

PLANNING REPORT

INCLUDING: STATEMENT OF CONSISTENCY,
MATERIAL CONTRAVENTION STATEMENT, AND
RESPONSE TO AN BORD PLEANÁLA' S OPINION

FOR A STRATEGIC HOUSING DEVELOPMENT

ON LANDS EAST OF CARLEY'S BRIDGE, ENNISCORTHY, E.D.
ENNISCORTHY RURAL, CO. WEXFORD

APRIL 2022

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On behalf of:

TORCA DEVELOPMENTS LIMITED



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CHAPTER 1 INTRODUCTION

On behalf of the applicant, Torca Developments Ltd., this planning report accompanies an application to An Bord Pleanála under Section 4 of the Planning and Development (Housing) and Residential Tenancies Act (2016) for a proposed Strategic Housing Development at On Lands East of Carley's Bridge, Enniscorthy, E.D. Enniscorthy Rural, Co. Wexford in accordance with the Planning and Development (Housing) and Residential Tenancies Act 2016.

The application has been prepared by a multidisciplinary team on behalf of Torca Developments Ltd as set out in the table below.

| Company Name | Documents Prepared |
|------------------------------|--|
| McGill Planning | Planning Report including <ul style="list-style-type: none"> - Statement of Consistency with Planning Policy - Statement of Response to An Bord Pleanála's Opinion - Material Contravention Statement |
| | EIA Screening Report & Statement in Accordance with Article 299(B)(1)(B)(li)(li)(C) |
| | Social and Community Audit |
| BDA Architecture | Design Statement |
| | Housing Quality Assessment |
| | Architectural Drawings |
| | Building Life Cycle Report |
| 3D Design Bureau | Daylight Sunlight Analysis |
| | Photomontages / CGIs |
| Landscape Design Services | Landscape Design Rationale |
| | Landscape Masterplan |
| Sweeney Consulting Engineers | Infrastructure Design Report |
| | Infrastructure Drawings |
| Transport Insights | Traffic and Transport Assessment Report including a Mobility Management Plan, Statement of Consistency with DMURS and a Traffic and Transport Assessment. |
| Traynor Environmental | Construction Management Plan |
| | Construction and Demolition Waste Management Plan |
| | Operational Waste Management Plan |
| Delap & Waller | Public Lighting Layout |
| | Public Lighting Report |
| Whitehill Environmental | Natura Impact Assessment |
| | Ecological Impact Assessment |
| Wildlife Surveys Ireland | Bat Assessment |
| IE Consulting | Flood risk Assessment |
| | Hydrological Impact Report |
| Independent Tree Surveys | Tree Drawings |
| | Tree Report |
| Byrne Mullins & Associates | Cultural Heritage Assessment Report |

Table 1 List of enclosures

Please note, that while every effort has been made to ensure consistency throughout the application, inconsistencies may arise due to human error. As such the drawings and documentation created by BDA Architecture are the principal documents for the design and layout of the development.

This planning report is set out into 9 chapters:

- Chapter 2 outlines the development description as set out in the statutory notices and provides a brief summary of the proposed development
- Chapter 3 sets out the site location and context
- Chapter 4 outlines the relevant planning history for the subject site and the surrounding area.
- Chapter 5 provides the rational for the proposed development
- Chapter 6 includes the response to An Bord Pleanála' s Opinion
- Chapter 7 assesses the proposed development against national, regional, and local planning policy
- Chapter 8 includes the material contravention statement
- Chapter 9 provides an overall conclusion

CHAPTER 2 THE PROPOSED DEVELOPMENT

Statutory Notices

The proposed development is described in the statutory notices as follows:

Torca Developments Limited intend to apply to An Bord Pleanála for permission for a strategic housing development at this site of c.8.7 ha located on lands located to the East of Carley's Bridge, Enniscorthy, E.D. Enniscorthy Rural, County Wexford. The site is bounded to the north west by Carley's Bridge Road and to the north by dwellings fronting Carley's Bridge Road, to the south by agricultural land, to the north and east by the Urrin Valley and Millbrook residential estates and to the south west and west by the River Urrin. The application site also extends along Carley's Bridge Road and include a portion of the public green area within Millbrook Estate.

The proposed Strategic Housing Development will consist of 233 no. residential units comprising 180 no. apartments/duplexes up to 4 storeys in height consisting of 72 no. 1 beds, 40 no. 2 beds and 68 no. 3 beds; and 53 no. 2-3 storey houses (45 no. 3-bed houses and 8 no. 4 bed houses). Provision of a creche (c.290 sqm), 352 no. car parking spaces, 497 no. cycle parking spaces, open spaces (including new riverside public park), bin storage, bicycle stores and pumping station. The proposal includes for new vehicular and pedestrian accesses via Carley's Bridge Road to the north and north-west, and a pedestrian access via Millbrook Residential Estate to the east of the site. All associated site development works including site reprofiling, boundary treatments, plant, site services and services connections.

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 the Enniscorthy Town & Environs Development Plan 2008 -2014 (as extended).

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 the Wexford County Development Plan 2013-2019 and the Enniscorthy Town & Environs Development Plan 2008 -2014 (as extended) other than in relation to the zoning of the land.

A Natura Impact Statement has been prepared in respect of the proposed development.

The application together with a Natura Impact Statement, may be inspected, or purchased at a fee not exceeding the reasonable cost of making a copy, during public opening hours at the offices of An Bord Pleanála and Wexford County Council. The application may also be inspected online at the following website set up by the applicant www.enniscorthyshd2.ie

Overcoming The Previous SHD Refusal Reason

Under Ref. ABP-311699-21 dated 16th February 2022 An Bord Pleanála refused permission for a residential development, for the same 233 no. units, creche and associated landscaping, services, etc., on this same application site.

The single reason for refusal stated as follows:

“It is considered, having regard to the having regard to the fundamental road safety concerns raised as a result of the proposed provision of a raised table on the Carley’s Bridge Road, in place of a dedicated pedestrian footpath, and having regard to the limited forward visibility at the location of the proposed raised table, as a result of the variable horizontal and vertical alignment of the Carley’s Bridge Road, and having regard to the proposed provision of a vehicle access and egress point close to the location of the existing rural speed limit zone (80 kilometre per hour), and the uncertainty in relation to the altering of same, the proposed development would endanger public safety by reason of traffic hazard.”

In summary, it is noted that the reason for refusal related only to the issue of public safety along Carley’s Bridge Road as a result of the proposed raised table, and uncertainty around the proposed vehicular access proximate to the rural speed limit location.

Aside from this issue, the remainder of the scheme, that being the residential development for 233 no. units and creche, with associated layout, internal road design, open spaces and landscaping, services provision etc. were considered acceptable by the Board and Board Inspector previously. No additional concerns were raised in the previous adjudication of the scheme, that warranted refusal or require additional detail that could not be conditioned as part of a grant of permission.

We refer to Section 13.0 of the ABP Inspector’s Report in this regard which states the following:

“The proposed residential scheme is acceptable in principle at this site with regard to the relevant zoning objectives of the Enniscorthy Town & Environs Development Plan 2008-2014 (extended to 2019). The provision of higher density (relative to the density provisions set out in the Enniscorthy Town & Environs Development Plan 2008-2014 – as extended to 2019) residential development at this location is acceptable in principle, having regard to the criteria as set out in relevant Section 28 Guidelines. The height, bulk and massing, detailed design and layout of the scheme are acceptable, subject to conditions. I am also satisfied that the development would not have any significant adverse impacts on the residential amenities of the surrounding area. The future occupiers of the scheme will also benefit from a high standard of internal amenity and the proposal will contribute significantly to the public realm. The overall provision of car parking and cycle parking is considered acceptable. I am satisfied the future occupiers of the scheme will not be at risk from flooding, and the proposal will not increase the risk of flooding elsewhere.”

As a result, the applicant has decided to relodge the otherwise acceptable residential and creche development proposal, whilst also including the revised design/updated analysis along Carley’s Bridge Road to overcome the public safety/traffic hazard issue.

On foot of ABP’s decision to refuse permission for the reason stated above, the previously proposed raised table on Carley’s Bridge Road has now been removed from the scheme.

In its place is a raised crossing (set out in detail within Section 5.4 of the Traffic & Transport Assessment prepared by Transport Insights). The new raised crossing is considered to address the concerns the ABP Inspector had with the previous raised table – specifically its length, effectiveness in reducing traffic speeds, visibility attributes, and related suitability in accommodating pedestrian needs.

The raised crossing has been subject to an independent Stage 1 Road Safety Audit (RSA), with the layout of the table revised following receipt of recommendations from the auditor and subsequently approved by the auditor.

Furthermore, a full vertical and horizontal forward visibility assessment of the revised crossing on Carley's Bridge Road has been undertaken and which robustly demonstrates the suitability of the proposals in accordance with the road's posted 50 km/ h speed limit.

We note that the revised raised crossing was forwarded to Wexford County Council in advance of lodging this application and the Council issued a new Letter of Consent (appended to the Application Form) to allow the inclusion of part of Carley's Bridge Road (and Millbrook Estate – for the separate pedestrian access) within the red line of the planning application to facilitate the new design. Consent from the third party landowner to continue the new footpath along Carley's Bridge Road to the north is also included again.

A traffic speed survey has also been undertaken at the location of the proposed main vehicle access and egress junction. The speed survey demonstrates that vehicle speeds in the vicinity of the proposed site access are low and not reflective of the posted maximum rural speed limit.

Informed by the speed survey findings, and in order to provide a robust assessment, visibility splays for a 60 km/ h design speed on Carley's Bridge Road have been assessed and demonstrated to be achievable. The revised visibility splays reflecting a robust design speed based on actual traffic speed survey results and illustrate there are no safety concerns at the site access junction.

Overall it is considered that the previous reason for refusal has been fully addressed in the new application, and that, all else being equal, planning permission can be granted in accordance with national, regional and local planning policy and having regard to the proper planning and sustainable development of the area.

Finally, we also refer to the Legal Opinion submitted with this application, prepared by McCann Fitzgerald LLP, confirming the ability of the applicant to lodge this SHD application, and utilising the original ABP Opinion Ref. ABP-307305-20, dated 26th January 2021.

Summary of the Development

The proposed development statistics are set out in the table below:

| Development Proposal | Statistics |
|--------------------------|--|
| No. of Residential Units | 233 no. dwellings as follows: <ul style="list-style-type: none">- 53 Houses- 180 no. 1/2/3 bed apartments |
| Non-Residential | Creche (c. 290 sq.m) |
| Site Area | 8.7 ha (Gross) 6.64 ha (Net) |
| Density | 35 Units Per Hectare (Net) |
| Plot Ratio | 0.27 |
| Site Coverage | 14.40% |

| | |
|--------------------|---|
| | |
| Building Height | Up to 4 storeys |
| Residential Aspect | 95% Dual Aspect |
| Open Space | 24,000 sq.m Public Open Space 2,030 sq.m Communal Open Space |
| Carparking | 352 |
| Cycle Parking | 497 |
| Vehicular Access | Via Carley's Bridge Road |

Table 2 Description of development

The breakdown of the residential units will be as follows:

| Unit Type | No. of Units | Percentage |
|--------------------|--------------|-------------|
| Apartment / Duplex | 180 | 77% |
| 1 bedroom | 72 | 31% |
| 2 bedrooms | 40 | 17% |
| 3 bedrooms | 68 | 29% |
| House | 53 | 23% |
| 3 bedrooms | 45 | 19% |
| 4 bedrooms | 8 | 4% |
| Total | 233 | 100% |

Table 3 Residential Unit Breakdown

CHAPTER 3 SITE LOCATION AND CONTEXT



Figure 1 Approximate Site Location. Please note the red line is shown for indicative purposes only. Please refer to the architect's drawings for an accurate red line boundary.

The subject site is located c. 1km west of Enniscorthy Town Centre, c. 23km north of Wexford Town Centre, and c. 30km south of Gorey. The site is located East of Carley's Bridge, Enniscorthy, E.D. Enniscorthy Rural, Co. Wexford, on a gross site area of c. 8.7 ha.

The site is bounded to the northwest by Carley's Bridge Road and to the north by detached dwellings fronting Carley's Bridge Road, to the south by agricultural land, to the north and east by the Urrin Valley and Millbrook residential estates and to the southwest and west by the River Urrin.

The boundaries comprise of a dense row of trees, mature vegetation and hedgerows along all sides and the southern and western boundary comprises of the River Urrin. A hedgerow runs through the centre of the site from west to east.

The uses surrounding the subject site comprise of residential use to the north and east; and agricultural uses to the west and south. The area east of the site is Enniscorthy Town Centre which comprises of retail, community and recreational services, educational and health services.

The greenfield site is vacant and used for agricultural purposes. A number of ruinous agricultural structures are located to the north of the site and are planned to be demolished as part of this application. The site is not located within a Conservation Area or an Architectural Conservation Area.

Public Transport

Vehicular access to the site is off Carley's Bridge Road to the northwest of the subject site. New pedestrian entrances are to be provided to the north along Carley's Bridge Road and to the east to Millbrook residential estate.

The subject site is served by excellent transport infrastructure. Enniscorthy train station is located c. 1.3km to the east of the subject site linking the area to Dublin, Wexford, Rosslare and Dundalk, c. 1.7 km west of the N11, and c. 2.6km east of the N30.

Enniscorthy is serviced by a range bus routes including Wexford Bus route no's 740 and 376; Local Link route no's 368 and 369 linking the area to Dublin, Wexford, Carlow, Tullow, New Ross and Bunclody.

Bus Eireann Routes 377 (connecting Enniscorthy to Wexford); x2 (Connecting Enniscorthy to Dublin Airport).

| Operator | Bus No. | Route | Time from Site Location |
|-------------|---------|------------------------------|-------------------------|
| Bus Eireann | 377 | Wexford – Enniscorthy | 1.6 km (16-minute walk) |
| | X2 / 2 | Wexford – Dublin Airport | 1.6 km (16-minute walk) |
| | 132 | Dublin (Connolly) – Bunclody | 1.6 km (16-minute walk) |
| Wexford Bus | 740 | Wexford – Dublin City Centre | 1.6 km (16-minute walk) |
| | 376 | Wexford – Carlow | 1.6 km (16-minute walk) |
| Local Link | 368 | Tullow – New Ross | 1.6 km (16-minute walk) |
| | 369 | Bunclody to Enniscorthy | 1.6 km (16-minute walk) |
| Train | n/a | Rosslare – Dublin Connolly | 1.7 km (17-minute walk) |

Table 4 Enniscorthy buses



Figure 2 Public Transport Routes within 1.5km of the subject site

Education

There are 4 primary schools, 3 post-primary schools and 1 special education school less than a 35-minute walk away from the subject site.

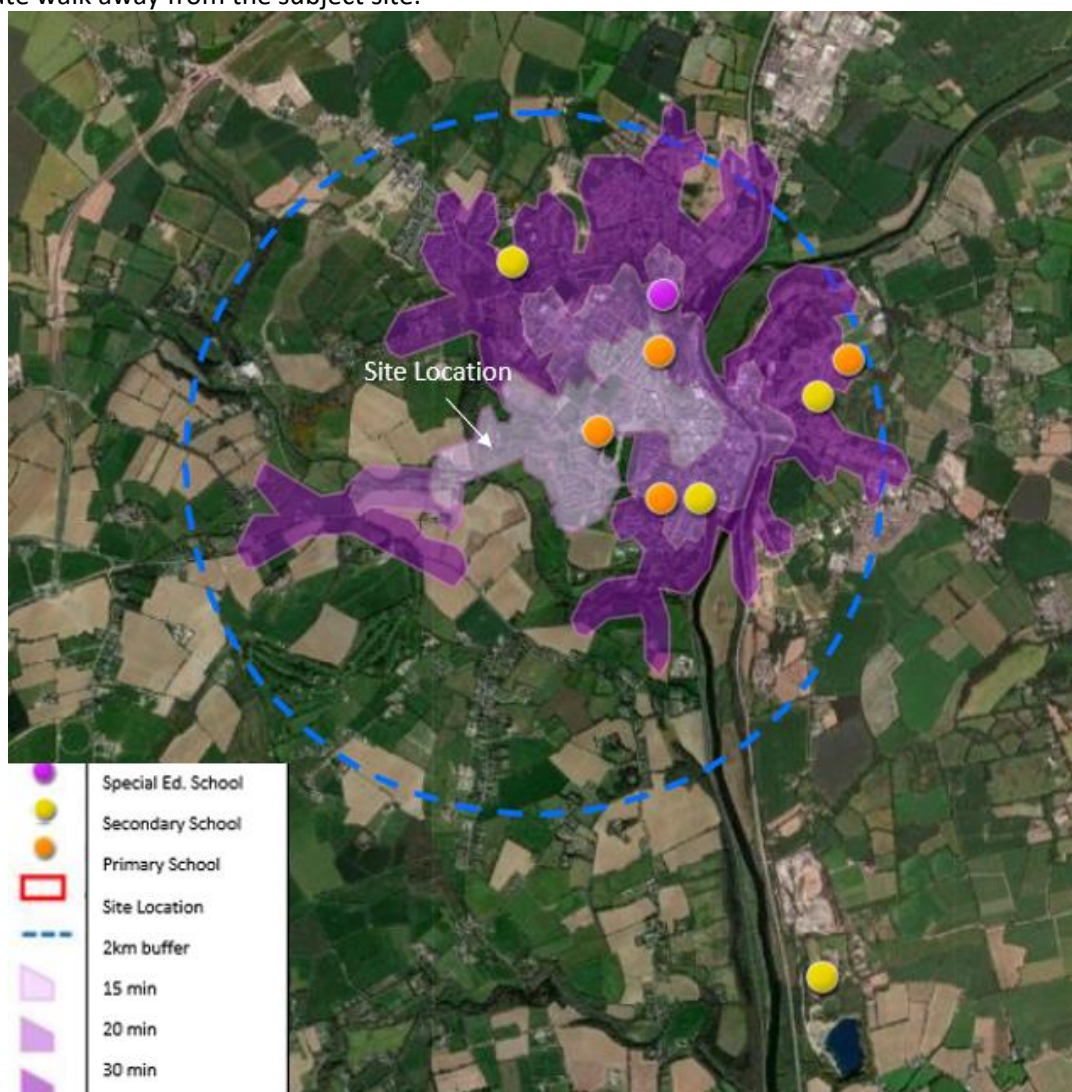


Figure 3 Schools within the 2km buffer of the proposed site and travel time

| Special Education | Cycling Time from Site |
|--------------------------------|------------------------|
| St Patricks Spec School | c. 35 Minute Walk Time |
| Primary Schools | |
| St Aidan's Parish School | c. 16 Minute Walk Time |
| Gaelscoil Inis Corthaidh | c. 35 Minute Walk Time |
| Mary's National School | c. 20 Minute Walk Time |
| St Senan's Primary School | c. 38 Minute Walk Time |
| Post-primary Schools | |
| St Mary's C.B.S. | c. 23 Minute Walk Time |
| Coláiste Bríde | c. 30 Minute Walk Time |
| Enniscorthy Vocational College | c. 30 Minute Walk Time |
| Meanscoil Garman | c. 9 Minute Drive |

Table 5 Schools and their distance from the proposed site

Retail and Employment Centres

Enniscorthy is served by a wide range of cafes, restaurants and takeaways. The Wilds, Copper Pan Takeaway, Dawson's Lounge and Bar and Doyle's are all within a c. 14-minute walk of the proposed development site.

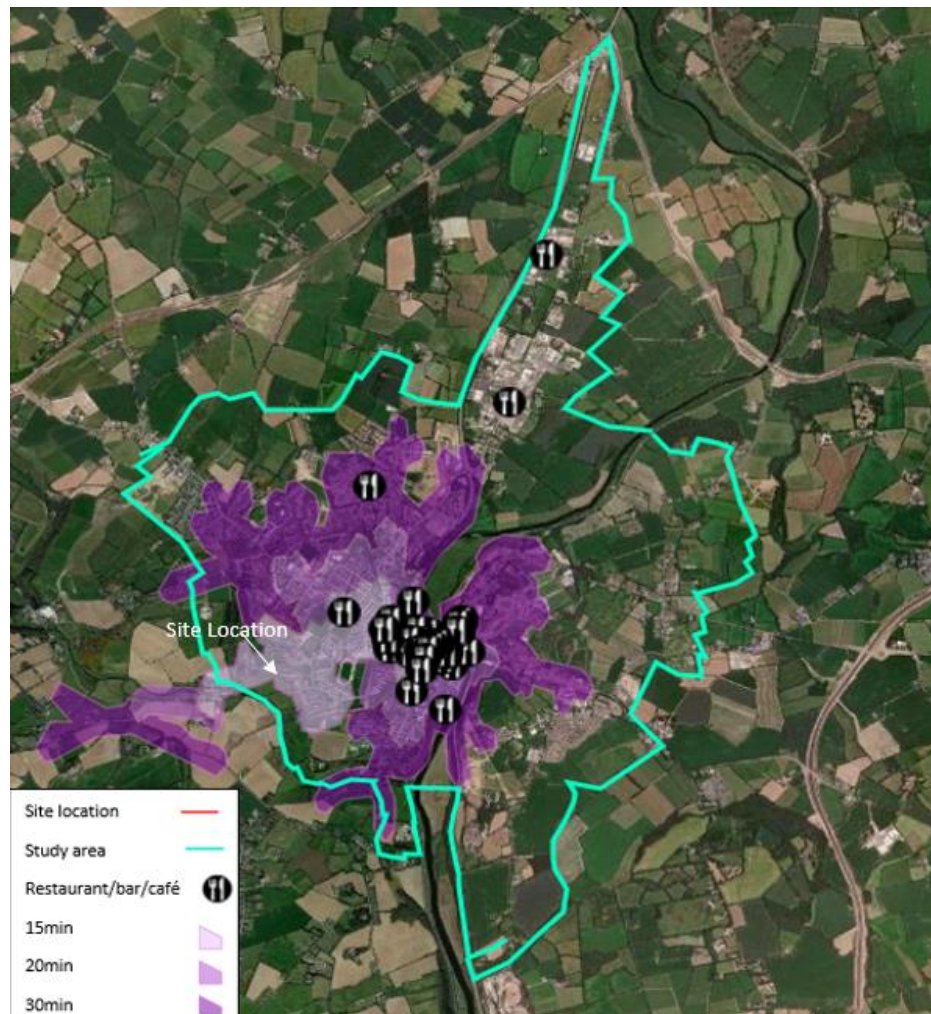


Figure 4 Restaurants, takeaways, cafes, and pubs in the study area

Dunnes Stores is the closest large supermarket that will serve the development located c.17-minute walk away from the site, along with Aldi and Lidl which are located approx. 23-minute walk away from the site. In addition to this, there are several smaller retail facilities in Enniscorthy Town within a c.15-minute walk.

