, the provisioned network of pocket parks and shared green spaces are within the "R - Residential" zoning objective, with the latter providing for an overall of 2.82 ha green space.

To illustrate the functionality of the proposed open spaces within the scheme, a large size play area is to be provided in the Parkland, capable of catering for children over 2 years old. 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. This is further reinforced by several pocket parks, shared green spaces, and amenity walks provisioned across the application site. Noted that pocket open spaces can provide play areas for smaller children but not necessarily formal play areas.





Figure 3. Proposed Hierarchy of Green Open Spaces to accord the Zoning Objectives and relevant Planning Policy

As such, it is submitted that the proposed development is consistent with the relevant zoning objectives, planning policy and guidelines in this instance, and also addresses this previous reason for refusal. For further information in this regard, please refer to the enclosed landscape drawings and Landscape Rationale Report prepared by RMDA Landscape Architects + Consultants.

#### Reason 2 for Refusing the Previous Application:

*“The site of the proposed development is on serviceable lands, within the development boundary of Gorey Town, in close proximity to social and community services. It is a requirement, under Section 2.3.8 of the Gorey Town and Environs Local Area Plan 2017-2023, that the Council has regard to the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, issued by the Department of the Environment, Heritage and Local Government in May, 2009, and accompanying Design Manual when considering the appropriate density for residential schemes. In addition, it is an objective of the planning authority (Objective HP08), as set out in Wexford County Development Plan 2013-2019, to ensure the density of residential developments is appropriate to the location of the proposed development to ensure that land is efficiently used. Having regard to the proposed density of the development, at 5.7 dwelling units per acre, it is considered that the proposed development would not be developed at a sufficiently high density to provide for an acceptable efficiency in serviceable land usage given the proximity of the site to the built-up area of Gorey Town and to established social and community services in the immediate vicinity. Furthermore, it is considered that such a low density would be contrary to these Ministerial Guidelines, which indicate that net densities less than 30 dwellings per hectare should generally be discouraged in the interest of land efficiency.*”

*The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.”*

#### **Applicant’s Response in the Proposed Development:**

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 Carnew Road which leads from the town centre. With respect to the ‘*Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009)*’, the proposed development falls within “*Outer Suburban/‘Greenfield’ sites*”. In this context, the Guidelines state that “*whilst the land take of the ancillary facilities remains relatively constant, 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. Development at net densities less than 30 dwellings per hectare should generally be discouraged in the interests of land efficiency, particularly on sites in excess of 0.5 hectares.*”

Furthermore, the ‘*Sustainable Urban Housing: Design Standards for New Apartments (Dec 2020)*’ identifies 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. Outlined in the Guidelines, “*such locations are generally suitable for limited, very small-scale (will vary subject to location), higher density development that may wholly comprise apartments, or residential development of any scale that will include a minority of apartments at low-medium densities (will also vary, but broadly <45 dwellings per hectare net), including:*

- *Sites in suburban development areas that do not meet proximity or accessibility criteria;*
- *Sites in small towns or villages.*

*The range of locations outlined above is not exhaustive and will require local assessment that further considers these and other relevant planning factors. While the provision of apartments may not be required below the 45 dwellings per hectare net density threshold, they can allow for greater diversity and flexibility in a housing scheme, whilst also increasing overall density. Accordingly, apartments may be considered as part of a mix of housing types in a given housing development at any urban location, including suburbs, towns and villages.”*

It is also acknowledged that the view expressed in An Bord Pleanála Reference PL 26.448159 is that net densities below 30 units per hectare should be discouraged. The ABP Pre-Application Consultation Opinion on this SHD also emphasised the necessity to provide for ‘*an acceptable efficiency in serviceable land usage*’.

Along with the location of the application site, the site itself 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 provision for housing and directly associated uses.

Having taken account of the slope and topography of the site and its location on the edge of Gorey Town together with the ABP Opinion, and the Circular NRUP 02/2021 (Residential Densities in Towns and Villages), aforementioned Guidelines, and other relevant planning policy, and upon designing several scenarios yielding various residential densities, the Stage 3 design proposes a higher density. It is proposed that 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, as follows:

- Overall Site Area Subject to this SHD Application: 19.17 ha (incl. off-site upgrade works)
- Net Site Area: 11.15 ha
- Net Density:  $421 \text{ units} \div 11.15 \text{ ha} = 37.7 \text{ uph}$

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 relevant planning policy and guidelines. Therefore, it is submitted that this previous refusal reason has been addressed. For further information in this regard, please refer to the enclosed Architecture Pack prepared by Connolly Architects.

### **Reason 3 for Refusing the Previous Application:**

*“The site of the proposed development is located on lands within the Creagh Neighbourhood Framework Plan, as set out in the Gorey Town and Environs Local Area Plan 2017-2023. It is considered that the siting of residential development on lands zoned for open space and amenity contravenes the provisions of the Framework Plan. It is also considered that the form, scale, layout and density of development proposed for the overall site would fail to establish a sense of place and would not give priority to the needs of pedestrians and other vulnerable road users, over that of vehicular traffic, contrary to the provisions of the Design Manual for Urban Roads and Streets, issued by the Department of the Environment, Community and Local Government in 2013, and would be incompatible with the provisions of the Creagh Neighbourhood Framework Plan, which seeks to facilitate the design of new development areas using robust urban block structures, with a presumption in favour of a perimeter block typology, and to encourage a variety of building types which reflect the function and hierarchy of routes and spaces in the area. Furthermore, by reason of the layout of the proposed development, which would remove the bulk of the existing site features, including hedgerows and the relict laneway, the proposed development would fail to reflect the provisions of the Creagh Neighbourhood Framework Plan, which requires that such features be respected and enhanced as part of an improved and integrated green infrastructure network. The proposed development would, therefore, undermine the provisions of the Creagh Neighbourhood Framework Plan, would contravene the provisions of the Local Area Plan and would, therefore, be contrary to the proper planning and sustainable development of the area.”*

### **Applicant’s Response in the Proposed Development:**

Appendix 1 of the 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 4 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 (Carlow Road) to Ramsfortpark Forest to the east. This also includes the application lands.

The subject lands are located to the most south-western end of the Creagh NFP area, as outlined in the Figure 4 below. As can be seen, with the zoning objectives of the Gorey Town & Environs LAP, the proposed conceptual layout for the area comprises of perimeter blocks arranged to form a radial grid around the green open space to the north-western portion of the lands. Outlined in the Plan, the NFP is based around three concepts of “place concept”, “route concept”, and “landscape concept”, however, given the unique site setting in this instance, this conceptual plan is suggested to be specified by a location-based criterion acknowledging the locational attributes of the lands.

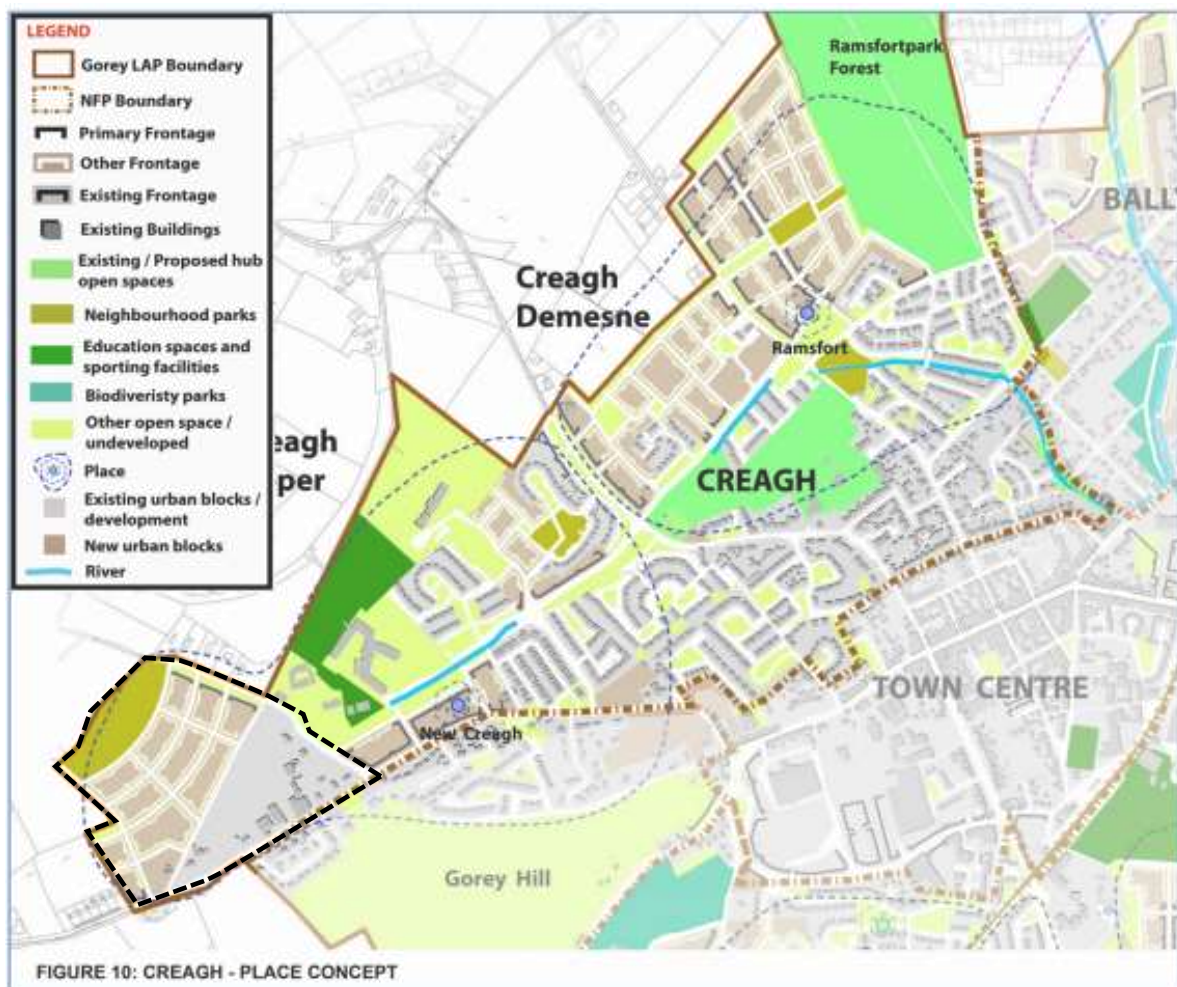


Figure 4. Creagh Place Concept extracted from the LAP (approximate boundaries of the subject site is dashed in black)

The subject lands situated on the side of a hill, and therefore the terrain on site is undulating, rising steadily from the southeast to its summit in the northwest. The development site is significantly sloped with falls in level of more than 29 metres from the western and northern sides towards south and east. This unique site setting and hilly topography effectively hinder development of the site, which also have a greater impact on the uptake of cycling and walking. With respect to these locational attributes and upon pre-application consultation meetings with both Local Authority and An Bord



Pleanála, and the ABP Opinion Letter, the conceptual layout of the site provisioned within the Creagh NFP has adjusted to meet the relevant planning policy and guidelines while having regard to the site setting. Therefore, the proposed development is laid out in residential clusters and urban blocks as envisaged in the Local Area Plan with the apartment blocks located at the lower levels of the site.

The development will provide a significant level of distinctiveness through establishing this emerging area of Kilnahue as a unique and identifiable place. The layout and massing provide a clear and different response to the severely sloping site while creating several different character areas which will provide a sense of belonging and ownership. The proposed scheme is set out to form these character areas around provisioned facilities and amenities to create high quality environment and neighbourhoods. These services and amenities include 1 no. childcare facility, a multi-purpose building comprising of 2 no. community rooms with 2 no. retail units, a parkland and several pocket parks and shared open spaces which would positively contribute to creating a sense of place.

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, with respect to the unique site setting properties and topography. The entrance to the development from Carnew Road is announced with a unique “Entrance Building” which is a landmark apartment building, evoking a strong sense of place and announces the scheme by its height, mass, and physical characteristics.



*Figure 5. Proposed Layout the Scheme*

The layout of the scheme has been designed to promote permeability and openness through the site and across the new public park. As illustrated in the Figure 5 above, the topography of the site determines a road network defined by three primary northeast-southwest roads formed working with



the levels and contours across the site. This road network is further complemented by tertiary roads providing access to the residential areas.

Travel routes within the development have been designed with reference to the principles established by DMURS and are arranged in a manner that reduces excessively long vehicular routes while maintaining pedestrian links across the site. The design of the layout has been informed by prioritising the cyclists and pedestrians.

The landscape element of the scheme aims to not only meet the relevant planning policy and guidelines, but also to marry the external amenity spaces together, and create a visual continuity between the scheme and its wider context providing for effective integration of green spaces into the overall planning and design process. In this regard, a hierarchy of green open spaces is proposed, including a large Parkland, designed as a key element of the scheme located to the north-western portion of lands. This includes a large size play area and 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. This is further reinforced by providing for a number of pocket parks, communal and habitat spaces, and amenity walks to amplify the design and improve the level of amenity and quality of life within the subject lands and the wider area.

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 provision for a 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, be it, single professionals, young couples, small young families, older families, the elderly, those looking to downsize, etc.

Therefore, it is submitted that the whole design process is based upon developing a “place concept”, “route concept”, and “landscape concept”, all informed by the requirements of the Creagh NFP and other relevant local planning policy, and efficiently utilising the locational and topographical attributes of the lands to provide for a well-integrated development. For further information in this regard, please refer to the enclosed landscape drawings and Landscape Rationale Report prepared by RMDA Landscape Architects + Consultants and Architecture Pack prepared by Connolly Architects.

#### **Reason 4 for Refusing the Previous Application:**

*“Having regard to the uncertainty regarding the timing of, and statutory approvals that may be required for, the improvement works outlined in the application to the R725 (Carnew) Road, to Kilnahue Lane and to the junction of Kilnahue Lane with the R725, it is considered that any development of the subject lands would be premature pending the provision of these improvement works. Furthermore, it is considered that, if developed prior to the carrying out and completion of these improvement works, the proposed development would endanger public safety by reason of traffic hazard, including hazard*

*to pedestrians and cyclists. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.”*

#### **Applicant’s Response in the Proposed Development:**

Waterman Moylan Consulting Engineers have addressed this response within their Engineering Pack, which the Board are invited to refer to. The proposed development includes road upgrade works to R725 (Carnew) Road and at Kilnahue Lane. These upgrade works have been discussed and agreed with Wexford County Council, and are follows:

**Carnew Road Upgrades:** A new footpath has been provided by Wexford County Council along the northern side of Carnew Road, extending from the Kilnahue Lane intersection as far as CH 510. As part of the subject development, the following upgrades are proposed along Carnew Road:

- Continuation of the existing footpath along the north side of Carnew Road from CH 500 to the proposed site entrance and continuing beyond the entrance to the existing residential/agricultural access at CH 690.
- Introduction of a new cycle lane adjacent to the site entrance on Carnew Road, with the roadway to be widened into the verge between CH 565 and CH 630 to accommodate the new cycle lane.
- Introduction of street lighting and signage near the site entrance.

The extent of the overall upgrade works and what is already completed by Wexford County Council is shown on Waterman Moylan Drawing No. 13-119-P4109. The proposed upgrade works to Carnew Road are shown on Waterman Moylan Drawing No. 13-119-P4110.

**Kilnahue Lane Upgrades:** The following upgrades are proposed along Kilnahue Lane:

- The road is to be widened as far as the north-western boundary of the site.
- New footpaths and cycle lanes are to be provided along the road where it bounds with the site.
- New traffic calming measures are proposed
- It is proposed to introduce a new unsignalised raised priority-controlled zebra crossing with flashing amber beacons

The proposed upgrade works to Kilnahue Lane are shown on Waterman Moylan Drawing No.’s 13-119-P4130 and 13-119-P4131.

**Carnew Road/Kilnahue Lane Junction:** Improvement works were previously carried out at the Carnew Road/Kilnahue Lane junction by Wexford County Council in 2018. As part of the proposed development, it is proposed to further upgrade the junction, as requested by WCC.

- It is proposed to signalise the existing Carnew Road/Kilnahue Lane junction (which currently functions as a priority junction). The proposed signalisation will not alter existing kerb alignments.
- Appropriate speed limit signage is to be added as part of the junction upgrade.