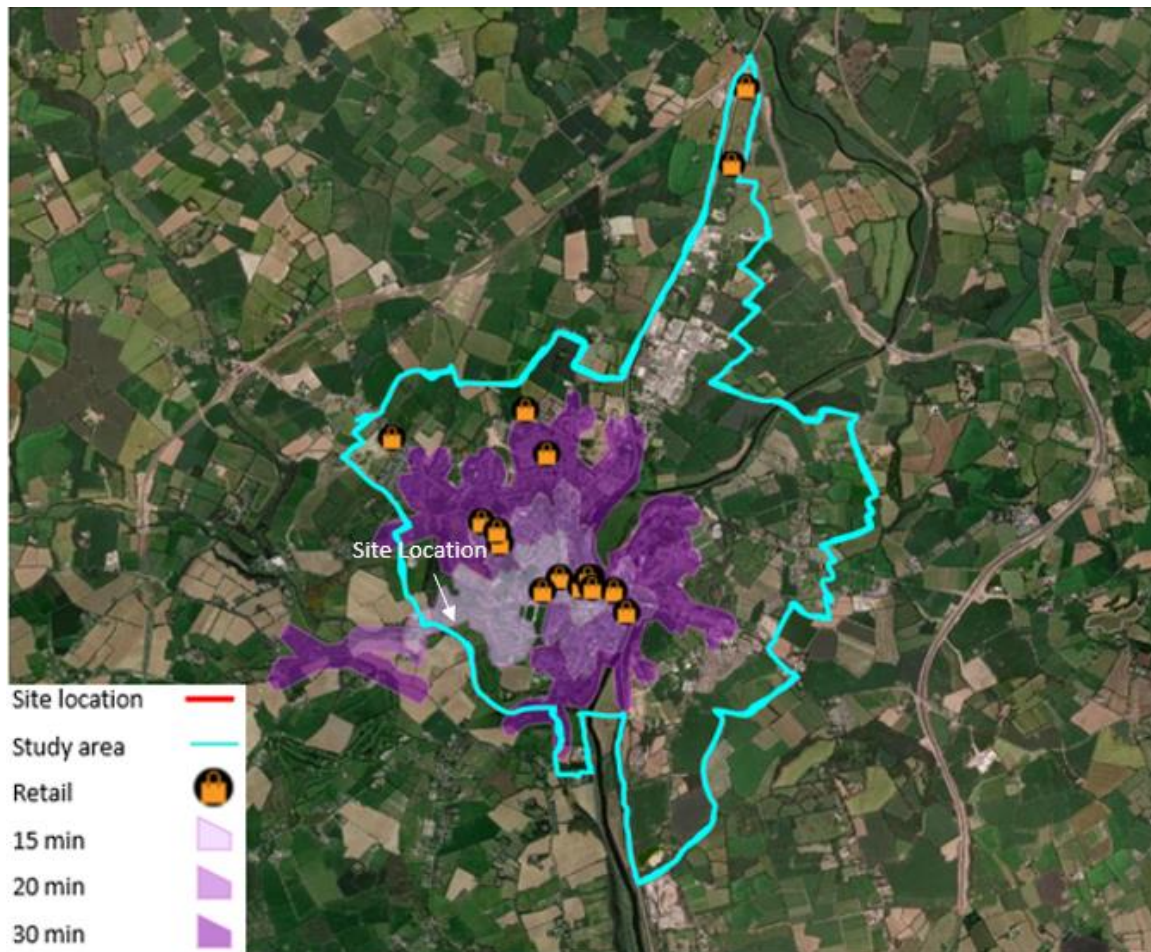


Figure 5 Grocery shops in the study area

Community Infrastructure

A large range of recreational and leisure facilities are in Enniscorthy. Enniscorthy Rugby Club, Enniscorthy Sports Hub and Enniscorthy Greyhound Stadium are all located within a c.10-minute walking distance from the proposed development and FDYS Enniscorthy is located c.19-minute walk from the proposed development. The town also benefits multiple Hotels with associated leisure facilities such as spas and marked walks. In addition to this, Saint Patrick's Pitch and Putt Club is a c.22 min walk from the subject site

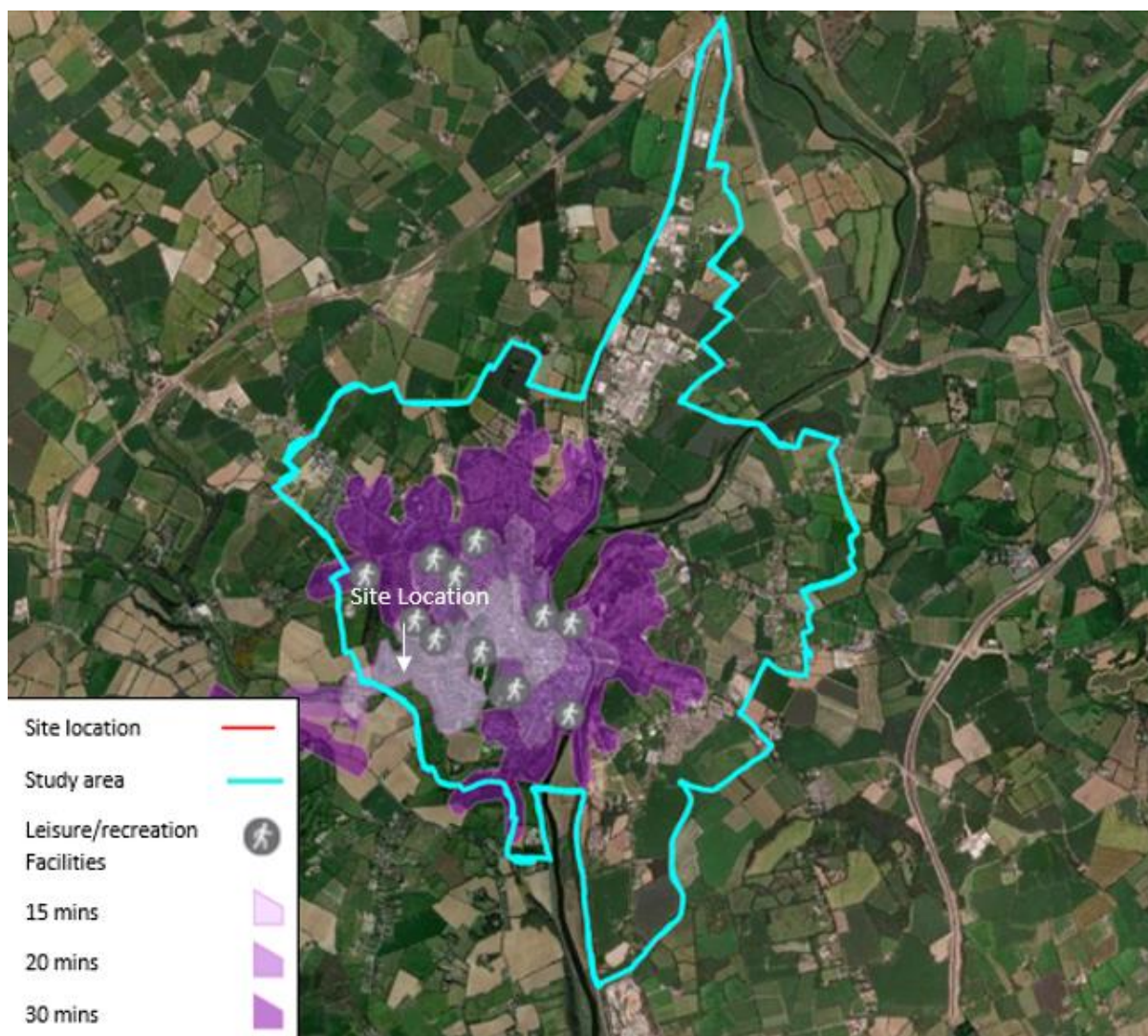


Figure 6 Leisure and recreation facilities in the study area

Enniscorthy has a variety of cultural facilities and community services to serve the local and future populations. The Enniscorthy Library is a venue for a multitude of events such as lecture, exhibition, book launches, reading circles and activities. It is located a c. 16-minute walk from the development site.

There is a garda station, social welfare office and citizens information centre in Enniscorthy town that enhance the community facilities.

Healthcare Facilities and Childcare

Enniscorthy town contains multiple healthcare services including GPs, pharmacies, medical centres and dental clinics. Wexford Mental Health Services is only a c. 9-minute walk from the proposed development site. St. John's Community Hospital is located a c. 25-minute walk from the subject site. There are two veterinary clinics approx. c. 40-minutes' walk from the subject site.

There is a range of Montessori and creches located in Enniscorthy including Tir Na Siamsa Creche that is a c.10-minute walk from the proposed development site.

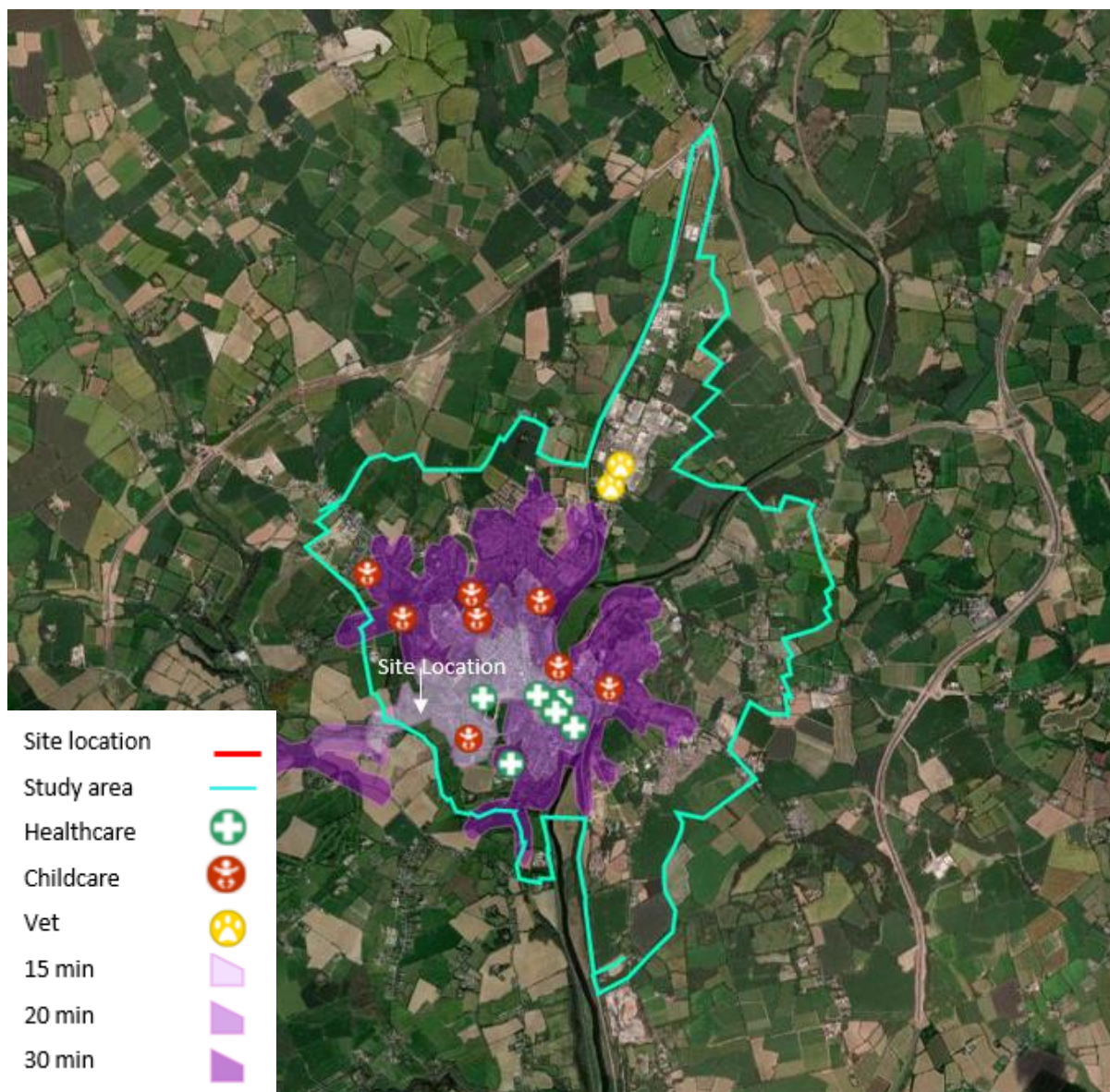


Figure 7 healthcare and childcare facilities in the study area

CHAPTER 4 PLANNING HISTORY

In 2018 two separate concurrent applications were lodged on the application site for residential development totalling c. 187 dwellings which shared a pumping station; roads; open space and creche facilities. Wexford County Council advised two separate applications rather than a SHD application. These applications were granted by Wexford County Council and then appealed to An Bord Pleanála where they were both refused. Prior to the 2018 applications there were numerous previous planning applications since 2000. The planning history details are as follows:

ABP Reg Ref: ABP-311699-21

Location: Lands located to the East of Carley's Bridge, Enniscorthy, E.D. Enniscorthy Rural, Co. Wexford.

Decision: Refused, 16/02/22

Under Ref. ABP-311699-21 dated 16th February 2022 An Bord Pleanála refused permission for a residential development, for 233 no. units, creche and associated landscaping, services, etc., on the same site as the current application.

The single reason for refusal stated as follows:

"It is considered, having regard to the having regard to the fundamental road safety concerns raised as a result of the proposed provision of a raised table on the Carley's Bridge Road, in place of a dedicated pedestrian footpath, and having regard to the limited forward visibility at the location of the proposed raised table, as a result of the variable horizontal and vertical alignment of the Carley's Bridge Road, and having regard to the proposed provision of a vehicle access and egress point close to the location of the existing rural speed limit zone (80 kilometre per hour), and the uncertainty in relation to the altering of same, the proposed development would endanger public safety by reason of traffic hazard."



Figure 8 Site Layout Plan Ref. ABP-311699-21

It is noted that the reason for refusal related only to the issue of public safety along Carley's Bridge Road as a result of the proposed raised table, and uncertainty around the proposed vehicular access proximate to the rural speed limit location.

Aside from this issue, the remainder of the scheme, that being the residential development for 233 no. units and creche, with associated layout, internal road design, open spaces and landscaping, services provision etc. were considered acceptable by the Board and Board Inspector previously.

No additional concerns were raised in the previous adjudication of the scheme, that warranted refusal or require additional detail that could not be conditioned as part of a grant of permission.

The reason for refusal has been fully addressed in the current application as summarised in Section 2 above and in the Traffic & Transport Assessment and associated drawings prepared by Transport Insights.

WCC Reg Ref: 20180818

Location: Lands located to the East of Carley's Bridge, Enniscorthy, E.D. Enniscorthy Rural, Co. Wexford. (Site A)

Decision: Granted, 08/02/19

ABP Appeal: PL26.303797

Decision: Refused, 12/11/19

Permission was sought for the demolition of existing agricultural structures (c.422sq.m) and the construction of 97 no. dwelling units comprising 40 no. (2-4 bedroom) semi-detached houses, 17 no. (2-3 bedroom) terraced houses/townhouses, 20 no. (2-bedroom) apartments and 20 no. (3-bedroom) duplexes; and the provision of a single storey crèche (c.235sq.m).



Figure 9: Site Layout Plan FI (WCC Reg. Ref. 20180818)

Permission was granted by the Local Authority subject to conditions following on from a further information request.

The application was appealed to An Bord Pleanála. ABP sought further information for both Site A and B to address the following issues:

- *Piecemeal approach to the development of the overall landholding, whereby two similarly scaled, functionally connected and mutually interdependent housing schemes are concurrently proposed by the same applicant on adjoining sites, leads to unnecessary ambiguity in respect of phasing and public open space, and to the inefficient duplication of childcare facilities.*
- *Low density.*
- *The oversupply of creche facilities due to the introduction of a second creche.*
- *The lack of pedestrian connectivity between the subject site and Millbrook Estate.*
- *Poor design and layout with disposition of open space areas, including lands identified as fully enclosed (apart from maintenance access) to allow for existing foul line retention, is discordant and haphazard and, in conjunction with the positioning of proposed dwellings which back onto these areas, might constitute a poor quality and inefficient layout.*

The scheme was redesigned to address the issues raised by ABP and further information was submitted to ABP for both Site A and B on the 04th of October 2019. ABP refused permission on the 12th of November 2019 for the following reasons:

Having regard to the provisions of the Ministerial Guidelines, 'Sustainable Residential Development in Urban Areas, Guidelines for Planning Authorities' issued by the Department of Environment, Heritage and Local Government in May 2009, specifically paragraph 5.11 and Appendix A, and Urban Development and Building Heights', Guidelines for Planning Authorities issued by the Department of Housing, Planning and Local Government in December 2018, specifically SPPR 4, it is considered that the net density of the proposed development, at this residentially zoned outer suburban site on the edge of a larger town, is excessively low and would be contrary to the Ministerial Guidelines and would, therefore, be contrary to the proper planning and sustainable development of the area.

It is considered that the proposed disposition of open space areas, including lands identified as fully enclosed (apart from maintenance access) to allow for existing foul line retention, is discordant and haphazard and, in conjunction with the positioning of proposed dwellings which back onto these areas, would constitute a poor quality and inefficient layout and would, therefore, be contrary to the Ministerial Guidelines, 'Sustainable Residential Development in Urban Areas, Guidelines for Planning Authorities' issued by the Department of Environment, Heritage and Local Government in May 2009, specifically paragraph 3.3 and Box 2: Best Practice Design Manual Criteria. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area. It is considered that the proposed development would comprise a poor response to the potential of the site to provide a firm boundary to the southern growth of the town, which demands a high quality of design and layout, and would seriously injure the residential amenity of future occupants and would, therefore, be contrary to the proper planning and sustainable development of the area.

In deciding not to accept the Inspector's recommendation to grant permission, the Board considered that the piecemeal approach to the development of the overall landholding, whereby two similarly scaled, functionally connected and mutually interdependent housing schemes are concurrently proposed by the same applicant on adjoining sites, leads to unnecessary ambiguity in respect of phasing and public open space, and to the inefficient duplication of childcare facilities.

WCC Reg Ref: 20180819

Location: Lands located to the East of Carley's Bridge, Enniscorthy, E.D. Enniscorthy Rural, Co. Wexford. (Site B)

Decision: Granted, 08/02/19

ABP Appeal: PL26.303839

Decision: Refused, 12/11/19

Permission was sought for the construction of 90 no. dwelling units comprising 50 no. (2-4 bedroom) semi-detached houses, 16 no. (2-3 bedroom) terraced houses/townhouses, 12 no. (2-bedroom) apartments and 12 no. (3-bedroom) duplexes.



Figure 10: Site Layout Plan FI (WCC Reg. Ref. 20180819)

Permission was granted by the Local Authority subject to conditions following on from a further information request.

The application was appealed to An Bord Pleanála. ABP sought further information for both Site A and B to address the following issues:

- *Piecemeal approach to the development of the overall landholding, whereby two similarly scaled, functionally connected and mutually interdependent housing schemes are concurrently proposed by the same applicant on adjoining sites, leads to unnecessary ambiguity in respect of phasing and public open space, and to the inefficient duplication of childcare facilities.*
- *Low density.*
- *The oversupply of creche facilities due to the introduction of a second creche.*
- *The lack of pedestrian connectivity between the subject site and Millbrook Estate.*

- *Poor design and layout with disposition of open space areas, including lands identified as fully enclosed (apart from maintenance access) to allow for existing foul line retention, is discordant and haphazard and, in conjunction with the positioning of proposed dwellings which back onto these areas, might constitute a poor quality and inefficient layout.*

The scheme was redesigned to address the issues raised by ABP and further information was submitted to ABP for both Site A and B on the 04th of October 2019. ABP refused permission on the 12th of November 2019 for the following reasons including:

Having regard to the provisions of the Ministerial Guidelines, 'Sustainable Residential Development in Urban Areas, Guidelines for Planning Authorities' issued by the Department of Environment, Heritage and Local Government in May 2009, specifically paragraph 5.11 and Appendix A, and Urban Development and Building Heights', Guidelines for Planning Authorities issued by the Department of Housing, Planning and Local Government in December 2018, specifically SPPR 4, it is considered that the net density of the proposed development, at this residentially zoned outer suburban site on the edge of a larger town, is excessively low and would be contrary to the Ministerial Guidelines and would, therefore, be contrary to the proper planning and sustainable development of the area.

It is considered that the proposed siting of a crèche facility (in the absence of full design details including elevations and sections) and the consequent removal of originally proposed public open space and potential for pedestrian connectivity to the adjoining Millbrook estate, would constitute a poor quality layout and would militate against the provision of sustainable transport connections to and from the subject site and would, therefore, be contrary to proper the planning and sustainable development of the area.

It is considered that the proposed development would comprise a poor response to the potential of the site to provide a firm boundary to the southern growth of the town, which demands a high quality of design and layout, and would seriously injure the residential amenity of future occupants and would, therefore, be contrary to the proper planning and sustainable development of the area.

WCC Reg Ref: 20080881

Location: Enniscorthy, E.D. Enniscorthy Rural, Co. Wexford.

Decision: Granted, 07/11/08

Permission was sought for to demolish 4 no. farm buildings and to erect in their place 52 no. dwelling units with treatment plant to serve development and 1 no. temporary construction entrance with associated site works.

Permission was granted by the Local Authority subject to conditions following on from a further information request.

An extension of duration of permission was sought but refused on the basis of non-compliance with the Water Framework Directive and Habitats Directive.

WCC Reg Ref: 20071545

Location: Enniscorthy, E.D. Enniscorthy Rural, Co. Wexford.

Decision: Refused, 14/12/07

ABP Appeal: PL26.227435

Decision: Appeal Withdrawn, 31/03/08

Permission was sought for the demolition of 4 no existing farm buildings and to erection in their place 199 no. dwelling units, with 1 no. crèche, treatment plant to serve development and 1 no. temporary construction entrance with all associated site works.

Permission was refused by the Local Authority for 2 no. reasons including:

- Development would be prejudicial to public health and to the protection of the SAC as there is inadequate capacity in the River Urrin to accommodate the development.
- Inadequate information and/or inadequate proposals have been submitted with regard to the phasing of the development and the implications for the operation of the treatment plant, boundaries of the site and the individual dwellings [on] the site, the retention of mature trees and traffic management.

WCC Reg Ref: 20050697

Location: Carley's Bridge, Enniscorthy, Enniscorthy Rural, Co. Wexford.

Decision: Refused, 07/04/05

Permission was sought for the erection of 162 dwelling house[s]. The application comprises 8 no. four bedroom detached houses (Type A), 98 no. three bedroom semi-detached [houses] (Type B), 28 no. three bedroom end-terrace houses (Type C), 24 no. three bedroom mid-terrace house[s] (Type D), 4 no. two bedroom mid-terrace house[s] (Type E), and associated site works. The site works to include new pumping station and provision made for an all-weather/synthetic playing pitch and associated facilities as part of the public open space at Carley's Bridge, Enniscorthy, (Enniscorthy Rural), Co, Wexford.