The proposed junction signalisation works are shown on Waterman Moylan Drawing No. 13-119-P4131. All of the proposed road upgrade works are to be carried out during the first phase of construction, and all of the proposed upgrade works are to be fully completed prior to any of the units in the development being occupied. It is submitted that this now addresses this previous refusal reason.

## 5.0 PRE-APPLICATION CONSULTATION

### 5.1 Pre-Application Consultation with Wexford County Council

#### 5.1.1 Formal Section 247 Pre-planning Consultation (meeting no. 1)

Section 247 Pre-Application Consultation with the Planning Authority required under the Planning and Development (Housing) and Residential Tenancies Act 2016 took place on 10<sup>th</sup> October 2017 in the offices of Wexford County Council. The initial concept design for the application site which were presented at this meeting provided for c. 340 dwelling units provisioned in a mix of houses, apartments and duplex apartments.

Those in attendance from Wexford County Council consisted of James Lavin, Planning (Senior Executive Planner), Neville Shaw, Water Services (Senior Executive Engineer), and Harriet Redmond, Housing (Administrative Officer), the Design Team consisted of Michael Connolly, PJ Sutton (Connolly Architects), and John Downey, Director (Downey Planning), and client's representative, Jim Kenny (Gannon Homes).

The proposal set out during this consultation states that the initial, preferred scheme consisted of a residential scheme comprised of 350 no. units with a net density of c. 31.2 units per hectare. The site layout plan submitted as part of this 247 Pre-Application Consultation with the Planning Authority is presented in the Figure 6 below:



Figure 6. Initial, Preferred Concept Design Presented in the Pre-application Consultation Meeting with the Local Authority

This consultation resulted in the design team giving further due consideration to density, creation of distinctive clusters across the scheme, permeability and provision for pedestrian and cycling linkages, green open spaces and the public park, creche location, etc. This ultimately helped to inform the design of the proposed development.

### 5.1.2 Formal Section 247 Pre-planning Consultation (meeting no. 2)

The formal Section 247 Pre-Application Consultation with the Planning Authority required under the Planning and Development (Housing) and Residential Tenancies Act 2016 took place on 15<sup>th</sup> August 2018 in the offices of Wexford County Council. This was logged under Wexford County Council Pre-Application Consultation Ref. Pre Planning Number (P20180460). The engineering proposals including road, drainage, and watermain were presented at this meeting. Proposals for cycleway upgrades were also discussed.

Those in attendance from Wexford County Council consisted of James Lavin, Planning (Senior Executive Planner), Fionnuala Callery, Water/Sanitary Services (Senior Executive Engineer), and Neil Dempsey, Fire Office (Executive Engineer), Niall McCabe, Housing (Administrative Officer), the Design Team consisted of Mike Connolly, PJ Sutton (Connolly Architects), Darragh Aiken, Senior Engineer (Waterman Moylan Consulting Engineers), Cormac Langan (Landscape Architect), and John Downey, Director (Downey Planning), and client's representatives, Jim Kenny and Michelle Kavanagh (Gannon Properties).

This consultation meeting resulted in the design team giving further due consideration to the roads, services, environmental elements, design and layout of the scheme, etc. The Local Authority feedback also included emphasis on the relevant planning and policy, accessibility and designing for "life-time homes", building control, and Fire Safety Certificates.

## 5.2 Part V Engagement

Part V of the Planning and Development Act, 2000 (as amended) applies to the proposed development. In order to reach an agreement regarding compliance with Section 96 of Part V of the Planning and Development Act, 2000 (as amended), the client engaged with the Housing Department of Wexford County Council. In accordance with the Council's requirements and upon sending a booklet of indicative costings to the Department, the client has received a validation letter from Wexford County Council's Housing Department. Noted that in light of recent Part V amendments following Housing Act 2021 and Housing Circular 28/2021 on Affordable Housing Act 2021, the Part V provision within the scheme was revisited, providing for a total 84 no. units of the overall 421 units. The 84 no. units designated for Part V, i.e. 20% of the overall units proposed, consist of 42 no. social housing and 42 no. affordable/cost rental units. These have been identified on the architectural drawings and detailed schedule of accommodation (Housing Quality Assessment) prepared by Connolly Architects. In accordance with the Council's requirements, indicative costings are enclosed as part of this planning application. A validation letter from Wexford County Council's Housing Department is also enclosed with this planning application. Thus, it is considered that the proposal meets the requirements of Part V of the Planning and Development Act, 2000 (as amended).

## 5.3 Pre-Application Consultation with An Bord Pleanála

### 5.3.1 Formal Section 5 Pre-application Consultation

Following consultation with Wexford County Council under Section 247 of Planning and Development Act, 2000 (as amended), a request to enter into pre-application consultation with An Bord Pleanála was submitted on 30<sup>th</sup> January 2019, with An Bord Pleanála subsequently accepting the Section 5 pre-

application consultation request. The pre-application consultation meeting was then held at the offices of Wexford County Council on 8<sup>th</sup> March 2019. This meeting included representatives from An Bord Pleanála, Wexford County Council, the applicant and their design team.

On 19<sup>th</sup> March 2019, An Bord Pleanála issued the notice of pre-application consultation opinion for the proposed development, under case reference ABP-303583-19. Having regard to the above, the opinion states that An Bord Pleanála *“following consideration of issues raised during the consultation process, and having regard to the opinion of the planning authority, An Bord Pleanála is of the opinion that the documentation submitted requires further consideration and amendments to constitute a reasonable basis for an application for strategic housing development to An Bord Pleanála.”*

The opinion further states that *“pursuant to article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is hereby notified that, in addition to the requirements as specified in articles 297 and 298 of the Planning and Development (Strategic Housing Development) Regulations 2017, the following specific information should be submitted with any application for permission”* and notes 8 items to be submitted with any application.

The Board’s opinion letter further states that, *“in addition to the requirements as specified in articles 297 and 298 of the Planning and Development (Strategic Housing Development) Regulations 2017, the following specific information should be submitted with any application for permission:*

1. *A planning report which coherently addresses the reasons for refusal in previous reason for refusal.*
2. *A report which outlines the timing and responsibility for the delivery of the proposed road upgrades.*
3. *A phasing plan which provides for the early delivery of the proposed neighbourhood park.*
4. *A report that specifically addresses the proposed materials and finishes of the proposed structures, the treatment of private amenity areas, landscaped areas, pathways, entrances and boundary treatment/s. particular regard should be had to the requirement to provide high quality and sustainable finishes and details which seek to create a distinctive character for the development, avoiding blank façades and render and creating active frontages and corners. The documents should also have regard to the long term management and maintenance of the proposed development.*
5. *A report should include full and complete drawings including levels and cross sections showing the relationship between the development and adjacent residential units, public pathways and interfaces with the public realm.*
6. *A detailed schedule of accommodation which shall indicate compliance with relevant standards in the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities’ 2018.*
7. *A life cycle report shall be submitted in accordance with section 6.3 of the Sustainable Urban Housing: Design Standards for New Apartments (2018).*
8. *A site layout that details any areas to be taken in charge by the local authority.*



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 Planning.

### **Further Pre-Application Consultation with Wexford County Council**

At this juncture, it is also important to note that this application now being submitted for a proposed Strategic Housing Development is the result of a detailed design review of the proposed development by the applicant and design team following receipt of the Board’s Pre-Application Consultation Opinion. It is also the result of further Section 247 pre-application consultation on 2<sup>nd</sup> September 2021 between the relevant design team consultants and Wexford County Council’s Roads, Housing and Water/Sanitary Departments, and Fire Office, prior to the formal lodgement of the application. Irish Water were also further consulted prior to lodgement. There were also off-line discussions with Wexford County Council’s Internal Departments.