Permission was refused by the Local Authority for 9 no. reasons including:

- Premature by reason of the deficiency in the capacity of the public sewage treatment plant and foul sewer infrastructure in the area.
- Development is located within a natural flood plain of the Urrin River.
- Diversion of the public sewer would require provision of shallow gradients along part of the existing public sewer.
- Deficiencies in the road network and absence of footpaths and lighting connecting the development to the town would endanger public safety by reason of a traffic hazard.
- The internal road layout by reason of design and in the absence of speed management and traffic calming would endanger public safety by reason of traffic hazard.
- The proposed density, design, layout, lack of design variation, poor siting, location and overlooking of open space, poor siting and location of car parking, absence of landscaping/boundary treatment proposals, removal of mature trees and lack of consideration for the context of the site in terms of the surrounding development is contrary to proper planning.
- Having regard to the scale of the proposal, by reason of the absence of detailed proposals to provide a crèche. The development would be contrary to proper planning.
- Insufficient information submitted in relation to storm water attenuation to enable the PA to adequately assess the impact of the proposed development.

- Impact on the salmonid water and spawning/nursery stream for salmon and trout.

WCC Reg Ref: 20000641

Location: Carley's Bridge, Enniscorthy, Co. Wexford.

Decision: Refused, 07/04/00

Permission was sought for the construction of 142 dwellings comprising of 9 no. two storey six bedroom detached houses, 2 no. two storeys six bedroom semi-detached houses, 8 no. single storey three bedroom semi-detached houses, 1 no. single storey three bed detached house, 106 no. two storey four bedroom semi-detached houses and 16 no. two bed apartments in 2 no. 2 storey blocks.

Permission was refused by the Local Authority for 4 no. reasons including:

- The site is located within the corridor of the proposed Enniscorthy Bypass. The proposal is premature pending the determination of the road layout.
- Premature by reason of the deficiencies in the provision of sewerage facilities and the period within which the constraints involved may be expected to cease.
- The site is located outside the designated development area of the Town Plan. The proposal would conflict with the policy in the Plan to concentrate development lands zoned within the development area boundary.
- Premature pending preparation of the new town and environs plan.

CHAPTER 5 RATIONALE FOR DEVELOPMENT

The proposal is for a residential development on a site of c. 8.7 ha. The development will consist of:

- 233 no. residential units comprising 180 no. apartments/duplexes up to 4 storeys in height consisting of 72 no. 1 beds, 40 no. 2 beds and 68 no. 3 beds; and 53 no. 2-3 storey houses (45 no. 3-bed houses and 8 no. 4 bed houses),
- Provision of a creche (c.290 sqm),
- Provision of 352 no. car parking spaces, 497 no. cycle parking spaces,
- Open spaces (including new riverside public park), bin storage, bicycle stores and pumping station,
- The proposal includes for new vehicular and pedestrian accesses via Carley's Bridge Road to the north and north-west, and a pedestrian access via Millbrook Residential Estate to the east of the site. All associated site development works including site reprofiling, boundary treatments, plant, site services and services connections.



Figure 11 Proposed Site Layout Plan (Source: BDA, 2022)

The rationale for development of the subject proposal derives from the residential zoning of the site, its greenfield nature and unsuccessful attempts to develop the site for residential use dating as far back as the early 2000s. This site, which measures c. 8.7 ha, is mostly zoned Objective C - New Residential (R1): *“To provide for new residential development, associated residential services and community facilities”* and partly zoned Objective F - Open Space & Amenity (OS): *“To protect and*

provide for recreation, open space and amenity provision” in the Enniscorthy Town & Environs Development Plan 2008-2014 (Extended to 2019).

The proposal overcomes the challenges experienced in the previous planning applications and endeavours to achieve a positive planning outcome with a view to delivering quality housing for the population of Enniscorthy in a timely and efficient manner.

In particular the reasons for refusal for the two most recent concurrent applications (Refs. PL26.303797 & PL26.303839) have been overcome as follows:

- **A single application for the overall development is now proposed, as opposed to two concurrent phased proposals, which provides a coherent and logical approach that ensures that the provision of open spaces, childcare and physical services are provided in tandem with the residential development.**
- **The net residential density of the current scheme is 35 units per ha which achieves the national policy minimum requirement of 35 uph for outer suburban greenfield sites at the edge of large towns. This density is calculated based on a net site area of 6.64 ha, which excludes the riverside park which we note is zoned open Space and is also defined by the predicted worst case flood risk extent. The remainder of the site, including all open spaces, roads, creche etc, are included within the net site area.**
- **The disposition of open spaces throughout the development, including those that contain the strategic Irish Water foul line underneath are now fully open and accessible in the revised scheme and form part of the communal open space provision for the apartment blocks proposed. The dual frontage opportunities provided by the apartment blocks (as opposed to own door houses at those locations) allows the proposed buildings to equally address the streets and the open spaces on either side.**
- **The provision of duplex/apartment blocks along the proposed link road provides a “clear urban edge and definition to the southern extent of the town and the overall mix of units proposed, quantity and quality of open spaces and architectural design provides a highly attractive residential layout that will secure a high level of amenity for future residents.**
- **The overall development is served by a single creche which is appropriately located in the heart of the development within easy walking distance of future residents.**
- **The development includes for a new pedestrian/cyclist link to the adjoining Millbrook estate which will provide direct connection to the town centre and public transport.**

The proposed development will comprise of 233 residential units. This includes 53 no. houses comprising 45 no. 3-bed, and 8 no. 4-bed units; 90 no. apartments comprising 72 no. 1-bed, 13 no. 2-bed, and 5 no. 3-bed units; 90 no. duplex units comprising 27no. 2-bed and 63 no. 3 bed units. The proposal also includes a creche (c. 290 sq.m).

This results in a density of 35 UPH. This medium density development is achievable due to the excellent supporting infrastructure surrounding the site including:

- Great transport infrastructure including Enniscorthy train station c. 1.8km to the east of the subject site, c. 1.7 km west of the N11, and c. 2.6km east of the N30. Enniscorthy is serviced by a range bus routes including Wexford Bus route no’s 740 and 376; Local Link route no’s 368 and 369.
- A choice of schools and creche’s within 10 minutes’ walk of the site.
- Enniscorthy Town Centre is located c. 1 km east of the site offering a variety of shops, services, pubs, cafes, and restaurants.

- A variety of leisure amenities, including parks, playgrounds, sports clubs, and gyms within 10 minutes of the site.

The provision of high quality residential development will be delivered in tandem with the provision of a purpose built childcare facility and quality public open spaces which will be used by the wider community.

The proposed unit typology will cater to the greatest range of future occupants from couples, families with children, empty nesters and the elderly, as demonstrated in the variety of dwelling types proposed as part of this application.

Proposed road upgrades on the Carley's Bridge Road and works proposed as part of the application will strengthen and enhance connections to the town centre. Vehicular, cyclist and pedestrian connections to the existing residential estates and lands surrounding the site are also proposed. A new pedestrian link will connect the subject development to the Millbrook Estate and Ajax Athletic Football Club to the southeast. The layout and design of the scheme promotes a legible, accessible and sustainable environment. The proposed open spaces are easily accessible and provide both passive and active open spaces for all age groups and abilities.

To this end, the proposal makes the most efficient use of this zoned site by creating much needed residential accommodation with childcare and recreation facilities. In addition, the proximity of the site from Enniscorthy Town Centre will support existing local shops, services and facilities, thus strengthening the local economy and enhancing the vibrancy and vitality of the town centre.

LAYOUT AND DESIGN

The scheme is carried out across 21 no. apartment and duplex apartment blocks and 53 no. houses. The apartment and duplex apartment blocks range in height from 3-4 storeys depending on their location throughout the site. The houses range in height from 2-3 storeys.

Apartment and duplex apartment blocks which are up to 4 storeys in height have been located along Carley's Bridge Road, the main entrance to the development and continue along the main road within the scheme. These blocks clearly denote the entrance into the proposed development and offer strong frontage along Carley's Bridge Road. These units also offer excellent passive surveillance to the main area of public open space located to the west/ south of the scheme which runs along the River Urrin.



Figure 12: CGI showing apartment building passive surveillance to main area of open space (Source: 3DDB, 2021)



Figure 13 Photomontage showing frontage along the Carley's Bridge Road facing south west (Source: 3DDB, 2021)



Figure 14 Photomontage showing frontage along the Carley's Bridge Road facing north east (Source: 3DDB, 2021)

Towards the north, east and south of the site there is a more varied housing typology comprising of a mix of terraced and semi-detached house, duplex and apartment blocks.

The creche building is located to the north of the development. This is a single storey building and respects the neighbouring building heights. The creche is located in close proximity to family units within the scheme.



Figure 15 North West Extract of the Proposed Site Layout Plan (Source: BDA, 2021)

The building heights throughout the site have been carefully modulated to ensure that the development will not have a detrimental impact on the amenity of the existing surrounding properties in terms of overshadowing, overlooking or loss of privacy. The orientation of the buildings, the location of windows and private open space and the separation distances involved, including the perimeter buffer zone, further protect the surrounding existing properties in terms of privacy and ensures no overlooking will occur of these properties.

Parking is provided to the front of each house and at communal areas close to the Apartment and Duplex Blocks. This allows for a large quantum of public and communal open space to be provided to maximise residential amenity. All of the blocks and houses overlook the open spaces throughout the site offering excellent passive surveillance.

Mature trees, hedgerows and vegetation are being retained where possible particularly along the boundaries. This will screen the development from the surrounding area whilst making the development feel mature and well established.

The density of the development equates to 35 UPH which is in line with national policy for outer suburban locations.,...

The scheme comprises of 233 no. units with 72 no. 1-bed, 40no. 2-bed, 113 no. 3-bed, 8 no. 4-bed dwellings. The range of dwelling types will facilitate a wider range of homeowners including individuals, couples, small-large families and empty nesters. The unit mix helps to provide a number of distinct character areas throughout the scheme.

Open space

The scheme design has evolved having regard to the natural features of the site in terms of the mature trees and vegetation; and the River Urrin which runs along the southern/ western boundary. This has helped to form a series of mature public and communal open spaces with attractive features which provides high amenity value.

The bank of the River Urrin provides for a large public open space (c. 17,750 sq.m) which comprises of a mix of amenity areas including multiple play areas (to cater for different age groups), rough grass meadows, calcareous meadows, native species biotope planting, green routes, and grass lawn recreation areas. This area will be heavily planted in native trees, hedgerows and wildflowers significantly increasing the biodiversity in the area.

A green link from the riverside amenity space flows through the site to neighbouring Millbrook Estate. Smaller pockets of open space branch off the green link ensuring that all dwellings have ease of access to amenity spaces. Pedestrian green links are provided throughout the site offering safe routes connect all open spaces and the creche.

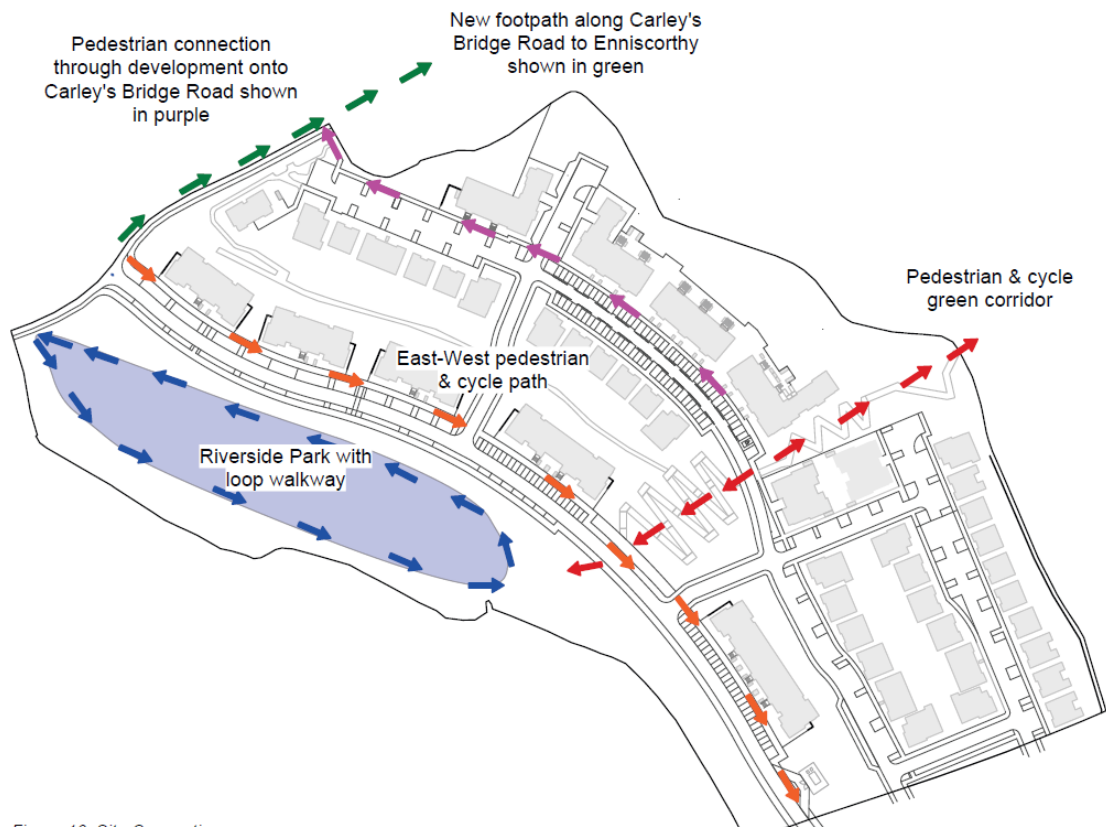


Figure 16 Internal Site Connections (Source: BDA, 2021)

The design provides for a large quantum of public and communal open space throughout to maximise residential amenity. Priority is given to pedestrians and cyclists throughout the scheme with strong links provided for between open spaces and to the surrounding area. Parking is located away from open spaces to maximise amenity value.



Figure 17 CGI showing an apartment building providing passive surveillance over children's play area (Source: 3DDB, 2021)



VISUAL IMPACT ASSESSMENT

The proposed development will result in the creation of a new series of buildings, ranging in height up to 4 storeys on a site which currently comprises of derelict farm sheds: and agricultural land. The sensitivity of the site, and the surrounding area is considered low as it is not in an Architectural Conservation Area. The insertion of 4 storey buildings along Carley's Bridge Road is considered to have a positive impact on the streetscape by providing a new urban edge along this important route into Enniscorthy. The form of the residential units to the northeast corner of the site are two/three storeys in height to respect the scale of the existing neighbouring estates. The height and density of the built form increases to the south of the site overlooking the new public park.

The scheme will provide attractive housing in this area which is well screened due to the retention of mature trees, hedgerows and vegetation. The proposed development will have high quality materials throughout and high-quality landscaping. The overall effect of this proposal, when viewed from the surrounding areas is considered to be positive. The application is accompanied by Photomontages and CGI's prepared by 3D Design Bureau displaying the visual impact of the proposed development.

CHILDCARE FACILITIES

As part of the application a large childcare facility (c. 290 sqm) has been provided. This facility will have 5 no. classrooms and can accommodate 44 no. students. This facility will cater for the demand for childcare places caused by the proposed development.

TRANSPORT

The scheme has 352 no. car spaces in total. Car parking is located to the front of the houses and at communal areas close to the apartments and duplex units. The parking is segregated where possible from the landscaped areas which enables the provision of high-quality landscaping throughout the development making the dwellings and their surroundings a pleasant and peaceful location to be in. This level of parking is under the maximum standards permitted in the Development Plan.

The Traffic and Transport Assessment has reviewed the development in terms of levels of car parking, the rate of growth of car ownership as part of this scheme and the access arrangements to the car parking. This report demonstrates that the level of car parking and access points are acceptable in terms of DMURS and WCC Development Plan standards.

497 bicycle parking spaces are proposed within the scheme. Secure bicycle parking is provided throughout the site. The proposed scheme has been designed to provide fully integrated and safe bicycle paths, allowing ease of access throughout.

Please refer to documentation prepared by Transport Insights for full details on transport proposals and DMURS compliance.

COMPLIANCE WITH PART V

The applicant has allocated 47 no. units (20%) for Part V on-site. These units are indicated on the associated plans submitted as part of this pre-application in the Part V pack. The costings of the Part V units are attached in the Part V planning pack.

NATURA IMPACT ASSESSMENT

An Appropriate Assessment Screening Report was carried out for this site. It has found that *"the proposed development is not directly connected with or necessary to the nature conservation*

management of the designated site. Therefore, following consideration of the location of the Slaney River Valley SAC and the Wexford Harbour and Slobbs SPA in relation to the proposed development at Enniscorthy Rural, and the potential impacts that may occur, this project must proceed to the next stage of Appropriate Assessment, namely the Natura Impact Assessment."

Following the Appropriate Assessment Screening Report conclusion, a full NIS was undertaken to evaluate the potential impacts of the proposed development with regard to the effects upon the conservation objectives and qualifying interests (including the habitats and species) of Slaney River Valley SAC and the Wexford Harbour and Slobbs SPA.

The NIS concluded *"it is considered that following mitigation, that the proposed project does not have the potential to significantly affect the conservation objectives of these aforementioned Natura 2000 sites and the integrity of these sites as a whole will not be adversely impacted."*

It is considered that these potential impacts can be successfully mitigated against. With implementation of the mitigation measures there will be no deterioration in water quality or impacts upon any designated habitat or any species dependent on these designated habitats.

In light of the above, it is considered that the proposed works do not have the potential to significantly affect the conservation objectives or qualifying interests of the Slaney River Valley SAC and the Wexford Harbour and Slobbs SPA. The integrity of the site will not be adversely affected."

Please refer to Natura Impact Statement prepared by Whitehill Environmental for further information.

CHAPTER 6 STATEMENT OF RESPONSE TO AN BORD PLEANÁLA OPINION

A Section 5 Pre-Planning Consultation Meeting with An Bord Pleanála and Wexford County Council on the 3rd of December 2020 via Microsoft Teams. Following on from this An Bord Pleanála issued a Direction, dated the 16th of December 2020, along with a Notice of Pre- Application Consultation Opinion, also dated the 10th of July 2020 under reg. ref. ABP-307305-20, which stated that it is *of the opinion that the documents submitted with the request to enter into consultations constitute a reasonable basis for an application for strategic housing development.*

An Bord Pleanála considers that the following issues need to be addressed in the documents submitted that could result in them constituting a reasonable basis for an application for strategic housing development.

Issues to be addressed

- 1.) *Further consideration of the documents as they relate to the design and layout of the proposed development with regard to national and local planning policy, in particular the ‘Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas’, the updated ‘Sustainable Urban Housing Design Standards for New Apartments – Guidelines for Planning*
Further consideration of the documents as they relate to the design and layout of the proposed development with regard to national and local planning policy, in particular the ‘Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas’, the updated ‘Sustainable Urban Housing Design Standards for New Apartments – Guidelines for Planning.
- 2.) *The prospective applicant should satisfy themselves that the proposed design and buildings heights provide the optimal urban design and architectural solution for this site and that it is of sufficient quality to ensure that the proposed development makes a positive contribution to the character of the area over the long term. In this regard, the submitted documents should allow for further consideration of the following matters:*
 - *Provision of additional variety in the architectural composition of the various building types.*
 - *Introduction of hierarchical height structure and more variation in building typology to create an appropriate urban edge along the internal access road fronting the riverside park.*
 - *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. Additional CGIs and visual assessment, having regard to the local objectives pertaining this site, and recognising the visual sensitivity of this area/site.*
- 3.) *Further consideration of the documents as they relate to the provision of pedestrian and cycle links from the proposed development through Millbrook Estate towards Enniscorthy town centre. The submitted documentation should be sufficient to show that proper links would be provided from the site through the Millbrook Estate upon the initial occupation of the proposed homes. The documents should provide details of necessary upgrade works required to facilitate*

the development to include, inter alia: a quality audit, plans and particulars and relevant third-party consent, as applicable. The submitted documentation should indicate how the proposed links can facilitate movement by pedestrians and cyclists after dark and whether such movement would be constrained. Cycle links should be designed in compliance with the National Cycle Manual issued by the NTA.

- 4.) *Further consideration of the documents as they relate to upgrade works and the provision of a continuous footpath connection on Carley's Bridge Road from the north eastern site boundary over a distance of approx. 150m from the site boundary to the existing public footpath connecting the site to Enniscorthy town centre. The provision of appropriate connections and permeability into and out of the site is considered a necessary component of the development. The documents should provide details of necessary upgrade works required to facilitate the development in consultation with Wexford County Council to include, inter alia: plans and particulars and relevant third-party consent, as applicable. The justification should include, inter alia, alternatives considered/deliverable if applicable.*

Specific Information Required

The board also requested, 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:

1. *The inclusion of all works to be carried out, and the necessary consents to carry out works on lands, within the red line boundary.*
2. *A landscape and permeability plan of the proposed open space within the site clearly delineating public, semi-private and private spaces, areas to be gated, treatment of interface areas and provision of future connections to adjoining lands, location and design of identified play areas.*
3. *A landscape masterplan for the proposed Riverside Park to include appropriate measures to address water safety at the water's edge.*
4. *A Site-Specific Flood Risk Assessment Report.*
5. *Proposals as they relate to water and wastewater proposals to service the development. The documents should provide details of necessary upgrade works required to facilitate the development to include, inter alia: plans and particulars, having regard to the concerns raised by Irish Water report dated 6th July, in particular, site specific modelling.*
6. *A statement of compliance with the applicable standards set out in DMURS, and a mobility management plan which justified the proposed provision of parking for cars and bicycles.*
7. *Submission of a Traffic and Transport Assessment.*
8. *A housing quality assessment which provides specific information regarding the proposed apartments, and which demonstrates compliance with the various requirements of the 2018*

Guidelines on Design Standards for New Apartments, including its specific planning policy requirements.

9. *A comprehensive daylight and sunlight analysis, where applicable, for apartment units within the development.*
10. *A building life cycle report in accordance with section 6.3 of the Sustainable Urban Housing: Design Standards for New Apartments (2018).*
11. *Inclusion of a Social and Community Audit of the schools in the vicinity in particular school going children and the accommodation of additional requirement resulting from the proposed development.*
12. *A phasing scheme for the development which would indicate how open space and access to serve the proposed houses would be provided in a timely and orderly manner.*
13. *Proposals for compliance with Part V of the planning act.*
14. *Proposals for compliance with Part V of the planning act.*
15. *A waste management plan*
16. *A NIS, clearly addressing all potential impacts (construction as well as operational, delivery and operation of mitigating features associated with the development; etc.*
17. *Where the applicant considers that the proposed strategic housing development would materially contravene the relevant development plan or local area plan, other than in relation to the zoning of the land, a statement indicating the plan objective (s) concerned and why permission should, nonetheless, be granted for the proposed development, having regard to a consideration specified in section 37(2)(b) of the Planning and Development Act 2000. Notices published pursuant to Section 8(1)(a) of the Act of 2016 and Article 292 (1) of the Regulations of 2017, shall refer to any such statement in the prescribed format.*

In addition, the opinion identifies that the applicant shall notify the following authorities in the event of making a planning application:

- 1.) Irish Water
- 2.) Transport Infrastructure Ireland
- 3.) Inland Fisheries Ireland

We can confirm that the prescribed bodies identified by An Bord Pleanála have been notified and a full copy of the planning application under consideration has been furnished to these bodies. It is worth noting that all statutory consultees listed above have requested that only a soft copy be sent to them.

Statement of Response to Issues raised and Specific Information Required

This section of the report aims to deliver an overview of the response to all matters raised in the opinion issued and addressed the additional specific information requested at the tripartite meeting and in the Opinion by the Board in respect of the proposed development following the pre-application process for a Strategic Housing Development at the subject site (Reg. Ref. ABP 307305-21). Please note that these specific information requests should be read in conjunction with the accompanying detailed documentation prepared by McGill Planning, Brian Dunlop Architects, Landscape Design Services, Sweeney Consulting Engineers, Independent Tree Surveys, 3D Design Bureau, Transport Insights, Traynor Environmental, IE Consulting, Delap & Waller Ltd., Wildlife Surveys Ireland Ltd.,

An Bord Pleanála considers that the following issues need to be addressed in the documents submitted that could result in them constituting a reasonable basis for an application for strategic housing development:

- 1.) Further consideration of the documents as they relate to the design and layout of the proposed development with regard to national and local planning policy, in particular the 'Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas', the updated 'Sustainable Urban Housing Design Standards for New Apartments – Guidelines for Planning Authorities', the 'Urban Developments and Building Heights Guidelines for Planning Authorities', the National Planning Framework and the relevant provisions of the Enniscorthy Town Development Plan 2008-2014 (extended) and the Wexford County Development Plan 2013-2019.***

Please refer to the Statement of Consistency, Chapter 7 this Planning Report prepared by McGill Planning Limited. This chapter provides an overview of the National, Regional and Local policies relevant to the proposed development and how the scheme, as now revised, is consistent with these policies.

- 2.) The prospective applicant should satisfy themselves that the proposed design and buildings heights provide the optimal urban design and architectural solution for this site and that it is of sufficient quality to ensure that the proposed development makes a positive contribution to the character of the area over the long term. In this regard, the submitted documents should allow for further consideration of the following matters:***

- Provision of additional variety in the architectural composition of the various building types.***
- Introduction of hierarchical height structure and more variation in building typology to create an appropriate urban edge along the internal access road fronting the riverside park.***
- 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. Additional CGIs and visual assessment, having regard to the local objectives pertaining this site, and recognising the visual sensitivity of this area/site.***

Key changes have been made to the scheme to ensure that any issues that arose from the An Bord Pleanála opinion have been addressed in the application. The architectural design statement by BDA Architects contains full details of the design and layout of the proposed development and demonstrates the evolution of the scheme. The key architectural alterations made between the pre application submission, and the full application are:

- Relocation of the East-West Street further from the River Edge in the South-Eastern corner of the site to facilitate appropriate future connection into adjoining lands and to provide an improved riparian corridor zone along the river in this location.
- Provision of a new gently sloped foot and cycle path to complete the pedestrian link from to and from Millbrook in an inviting and direct route through to the Riverside Linear Park via a high landscaped green corridor.
- Additional footpath connectivity provided along Carley's Bridge Road.
- Alterations to Buildings Blocks 17-21 to provide a split-level section to these buildings across the steepest section of the site and to eliminate sunken courtyards or lightwells in addition to providing dual aspect and dual entrances to each building. This has resulted in 100% compliance for the development with the sunlight and daylight analysis undertaken by 3D Design Bureau.
- Further assessments and updates in relation to proposed building heights and locations to ensure delivery of a development appropriate to the receiving environment. Taller buildings elements are proposed at key corners throughout the development and a mix of 3 & 4 stories along the East-West Street. The updated and additional 3D Images indicate that additional overall scheme height and further variety is provided through the various finished floor levels and various building types as positioned on the sloped site.
- A reduction in the number of individual buildings addressing the East-West Street to facilitate the new pedestrian pathway and landscaped green link.
- Updates to the elevation's treatments of a number of buildings in particular those addressing the East-West Street to include alternative roof profiles, alternative brick selections, and updates to the proportions and areas of render & brick to introduce additional elevational variety to the streetscape.
- Increased variety of building types proposed to include 2 storey houses, 3 storey houses, 1-, 2- & 3-bedroom apartments, and a variety of duplex buildings.
- Updates to the layouts, orientations, and overall areas of the proposed apartments and duplex units to ensure compliance with National Policy and to ensure delivery of the highest quality accommodation.

Additional Variety in the Architectural Composition of the Various Building Types:

The mix of dwelling types proposed will facilitate delivery of a variety of the housing stock which will add to the home choice available within Enniscorthy, the immediate area, within the site itself, and will also allow for future residents to upgrade or downsize whilst maintaining their established roots.

| Unit Type | No. of Units | Percentage |
|--------------------|--------------|------------|
| Apartment / Duplex | 180 | 77% |
| 1 bedroom | 72 | 31% |
| 2 bedrooms | 40 | 17% |
| 3 bedrooms | 68 | 29% |
| House | 53 | 23% |

| | | |
|--------------|------------|-------------|
| 3 bedrooms | 45 | 19% |
| 4 bedrooms | 8 | 4% |
| Total | 233 | 100% |

The proposed houses are 3 and 4 bedroom and generally 2 / 3 storey family units in detached, semi-detached and terraced formats.

The proposed Duplex Units are primarily three storey, incorporating a two-storey duplex house over a single-storey ground floor apartment, each with own door access. The Duplex Units are spread throughout the site however they are primarily along the main access road to the south providing a strong urban edge upon entry to the site and also providing a strong background and a comprehensive passive observation of the open space along the River Urrin.

The proposed apartments, in buildings of three to four storeys are a mix of one, two and three-bedroom units. Please refer to the below map which demonstrates the variety in architectural composition:

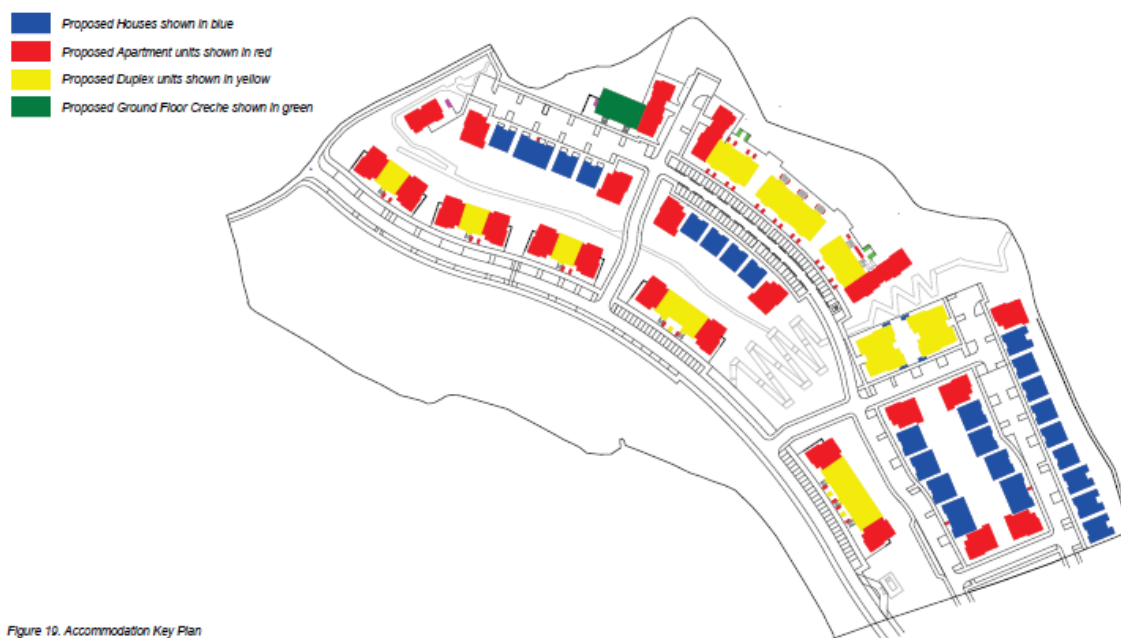


Figure 12. Accommodation Key Plan

Figure 19 Architectural Composition Map (BDA, 2021)

Hierarchical Height Structure and more variation in the building typology:

The proposed building heights have been varied within the development to ensure a visually engaging and high-quality residential environment. The massing of the development is designed to have the taller 3-4 storey buildings at the lowest point to the south of the site providing a strong edge to the open space and using a split-level section to address the steeper parts of the topography. In addition to this, taller buildings are located to address the edge of the green link to Millbrook and to ensure significant passive surveillance to these areas. Where taller buildings are located to the north / east of the site these are set back from the site boundary in order to retain the existing foul line and wayleaves in place. The remainder of the development consists of 2-3 storey buildings following the gradient of the site up to the north-eastern boundary to tie in with the 2 storey dwellings of the neighbouring estates.

Key corners within the development are identified with taller sections of the buildings as shown in the diagram below. In most cases these taller buildings are a mix of apartment and duplex accommodation and as such are identifiably different in both height and elevation from their adjacent accommodations. The provision of clearly identifiable buildings at these junction assists in the understanding of the development as a whole and in wayfinding for both residents and visitors in each of the character areas. A mix of similar materials, brick and plaster, ensures that these buildings remain part of the overall collective design, but the contrasting colours provide a subtle definition of place.



Figure 20 Building Height Map (BDA, 2021)

High quality and sustainable finishes and details which seek to create a distinctive character for the development:

In relation to creating a distinctive character for the development, BDA Architecture have provided high quality and sustainable materials. It is intended to offer solutions which are durable, attractive, and cohesive within the overall mix of houses, apartments and duplex units. Brick has been chosen in a number of areas as an appropriate material & finish in terms of both scale and robustness. The brick finishes are of human scale and offer a warmth of finish. The render finish, substantially lighter in colour than the brick finishes, provides variety and breaks down the scale of the facades in conjunction with the architectural relief of the inset balconies and terraces.



Figure 21 Building Materials Map (BDA, 2021)

Brick and render are used as the principal finishes to the elevations which echoes the predominate use of these materials as a durable weathering finish to the traditional buildings over many centuries. Two types of brick finish are proposed in conjunction with render and other materials to give visual interest, texture and variation to the elevational composition.

Three Character Areas have been proposed within the development each with varying densities, heights, and layout which will assist in the creation of neighbourhood and a sense of place. Character Area 1 will consist of the 5 apartment blocks forming a strong urban edge along the main access road through the development but also provide a strong edge to Enniscorthy as a whole as you enter the town from Carley's Bridge Road. Selected buff-cream handmade brick & selected plaster finishes, along with a gable fronted aesthetic have been included to establish a repeating rhythm along the main access road.

Character Area 2 will consist of streets of semi-detached and terraced 3- & 4-bedroom dwellings. This Character Area has been designed to foster the sense of a smaller, less dense and more intimate area away from the primary access road and to the eastern and western site boundaries.

Character Area 3 forms a higher density area incorporating a mix of two and a half storey dwellings and duplex and apartments is the primary homezone area in the proposed development. The taller 3 & 4 storey buildings provide a strong edge to the homezone area and addresses the communal open space to the north and the proposed new green link to the neighbouring Millbrook estate to the east. The use of handmade brick and plaster and gable fronted aesthetics is continued to retain a consistent character to the area. The landscaped streetscape incorporates perpendicular parking and set down spaces to serve to the staff and parents associated with this creche.



Figure 61. Image of proposed red brick finish



Figure 64. Sample of proposed red brick finish in use



Figure 62. Image of proposed buff brick finish



Figure 65. Sample of proposed buff brick finish in use



Figure 63. Image of proposed zinc dormer rooflight



Figure 66. Image of stone to duplex entrances

Figure 22 Building Materials Examples (BDA, 2021)

3.) Further consideration of the documents as they relate to the provision of pedestrian and cycle links from the proposed development through Millbrook Estate towards Enniscorthy town centre. The submitted documentation should be sufficient to show that proper links would be provided from the site through the Millbrook Estate upon the initial occupation of the proposed homes. The documents should provide details of necessary upgrade works required to facilitate the development to include, inter alia: a quality audit, plans and particulars and relevant third-party consent, as applicable. The submitted documentation should indicate how the proposed links can facilitate movement by pedestrians and cyclists

after dark and whether such movement would be constrained. Cycle links should be designed in compliance with the National Cycle Manual issued by the NTA.

A new pedestrian link to the Millbrook estate public footpath network is included within the red line boundary of the application, with further footpath links and upgrades through Millbrook, the adjacent Andy Doyle Close Valley, and through to Enniscorthy set out as recommendations within the Quality Audit (within the Traffic and Transport Assessment) and envisaged to be implemented in agreement with the local authority following a grant of permission for the development (and which can be conditioned for a Special Development Contribution levy under Section 48(2)(c) of the Planning & Development Act, 2000 (as amended) .

The phasing plan submitted as part of this application shows that the proposed link through Millbrook Estate will be provided in Phase 1 of the proposed development along with the Riverside Amenity Park via the Greenlink corridor. This will allow future residents to use an established pedestrian route from the proposed development to Enniscorthy Town Centre. Inversely, it will also provide a link for the general public from the town centre to the high-quality riverside park.

A description of how the proposed links facilitate pedestrian and cyclist movements after dark is set out within Section 5.3 of the Traffic and Transport Assessment. Cycle links have been designed in accordance with the National Cycle Manual, please refer to Section 2.2 and 5.3 of the TTA for further detail.

The letter of consent from Wexford County Council to facilitate the link through Millbrook Estate is submitted as part of this application.

4.) Further consideration of the documents as they relate to upgrade works and the provision of a continuous footpath connection on Carley's Bridge Road from the north eastern site boundary over a distance of approx. 150m from the site boundary to the existing public footpath connecting the site to Enniscorthy town centre. The provision of appropriate connections and permeability into and out of the site is considered a necessary component of the development. The documents should provide details of necessary upgrade works required to facilitate the development in consultation with Wexford County Council to include, inter alia: plans and particulars and relevant third-party consent, as applicable. The justification should include, inter alia, alternatives considered/deliverable if applicable.

As set out within Table 1.3 of the Traffic & Transport Assessment (TTA) prepared by Transport Insights, a new pedestrian link is proposed along the northern side of Carley's Bridge Road, with this footpath connecting with an existing footpath which provides a direct link to Enniscorthy. In conjunction with the previously proposed footpath along the site's frontage, and a proposed raised table crossing, a continuous route to Enniscorthy is provided.

It should be noted that the shortest route to Enniscorthy for most residents of the development shall remain the route through the Millbrook Estate.

Improvements to Carley's Bridge Road are set out within Section 5.3 of the TTA , with pedestrian routes through Millbrook to Enniscorthy set out within the Quality Audit (Section 8 of the TTA). Drawings setting out these works are included with the TTA along with associated letters of consent.

Specific Information Required

The board also requested, 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:

Specific Item no. 1:

The inclusion of all works to be carried out, and the necessary consents to carry out works on lands, within the red line boundary.

The letter of consent from Wexford County Council and Mr. Michael Banville to facilitate the upgrade works to Carley's Bridge Road is submitted as part of this application. In addition to this, the letter of consent from Wexford County Council to facilitate the link through Millbrook Estate is submitted as part of this application.

Please also refer to the Site Location Map by BDA Architects which identifies the lands in Wexford County Council's ownership and Michael Banville's ownership.

Specific Item no. 2:

A landscape and permeability plan of the proposed open space within the site clearly delineating public, semi-private and private spaces, areas to be gated, treatment of interface areas and provision of future connections to adjoining lands, location and design of identified play areas.

Please refer to Drawing number 1768-P-015 'Open Space Key Plan' by BDA Architects which clearly delineates the public open space and communal open space.

Please refer to the Landscape Architecture pack by Landscape Design. Drawing nos. 20_174-PD-017, 20_174-PD-018 and 20_174-PD-019 shows the proposed boundary details. Each apartment has a generous external terrace, duplexes now have private gardens, and each private dwelling has a garden. The rear gardens of the residential dwelling houses have new Hornbeam or Holly hedges to the rear of garden, and decorative trees are planted to each rear garden of a dwelling.

All of the amenity open spaces have been detailed to provide passive surveillance and ensure overlooking and activation. Appropriate planting and landscaping measures are proposed to provide privacy buffers in dwellings generally.

In relation to the provision for play and recreation in the amenity open spaces, guidance has been followed from the National Children's Play Policy 'Ready Steady Play', the Guidelines on 'Quality Housing for Sustainable Communities' and 'Sustainable Urban Housing' by the DoHPLG and provided suitable play opportunities for the future child population within the proposed development. A number of play spaces, natural in character to fit with the site, are arranged per age group (older children 11-15 and younger children 1-10) to activate the open spaces.

Children's play in our scheme has been accommodated for as follows:

- Within small, dispersed play spaces 85-100m² for the specific needs of toddlers and children up to the age of six, with suitable play equipment, within sight of the dwellings.
- Creche play space: with age, activity and curriculum appropriate play equipment and surfacing
- Within larger play areas 200-400m² for older children and young teenagers

- [illegible]

Specific Item no. 3:

A detailed Landscape Masterplan prepared by Landscape Design is included with the application. A detailed design approach for the riverside park has been informed by the IFI guidance document 'Planning for Watercourses'. A 1.20m high sweet chestnut fence has been provided along the riverbanks to provide a riparian buffer zone as shown on our landscape plans in a brown dashed line; and specifically addressed in detail on page 22-23 of the Landscape Design Rational Report 'River Urrin - Riparian Buffer Zones'. Gates will be provided along the fence for angler and maintenance access.

A Site-Specific Flood Risk Assessment Report.

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Specific Item no. 5:

Proposals as they relate to water and wastewater proposals to service the development. The documents should provide details of necessary upgrade works required to facilitate the development to include, inter alia: plans and particulars, having regard to the concerns raised by Irish Water report dated 6th July, in particular, site-specific modelling.

Please refer to documentation provided by Sweeney Consulting Engineers.

Specific Item no.6:

A statement of compliance with the applicable standards set out in DMURS, and a mobility management plan which justified the proposed provision of parking for cars and bicycles.

Please refer to the DMURS Compliance statement and the Mobility Management Plan included within the Traffic and Transport Assessment by Transport Insights

Specific Item no.7:

Submission of a Traffic and Transport Assessment.

Please refer to the Traffic and Transport Assessment submitted as part of this application by Transport Insights.

Specific Item no.8:

A housing quality assessment which provides specific information regarding the proposed apartments, and which demonstrates compliance with the various requirements of the 2018 Guidelines on Design Standards for New Apartments, including its specific planning policy requirements.

Please refer to the Housing Quality Assessment submitted as part of this application by BDA Architecture.

Specific Item no.9:

A comprehensive daylight and sunlight analysis, where applicable, for apartment units within the development.

Please refer to the Daylight and Sunlight Assessment Report prepared by 3D Design Bureau and submitted as part of this planning application. The report concludes that the level of daylight and sunlight to the surrounding existing properties can be considered very favourable and acceptable. No existing properties will experience an unacceptable drop in levels of daylight or sunlight. The results of this assessment presented 100% compliance in terms of VSC, APSH, and Sun lighting.

Specific Item no.10:

A building life cycle report in accordance with section 6.3 of the Sustainable Urban Housing: Design Standards for New Apartments (2018).

Please refer to the Building Life Cycle Report submitted as part of this application by BDA Architecture.

Specific Item no.11:

Inclusion of a Social and Community Audit of the schools in the vicinity in particular school going children and the accommodation of additional requirement resulting from the proposed development.

Please refer to the Social and Community Audit prepared by McGill Planning Limited submitted as part of this application.

Specific Item no.12:

A phasing scheme for the development which would indicate how open space and access to serve the proposed houses would be provided in a timely and orderly manner.

Please refer to drawing no. 1768-P-025 'Phasing Plan' submitted as part of this application by BDA Architecture.

Specific Item no.13:

Proposals for compliance with Part V of the planning act.

Please refer to the Part V pack which includes the Part V costings and drawings by BDA Architecture.

Specific Item no.14:

A Construction Management Plan

Please refer to the Construction & Environmental Management Plan prepared by Traynor Environmental submitted as part of this application.

Specific Item no.15:

A waste management plan

Please refer to the Operational Waste & Recycling Management Plan prepared by Traynor Environmental submitted as part of this application.

Specific Item no.16:

A NIS, clearly addressing all potential impacts (construction as well as operational, delivery and operation of mitigating features associated with the development; etc.

Please refer to the Natura Impact Statement prepared by Whitehill Ecology and submitted as part of this application. The report concludes that following mitigation, the proposed project does not have the potential to significantly affect the conservation objectives of these aforementioned Natura 2000 sites and the integrity of these sites as a whole will not be adversely impacted.

Specific Item no.17:

Where the applicant considers that the proposed strategic housing development would materially contravene the relevant development plan or local area plan, other than in relation to the zoning of the land, a statement indicating the plan objective (s) concerned and why permission should, nonetheless, be granted for the proposed development, having regard to a consideration specified in section 37(2)(b) of the Planning and Development Act 2000. Notices published pursuant to Section 8(1)(a) of the Act of 2016 and Article 292 (1) of the Regulations of 2017, shall refer to any such statement in the prescribed format.

Please refer to the Material Contravention Statement included within this Planning Report. The public notices state that: *“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 the Wexford County Development Plan 2013-2019 and the Enniscorthy Town & Environs Development Plan 2008 -2014 (as extended) other than in relation to the zoning of the land.”*

CHAPTER 7 STATEMENT OF CONSISTENCY

PLANNING POLICY REVIEW

This chapter provides an overview of national, regional, and local planning policy which are relevant to this development.

NATIONAL & REGIONAL PLANNING POLICY

The key national and regional policies and guidelines (including Section 28 Guidelines) relevant to the proposed development are as follows:

- *Ireland 2040 Our Plan - National Planning Framework (2018);*
- *Rebuilding Ireland Action Plan 2016;*
- *Regional Spatial and Economic Strategy for the Southern Region (2020);*
- *Guidelines for Planning Authorities on Urban Development and Building Heights (2018);*
- *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009), and the accompanying Urban Design Manual;*
- *Delivering Homes, Sustaining Communities (2008) and the accompanying Best Practice Guidelines- Quality Housing for Sustainable Communities (2007);*
- *Guidelines for Planning Authorities on Sustainable Urban Housing: Design Standards for New Apartments (2018);*
- *Design Manual for Urban Roads and Streets (2019);*
- *Guidelines for Planning Authorities on Childcare Facilities (2001);*
- *Smarter Travel – A New Transport Policy for Ireland (2009-2020);*
- *The Planning System and Flood Risk Management (2009).*

Ireland 2040 Our Plan - National Planning Framework (2018)

The National Planning Framework (NPF) is the Government's plan high level strategic plan for shaping the future growth and development of the country and to cater for the extra one million people that are anticipated to be living in Ireland. The NPF includes National Strategic Outcomes and National Policy Objectives to guide development and policy making at regional and local levels, providing an overall framework for the entire country.

The NPF notes that ensuring a balanced approach in activating and realising much underutilised potential in wider rural towns and dispersed communities is a priority for the Southern Region (which includes Wexford). The South-East subregion (which includes Wexford) has a network of large towns and has capacity for improved growth.

The NPF Strategy includes the following aims:

- There is a need to encourage population growth in towns of all sizes that are strong employment and services centres, where potential for sustainable growth exists, also supported by employment growth.
- Balance the provision of good quality housing that meets the needs of a diverse population, in a way that makes our cities, towns, villages and rural areas good places to live now and in the future.