## 6.0 DESCRIPTION & MERITS OF THE PROPOSED DEVELOPMENT

### 6.1 Description of Proposed Development

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.”*

The key characteristics of the proposed development are set out below for the convenience of the Board:

*Table 1. Key Characteristics of the Proposed Development*

<b>Overall Site Area Subject to this SHD (incl. the off-site upgrade works)</b>	19.17 ha
<b>Net Site Area</b>	11.15 ha
<b>No. of Residential Units</b>	421
<i>Houses</i>	133
<i>Duplexes</i>	60
<i>Apartments</i>	228
<b>HOUSES</b>	
<i>3 Bedroom Units</i>	115
<i>4 Bedroom Units</i>	18
<b>DUPLEXES</b>	
<i>1 Bedroom Units</i>	4
<i>2 Bedroom Units</i>	26
<i>3 Bedroom Units</i>	30
<b>APARTMENTS</b>	
<i>1 Bedroom Units</i>	76
<i>2 Bedroom Units</i>	145
<i>3 Bedroom Units</i>	7
<b>Net Density</b>	37.7 uph
<b>Car Parking Spaces</b>	759 no. spaces

<b>Bicycle Parking Spaces</b>	480 no. spaces
<b>Residential Amenities</b>	a childcare facility, 2 no. community rooms and 2 no. retail units

## 6.2 General Layout

The layout to the proposed development can be summarised as below:

- Primary vehicular circulation is based on the three Routes, i.e., the Park Avenue, the Middle and the Lower Avenues which follow the contours and topography of the site.
- The Avenues create and define the Urban Design of the development and allow the visual transition between the different site levels. The Avenues further define the Character Areas within the development.
- The Lower Avenue connects the entrance from R725 Carnew Road along the lower levels of the development and track the old rural lane which ceased to exist some time ago.
- A Distinctive Landmark building is located at the entrance to the estate from the Carnew Road. This signals the distinctiveness and identity of the development.
- A link road running northwards up the slope connects to the Middle Avenue and to the Park Avenue beyond. This provides the primary means of vehicular access and connects to all secondary routes within the development. The road design and layout have been carefully designed to ensure that Kilnahue Estate will not become a through route for non-residents.
- The Park Avenue provides access for the Residents and other users to the Public Park. Housing is laid out in an 'Urban Villa' arrangement overlooking the park thus giving a strong edge to the public open space.
- The development is laid out in residential clusters and urban blocks as envisaged in the Local Area Plan. Apartment Blocks are located at the lower levels of the site
- The layout of the scheme has been designed to promote permeability and openness through the site and across the new Public Open Space Park
- The layout and 'Desire Line' routes, through the development promote passive surveillance of the site and allow visual connections to the shared amenities provided throughout the site.
- Travel routes within the development have been designed with reference to the principles established by DMURS and are arranged in a manner that prevents excessively long vehicular routes while maintaining pedestrian links across the site.
- Many well landscaped pocket parks, smaller open spaces and pedestrian links are provided throughout to provide visual amenity. The existing tree borders have been retained where viable and have been fully integrated into the overall landscape strategy
- The Crèche is located adjoining Kilnahue Lane to mark the entrance to the development and recognise that many of the users may come from outside the Kilnahue Development. A dedicated play area is located nearby.

### 6.3 Building Height and Form

The height of the proposed development will range from 2 storeys to 4 storeys, with the variation in height being supported by the variation in housing types and the different character areas. This includes four-storey apartment buildings, three-storey duplex buildings in two typologies, and conventional own door housing on own curtilage. The designers have also utilised the existing characteristics of the site to determine the appropriate buildings heights and form, i.e., 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. Therefore, the heights being proposed are suggested to be consistent with national planning guidelines, particularly the *“Urban Development and Building Heights Guidelines for Planning Authorities (December 2018)”*.

### 6.4 Communal and Public Open Space

There is a range of communal open space areas provided throughout the application site. In accordance with the Creagh Neighbourhood Framework a Neighbourhood Park has been designed which extends to 2.80 hectares. Furthermore, a total of 2.82 hectares 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 Local Area Plan. Noted that this exceeds the public open space threshold provisioned within the County Development Plan at a rate of around 1 hectare per 150 dwellings or 10% of the site area.

The provisioned range of green open spaces within the scheme comprises of a large Parkland, several pocket parks, communal and habitat spaces. The Parkland is located to the north-western portion of the site and is primarily the outcome of site natural setting and topography, which has made the land un-developable in terms of housing provision. Therefore, it is considered that provision for a large Parkland represents an optimum design solution and an efficient use of this portion of the lands, which also notably improves the level of amenity and quality of life within the subject lands and the wider area. In terms of functionality, the Parkland comprises of a large size play area featured with a variety of amenities. This co-locates with the playing pitch, MUGA, natural playing elements and a woodland walk. As mentioned earlier, several informal kickabout and soft zones are also proposed across the scheme, which are to be equipped for safe play. It is also envisaged that the play area associated with the childcare facility to be useable by the residents.

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. Landscape design will play an important role in marrying the external amenity spaces together, and creating visual continuity between the scheme and its wider context.

In addition to the above, 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 between spaces. Appropriate separation distances have been provided between buildings to ensure privacy without compromising internal residential amenity of the apartments.



Figure 7. Hierarchy of Green Open Spaces throughout the Scheme (source: RMDA Landscape Architects)

## 6.5 Private Open Space

Private open space has been provided for all houses by way of private gardens to the rear or side of a house, or balconies/terraces for the apartments. Noted that provision for private open spaces for the apartments is also in full compliance with the requirements of the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities 2020.

## 6.6 Density

As outlined earlier, the site subject to this SHD application extends to approximately 19.17 hectares (including the off-site upgrade works), however, it is characterised with a unique setting which appears as both an opportunity to deliver a distinct development fused within topographical feature of the site, and a constraint which restricts the quantum of developable land to provision for housing and directly associated uses. It is also acknowledged that the view expressed in An Bord Pleanála Reference PL 26.448159 is that net densities below 30 units per hectare should be discouraged. The ABP Pre-Application Consultation Opinion on this SHD also emphasised the necessity to provide for *'an acceptable efficiency in serviceable land usage'*.

Having taken account of the slope and topography of the site and its location on the edge of Gorey Town together with the ABP Opinion, the Stage 3 design proposes a higher density at 37.7 units per hectare. Excluding the Neighbourhood Park, central distributor road, and un-buildable/severely sloped lands, the development area stands at 11.15 hectares, and with respect to the overall proposed number of units at 421 dwellings, the density of c. 38 units per hectare would be achieved.

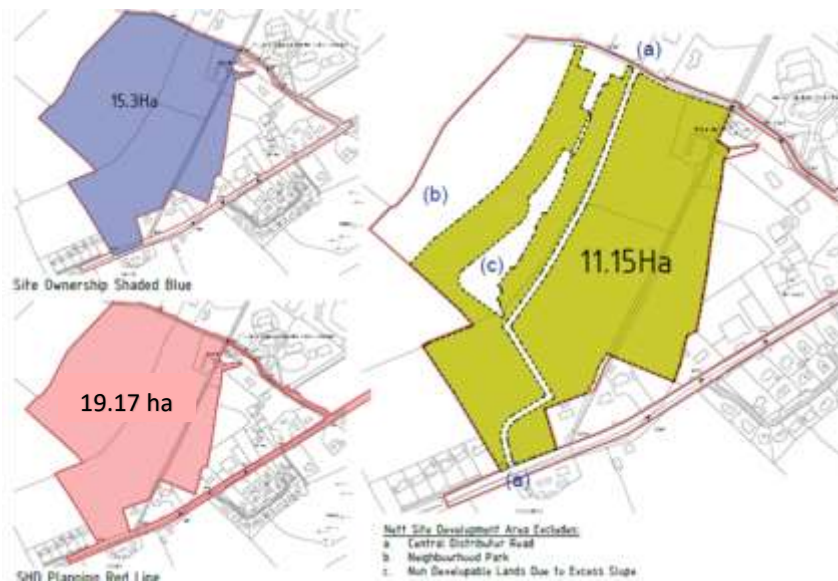


Figure 8. Indication of Net Density Calculation for the Proposed Scheme

This is consistent with HP08 of the Gorey Local Area Plan 2017-2023, and has been calculated as per the provided guidance on the Appendix A of the “Sustainable Residential Development in Urban Areas and Best Practice Urban Design Guidelines (2009)”.

- Overall Site Area Subject to this SHD Application: 19.17 ha
- Net Site Area: 11.15 ha
- Net Density: 421 units ÷ 11.15 ha = 37.7 uph

As per, the residential density of the proposed development is in keeping with the decision of an Bord Pleanála and is consistent with the DEHLG Guidelines on “Sustainable Residential Development in Urban Areas and Best Practice Urban Design Guidelines (2009)” and accompanying Design Manual.

In light of the objectives and constraints associated with the development site, it is considered that the density proposed represents an optimum design solution and an efficient use of the site.