- NPO9 aims to support the growth of and appropriate designed development in towns that are not identified within Policy 2a or 2b of the framework to enable a co-ordinated strategy to ensure the alignment of investment in infrastructure and the provision of employment, together with supporting amenities and services to ensure a good quality of life for both existing and future residents.

Key National Policy Objectives (NPOs) which relate to this proposal are set out below:

National Policy Objective 4

Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.

National Policy Objective 11

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

National Policy Objective 13

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

National Policy Objective 27

Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments and integrating physical activity facilities for all ages.

National Policy Objective 32

To target the delivery of 550,000 additional households to 2040:

- Location of homes: addressing long term spatial distribution of housing
- Building Resilience – re-use, adaptability and accessibility in our housing stock
- Need and demand profile
- Reconciling Future Housing Requirements effectively

National Policy Objective 33

Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.

National Policy Objective 34

Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time.

National Policy Objective 60

Conserve and enhance the rich qualities of natural and cultural heritage of Ireland in a manner appropriate to their significance.

National Policy Objective 62

Identify and strengthen the value of greenbelts and green spaces at a regional and city scale, to enable enhanced connectivity to wider strategic networks, prevent coalescence of settlements and to allow for the long-term strategic expansion of urban areas.

STATEMENT OF CONSISTENCY

The proposed development seeks to deliver an appropriate form and scale of residential development at a site that is located c. 1km west of Enniscorthy Town Centre and c. 23km north of Wexford Town. The site is serviced by Enniscorthy train station which is located c. 1.8km to the east of the subject site linking the area to Dublin, Wexford, Rosslare and Dundalk, c. 1.7 km west of the N11, and c. 2.6km east of the N30. Enniscorthy is also serviced by a range bus routes including Wexford Bus route no's 740 and 376; Local Link route no's 368 and 369 linking the area to Dublin, Wexford, Carlow, Tullow, New Ross and Bunclody.

Both Enniscorthy and Wexford offer a range of employment opportunities. The subject site is located west of Enniscorthy Town Centre which offers a range of shops, pubs and restaurants, services, recreational centres, and employment opportunities.

The proposed development will provide for a high-quality residential scheme of 269 units through the design, quality, materials and finishes proposed. In addition, the proposed units are in excess of the minimum apartment and house size requirements as stated in the Apartment Guidelines and County Development Plan and provide well orientated spacious units. The scheme provides a wide mix of units in the urban settlement of Enniscorthy where there is strong demand for housing.

Development of these lands is considered to be fully in accordance with the recommendations of the NPF.

The proposed development is in accordance with the NPF's over-arching aim of consolidated and sustainable growth patterns. The subject site is considered an appropriate location for residential development due to its proximity to the town centre and existing residential development. The proposal will increase the local population supporting the existing town of Enniscorthy. The proximity of the proposed development to Enniscorthy Town Centre and various shopping areas will help to encourage walking and cycling as alternative transport option to the car.

REBUILDING IRELAND – ACTION PLAN FOR HOUSING AND HOMELESSNESS 2016

Rebuilding Ireland was launched in 2016 with the objective to double the annual level of residential construction to 25,000 homes and deliver 47,000 units of social housing in the period to 2021. It was based on 5 no pillars. Pillar 3 – Build More Homes aims to increase the output of private housing to meet demand at affordable prices.

STATEMENT OF CONSISTENCY

The proposed development is consistent with Pillar 3 to build more homes. The proposed development provides for 233 no. new dwelling units. The provision of the 233 no. residential units will add to the housing stock of the area and will cater to the increasing demand for housing in Enniscorthy.

STATEMENT OF CONSISTENCY

The proposed development will support the objectives and vision of the Regional Spatial and Economic Strategy for the Southern Region.

Enniscorthy Town Centre is well-connected town in the Wexford's urban network and the proposed development will help to support the existing shops, services and facilities in the area.

URBAN DEVELOPMENT & BUILDING HEIGHTS: GUIDELINES FOR PLANNING AUTHORITIES, 2018

The Guidelines set out national planning policy guidelines on building heights in urban areas in response to specific policy objectives set out in the National Planning Framework and Project Ireland 2040. There is a presumption in favour of high buildings at public transport nodes. It is Government policy to promote increased building height in locations with good public transport services.

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

The Guidelines emphasise the policies of the NPF to increase levels of residential development in urban centres and increase building heights and overall density by both facilitating and encouraging the development of increased heights and densities by Local Authorities and An Bord Pleanála.

They place significant emphasis on promoting development within the existing urban footprint utilising the existing sustainable mobility corridors and networks. *"In order to optimise the effectiveness of this investment in terms of improved and more sustainable mobility choices and enhanced opportunities and choices in access to housing, jobs, community and social infrastructure, development plans must actively plan for and bring about increased density and height of development within the footprint of our developing sustainable mobility corridors"*. It goes on to highlight that *"the preparation of development plans, local areas plans, and Strategic Development Zone Planning Schemes and their implementation in the city, metropolitan and wider urban areas must therefore become more proactive and more flexible in securing compact urban growth through a combination of both facilitating increased densities and building heights"*.

STATEMENT OF CONSISTENCY

In accordance with SPPR3 and SPP4 of the Guidelines it is considered that the subject site is an appropriate site for buildings ranging in height up to 4 storeys as proposed. The proposal responds to its undulating topography and it makes a positive visual impact in forming a new urban edge to the towns southern boundary overlooking the river.

The proposed development ranges from two storey to Duplex blocks and apartment blocks stepping up to 3-4 storeys in height. The prevailing heights of existing developments to the east and north of the site are respected.

The materials and finishes of the proposed blocks will be designed to a high architectural standard. The materials and finishes have also been considered with regard to the surrounding existing pattern of development and material pallet in the locality. It is considered that the proposed development will establish a new character but will be suitable for this attractive location. The proposed development provides for significant open space within the application site.

It is respectfully submitted that the proposed development has had regard to the planning policy framework as set out in the building height guidelines and National Planning Framework. The provision of residential development at this location of up to 4 storeys is supported by the height guidelines which encourages increased density and building heights at appropriate urban and suburban locations. The proposed development is considered to be in accordance with the provisions of national policy guidelines.

GUIDELINES FOR PLANNING AUTHORITIES ON SUSTAINABLE RESIDENTIAL DEVELOPMENT IN URBAN AREAS, 2009

The guidelines set out the key planning principles to be reflected in development plans and local area plans, to guide the preparation and assessment of planning applications for residential development in urban areas.

In accordance with Chapter 5 the site can be defined as an “Outer Suburban/”Greenfield” site” which is defined as open lands on the periphery of larger towns. In relation to appropriate residential density, Chapter 5.11 states:

“Studies have indicated 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.”

The net density in this instance is just over 35 units per ha and is in accordance with the above.

The Guidelines elaborate a range of high-level aims for successful and sustainable residential development in urban areas. These are assessed against the proposed scheme as follows:

| Guidance | STATEMENT OF CONSISTENCY |
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| <i>Prioritise walking, cycling and public transport, and minimise the need to use cars;</i> | <p>The application site will be served by high quality walking and cycling links connecting the site to the surrounding environs. The site is within a 15-minute walk or a 7-minute cycle of Enniscorthy Town Centre.</p> <p>The subject site is also located relatively proximate to public transport infrastructure. Enniscorthy train station is located c. 1.8km to the east of the subject site linking the area to Dublin, Wexford, Rosslare and Dundalk.</p> |

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| | <p>Enniscorthy is serviced by a range bus routes including Wexford Bus route no's 740 and 376; Local Link route no's 368 and 369 linking the area to Dublin, Wexford, Carlow, Tullow, New Ross and Bunclody.</p> <p>There are 352 no. car parking spaces allocated as part of this scheme and 497 no. secure bicycle parking spaces.</p> |
| <i>Deliver a quality of life which residents and visitors are entitled to expect, in terms of amenity, safety and convenience;</i> | The scheme has been designed to the highest residential standard. All units accord with the quantitative and qualitative standards sets down in the National Apartment Guidelines and the WCC Development Plan. |
| <i>Provide a good range of community and support facilities, where and when they are needed and that are easily accessible;</i> | <p>The development will consist of houses, apartments and duplex units with outdoor play areas and a variety of outside spaces for resident's amenity.</p> <p>The development is well located in relation to existing/planned social infrastructure in the area.</p> |
| <i>Present an attractive, well-maintained appearance, with a distinct sense of place and a quality public realm that is easily maintained;</i> | The layout of development has been designed around a number of open spaces with a series of distinct character areas. |
| <i>Are easy to access for all and to find one's way around;</i> | <p>There are a number of pedestrian and vehicular access points into the site off Carley's Bridge Road to the north and a new pedestrian link to Millbrook Residential Estate to the east is proposed.</p> <p>These points provide access to all of the dwellings increasing permeability throughout the site. All of the buildings are focussed around landscaped areas which have a variety of character areas ensuring that the layout is logical and wayfinding uncomplicated.</p> |
| <i>Promote the efficient use of land and of energy, and minimise greenhouse gas emissions;</i> | The proposal seeks to import best practice construction/engineering techniques and use of energy efficient materials to maximise energy capacity and minimise impacts of climate change in accordance with current buildings regulations. |
| <i>Provide a mix of land uses to minimise transport demand;</i> | <p>The site is zoned for residential development as is proposed. The proposed development also includes a creche which will cater for childcare demand from the proposed scheme. The scheme is within c. 1 km of Enniscorthy Town Centre and has ease of access to a variety of existing and planned services within the area.</p> <p>The subject site is served by excellent transport infrastructure. Enniscorthy train station is located c. 1.8km to the east of the subject site linking the area to Dublin, Wexford, Rosslare and Dundalk, c. 1.7 km west of the N11, and c. 2.6km east of the N30. Enniscorthy is serviced by a range bus routes including Wexford Bus route no's 740 and 376; Local Link route no's 368 and 369</p> |

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| | linking the area to Dublin, Wexford, Carlow, Tullow, New Ross and Bunclody. |
| <i>Promote social integration and provide accommodation for a diverse range of household types and age groups;</i> | <p>A range of unit sizes is proposed for the scheme with 1, 2, 3, and 4-bedroom houses, apartments and duplex units.</p> <p>A variety of household types will be catered for. The mix of residential unit types in the general area will be significantly improved.</p> |
| <i>Enhance and protect the green infrastructure and biodiversity; and</i> | <p>The site is largely a greenfield site with the exception of ruinous agricultural sheds located to the north of the site. The boundaries comprise of a dense row of trees, mature vegetation and hedgerows along all sides and the southern and western boundary comprises of the River Urrin. A hedgerow runs through the centre of the site from west to east please refer to the Arborist documentation prepared by Independent Tree Surveys for further information. Mature trees, hedgerows and planting will be retained as part of this application where possible. Additional planting will integrate the scheme with the surrounding area and to provide shelter and amenity value within the site.</p> <p>The proposal will result in an improvement in the green landscaping and biodiversity of the area as the level of green infrastructure will be increased significantly compared to the existing fallow agricultural fields. Please refer to documentation prepared by Landscape Design Services for full details of the landscape proposals.</p> |
| <i>Enhance and protect the built and natural heritage.</i> | <p>In summary, there are no previously identified sites of archaeological interest located within the subject development lands, and no features of archaeological potential were noted as a result of cartographic or aerial photographic research or by a subsequent detailed surface reconnaissance survey. The nearest Recorded Monument to the site is a Ringfort (unclassified) – SMR: WX026-001; Site CH-1 – located approx. 400m to the southwest.</p> <p>A Cultural Heritage Assessment Report prepared by Byrne Mullins & Associates Archaeological & Historical Heritage Consultants has been carried out as part of the application. The subject lands are not proximate to any other Protected Structures or Architectural Conservation Areas.</p> <p>The proposal has been carefully designed to take into account the impact that this development will have on the area as is demonstrated by the architect's drawings and statement.</p> |

The Guidelines support a plan-led approach to the location, scale and nature of major residential development, as per the Planning and Development Act.

The Guidelines promote urban design to create places of high quality and distinct identity, to provide connectivity, permeability, safety, legibility and sense of place.

In this regard, the Guidelines are accompanied by a Design Manual (discussed below) which demonstrates how design principles can be applied in the design and layout of new residential developments, at a variety of scales of development and in various settings.

URBAN DESIGN MANUAL – A BEST PRACTICE GUIDE, 2009

The Urban Design Manual is the accompanying document to the Sustainable Residential Development in Urban Areas document which provides policy guidance for the creation of successful neighbourhoods having regard to the 12-point criteria. The proposal complies with the following design criteria:

| 1. Context –How does the development respond to its surroundings? | STATEMENT OF CONSISTENCY |
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| <p><i>The development seems to have evolved naturally as part of its surroundings.</i></p> | <p>The site is located to the south of Carley’s Bridge Road which leads into Enniscorthy Town Centre. The boundaries comprise of a dense row of trees, mature vegetation and hedgerows along all sides and the southern and western boundary comprises of the River Urrin.</p> <p>The scheme design has evolved having regard to the natural features of the site in terms of the mature trees and vegetation; and the River Urrin which runs along the southern/ western boundary. This has helped to define a series of mature public and communal open spaces with attractive features which provides high amenity value.</p> <p>The bank of the River Urrin provides for a large public open space which comprises of a mix of amenity areas including multiple play areas (to cater for different age groups), rough grass meadows, calcareous meadows, native species biotope planting, green routes, and grass lawn recreation areas. This area will be heavily planted in native trees, hedgerows and wildflowers significantly increasing the biodiversity in the area.</p> <p>Mature trees, hedgerows and planting will be retained as part of this application where possible. Additional planting will integrate the scheme with the surrounding area and to provide shelter and amenity value within the site.</p> <p>The proposed development seeks to deliver an appropriate form and scale of residential</p> |

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| | <p>development at a site that is located c. 1km west of Enniscorthy Town Centre which offers a range of shops, pubs and restaurants, services, recreational centres, and employment opportunities.</p> <p>A green link from the riverside amenity space flows through the site to neighbouring Millbrook Estate. Smaller pockets of open space branch off the green link ensuring that all dwellings have ease of access to amenity spaces. Pedestrian green links are provided throughout the site offering safe routes connect all open spaces and the creche.</p> <p>Unit types have then been carefully positioned to suit the site. Dwelling units overlook the open spaces to offer passive surveillance.</p> <p>Apartment and duplex blocks have been positioned along the northern boundary to establish a building line along Carley's Bridge Road creating an appropriate urban edge and street frontage. The massing of the development steps appropriately from the context of its neighbouring properties.</p> |
| <i>Appropriate increases in density respect the form of buildings and landscape around the site's edges and the amenity enjoyed by neighbouring users.</i> | The proposed density is an increase over the existing low-density suburban housing estates which are common to the area. |
| <i>Form, architecture and landscaping have been informed by the development's place and time.</i> | <p>The density of c. 35 UPH is appropriate on this outer suburban site and creates an appropriate building form and layout for this site.</p> <p>The development is of an appropriate size with exceptional landscaping which has facilitated the scale and layout of the proposed dwellings.</p> |
| <i>The development positively contributes to the character and identity of the neighbourhood.</i> | The proposal is an elegant design within a site bounded by mature trees and vegetation. The incorporation of the river open space and links to the adjoining Millbrook development helps to create a new identity for the area and creates a definite urban edge to the town's southern boundary. |
| <i>Appropriate responses are made to the nature of specific boundary conditions.</i> | Along the northern boundary there is significant mature planting and a strategic Irish Water foul sewer that cannot be relocated. The scheme is set back from this area with the boundary planting retained and augmented, and with new communal open spaces provided. The existing hedgerow boundary with Millbrook estate to the east is retained with own door houses proposed backing onto same. Along the north-western boundary with Carley's Bridge Road the existing boundary planting |

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| | is to be removed to create a new streetscape and to facilitate footpaths and cycle path. |
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| 2. Connections – How well connected is the new development | STATEMENT OF CONSISTENCY |
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| <i>There are attractive routes in and out for pedestrians and cyclists.</i> | The site is accessed from a number of pedestrian connections off Carley's Bridge Road to the north and one pedestrian connection to Millbrook Estate to the east. These connections will link with the existing pedestrian/cycle networks in the town. The multiple access points throughout the site ensures that the development optimises permeability. |
| <i>The development is located in or close to a mixed-use centre.</i> | The scheme will be located less than c. 1 km west of Enniscorthy Town Centre and has ease of access to a variety of existing services within the area. |
| <i>The development's layout makes it easy for a bus to serve the scheme.</i> | Enniscorthy is serviced by a range bus routes including Wexford Bus route no's 740 and 376; Local Link route no's 368 and 369 linking the area to Dublin, Wexford, Carlow, Tullow, New Ross and Bunclody. These stops are located in the town centre c.7 mins walk from the development. |
| <i>The layout links to existing movement routes and the places people will want to get to.</i> | Pedestrian permeability through the site is promoted in the residential layout enabling future residents to access the development from multiple points to access the existing network of pedestrian, cycle and public transport facilities. |
| <i>Appropriate density, dependent on location, helps support efficient public transport.</i> | The density of c. 35 UPH is consistent with the minimum density promoted in the national guidelines for outer suburban greenfield sites (35 uph). |

| 3. Inclusivity – How easily can people use and access the development? | STATEMENT OF CONSISTENCY |
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| <i>New homes meet the aspirations of a range of people and households.</i> | The wide range of dwelling types will facilitate a wider range of homeowners including individuals, couples, small-large families and empty nesters. |
| <i>Design and layout enable easy access by all.</i> | The proposal has been designed for ease of access throughout the site in accordance with Part M of the building regulations. |
| <i>There is a range of public, communal and/or private amenity spaces and facilities for children of different ages, parents and the elderly.</i> | The scheme will provide a variety of open spaces, including public, communal and private amenity spaces for a range of different ages including children, adults and the elderly. |
| <i>Areas defined as public open space that have either been taken in charge or</i> | The scheme is designed around a series of public open spaces. All dwellings have ease of access to these areas. It is also easily accessible from the |

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| <i>privately managed will be clearly defined, accessible and open to all.</i> | surrounding area. All of the open spaces are easily accessible and are overlooked by the development creating a safe and secure environment. |
| <i>New buildings present a positive aspect to passers-by, avoiding unnecessary physical and visual barriers.</i> | <p>The layout is designed to maximise visual and physical fluidity throughout the scheme and will not hinder movement.</p> <p>The design provides a strong urban edge to the Carley's Bridge Road with a development of up to 4 storeys along the new access road. The site is well screened from the surrounding area through the retention of mature trees and vegetation.</p> |

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| 4. Variety – How does the development promote a good mix of activities? | STATEMENT OF CONSISTENCY |
| <i>Activities generated by the development contribute to the quality of life in its locality.</i> | The proposal will contribute to the housing mix of the area and will increase population creating additional support to existing educational, sports, recreational and retail services all of which are provided close to the development. |
| <i>Uses that attract the most people are in the most accessible places.</i> | A variety of open spaces are provided throughout the scheme, including open spaces with child's play areas, flexible lawns, kickabout areas and seating areas. All of these spaces will be easily accessible. |
| <i>Neighbouring uses and activities are compatible with each other.</i> | The surrounding area is largely characterised by residential uses and is compatible with the proposed use. |
| <i>Housing types and tenure add to the choice available in the area.</i> | A variety of dwellings are provided which will further improve the range of unit types available in the area. Please refer to the HQA for more information. |
| <i>Opportunities have been taken to provide shops, facilities and services that complement those already available in the neighbourhood.</i> | The site is less than c. 1km from Enniscorthy Town Centre, it is therefore unnecessary to provide additional shops and services. |

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| 5. Efficiency - How does the development make appropriate use of resources, including land | STATEMENT OF CONSISTENCY |
| <i>The proposal looks at the potential of higher density, taking into account appropriate accessibility by public transport and the objectives of good design.</i> | The overall average density of c. 35 units/ha is considered appropriate for this site given the proximity to public transport, shops and services, and social infrastructure. |
| <i>Landscaped areas are designed to provide amenity and biodiversity, protect buildings and spaces from the elements and incorporate sustainable urban drainage systems.</i> | High quality landscaping is provided throughout the site. As a result, there is significant open space provided across the entire scheme incorporating SuDS, promoting biodiversity and providing residential amenity. |
| <i>Buildings, gardens and public spaces are laid out to exploit the best solar orientation.</i> | All units are dual aspect. Dwellings and open spaces will enjoy sufficient sunlight and daylight provision. The distance between buildings and the layout of the |

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| | buildings ensures that open spaces have the benefit of daylight and sunlight throughout the day. |
| <i>The scheme brings a redundant building or derelict site back into productive use.</i> | N/A |
| <i>Appropriate recycling facilities are provided.</i> | Recycling facilities will be provided with the bin stores. |

| 6. Distinctiveness - How do the proposals create a sense of place? | STATEMENT OF CONSISTENCY |
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| <i>The place has recognisable features so that people can describe where they live and form an emotional attachment to the place.</i> | <p>The series of open spaces create a unique sense of place and will create different character areas. Duplex and apartment blocks run parallel with the River Urrin. The bank of the River Urrin provides for a large public open space which comprises of a mix of amenity areas including multiple play areas (to cater for different age groups), rough grass meadows, calcareous meadows, native species biotope planting, green routes, and grass lawn recreation areas. This area will be heavily planted in native trees, hedgerows and wildflowers significantly increasing the biodiversity in the area.</p> <p>A green link from the riverside amenity space flows through the site to neighbouring Millbrook Estate. Smaller pockets of open space branch off the green link ensuring that all dwellings have ease of access to amenity spaces. Pedestrian green links are provided throughout the site offering safe routes connect all open spaces and the creche.</p> <p>The mix of houses, apartments and duplex units helps to provide recognisable features within the development.</p> <p>A variety of both public and private open spaces are provided throughout the scheme, including open spaces with child's play areas, flexible lawns, kickabout areas and seating areas.</p> |
| <i>The scheme is a positive addition to the identity of the locality.</i> | The site currently comprises of derelict agricultural sheds; and agricultural land. The proposal will provide an appropriate scale, density and quantum of residential development on a key site adjacent to Enniscorthy Town. |
| <i>The layout makes the most of the opportunities presented by existing buildings, landform and ecological features to create a memorable layout.</i> | The site is located to the south of Carley's Bridge Road which leads into Enniscorthy Town Centre. The boundaries comprise of a dense row of trees, mature vegetation and hedgerows along all sides and the southern and western boundary comprises of the River Urrin. |

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| | <p>The scheme design has evolved having regard to the natural features of the site in terms of the mature trees and vegetation; and the River Urrin which runs along the southern/ western boundary. This has helped to form a series of mature public and communal open spaces with attractive features which provides high amenity value.</p> <p>Strong pedestrian routes run through the development increasing permeability for residents of the scheme.</p> |
| <i>The proposal successfully exploits views into and out of the site.</i> | Where views do arise, they have been carefully considered in order to enhance the area and is sensitive to the character of the surrounding area. |
| <i>There is a discernible focal point to the scheme, or the proposals reinforce the role of an existing centre.</i> | The proposal offers a strong street frontage along Carley's Bridge Road. |

| 7. Layout - How does the proposal create people friendly streets and spaces? | STATEMENT OF CONSISTENCY |
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| <i>Layout aligns routes with desire lines to create a permeable interconnected series of routes that are easy and logical to navigate around.</i> | Pedestrian permeability around the scheme and open spaces is a key design outcome. These routes are overlooked and are easy to find your way around. |
| <i>The layout focuses activity on the streets by creating frontages with front doors directly serving the street.</i> | The scheme includes fine grain elements throughout. All open spaces are overlooked by the residential units. There are also multiple access points for residents to the open spaces. Street designs are narrower than traditional suburban estate streets (4.8m – 5.5m) and is all on-street parking and with street trees and other planting throughout. |
| <i>The streets are designed as places instead of roads for cars, helping to create a hierarchy of space with less busy routes having surfaces shared by pedestrians, cyclists and drivers.</i> | |
| <i>Traffic speeds are controlled by design and layout rather than by speed humps.</i> | The scheme has been designed to create a priority for pedestrians, and cyclists. This development is not dominated by cars but instead is a well landscaped pleasant environment to be in. The street design is fully compliant with DMURS. Please refer to documentation prepared by Transport Insights. |
| <i>Block layout places some public spaces in front of building lines as squares or greens, and some semi-private space to the back as communal court.</i> | The open space strategy for the scheme creates multiple open space areas of varying uses and sizes. |

| 8. Public Realm - How safe, secure and enjoyable are the public areas? | STATEMENT OF CONSISTENCY |
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| <i>All public open space is overlooked by surrounding homes so that this amenity is owned by the residents and safe to use.</i> | All spaces are overlooked and surveyed by residential units. |
| <i>The public realm is considered as a usable integrated element in the design of the development.</i> | Public realm is integrated into the design of the development and forms part of the wider network of usable public spaces in the wider area. |

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| <i>Children's play areas are sited where they will be overlooked, safe and contribute to the amenities of the neighbourhood.</i> | There are a number of formal and informal children's play areas facilitated across the site catering for a number of different age groups. All public and communal open spaces are easily accessible to all residents and are overlooked by all the blocks. |
| <i>There is a clear definition between public, semi-private, and private space.</i> | Private open space is provided with gardens, balconies and terraces. Where these spaces abut a communal or public open space further delineation is provided through additional landscaping to provide a clear definition between the two spaces. The communal open spaces provided within the scheme are clearly defined and separated from the public open space. Public areas are provided throughout the site. |
| <i>Roads and parking areas are considered as an integral landscaped element in the design of the public realm.</i> | The scheme has 352 no. carparking spaces throughout the scheme. Car parking is located to the front of the houses and at communal areas close to the apartments and duplex units. The parking is segregated where possible from the landscaped areas which enables the provision of high-quality landscaping throughout the development making the dwellings and their surroundings a pleasant and peaceful location to be in. |

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| 9. Adaptability - How will the buildings cope with change? | STATEMENT OF CONSISTENCY |
| <i>Designs exploit good practice lessons, such as the knowledge that certain house types are proven to be ideal for adaptation.</i> | There is a variety of house types including apartments, duplexes, semi-detached, and terraced houses. All of the houses have the ability to be altered/ extended in the future. |
| <i>The homes are energy-efficient and equipped for challenges anticipates from a changing climate.</i> | The new houses, duplexes and apartments will be constructed in accordance with the energy efficiency standards in place. The design practices and proposed materials will militate against the effects of climate change. |
| <i>Homes can be extended without ruining the character of the types, layout and outdoor space.</i> | The houses can all be extended without having a detrimental impact on the surrounding residential amenities and character. All of the houses can accommodate conversions and extensions as appropriate. The internal space is also flexible and allows for the removal/ addition of walls etc to create different spaces according to needs. |
| <i>The structure of the home and its loose fit design allows for adaptation and subdivision, such as the creation of an annex or small office.</i> | |
| <i>Space in the roof or garage can be easily converted into living accommodation.</i> | |

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| 10. Privacy and Amenity - How does the scheme provide a decent standard of amenity? | STATEMENT OF CONSISTENCY |
| <i>Each home has access to an area of useable private outdoor space.</i> | Yes, each unit has its own private open space in accordance with the minimum residential standard. |

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| <i>The design maximises the number of homes enjoying dual aspect.</i> | 95% of the units are dual aspect. |
| <i>Homes are designed to prevent sound transmission by appropriate acoustic insulation or layout.</i> | All units will be designed to prevent sound transmission in accordance with building regulations. |
| <i>Windows are sited to avoid views into the home from other houses or the street and adequate privacy is affordable to ground floor units.</i> | Through successful architectural design along with appropriate separation distance between opposing windows ensures overlooking is prevented. |
| <i>The homes are designed to provide adequate storage including space within the home for the sorting and storage of recyclables.</i> | All apartments are designed in accordance with national design standards on storage areas. |

| 11. Parking – How will the parking be secure and attractive? | STATEMENT OF CONSISTENCY |
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| <i>Appropriate car parking is on-street or within easy reach of the home's front door.</i> | <p>The scheme has 352 no. carparking spaces throughout the scheme. Car parking is located to the front of the houses and at communal areas close to the apartments and duplex units.</p> <p>The carparking is located in close proximity to each dwelling. This is in line with current NPF policy. Please see the documentation prepared by Transport Insights for further details.</p> |
| <i>Parked cars are overlooked by houses, pedestrians and traffic, or stored securely, with a choice of parking appropriate to the situation.</i> | All parking spaces will be overlooked by dwellings in well-lit areas. |
| <i>Parking is provided communally to maximise efficiency and accommodate visitors without the need to provide additional dedicated spaces.</i> | The scheme has 352 no. carparking spaces throughout the scheme. Car parking is located to the front of the houses and at communal areas close to the apartments and duplex units. |
| <i>Materials used for parking areas are of similar quality to the rest of the development.</i> | Yes, the highest quality materials will be used throughout the scheme. |
| <i>Adequate secure facilities are provided for bicycle storage.</i> | Dedicated bicycle parking is provided throughout the site. Visitor cycle parking is strategically located at different locations to serve the scheme. There are 497 spaces throughout the scheme. |

| 12. Detailed Design – How well thought through is the building and landscape design? | STATEMENT OF CONSISTENCY |
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| <i>The materials and external design make a positive contribution to the locality.</i> | The materials include brick, render, metal cladding, glass, slate and concrete panels which will reflect and complement this existing building elevations in the area. |
| <i>The landscape design facilitates the use of the public spaces from the outset.</i> | The public realm has been designed to ensure spaces are easily accessible, safe and secure and aesthetically complement the built form. The open |

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| | spaces will be provided in tandem with the residential and neighbourhood development. |
| <i>Design of the buildings and public space will facilitate easy and regular maintenance.</i> | The layout of the houses, apartments and the landscaped areas will be accessible for easy and regular maintenance. |
| <i>Open car parking areas are considered as an integral element within the public realm design and are treated accordingly.</i> | Yes, the highest quality materials will be used throughout the scheme. It will be provided in tandem with the dwellings. |
| <i>Care has been taken over the siting of flues, vents and bin stores.</i> | Bin stores are located discretely within the development. Flues and vents are located in appropriate locations to allow for ventilation. |

QUALITY HOUSING FOR SUSTAINABLE COMMUNITIES: BEST PRACTICE GUIDELINES FOR SUSTAINABLE COMMUNITIES, 2007

The Department's policy statement Delivering Homes, Sustaining Communities, Guidance provides the overarching policy framework for an integrated approach to housing and planning. Sustainable neighbourhoods are areas where an efficient use of land, high quality design, and effective integration in the provision of physical and social infrastructure combine to create places people want to live in. The policy statement is accompanied by Best Practice Guidelines that promotes quality sustainable residential development in urban areas having regard to the following:

- *Promote high standards in the design and construction and in the provision of residential amenity and services in new housing schemes;*
- *Encourage best use of building land and optimal of services and infrastructure in the provision of new housing;*
- *Point the way to cost effective options for housing design that go beyond minimum codes and standards;*
- *Promote higher standards of environmental performance and durability in housing construction;*
- *Seek to ensure that residents of new housing schemes enjoy the benefits of first-rate living conditions in a healthy, accessible and visually attractive environment; and*
- *Provide homes and communities that may be easily managed and maintained.*

The following criteria indicate the 7 no. essential requirements new residential developments should have regard to when carrying out development:

| Guidelines | STATEMENT OF CONSISTENCY |
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| <u>Socially & Environmentally Appropriate</u> <i>"The type of accommodation, support services and amenities provided should be appropriate to the needs of the people to be accommodated. The mix of dwelling type, size and tenure should support sound social, environmental and economic sustainability policy objectives for the area and promote the development of appropriately integrated play and recreation spaces."</i> | The scheme will provide an appropriate mix of 1, 2, 3, and 4-bedroom dwellings. The proposal seeks to integrate usable open spaces distributed throughout a number of character areas which are all interconnected. All open spaces will be overlooked by dwellings. |

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| <p><u>Architecturally Appropriate</u> <i>"The scheme should provide a pleasant living environment, which is aesthetically pleasing and human in scale. The scheme design solution should understand and respond appropriately to its context so that the development will enhance the neighbourhood and respect its cultural heritage."</i></p> | <p>The design and layout of the scheme creates a liveable and visually pleasing residential environment.</p> <p>The design is appropriate and mindful of the urban edge context, the site constraints, and architectural character of the adjoining areas.</p> |
| <p><u>Accessible & Adaptable</u> <i>"There should be ease of access and circulation for all residents, including people with impaired mobility, enabling them to move as freely as possible within and through the development, to gain access to buildings and to use the services and amenities provided. Dwellings should be capable of adaptation to meet changing needs of residents during the course of their lifetime."</i></p> | <p>The proposal has been designed for ease of access throughout the site in accordance with Part M of the building regulations. Lifts are provided within the apartment blocks.</p> |
| <p><u>Safe, Secure & Healthy</u> <i>"The scheme should be a safe and healthy place in which to live. It should be possible for pedestrians and cyclists to move within and through the area with reasonable ease and in safety. Provision for vehicular circulation, including access for service vehicles, should not compromise these objectives."</i></p> | <p>The scheme provides good segregation of vehicle and pedestrians/cyclists. A very safe walking and cycling environment will be provided for future residents and the existing residents in the area through the development of strong walking and cycling links.</p> <p>The interconnectivity of the scheme will ensure ease of access for all while creating a walkable environment for inhabitants of the scheme. The continuity of path networks will assist natural way-finding in the scheme. Public areas will be overlooked as far as practicable to achieve maximum passive surveillance.</p> |
| <p><u>Affordable</u> <i>"The scheme should be capable of being built, managed and maintained at reasonable cost, having regard to the nature of the development."</i></p> | <p>The scheme will be built, managed and maintained at reasonable cost.</p> |
| <p><u>Durable</u> <i>"The best available construction techniques should be used, and key elements of construction should have a service life in the order of sixty years without the need for abnormal repair or replacement works."</i></p> | <p>The scheme endeavours to use the best available materials and construction techniques in order to minimise the level of refurbishment over the lifetime of the scheme.</p> |
| <p><u>Resource Efficient</u> <i>"Efficient use should be made of land, infrastructure and energy. The location should be convenient to transport, services and amenities. Design and orientation of</i></p> | <p>The scheme is considered to accord with the aforementioned sustainable development principles. The site is located in a highly accessible location and the density proposed for this site is appropriate to its location. It has</p> |

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| <i> dwellings should take account of site topography so as to control negative wind effects and minimise the benefits of sunlight, daylight and solar gain; optimum use should be made of renewable sources of energy, the use of scarce natural resources in the construction, maintenance and management of the dwellings should be minimised.”</i> | been laid out in a way to ensure that it maximises passive solar gain and meets the best practice for sustainable development. |
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Sustainable Urban Housing: Design Standards for New Apartments, 2020

The Apartment Guidelines 2018 promote sustainable housing, by ensuring that the design and layout of new apartments provide satisfactory accommodation for a variety of household types and sizes, including families with children over the medium to long term. The guidelines provide for updated guidance on apartment developments in response to the National Planning Framework and Rebuilding Ireland.

The Guidelines outline a range of policy requirement relating to the mix and design of apartment developments. These are reviewed below:

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| <p>Specific Planning Policy Requirement 1</p> <p><i>Apartment developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms. Statutory development plans may specify a mix for apartment and other housing developments, but only further to an evidence-based Housing Need and Demand Assessment (HNDA), that has been agreed on an area, county, city or metropolitan area basis and incorporated into the relevant development plan(s).</i></p> | <p>The 180 apartments/duplexes include 72 no. 1-bed units which is 40% , and in accordance with SPPR1.</p> |
| <p>Specific Planning Policy Requirement 2</p> <p><i>For all building refurbishment schemes on sites of any size, or urban infill schemes on sites of up to 0.25ha:</i></p> <ul style="list-style-type: none"> <i>• Where up to 9 residential units are proposed, notwithstanding SPPR 1, there shall be no restriction on dwelling mix, provided no more than 50% of the development (i.e. up to 4 units) comprises studio-type units;</i> <i>• Where between 10 to 49 residential units are proposed, the flexible dwelling mix provision for the first 9 units may be carried forward and the parameters set</i> | <p>SPPR2 is not applicable to this development.</p> |

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| <p>out in SPPR 1, shall apply from the 10th residential unit to the 49th;</p> <ul style="list-style-type: none"> For schemes of 50 or more units, SPPR 1 shall apply to the entire development. | |
| <p>Specific Planning Policy Requirement 3 Minimum Apartment Floor Areas: Studio apartment (1 person) 37 sq.m 1-bedroom apartment (2 persons) 45 sq.m 2-bedroom apartment (4 persons) 73 sq.m 3-bedroom apartment (5 persons) 90 sq.m</p> | <p>As per the Housing Quality Assessment submitted the permitted unit sizes accord with SPPR3.</p> |
| <p>Specific Planning Policy Requirement 4 In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply:</p> <p>(i) A minimum of 33% of dual aspect units will be required in more central and accessible urban locations, where it is necessary to achieve a quality design in response to the subject site characteristics and ensure good street frontage where appropriate.</p> <p>(ii) In suburban or intermediate locations, it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme.</p> <p>(iii) For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 33% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects.</p> | <p>95% apartments and duplex units are dual aspect and accord with SPPR4.</p> |
| <p>Specific Planning Policy Requirement 5 Ground level apartment floor to ceiling heights shall be a minimum of 2.7m and shall be increased in certain circumstances, particularly where necessary to facilitate a future change of use to a commercial use. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up</p> | <p>The permitted ground floor apartments have 2.7m floor to ceiling height in accordance with SPPR5.</p> |

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| to 0.25ha, planning authorities may exercise discretion on a case-by-case basis, subject to overall design quality. | |
| Specific Planning Policy Requirement 6 <i>A maximum of 12 apartments per floor per core may be provided in apartment schemes. This maximum provision may be increased for building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha , subject to overall design quality and compliance with building regulations.</i> | Each apartment core has less than 12 apartments per floor in accordance with SPPR6. |
| <i>Specific Planning Policy Requirements 7 to 9 relate to Build to Rent (BTR) and Shared Accommodation are not relevant to the current proposal.</i> | N/A |

| Guidance | STATEMENT OF CONSISTENCY |
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| <p>A key inclusion in the guidelines is the acknowledgement of the importance of strategic sites in existing urban areas in close proximity to existing public transport facilities. The guidelines identify locations is cities and town that may be suitable for apartment development as follows:</p> <ul style="list-style-type: none"> • Central and/ or Accessible Urban Locations • Intermediate Urban Locations • Peripheral and/ or Less Accessible Urban Locations | <p>The subject site is located within a Peripheral and/ or Less Accessible Urban Locations Accessible Urban Location due to its location on the outskirts of Enniscorthy. The Apartment Guidelines note that these locations are generally suitable for small to large scale (which will vary subject to location), and low-medium density development. As such this site is an appropriate location for medium density development as is proposed.</p> |
| <p>Section 4.16 identifies that cycling “<i>provides a flexible, efficient and attractive transport option for urban living and these guidelines require that this transport mode is fully integrated into the design and operation of all new apartment development schemes.</i>”</p> | <p>In line with this ambition 497 secure, readily accessible cycle parking spaces have been provided and designed throughout the scheme.</p> |
| <p>Section 4.22 identifies that in Peripheral and/or Less Accessible Urban Locations such as this one, “<i>one car parking space per unit, together with an element of visitor parking, such as one space for every 3-4 apartments, should generally be required.</i>”</p> | <p>Throughout the scheme there are 352 no. car parking spaces provided which is in line with this policy.</p> |

The apartment guidelines states that all apartments should include private and communal open space.

Each of the proposed units will contain private open space in excess of the requirements. The quantum of private open space is set out in the Housing Quality Assessment prepared by Brian Dunlop Architects. There is c. 24,000 sq.m of open space throughout the scheme. This high quality landscaped open space with multiple character areas creates a very pleasant environment for future occupants. The proposed public and communal open spaces exceed the requirements of the apartment guidelines. It is considered that the location of the public areas allows for free movement within the site and to the surrounding lands which increases permeability and connectivity through the site. The public open space and communal open spaces are located throughout the scheme. Please refer to documentation prepared by Landscape Design Services for full landscaping proposals.

The proposed density on the subject site is c. 35 units per hectare. It is considered that the proposed density is appropriate given the National Policy objective to increase residential density including at out of centre urban locations. This planning application is accompanied by a Housing Quality Assessment document prepared by Brian Dunlop Architects which demonstrates the compliance of the proposed development with the relevant quantitative standards required under the 2018 Apartment Guidelines.

The proposed apartment buildings and units are considered to be suitably located on the subject site, integrated within the landscape and are well connected to adjacent facilities including public transport, and will provide a high-quality development on the subject site.

DESIGN MANUAL FOR URBAN ROADS & STREETS (DMURS), 2019

The Design Manual for Urban Roads and Streets (DMURS), 2019, sets out design guidance and standards for constructing new and reconfiguring existing urban roads and streets in Ireland. It also outlines practical design measures to encourage more sustainable travel patterns in urban areas.

STATEMENT OF CONSISTENCY

The adopted design approach successfully achieves the appropriate balance between the functional requirements of different network users whilst enhancing the sense of place. This scheme prioritises pedestrians and cyclists throughout the development. There will be one vehicular access into the scheme off Carley's Bridge Road and a number of pedestrian entrances to the north and east of the site. For further detail of compliance with DMURS please refer to the Traffic and Transport Assessment prepared by Transport Insights which contains a DMURS Compliance Statement.

GUIDELINES FOR PLANNING AUTHORITIES ON CHILDCARE FACILITIES, 2001

These guidelines state that Development Plans should facilitate the provision of childcare facilities in larger new housing estates with the standard minimum provision of one childcare facility with 20 places for each 75 dwellings.

Section 4.7 of the *Sustainable Urban Housing Design Guidelines for New Apartments*, 2018 states the following:

"Notwithstanding the Planning Guidelines for Childcare Facilities (2001), in respect of which a review is to be progressed, and which recommend the provision of one child-care facility (equivalent to a minimum of 20 child places) for every 75 dwelling units, the threshold for provision of any such facilities in apartment schemes should be established having regard to

*the scale and unit mix of the proposed development and the existing geographical distribution of childcare facilities and the emerging demographic profile of the area. **One-bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision and subject to location, this may also apply in part or whole, to units with two or more bedrooms.***

STATEMENT OF CONSISTENCY

As part of the application a childcare facility (c. 290sq.m) has been provided. This facility has capacity for 44 childcare places.

When the 72 1-bed apartments are excluded the remaining 161 residential units would generate a childcare demand of c.43 places ($161/75 \times 20$).

This facility will therefore cater for the demand for childcare places resulting from the proposed development.

SMARTER TRAVEL – A SUSTAINABLE TRANSPORT FUTURE: A NEW TRANSPORT POLICY FOR IRELAND 2009-2020

Key targets of this national sustainable transport policy include:

- To support sustainable travel, future population and employment growth will have to predominantly take place in sustainable compact urban areas or rural areas, which discourage dispersed development and long commuting.
- Work-related commuting by car will be reduced from a current modal share of 65% to 45%, which will mean that between 500,000 and 600,000 commuters will be encouraged to take means of transport other than car driver (of these 200,000 would be existing car drivers). Change in personal behaviour will also be necessary for other travel purposes as most travel relates to non-commuting.
- Car drivers will be accommodated on other modes such as walking, cycling, public transport and car sharing (to the extent that commuting by these modes will rise to 55% by 2020) or through other measures such as e-working.
- The total kilometres travelled by the car fleet in 2020 will not increase significantly from current total car kilometres.

STATEMENT OF CONSISTENCY

The proposed development is in line with this overall vision for better integration between land-use and transport. The car parking and cycle parking provision, along with the site's proximity to public transport ensures that there will be a modal shift amongst residence in this scheme to try alternative modes of transport and reduce reliance on the private car.

GUIDELINES FOR PLANNING AUTHORITIES ON THE PLANNING SYSTEM AND FLOOD RISK MANAGEMENT, 2009

These guidelines require the planning system to avoid development in areas at risk of flooding, particularly floodplains, unless there are proven wider sustainability grounds that justify appropriate

development and where the flood risk can be reduced or managed to an acceptable level without increasing flood risk elsewhere.

The Guidelines adopt a sequential approach to flood risk management when assessing the location for new development based on avoidance, reduction and mitigation of flood risk; and incorporate flood risk assessment into the process of making decisions on planning applications and planning appeals.

STATEMENT OF CONSISTENCY

A Site Specific Flood Risk Assessment was carried out by IE Consulting which concludes that *“in the context of the ‘Planning System and Flood Risk Management Guidelines, DOEHLG, 2009’ the Site Specific Flood Risk Assessment prepared by IE Consulting has determined that the majority of the proposed development site is located within Flood Zone ‘C’. The western and south-western areas of the site fall within Flood Zone ‘B’, which are proposed as roads and footpath areas. Areas of the site that are designated as proposed green open space also fall within Flood Zone ‘A’.*

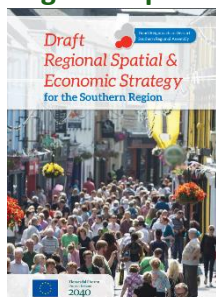
In consideration of implementation of the recommendations of this SSFRA the flood risk to and from the proposed development site is considered to be LOW. Development of the site is not expected to result in an adverse impact to the hydrological regime of the area or increase flood risk elsewhere.” Please refer to documents prepared by IE Consulting for further details.

REGIONAL PLANNING POLICY

The subject site is located in Enniscorthy, County Wexford which is covered by

- the Regional Spatial and Economic Strategy for the Southern Region.

Regional Spatial and Economic Strategy



Under the Local Government Reform Act 2014 the Regional Planning Framework has been revised with the previous Regional Authorities/Assemblies (ten in total) now replaced with three Regional Assemblies. The Regional Spatial and Economic Strategy (RSES) provides a framework for the delivery of the National Planning Framework objectives and sets out a 12 year strategic development framework for the Southern Region. This was adopted on the 31st January 2020.

The Southern Region comprises 9 counties which includes Wexford. The Region is subdivided into sub-regions or Strategic Planning Areas (SPAs), namely the Mid-West, South-East and South-West. County Wexford are within the South-East sub-region.