## 6.7 Unit Mix

The proposed scheme provisions for an overall of 421 no. residential units, offering a variety of unit mix in terms of size and type, as summarised in the Table 2 below.

Table 2. Proposed Residential Mix Statistics

Dwelling Type	Unit Type	Bedroom Provision	No. of Units
Apartments	1 Bed Apartments	1 Bed	76
	2 Bed Apartment (3 Person)	2 Bed	20
	2 Bed Apartment (4 Person)	2 Bed	125
	3 Bed Apartments	3 Bed	7
Duplexes	1 Bed	1 Bed	4
	2 Bed	2 Bed	26
	3 Bed	3 Bed	30

<b>Terraced Houses</b>	4 Bed End of Terrace	4 Bed	18
	3 Bed Mid & End Terrace	3 Bed	106
	3 Bed Semi Detached	3 Bed	8
<b>Detached Houses</b>	3 Bed Detached	3 Bed	1
<b>Total</b>	<b>421</b>		

This will provide significant diversity of dwelling types to meet the policy stated in the Gorey LAP 2.3.7 Housing Mix. The proposal also allows for a wide choice of dwelling types meeting the needs of people of all age groups and stages of personal and family life.

The mix of unit types is provided in the development in a series of character areas and urban blocks ensuring choice in both unit type and location while maintain a sense of enclosure and belonging by providing clear identifiable residential zones.

Further to provision for a 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, be it, single professionals, young couples, small young families, older families, the elderly, those looking to downsize, etc. 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.

## 6.8 Car & Bicycle Parking

The proposed development provides for 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.

All houses have two car parking spaces either within or close to their curtilages. The hard standing has been designed to allow for one space to be adapted for use by disabled persons in the future. In addition, visitor spaces have been provided throughout the proposed development. The parking spaces for apartments have been provided across surface, undercroft/podium, and basement level. It is proposed to provide car parking spaces serving the childcare facility, community rooms and retail units as part of the overall development.

Please refer to the enclosed Car Parking Compliance prepared by Connolly Architects and Traffic and Transport Assessment prepared by Waterman Moylan Consulting Engineers for further details on the proposed car parking and bicycle parking to serve the proposed development and the Statement of Consistency with Planning Policy report prepared by Downey for further information in this regard.

## 6.9 Residential Amenities

The proposed development will also provide for a purpose-built single-storey detached childcare facility extending to c. 565 sqm to accommodate for approximately 89 children within the site with appropriate outdoor play space, drop off facilities, etc. The proposed development will also provide

for a multi-purpose building comprising of 2 no. community rooms and 2 no. retail units to serve for the local needs.

A Childcare Provision Assessment Report has been prepared by Downey Planning and submitted with this Strategic Housing Development application which demonstrates that there is sufficient capacity within area to cater for the proposed development and that the proposed childcare facility will sufficiently provide an appropriate level of childcare facilities to serve the future residents of the scheme. Please refer to the enclosed Childcare Provision Assessment Report, School Demand Assessment Report, Community Infrastructure and Social Audit, and the Statement of Consistency with Planning Policy report prepared by Downey Planning for further information in this regard.

### 6.10 Materials & Finish

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 selected render. Roofs will be fibre cement slated or matching concrete roof tiles in a blue-black color. Apartment and duplex buildings will be finished in brickwork and stone paneling thus reducing maintenance. This will be combined within proprietary-colored panels to provide variation in color and reduce maintenance. Roofs to these buildings will be metal clad in an appropriate color to maintain visual consistency. Some proprietary cladding is used to define service and utility areas. Balcony guarding will generally be of frameless glass with an aluminum base frame. Ancillary fixtures such as rainwater goods will be color coated metal which will be visually complimentary to the uPVC windows and external doors.

Please refer to the plans, sections, and elevation drawings and Architectural Statement prepared by Connolly Architects for further details on the designs, materials, and finishes. Please also refer to the photomontages and CGIs prepared by Digital Dimensions.

## 7.0 LOCAL PLANNING POLICY CONTEXT

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.

## 7.1 Wexford County Development Plan 2013-2019

### 7.1.1 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.”*

### 7.1.2 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



Figure 9. Gorey within the Core Strategy Map (extracted from the Development Plan)



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.

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
<b>Larger Towns</b>						
Enniscorthy	2,101	92.75	1,060.04	379	7,580	+286.25
New Ross	2,101	87.12	995.75	39	790	-48.12 <sup>7</sup>
<b>Gorey</b>	2,101	89.46	1,022.48	121	2,420	+31.54
<b>District Towns</b>						
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 10. 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.

### **7.1.3 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.

#### **7.1.4 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.

#### **7.1.5 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.

### 7.1.6 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 3. 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>



	Assessment Screening Report prepared by Openfield Ecological Services for further details.
<b>18.5 Environmental Impact Assessment</b>	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.
<b>18.6 Flood Risk Management</b>	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.  Please refer to the Flood Risk Assessment prepared by Waterman Moylan Consulting Engineers for further information in this regard.
<b>18.7 Sustainable Drainage Scheme (SuDS)</b>	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: <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> Please refer to the pertaining documents and drawings prepared by Waterman Moylan Consulting Engineers demonstrating compliance in this regard.
<b>18.8 Accessibility</b>	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: <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 11. Minimum Internal Space in a Dwelling</i></p> <table border="1" data-bbox="555 1126 1353 1328"> <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> <li>- Please refer to the enclosed landscape drawings and report prepared by RMDA Landscape Architects + Consultants for further information in this regard.</li> </ul>
<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</p>



	<p>regard, please see the enclosed Architectural Statement &amp; pertaining drawings prepared by Connolly Architects, which confirm that the proposed development complies with the aforementioned guidelines.</p>
<b>18.10.12 Energy Efficiency</b>	<p>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.</p>
<b>18.10.13 Refuse/Recycling/Fuel</b>	<p>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.</p>
<b>18.10.14 Access</b>	<p>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.</p> <p>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.</p>
<b>18.10.15 Materials</b>	<p>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.</p>
<b>18.10.16 Taking in Charge</b>	<p>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</p>

	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 12. 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>	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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<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>													

## 7.2 Gorey Town and Environs Local Area Plan 2017-2023

### 7.2.1 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."*

### 7.2.2 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-eastern 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."*