The RSES note that by 2040 the population of the entire Southern Region is expected to grow by 380,000 to almost two million people. The South-East Region Strategic Planning Area is expected to grow from 509,500 people in 2016 to almost 600,000 people in 2031.

The RSES outline 11 elements that underpin the Strategy for the Southern Region. The most relevant of these to the application and the proposed development's consistency with these is outlined in the table below:

| Strategy | Evaluation of Consistency |
|--|--|
| No. 1 Strengthening and growing our cities and metropolitan areas, building on the strong network of towns throughout the region and supporting our villages and rural areas | The proposed development will add to the population of Enniscorthy and help to strengthen the urban network within Wexford county. |
| No. 4 To Transform Our Transport Systems from Polluting and Carbon Intensive Modes To Well-Functioning Integrated Public Transport, Walking And Cycling And Electric Vehicles | The location of the site within 15 min of Enniscorthy town centre and the provision of pedestrian routes through the site and within the wider area will work to encourage walking as an alternative mode of transport to the car. |
| No. 7 Strengthen and protect our region's diverse culture recreation, natural heritage, biodiversity and built heritage | The proposed development will protect local biodiversity through the protection and enhancement of biodiversity on the site. Please refer to the Ecological Impact Assessment prepared by Whitehill Environmental. |
| No. 8 Safeguard and enhance our environment through sustainable development, transitioning to a low carbon and climate resilient society | The proposed walkway alongside the River Urrin Stream will provide an attractive pedestrian route through the site. |

| Objective | Evaluation of Consistency |
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| RPO 29 Rebuilding Ireland Support Government policy and targets of the Housing Agency under Rebuilding Ireland: Action Plan for Housing and Homelessness and Local Authority actions that contribute to progress under the key pillars of addressing homelessness, accelerating social housing, building more homes, improving the rental sector and utilizing the existing building stock within our region. | The proposed development will provide 233 no. additional homes within a large key town in this region this is in line with the Rebuilding Ireland policy as outlined above. |
| RPO 85 Low Carbon Energy Future 2015-2030 The Southern Region is committed to the implementation of the policy of Government under Ireland's Transition to a Low Carbon Energy Future 2015-2030. It is an objective to promote change across business, public and residential sectors to achieve reduced Green House Gas (GHG) emissions, improve energy efficiency and increase the use of renewable energy sources across the key sectors of electricity supply, heating, transport and agriculture. | The location of the site within proximity to the town centre in addition to the provision of multiple attractive, safe pedestrians and cycle routes through the scheme will help to make walking and cycling attractive and viable transport options. This will in turn help with the transition to a low carbon energy future. |
| RPO 168 "10-minute" city and town concepts To attain sustainable compact settlements with "10-minute" city and town concepts, whereby, a | The proposed development is within walking distance of Enniscorthy town centre which contains a wide variety of shops and services. |

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| range of community facilities and services are accessible in short walking and cycle timeframes from homes or are accessible by high quality public transport services by connecting people to larger scaled settlements delivering these services. Local Authorities should ensure that decision making in relation to new infrastructure to provide improved connectivity is informed by an appropriate level of environmental assessment. | <p>The proposal also includes a creche to the north of the site, which ensures that a childcare facility is within a short distance of all the proposed residential units.</p> <p>The new pedestrian link through Millbrook Estate will allow pedestrians to walk and cycle safely into Enniscorthy town.</p> |
| <p>RPO 173 Equal Access</p> <p>To improve equal access for abled and disabled people and universal design for public transport access, housing, social, cultural and recreational facilities and the public realm to improve quality of life equally for abled and disabled citizens in our region. Local Authorities should ensure that decision-making in relation to investment in infrastructure and facilities is informed by an appropriate level of environmental assessment.</p> | <p>The proposed layout and design ensure a universally accessible scheme.</p> <p>The proposed homezones and pedestrian crossings have been carefully located to ensure a safe and clear route for pedestrians throughout the scheme.</p> |
| <p>RPO 192 Green Infrastructure</p> <p>To support investment in the on-going maintenance and enhanced facilities in existing green infrastructure and support the provision of new public, parks, green space corridors and other public open spaces in tandem with projected population growth to create green, healthy settlements throughout our region. Local Authorities shall identify the potential locations of new public parks and opens spaces jointly (with neighbouring local authorities) and individually to develop both regional scale recreational open space and local parks and open space. Local Authorities should ensure that decision-making in relation to the development of new or enhanced Green Infrastructure and new public parks and facilities is informed by an appropriate level of environmental assessment.</p> | <p>The proposed landscaping masterplan provides a network of open green spaces that will protect the biodiversity in the area while also providing amenity spaces for the residents.</p> <p>The creation of Riverside Amenity Area along the River Urrin will enhance this area, creating an attractive area for animals as well as humans.</p> |

Evaluation of Consistency

The proposed development will support the objectives and vision of the Regional Spatial and Economic Strategy for the Southern Region.

Enniscorthy town is extremely well connected and has the infrastructure capacity to support the future housing development on the subject lands. As such, the provision of housing on this site will ensure the development of this well-connected town in the Wexford's urban network. Furthermore, the proposed development which includes a creche, will help to support the existing shops, services and facilities in the area.

LOCAL PLANNING POLICY

The subject site is located within the administrative area of Wexford County Council and is therefore subject to the land use policies and objectives of the County Development Plan 2013-2019. This Plan covers the entire county with the exception of Wexford Town, **Enniscorthy Town** and New Ross Town which are covered by their respective development plans. This Plan covers the entire county with the exception of Wexford Town, **Enniscorthy Town** and New Ross Town which are covered by their respective development plans.

WEXFORD COUNTY DEVELOPMENT PLAN 2013-2019

The Development Plan sets out Wexford County Councils objectives for the future development of the land. The Council intends to take a positive approach to development, and it is noted that new development opportunities will not be restricted unless there are strong, persuasive justifications for doing so having regard to European, national and regional policies. There are three underlying themes throughout the Development Plan: Sustainable Development, Adaptation to Climate Change and Social Inclusion.

The Development Plan states that *“the larger towns of **Enniscorthy** and New Ross are recognised as important urban centres. They provide good bases for population and services which will attract investment and employment activities additional to those that need to be located in or near the Gateway.”* The Plan states that Enniscorthy is to be targeted for growth. There will be a focus on consolidating the existing pattern of development and on encouraging and facilitating the provision of physical and social infrastructure.

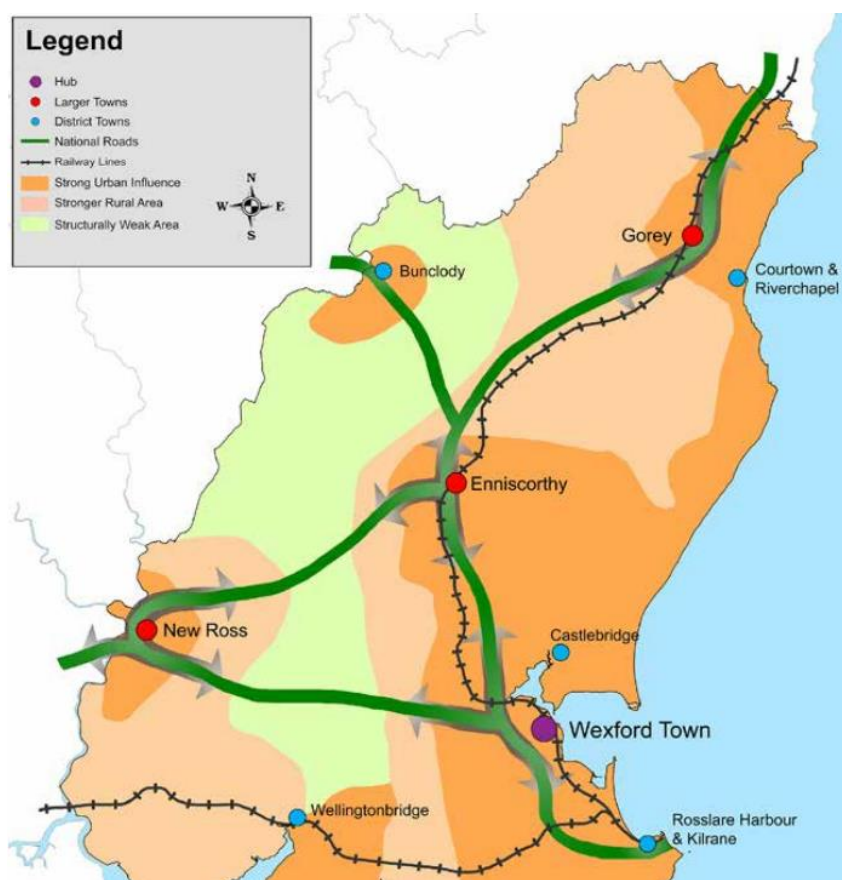


Figure 24 Core Strategy Map, (Source: Wexford County Development Plan 2013-2019)

The Core Strategy Map (Map No. 5, as shown above) shows how well-connected Enniscorthy is to the other towns in the county. The railway line connects the town Enniscorthy, Wexford Town, Gorey Town, Rosslare and Dublin City. National roads connect the town with these four towns as well as New Ross and Bunclody.

The vision for Wexford County is for the Upturn-Towards Sustainable Growth and Development. The Plan supports this vision and the strategies and objectives in the Plan seek to develop a county:

- *Where people want to live, work and play*
- *Which offers high quality sustainable employment opportunities and residential developments*
- *With high quality urban and rural environments supported by excellent sustainable physical and social infrastructure*
- *Which values its natural environment, built and cultural heritage*
- *Which offers visitors a range of high quality experiences*

The strategic aims for achieving this vision and which underpin the objectives of the Plan are to:

- *Promote the balanced and sustainable development of the urban and rural areas of the county for a range of residential, services and employment opportunities.*
- *Broaden and strengthen the economic base of the county by encouraging the sustainable growth of employment, enterprise and economic activity, and in particular facilitate innovation and enterprise in indigenous industries.*
- *Continue to develop the role of tourism and the development of a high quality and diverse tourism product throughout the county in a balanced and sustainable manner.*
- *Develop an integrated Transport Plan for the county which will deliver local transport links, provide safe and efficient road and rail access within the county and to other regions. This, in turn, will facilitate improved public transport provision and reduce the distance that people need to travel to work, school, services and recreational facilities.*
- *Promote the development of viable and vibrant town and village centres across the county that provide shopping services of appropriate scale to serve their communities and rural hinterlands, while supporting and enhancing the scale, mix and attractiveness of the retail offer in the Hub of Wexford Town and the Larger Towns of New Ross, Enniscorthy and Gorey.*
- *Facilitate the provision of high quality housing in a range of locations to meet the needs of the county's population, with particular emphasis on facilitating access to housing to suit different household and tenure needs in a sustainable manner and in appropriate locations.*
- *Protect and enhance the county's rural assets and recognise the housing, employment, social and recreational needs of those living and working in rural areas.*
- *Protect, conserve and enhance the county's built, natural and cultural environment through promoting awareness, and good quality urban and rural design.*
- *Protect and develop the county's water and wastewater infrastructure, integrating their provision with the county's overall land use strategies whilst having regard to environmental responsibilities and complying with European and national legislation.*
- *Facilitate the provision of, and improvements to, social and recreational infrastructure and provide access to new and existing community facilities throughout the county for all its residents.*
- *Promote the balanced and sustainable development of the urban and rural areas of the county for a range of residential, services and employment opportunities.*
- *Protect and enhance the county's unique natural heritage and biodiversity, while promoting and developing its cultural, educational and eco-tourism potential in a sustainable manner.*
- *Manage the challenges of climate change including flooding and sea level rise. Develop an integrated and coherent Green Infrastructure Strategy for the county which will allow for the*

protection, provision and management of the county's green spaces, in tandem with plans for growth and development.

- *Harness the county's natural resources in a manner that is compatible with the sensitivity of rural areas, the existing quality of life, and the protection and enhancement of the county's natural heritage and biodiversity.*

Housing

Volume 6 of the Development Plan contains the Housing Strategy for the county. This Housing Strategy identified a *requirement for a greater mix of unit types due to increases in the number of single persons requiring accommodation. 94.8% of all households in the county are accommodated in detached, semi-detached or terraced housing. This is notwithstanding the fact that 23% of the population live in single person households. It is evidence of the continued preference for houses over apartments.*

The Development Plan notes that *it is appropriate to permit higher residential densities at appropriate locations* such as town centres, brownfield sites and in the vicinity of public transport nodes and corridors. Higher densities minimise the *unnecessary extension of public infrastructure such as water, sewers, footpaths and lighting*. However, the Council recognises that *there is an important role for lower density development in certain towns and villages to cater for the various household types and to provide an alternative to single houses in rural areas*. In addition, it is noted that higher densities would not fit into the natural grain of some suburban locations throughout the County.

New housing development *should take into account the need to protect the amenities of existing residential areas*. In addition, new housing developments *should be located and laid out in a way which ensures that they are easily integrated into the existing fabric and structure of the settlement and that natural assets are protected*.

| Objective | Evaluation of Consistency |
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| Strategic Aims | |
| Facilitate the provision of high quality housing in a range of locations to meet the needs of the county's population, with particular emphasis on facilitating access to housing to suit different household and tenure needs in a sustainable manner and in appropriate locations. | The proposed development will increase the local population of Enniscorthy helping to support local business, services and public transport services. The development is of an appropriate scale for the town and will help to create a vibrant and viable town. The proposed development provides a variety of house types and sizes that will add to the existing housing stock in the area providing houses within the boundaries of a key town in the county. |
| Facilitate the provision of, and improvements to, social and recreational infrastructure and provide access to new and existing community facilities throughout the county for all its residents. | The proposed development will provide an ecological corridor and new linear walk along the Urrin River. It is also proposed to provide a variety of outdoor spaces. Finally, it is noted that the site is a c. 15 min walk from Enniscorthy town centre. The proposed development will support |

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| | the existing community facilities within Enniscorthy town. |
| Core Strategy | |
| Objective SS05 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. | The proposed development will provide residential development within a Larger Town that has been identified for measured growth. |
| Objective SS06 To ensure the density of residential developments is appropriate to the location of the proposed development having regard to the benefits of ensuring 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 compliance with normal planning and environmental criteria and the development management standards in Chapter 18. | The proposed density of 35 units per hectare is considered appropriate for the subject site considering its proximity to Enniscorthy town centre and the existing low residential density in Enniscorthy. |
| <p>The Development Plan states that <i>‘in achieving the appropriate density of residential development, the Council will have regard to’:</i></p> <ul style="list-style-type: none"> - <i>The location, characteristics and context of the site</i> - <i>The overall design quality of the proposed development</i> - <i>The need for inclusivity with a variety of housing types and sizes being provided within each neighbourhood</i> - <i>The need to maximise returns on public infrastructure investment and to ensure the satisfactory operation of private infrastructure where required</i> - <i>The need to create critical mass for local businesses, services and public transport o The need to reduce reliance on the private car for all journeys</i> - <i>Compliance with Plans, supplementary guidance or other site-specific guidance documents produced by/with the Council</i> | This density reflects the adjacent developments and will enable the development to fit in with the character of the surrounding area. It has been designed in compliance with all National policies. |

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| - <i>Government guidance</i> | |
| <p>Objective SS08</p> <p>To avoid the siting of new residential developments in areas vulnerable to flood risk in accordance with the provisions of the Flood Risk Management-Guidelines for Planning Authorities (DEHLG and OPW, 2009).</p> | <p>The subject site is not susceptible to flooding as demonstrated by the Site-Specific Flood Risk Assessment carried out by IE Consulting Engineers. In addition, the proposed storm water attenuation system will address a 1 in 100 year (plus climate change) extreme storm, reducing the volume of storm water leaving the site during extreme storms.</p> |
| <p>Objective SS14</p> <p>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.</p> | <p>The proposed development will provide residential development within Enniscorthy, a larger town, and as such is in accordance with this objective.</p> <p>It has been determined that the wastewater and drinking water capacity can cater for the proposed development.</p> <p>Please see the Irish Water letter submitted with this application.</p> |
| <p>Objective SS16</p> <p>Require the phasing of land zoned for residential development. The phasing of development will be based on a clear sequential approach with the zoning extending outwards from the town centres. A strong emphasis will be placed on consolidating existing patterns of development, encouraging infill opportunities and better use of lands.</p> | <p>The proposed development is located within Enniscorthy town and is primarily zoned for new residential development. The surrounding residential land to the east and north of the subject site have been developed. As a result, the subject site is the next logical location for further residential development.</p> |
| Housing | |
| <p>Objective HP01</p> <p>To promote Universal Design and Lifetime Housing in accordance with best practice and the policies and principles contained in Building for Everyone: A Universal Design Approach (National Disability Authority, 2012) and Sustainable Residential Development in Urban Areas: Guidelines for Planning Authorities and its companion document Urban Design Manual (DEHLG, 2008). Universal design is design of environment that can be accessed, understood and</p> | <p>The proposed development, as set out in the architect's design statement, will promote universal design and lifetime homes throughout the development.</p> |

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| used to the greatest possible extent by all people regardless of their age, size or ability. | |
| <p>Objective HP02</p> <p>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.</p> | <p>The proposed development is designed to ensure it is universally accessible and easy to navigate for all users.</p> <p>The site is located within a short distance of Enniscorthy town centre which contains a variety of existing facilities and services.</p> |
| <p>Objective HP03</p> <p>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.</p> | <p>The proposed development includes a public park, children's play areas, and a Riverside amenity walkway, along with a new creche. These new amenities will all add to the existing community infrastructure in the area.</p> |
| <p>Objective HP06</p> <p>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.</p> | <p>The proposed development is designed to a high standard and will create an attractive living environment for future residents.</p> |
| <p>Objective HP07 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.</p> | <p>A Design Statement has been completed by BDA Architects which sets out the design development for this site in line with Chapter 17.</p> |
| <p>Objective HP08</p> <p>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</p> | <p>As set out above the proposed density for this development is 35 units per hectare. This reflects the density of the surrounding area, including the recent development to the north. It is also in line with National Planning Policy including Sustainable Residential Development in Urban Areas.</p> |

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| development management standards contained in Chapter 18. | |
| <p>Objective HP10</p> <p>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).</p> | A PART V proposal is submitted with this development. This provides for 20% Part V residential units. |
| <p>Objective HP11</p> <p>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</p> | In line with the Affordable Housing Act 2021, 20% Part V is proposed development is fully in accordance with objectives HP10 and HP11. |
| <p>Objective HP13</p> <p>To seek to facilitate all households to access good quality housing appropriate to household circumstances and in their particular community of choice. The Council's priority will be on meeting the most acute needs – those unable to provide for their accommodation from their own resources.</p> | The proposed development provides for a wide range of housing choices from one, two and three bed apartments to three and four bed houses. This provides an appropriate form of accommodation for a range of people. The proposal also includes for PART V housing |
| <p>Objective HP14</p> <p>To ensure that housing is available for people of different income types. This shall be achieved through the housing support system and through the planning system which will ensure that an appropriate mix of units is provided in appropriate locations</p> | |
| <p>Objective HP15</p> <p>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.</p> | <p>The mix of the 233 no. units is</p> <ul style="list-style-type: none"> - 72 no. 1 bed apartments - 13 no. 2 bed apartments - 5 no. 3 bed apartments - 27 no. 2 bed duplex units - 63 no. 3 bed duplex units - 45 no. 3 bed houses - 8 no. 4 bed houses <p>This mix provides for a range of needs within the community.</p> |
| <p>Objective HP20 (also CF05)</p> <p>To ensure that a minimum of 20% of dwellings in all new housing estates of five dwellings or more are</p> | Houses are adaptable in various ways and can be expanded into the back garden for additional living and bedroom areas. |

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| <p>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.</p> | <p>The Architects Design Statement confirms that the proposed development will meet a range of needs and meets access standards. The Design Statement includes an Access Statement</p> |
| <p>Objective HP21 (also CF06)</p> <p>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).</p> | |
| <p>Objective HS12</p> <p>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.</p> | <p>All of the houses can be extended and altered subject to the appropriate planning permissions.</p> <p>All of the apartments can be altered internally.</p> |
| <p>Objective HS17</p> <p>Promote the development of sustainable housing developments which are energy efficient, and efficient in their use of natural resources such as water and materials.</p> | <p>The proposed houses and apartments will be designed and developed in accordance with the energy efficiency standards in place.</p> |
| <p>Transportation</p> | |
| <p>Objective T01</p> <p>To support the sustainable transport principles outlined in Smarter Travel: A Sustainable Transport Future (Department of Transport, 2009).</p> | <p>The proposed development due to its proximity to the town centres, the proposed walking and cycling facilities proposed within the development, and the overall permeability of the development will promote smarter travel throughout the development.</p> |
| <p>Objective T02</p> <p>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.</p> | |
| <p>Objective T10</p> <p>To encourage walking and cycling by all sections of the community through:</p> | <p>The layout of the development is designed to encourage permeability throughout the site, provide attractive walks within the development, including</p> |

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| <ul style="list-style-type: none"> ● 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 | <p>the linear walk, and provide connectivity for cyclists within the development.</p> <p>The proposed development, including all roads, have been designed to meet DMURS requirements including ensuring that the footpaths, kerbs, pavements are designed to promote walking throughout the site irrespective of mobility.</p> |
| <p>Objective T23</p> <p>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</p> | <p>A Traffic Impact Assessment has been completed by Transport Insights. These assess in full the development, including the new road proposal. It demonstrates that the development will ensure an efficient operation of the road network.</p> <p>The Residential Travel Plan promotes sustainable travel for the development.</p> |

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| 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. | |
| <p>Objective T24</p> <p>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)</p> | A Quality Audit and a DMURS Statement have been completed for this development. These demonstrates that the proposed design and layout of the development is in accordance with all design and safety requirements. |
| Flood Risk | |
| <p>Objective FRM04</p> <p>To ensure that all development proposals comply with the requirements of the Planning System and Flood Risk Management-Guidelines for Planning Authorities' (DEHLG and OPW 2009) and to ensure that the Justification Test for Development Management is applied to required development proposals and in accordance with methodology set out in the guidelines.</p> | A Site Specific Flood Risk Assessment has been completed by IE Consulting Engineers confirming that the proposed residential development is appropriate on this site, and not at risk from flooding. |
| Green Infrastructure | |
| <p>Objective GI04</p> <p>To ensure the principles of Green Infrastructure and the County Green Infrastructure Strategy are used to inform the development management process in terms of design and layout of new residential schemes, business and industrial developments and other relevant projects, for example, through the integration of Sustainable Drainage Systems (SuDS) into the overall site concept and layout.</p> | The proposed development has been designed to not only incorporate the existing green infrastructure and retain as much as possible, but to also enhance it. The proposed development uses SuDS within the development, it also provides a new linear walk beside the existing waterway on site. |
| <p>Objective GI05</p> <p>To require new developments to contribute to the protection and enhancement of existing Green Infrastructure, and the provision of new Green Infrastructure where appropriate, in an integrated and coherent manner. Such development shall be in</p> | |

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| compliance with all other planning and environmental criteria and the development management standards contained in Chapter 18. | |
| Archaeological Heritage | |
| <p>Objective AH04</p> <p>To require an archaeological assessment for development that may, due to its size, location or nature, have a significant effect upon archaeological heritage and to take appropriate measures to safeguard this archaeological heritage. In all such cases the Planning Authority shall consult with the National Monuments Service in the Department of Arts, Heritage and the Gaeltacht.</p> | As set out in the Cultural Heritage Assessment carried out by Byrne Mullins. This identified that there are no known archaeological or cultural heritage sites located within the proposed development boundary. |
| Recreational Space | |
| <p>Objective RS09</p> <p>To ensure that high quality play and recreation facilities are incorporated into new housing developments over 75 dwellings. Play facilities may include playgrounds, basketball courts, tennis courts, hurling walls or other facilities considered appropriate by the Council. This standard may be modified in any particular case where there are significant reasons for doing so. Criteria that may be taken into account include the existing geographical distribution of play facilities and the emerging demographic profile of the area.</p> | Landscape Design Services have designed a range of formal and informal play areas including playgrounds, which are distributed throughout the development. These provide attractive areas for play and relaxation throughout the development. |
| Community facilities | |
| <p>Objective CF01</p> <p>To promote social inclusion and access to education, health and community support services, amenities and leisure services and a good quality built environment for all members of the community through the planning process.</p> | This is an attractive development which is close to existing amenities within Enniscorthy. It will also provide a new creche, and attractive play areas, walks and areas of public open space which are accessible to all members of the community. |
| <p>Objective CF04</p> <p>To promote Universal Design and Lifetime Housing in accordance with best practice and the policies and principles contained in Building for Everyone: A Universal Design Approach (National Disability Authority, 2012) and Sustainable Residential Development in Urban Areas: Guidelines for Planning</p> | <p>Houses are adaptable in various ways and can be expanded into the back garden for additional living and bedroom areas.</p> <p>The Architects Design Statement confirms that the proposed development will meet a range of needs and meets access</p> |

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| Authorities and its companion document Urban Design Manual (DEHLG, 2008) | standards. The Design Statement includes an Access Statement |
| <p>Objective CF09</p> <p>To promote the development of sustainable communities on the basis of a high quality of life where people can live, work and enjoy access to a wide range of community, health and educational facilities suitable for all ages, needs and abilities.</p> | <p>The site is located c.15-minute walk away from Enniscorthy Town Centre. The Social and Community Audit submitted as part of this application demonstrates that there is a wide range of community, health and educational facilities in close proximity to the subject site.</p> <p>This proposed development provides for additional community facilities through the provision of new public open spaces and a creche.</p> |
| <p>Objective CF10</p> <p>To maintain and, where possible, improve the provision of community facilities in the county, ensuring that these facilities are adequate to meet the needs of the communities they serve, are physically integrated with residential and employment areas and are provided concurrently with new residential development, subject to normal planning and development criteria and the development management standards contained in Chapter 18.</p> | |

STATEMENT OF CONSISTENCY

The proposed development is consistent with the requirements of the Core Strategy and the Vision of the Plan which seeks to focus growth within Larger Towns such as Enniscorthy. The subject site served by good public transport infrastructure and has a proposed density of c. 35 units per ha and is therefore considered acceptable and in accordance with the density set out in the County Development Plan.