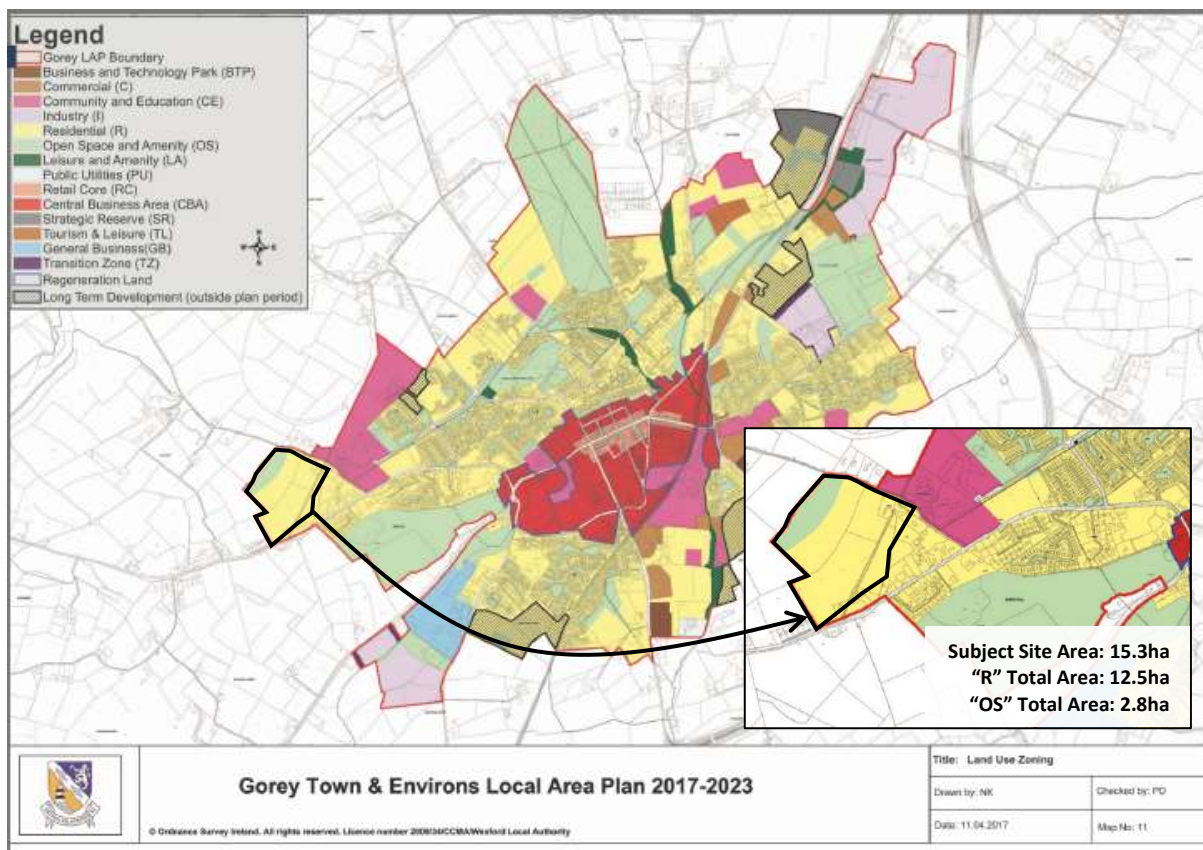


Figure 13. Land Use Zoning Map Extracted from the County Development Plan (application site outlined in black)

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).

### **7.2.3 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>1</sup>. The LAP states that between April 2011 and the end of 2015, it is estimated that 50<sup>2</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

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<sup>1</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>2</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 amenity 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, i.e. a total of 84 units.

**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 at Kilnahue & Gorey Hill 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 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 4. 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 4 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.

#### **7.2.4 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.

### **7.2.5 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.”*

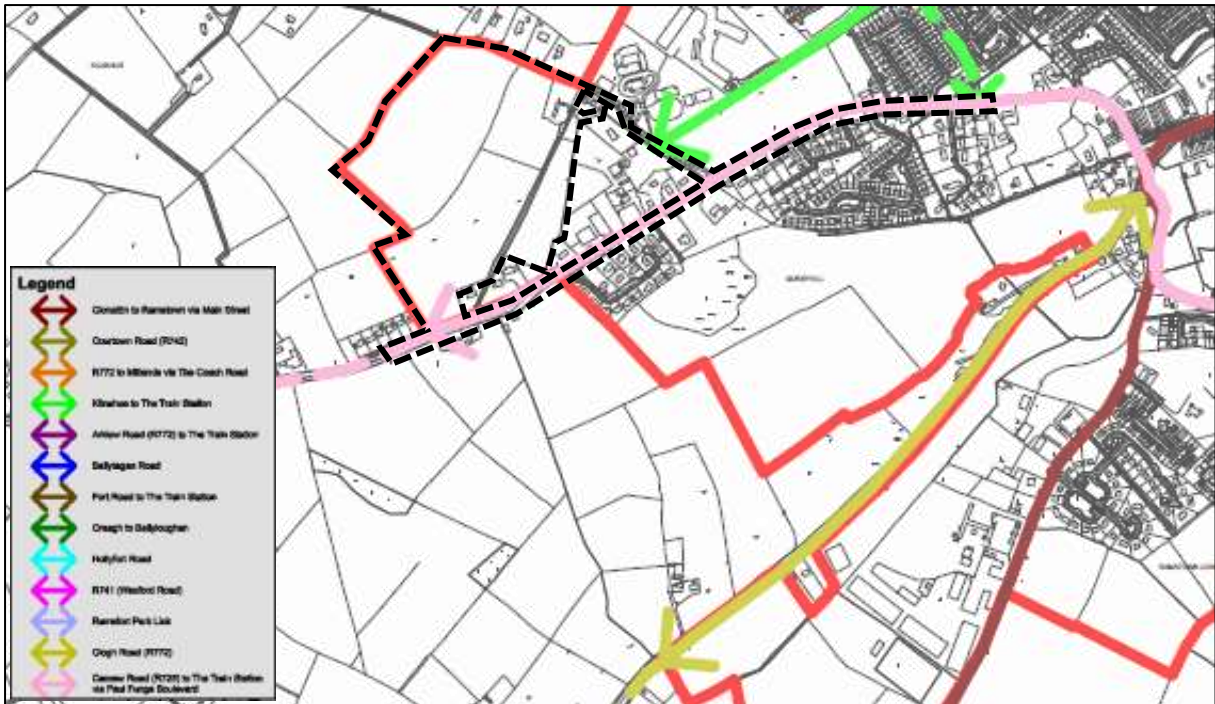


Figure 14. Existing and Proposed Footpath Map extracted from LAP (approximate boundaries of the subject site dashed in black)

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.”*

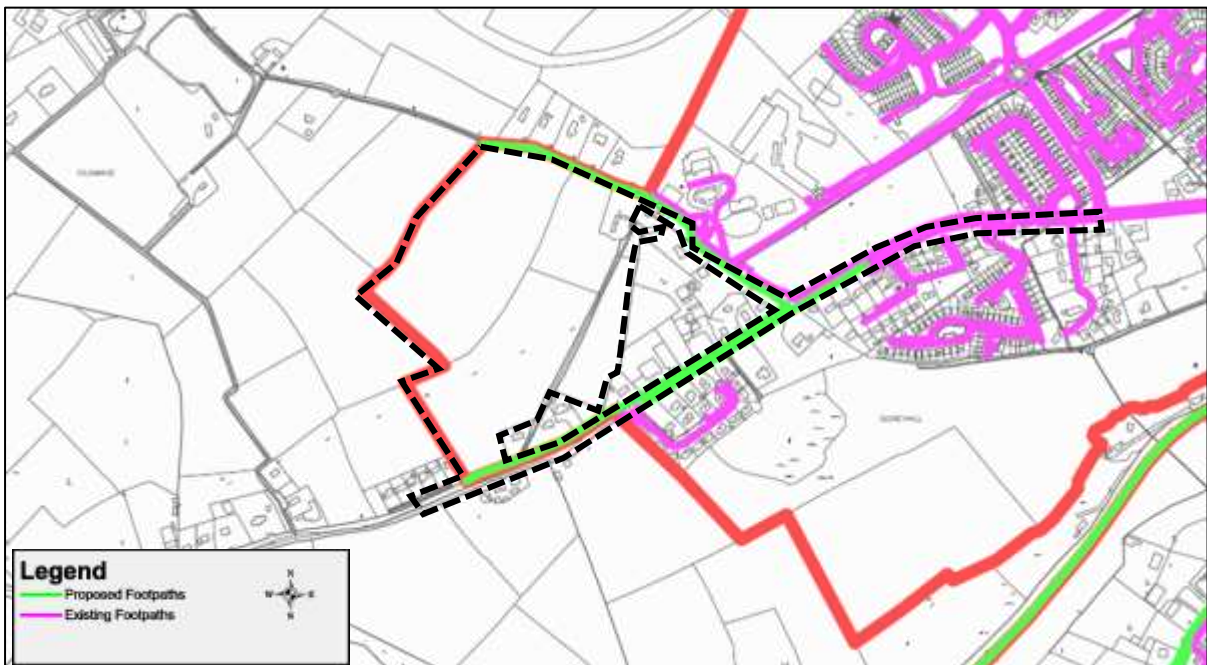


Figure 15. Proposed Cycling Network extracted from the LAP (approximate boundaries of the subject site dashed in black)

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 the Gorey Town Centre. as illustrated in the Figure 16 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 access point along each Carnew Road and Kilnahue Lane is provisioned.

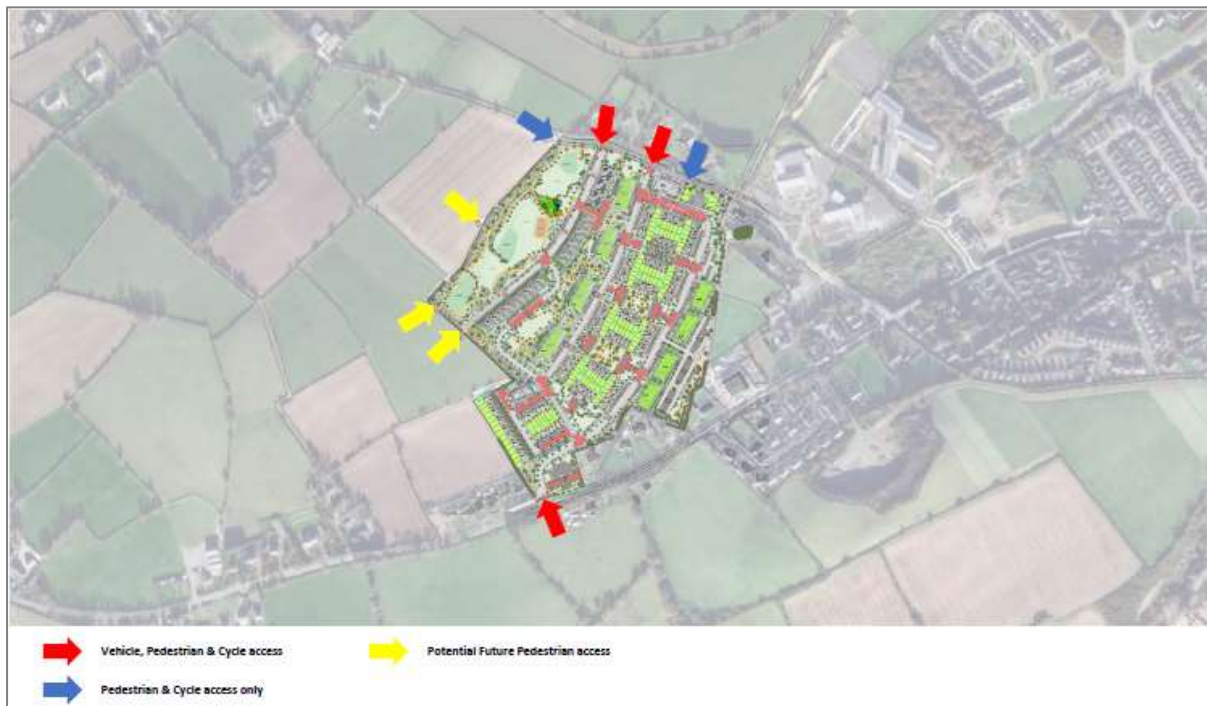


Figure 16. Proposed Access Points from Subject Site linking the Lands to its wider Surrounding and the Town Centre



Figure 17. 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.

### 7.2.6 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.

### 7.2.7 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 18 on the next page, 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.

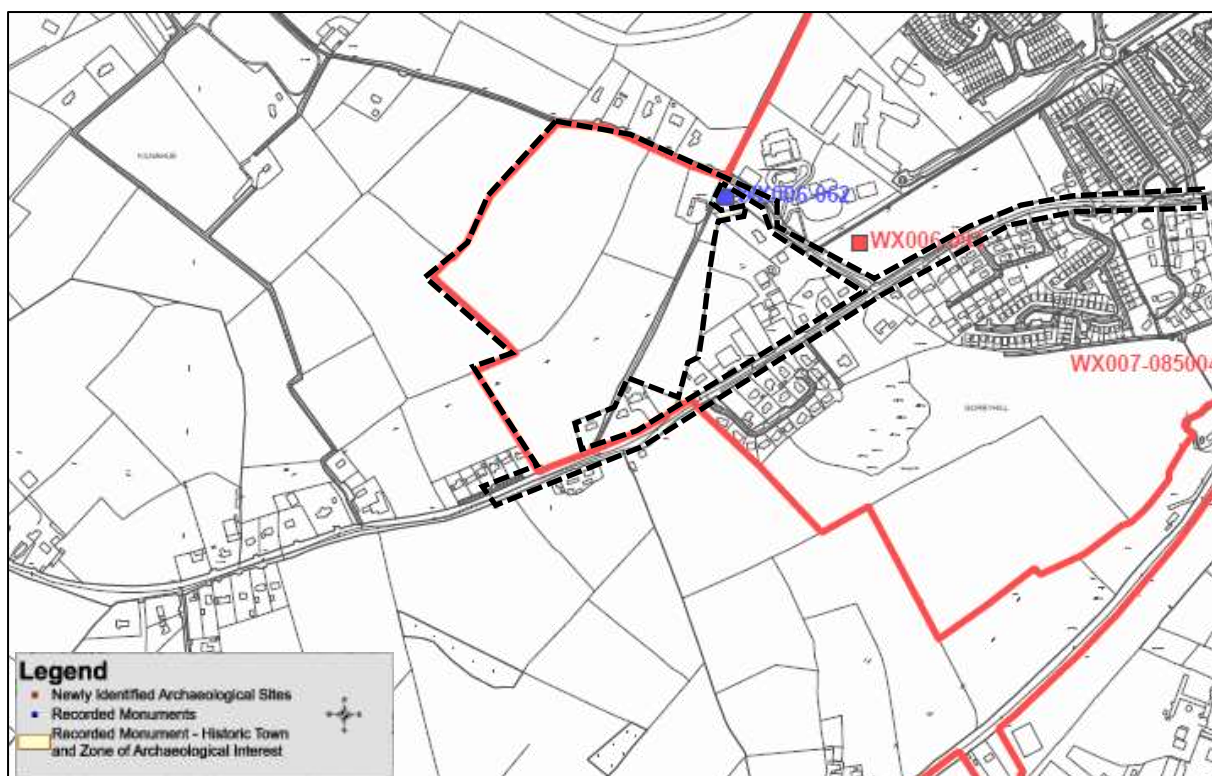


Figure 18. Archaeological Heritage within the Subject Site extracted the LAP (approximate boundaries of the subject site dashed in black)

### **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 accompanied by an Environmental Impact Assessment Report enclosed with this SHD application.

### 7.3 Creagh Neighborhood 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 (Carlow Road) to Ramsfortpark Forest to the east. This also includes the application lands.

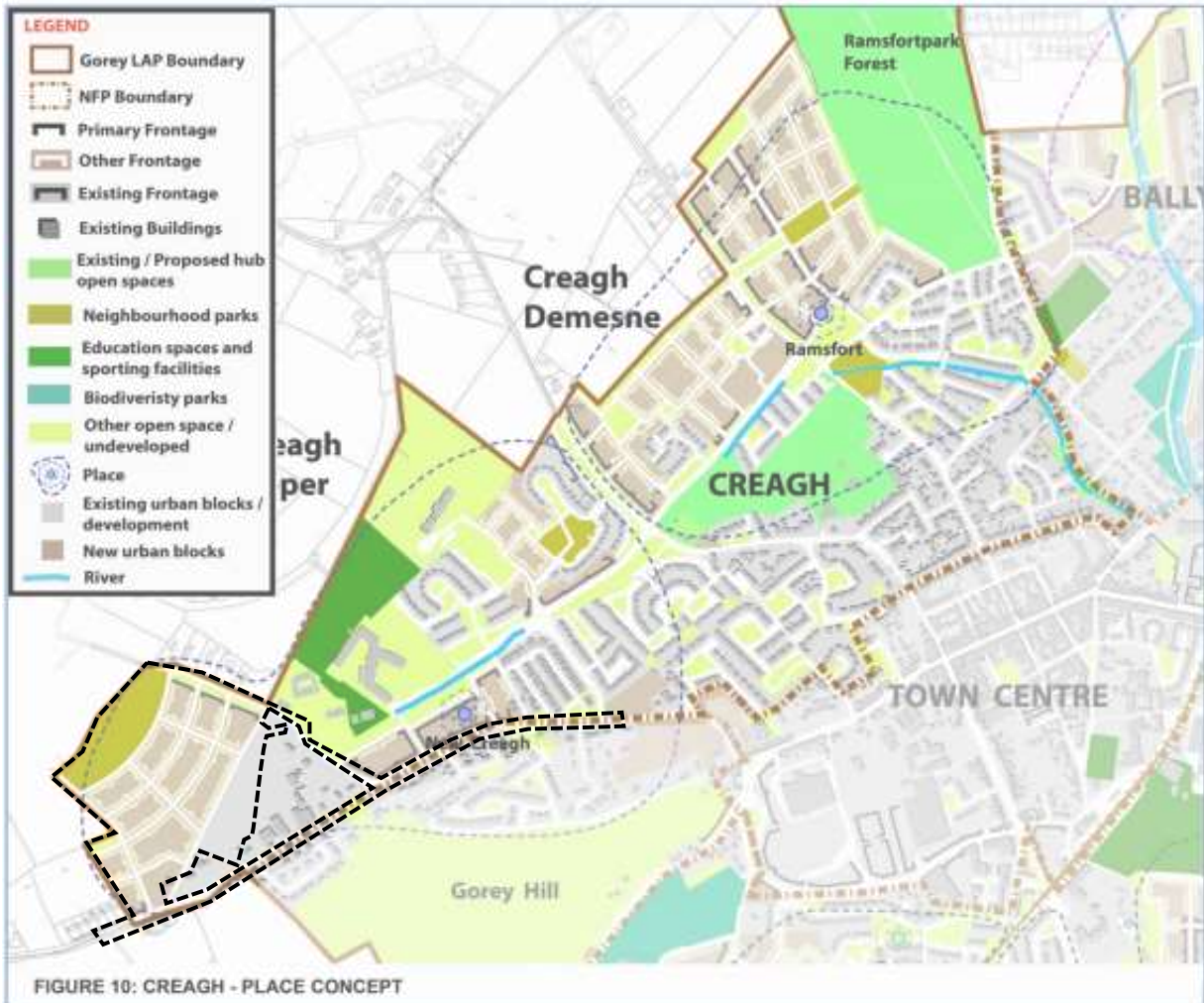


Figure 19. Creagh Place Concept extracted from the LAP (approximate boundaries of the subject site is dashed in black)

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 5. 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 6. 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.

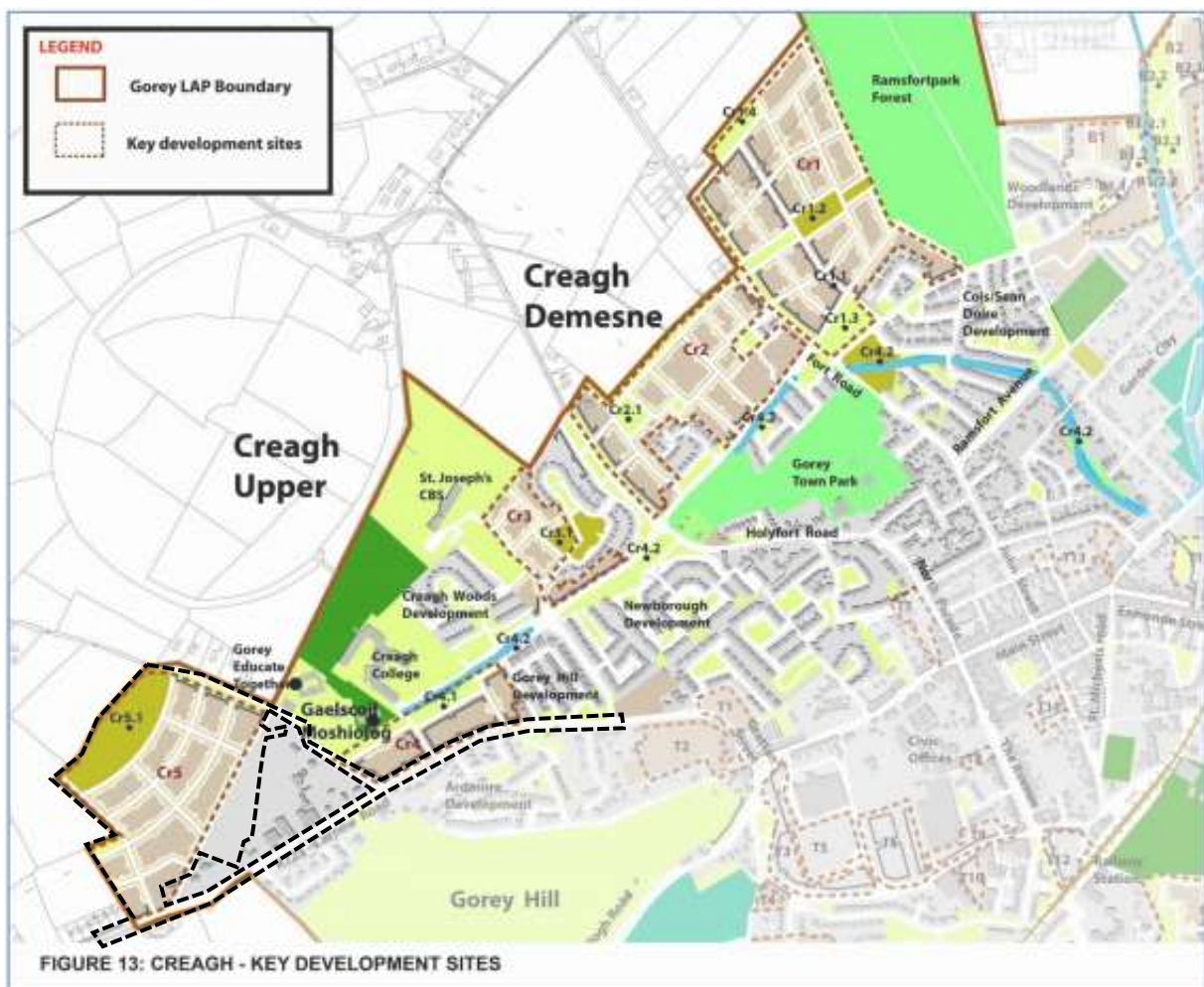


Figure 20. Key Infrastructure Map extracted from the LAP

As illustrated on the Figure 20 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).

#### 7.4 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.

### 8.0 ENGINEERING PROPOSALS

Waterman Moylan Consulting Engineers have prepared an engineering pack for the proposed development. This is included under a separate cover. A Confirmation of Feasibility and Statement of Design Acceptance has been obtained from Irish Water confirming that there is capacity within the network to cater for the development and that the design is in accordance with their standards. Furthermore, the Flood Risk Assessment prepared by Waterman Moylan Consulting Engineers confirms that the site is not within a flood risk area and thus is suitable for residential development.

### 9.0 APPROPRIATE ASSESSMENT SCREENING

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.

## 10.0 EIA SCREENING

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.

In this instance, given that the application site extends to circa 19.17 hectares within what can be considered a built-up area, and that 421 no. units are proposed, an Environmental Impact Assessment has been prepared to inform the proposed application. The EIAR is enclosed under separate cover as part of this planning application.

## 11.0 CONCLUSION

This Planning Statement has been prepared to accompany planning application to An Bord Pleanála for a Strategic Housing Development on lands at Kilnahue & Gorey Hill, Carnew & Kilnahue Road, Gorey, Co. Wexford.

The proposed development will consist of the demolition of existing derelict structures on site, and the construction of a total 421 no. residential dwellings, comprising of 133 no. houses, 228 no. apartments, and 60 no. duplexes. The proposed development also provides for 1 no. childcare facility, 2 no. community rooms and 2 no. retail units, a large Parkland and numerous pocket parks across the subject lands, car and cycle parking spaces, and all associated ancillary site development infrastructure works.

The design of the proposed scheme has been the subject of a full analysis/feasibility study of the proposed site and its surrounding landscape, and it is considered that the proposed development represents a high-quality design whilst optimising the appropriate use of the site. The proposed development is also informed by a series of pre-application meetings with both the Local Authority and An Bord Pleanála, the previous proposed planning application on the subject lands and the Bord's reasons for its refusal.

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. This will support compact growth of the town, and assist in meeting the increasing demand for residential accommodation in Gorey and the overall County.

The proposed development comprises a high-quality scheme of an appropriate scale and of a sustainable residential density reflective of its locational and topographical attributes. The Statement of Consistency which accompanies the application demonstrates that the proposed development complies with the relevant national, regional, and local planning policy. Please refer to the enclosed Statement of Consistency which sets out the justifications for the proposed development. Furthermore, the proposal will provide for an effective, efficient, sustainable use of what is a greenfield site in an accessible location. The nature, form and extent of the proposed development has been informed and guided by pre-application consultations with the pertaining Planning Authority and internal departments and the pre-application consultation with An Bord Pleanála.

The delivery of 421 no. residential units at this location would add to the sense of community in the area, would represent an appropriate and sustainable land use, and would provide for an appropriate use on an otherwise underutilised site. Please also refer to the Architectural Statement prepared by Connolly Architects which demonstrates the proposed development's compliance with the relevant planning policy and guidelines.

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 at represents a high-quality Strategic Housing Development proposal which is now being submitted for the consideration of An Bord Pleanála.