The proposed residential development will provide new dwellings within the town of Enniscorthy that will support the existing services and facilities in the area. The proposed development provides for a strong unit mix to cater for a wider variety of people.

Significant regard was had in the proposed design to ensure that new development will not negatively impact on the existing residential amenities of the area. The proposed development will be largely screened from the surrounding area by existing planting.

Accordingly, the proposed development has been informed by the Wexford County Development Plan 2013-2019 and has incorporated the relevant policies and objectives as contained therein.

It is noted that this Development Plan is currently under review and is due to be replaced by a new Wexford County Development Plan which is still at draft stage with a 2nd Draft expected for public consultation in November 2021, with adoption of the new Plan in 2022.

Having regard to the Draft Development Plan and Chief Executive's Report on public submissions to the Plan (as available on the Wexford CoCo Website) we note the following with regard to the application site and Enniscorthy in general:

- Enniscorthy is identified as a Level 2 Large Town and for which an LAP will be prepared post adoption of the new County Development Plan. Until such time the settlement boundary and zonings of the previous Enniscorthy Plan will remain in place.
- Enniscorthy is being allocated a population target of 13,771 by 2027, an increase from 11,381 (+2,390) from 2016.
- The Core Strategy allocation of population Enniscorthy from 2021 to 2027 is 888 residential units.
- Average densities used for Core Strategy calculations for Enniscorthy are 35 units per ha.
- Outer suburban sites at the edge of large towns such as Enniscorthy are promoted at densities of 35+ units per ha with densities below 30 units per ha to be avoided.
- Maximum car parking standards of 1 per house and 1 per apartment are proposed.

Given the above it is contended that the proposed development is also in compliance with the forthcoming County Development Plan as drafted to date.

ENNISCORTHY TOWN & ENVIRONS DEVELOPMENT PLAN 2008-2014 (EXTENDED TO 2019)

The site is located within the administrative area of Enniscorthy and is therefore subject to the land use policies and objectives of the Enniscorthy Town & Environs Development Plan 2008-2014 (Extended to 2019).

The subject site is located in Zone 5 – Cherry Orchard, St. John's, as illustrated in Figure 2 below. The site is subject of three land-use zonings:

1. New Residential/Low Medium Density (R1): *"To provide for new residential development, associated residential services and community facilities."*
2. Zoning Objective F - Open Space & Amenity (OS): *"To protect and provide for recreation, open space and amenity provision."*
3. A small portion of the site zoned Existing Residential and Infill/Medium Density (R)

Housing and childcare is permitted in principle under the residential zoned lands. The lands zoned Objective F will be used as open space ancillary to the residential development. The use is therefore considered acceptable and in accordance with the zoning of the Town Plan.

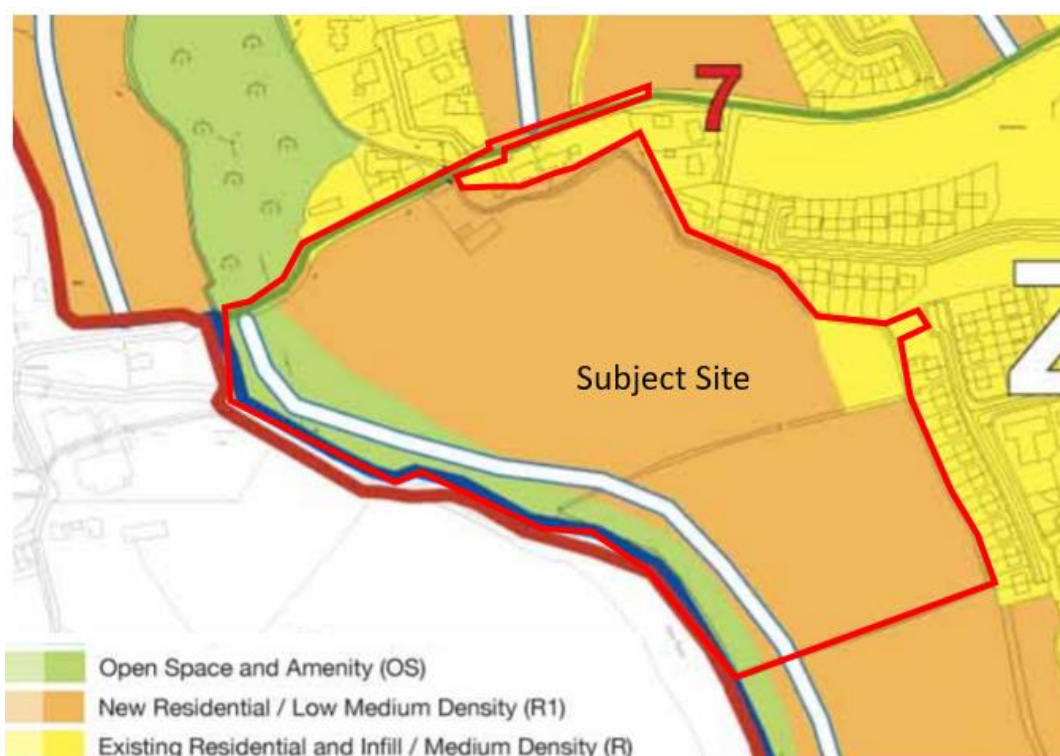


Figure 25 Zoning Map, (Source: Enniscorthy Town & Environs Development Plan 2008-2014 (Extended to 2019))

The R1 zoning objective states that residential development shall take place in conjunction with the provision of the necessary physical, social, community and recreational services/facilities being provided. In this instance open space and a childcare facility are being provided as part of the subject planning application as well as provision of links to a variety of services within walking distance in the town centre.

We note that there are no protected structures on site nor is the site located within an Architectural Conservation Area.

The table below provides a summary of the policies in the Enniscorthy Town & Environs Development Plan:

| Policies | STATEMENT OF CONSISTENCY |
|---|--|
| Existing Residential | |
| <i>HS1 To encourage the development of high-quality private housing with Enniscorthy Town and Environs.</i> | This is an attractive, high-quality development which is close to existing amenities within Enniscorthy. It will also provide a new creche, and attractive play areas, walks and areas of public open space. |
| Social, Affordable & Voluntary Housing | |
| <i>HS11 To ensure that 20% of any land zoned solely for the use or for mixture of residential and other uses shall be made available for the provision of social / affordable housing in accordance with the requirements of Part V of the Planning and Development Act 2000-2006 and the Housing Strategy.</i> | 20% of the proposed housing units have been allocated for the provision of social / affordable housing in accordance with Part V of the Planning and Development Act. |

| Housing & Community Facilities | |
|--|--|
| <i>HS17 To facilitate and co-operate with other organisations in the provision of services for the community including, in particular, schools, creches, and other education and childcare facilities in parallel with future housing</i> | The proposed development includes for the provision of a c.290 sqm creche. Furthermore, a 'Social and Community Audit' which is an analysis of the local community infrastructure including schools has been undertaken by MCG Planning and is included as part of this planning application. |
| <i>HS19 To ensure that the provision of recreational areas and the development of residential areas (Where both form part of the same development boundary) are undertaken concurrently.</i> | The proposed development proposes high quality public open space as part of the proposal including a Riverside Amenity Space. |
| <i>H20 To require the provision of Childcare Facilities in all new residential developments as appropriate. The indicative standard is on childcare facility, accommodating 20 children, for approximately 75 dwellings. This standard may be modified in any particular case where there are significant reasons for doing so. Criteria that may be taken into account in such an assessment include the existing geographical distribution of childcare facilities and the emerging demographic profile of the area.</i> | The proposal includes for a c. 290 sqm creche which will cater for c.44 children. Please also refer to the Social and Community Audit which has identified several creches within the local area. |
| Housing & Community Facilities | |
| <i>HS 22: To require diversity in the density of development and in the form, size and type of dwelling within residential areas.</i> | <p>The Enniscorthy Town & Environs Development Plan 2008-2014 recommends a density of 10-17 uph. However, Section 11.2.1 Residential Density states that “<i>strict adherence to maximum and minimum density standards is not recommended; rather the creation of residential areas with a sense of place should be a priority.</i>”</p> <p>The Town Plan goes onto state that the Council will adopt a flexible approach to residential density to avoid rigid specification of minimum and maximum density standards. The approach will focus on quality and innovation to achieve attractive living environments.</p> <p>The Plan states that an appropriate mix of dwelling types and sizes of houses, apartments and duplexes are required to meet the needs of different categories of households.</p> <p>On the basis of the above, the overall density of the site is c. 35uph which is in line with</p> |

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| | <p>National standards which set a minimum of 35uph for all new residential developments at outer suburban/greenfield locations. The proposed development will comprise of the construction of 233 residential units with a varied sustainable unit mix.</p> <p>The proposed residential density and unit mix is considered appropriate having regard to the policies and objectives of National and Local Planning Policy, as outlined above.</p> |
| <i>HS 23: To ensure that a high standard of design be incorporated in structures and layout with the design of estate development, such as to facilitate pedestrian safety and restricted vehicular traffic speeds.</i> | The proposal has been designed to a high standard of design to incorporate pedestrian safety and restricted vehicular traffic speeds. Please refer to the Traffic and Transport Assessment by Transport Insights. |
| <i>HS 25: To require that all new residential accommodation meets the necessary standards of health, sanitation and design, and are carried out generally in accordance with principles of good design.</i> | The proposal has been designed so that all housing units meet the necessary standard of health, sanitation and design and have been carried out in accordance with principles of good design. |
| <i>HS 26: To encourage strong frontages onto the main thoroughfares creating definite building lines and continuity of the town structure.</i> | The proposal has incorporated strong frontages onto the main thoroughfares to create definite building lines. |
| <i>HS 27: To encourage equal access housing as per Section 11.2.17 Housing for All.</i> | All housing has been created to encourage equal access and universal design as per Section 11.2.17 of the Housing for All. |
| Recreation, Amenity & Open Space | |
| <i>TR1: To ensure that adequate amenity and recreational open space and facilities, including community facilities and centres, are available for all groups of the population at a convenient distance from their homes and places of work.</i> | The proposed public open space and riverside amenity walk is strategically located to ensure that it is accessible for residents within the scheme and for residents of the adjacent residential estates through the Millbrook link. The proposed creche has also been strategically located to ensure users can access the service safely and with ease. |
| <i>TR2: To seek the provision for a minimum standard of 2 hectares (5 acres) of public open space per 1,000 population in all housing developments. To meet this standard, suitable areas of land will be identified and reserved for the provision of public open space.</i> | <p>The proposed development will provide 233 no. residential units and considering the national average household size of 2.7 people, this development will likely generate a population of c.629 when fully occupied. This population would require open space provision of c.1.25ha based on Policy TR2.</p> <p>The proposed development seeks to provide c. 24,000 sqm of Public Open Space which equates to c.2.4 hectares.</p> |

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| <i>TR5: To seek the provision and suitable management of a children's play area in new housing estates in suitable locations.</i> | A range of children's play spaces have been proposed as part of this scheme as follows: with small, dispersed play spaces (c.85-100 sqm) for toddlers aged up to six; creche playspaces; larger play spaces of c. 200-400 sqm for older children and teenagers; and 'play along the way' in the public open realm. |
| Public Rights-of-Way | |
| <i>T10: Promote the development of river-side walking routes and foster the enjoyment of the natural amenities of the area including the River Slaney and Vinegar Hill</i> | The proposed scheme has proposed a high quality river-side walking route for future residents of the scheme. The proposal also includes a link from Millbrook to allow residents from future estates to access the walkway. |
| <i>TR11: Encourage the provision of access routes to amenity areas in co-operation with landowners and protect amenity areas from infringement by inappropriate development.</i> | The proposed amenity spaces will be entirely accessible to residents of the scheme and residents of adjacent schemes through the Millbrook Link. |
| Conservation and Heritage | |
| <i>AH 6: It is the policy of the Joint Councils to require an archaeological assessment for development that may be due to its size, location or nature, have a significant effect upon archaeological heritage and to take all appropriate measures to safeguard this archaeological heritage. In all such cases the Councils shall consult with the National Monuments Section of the DoEHLG. (Any such assessments shall be carried out by a licensed archaeologist)</i> | A cultural Heritage Assessment Report has been prepared by Byrne Mullins which has been submitted as part of this application. This report assesses a baseline screening assessment of the proposed development from perspective of cultural heritage including Local History, Archaeology and Architectural Heritage. The assessment included a field inspection, Geophysical Survey and Archaeological Testing. The report found that it is not considered likely that the development, as proposed, will cause any direct impacts to any Recorded Monuments. Furthermore, there are no extant remains for any of the archaeological monuments and features located within, or in the general environs of, the subject development area; consequently, it is considered that no impacts will occur to the visual settings of such monuments. |
| <i>NH7: To protect riparian zones by maintaining an adequate buffer zone (minimum 5-10m back from the riverbank) along all watercourses, with no infilling or removal of vegetation within these buffer zones.</i> | A minimum riparian buffer zone of 15m has been retained along the banks of the river, where no infrastructure or hard landscaping will take place. This is in accordance with IFI guidelines (<i>Planning for Watercourse in the Urban Environment. IFI, 2020</i>). |

We also refer to Chapter 11 'Development Management Standards' under the following headings below:

Residential Density and Mix

The Enniscorthy Town & Environs Development Plan 2008-2014 recommends a density of 10-17 uph. However, Section 11.2.1 Residential Density states that *“strict adherence to maximum and minimum density standards is not recommended; rather the creation of residential areas with a sense of place should be a priority.”*

The Town Plan goes on to state that the Council will adopt a flexible approach to residential density to avoid rigid specification of minimum and maximum density standards. The approach will focus on quality and innovation to achieve attractive living environments.

The Plan states that an appropriate mix of dwelling types and sizes of houses, apartments and duplexes are required to meet the needs of different categories of households.

On the basis of the above, the overall density of the site is c. 35uph which is in line with National standards which set a minimum of 35uph for all new residential developments. The proposed development will comprise of the construction of 233 residential units with a varied unit mix.

The proposed residential density and unit mix is considered appropriate having regard to the policies and objectives of National and Local Planning Policy, as outlined above.

Table 1: Indicative Residential Densities

| Zone | *Maximum Dwelling units per | | Indicative appropriate locations |
|---|-----------------------------|--------|--|
| | Hectares | Acre | |
| Low Density Residential | 10 | 4 | Outer edge of the Urban-Rural transition |
| Low-Medium Density Residential (green-field/ edge of town) | 10 -17 | 4 - 7 | Generally new zoning within towns except where it is an urban – rural transitional area or a strategic location. |
| Medium-High Density Residential (existing built up area) | 17 - 25 | 7 - 10 | |
| Higher Density Residential (town centre/ strategic locations) | >27 | >11 | At Strategic locations including transport nodes and town centre and neighbourhood centres |

* Densities in excess of the upper limits will be considered on their merits

Building Height

Section 11.2.5 of the Town Plan states that building heights should be similar to the surrounding area. The scheme is carried out across 21 no. apartment and duplex apartment blocks and 53 no. houses. The apartment and duplex apartment blocks range in height from 3-4 storeys depending on their location throughout the site. The houses range in height from 2-3 storeys.

The building height of the surrounding area varies from single detached dwellings in the cul-de-sac to the north of the site to 2-storey semi-detached dwellings in the adjoining estates at Urrin Valley and Millbrook to the northeast and east of the site.

There are no protected views, protected structures, ACAs or landmark features on or near the site. The modest heights ranging from 2-4 storeys will not result in having a negative visual impact on the surrounding area.

We refer to Section 11.2.2 of the Town Plan which states an innovative layout for residential estates will be the overriding factor in the granting of planning applications. This will be judged on residential amenity and environmental sustainability.

Roads Layouts in Residential Areas and Car Parking:

The proposed scheme is fully DMURS compliant and has been designed with traffic calming measures in mind. The scheme has been designed to ensure that walking and cycling are prioritized as transportation modes, by the provision of safe and direct access to local services and public transport. The link through the Millbrook Estate ensures that this is facilitated.

In relation to car parking, the proposed development is seeking to provide 352 no. car parking spaces, representing a ratio of 1.51 spaces per dwelling. This is noted to be below the Enniscorthy and Wexford Development plan (below), however this is in accordance with the national policy. Furthermore, as car parking is not specifically allocated to each residential unit and is to be provided on a communal basis (in accordance with best practice), the proposed provision of car parking and allocation policy within the development is deemed appropriate to accommodate peak demand requirements, notwithstanding some additional visitor car parking needs and the extremely small no. of car parking bays required for the creche.

In addition, due to the site's favourable accessibility characteristic, including specifically its location ca.1 kilometres from Enniscorthy Town Centre, with a wide range of employment, retail and amenity opportunities within its walking catchment, the proposed level of on-site car parking provision is considered appropriate.

| Residential | Car Parking Requirements |
|--------------------|---|
| Houses | 2 per House |
| Apartment/Flat | 1.5 per apartment / flat |
| Crèche / Childcare | One per four children plus one per employee |

Apartment Developments:

Section 11.2.3 of the Town Plan states that the design of dwellings in residential estates should bear a relationship to the nature, scale and form of the existing and adjacent built fabric.

In response to the above, the innovative layout makes the most efficient use of the site's natural features while consolidating the build residential environment of adjoining estates at Urrin Valley and Millbrook and employing sustainable design features into the house design/layout and drainage design.

In accordance with Section 11.2.12 of the Town Plan, the apartments/duplexes are similar in scale to the remainder of development. Access and transportation, proximity to schools/services and facilities,

provision of on-site childcare and quality open space have been carefully considered as part of the masterplan for the development of the site.

The proposal accords with Section 11.2.12 of the Town Plan as follows:

- Strong building edges are presented towards streets and open spaces.
- On-street parking is provided along the spine road.
- Refuse storage is located in dedicated bin stores serving the apartments/duplexes and mid-terraced units. Side access leading to the rear of end-terrace and semi-detached dwellings will provide sufficient space for bin stores.
- Open spaces accommodate areas for children to play and recreation spaces for all age groups.
- Natural surveillance is achieved through passive overlooking of houses orientated towards the street/open space.

Open Space and Landscaping

All private open spaces associated with the houses exceed the standards of the Town Plan. We refer to the Proposed Site Layout Plan and HQA prepared by BDA for more information in this regard.

All of the housing proposed meet or exceed the private open space requirements as set out in the plan below:

Table 2 - Private Open Space Requirements

| Development Particulars | Distance /Area Required |
|--|--|
| Private open space required for 1 and 2 Bedrooms | 48 m2 (min) |
| Private open space required for 3/4/5 Bedrooms | 60-75m2 |
| Separation between dwelling and site boundary | 2.5 metres between flank wall of adjacent dwellings |
| Developments with a back to back building | 22 metres (This may be reduced in town centre locations) |

Generous separation distances between back-to-back units is provided in excess of the 22m standard. Existing natural boundary treatments trees/hedgerows/planting on the site's perimeter will remain in place where possible as part of the proposal.

As can be seen from the drawings by Landscape Design Services, a large quantity of high quality landscaped open space has been incorporated into the scheme. There is c. 24,000 sq.m of public open space, plus addition communal open space. This is in excess of 10% minimum standard set out in Section 11.2.7 of the Town Plan but which includes for a significant area along the river which is zoned Open Space in any event. The areas are easily accessible from each dwelling and will be passively overlooked by all residential units.

Retention of natural features including trees/hedgerows and vegetation are incorporated into the open space design. The hierarchy of open space comprises soft landscaping/tree/shrub planting, play areas, meadows etcetera serving a variety of resident requirements and needs. The riparian strip and habitats contained within will be protected by additional tree planting on the river's edge.

Please refer to documentation prepared by Landscape Design Services and Brian Dunlop Architects for further detail in relation to landscape proposals and boundary treatment works.

STATEMENT OF CONSISTENCY

The proposed development is consistent with the requirements of the Enniscorthy Town & Environs Development Plan 2008-2014 (Extended to 2019). The proposed development achieves a medium density of c. 35 UPH. This will help to consolidate the urban area of Enniscorthy.

The proposed vehicular access is from the north west of the site along Carley's Bridge Road. There will also be a number of pedestrian entrances to the north and east of the site. The entrances will link up to the existing pedestrian and cycling infrastructure in the area and will increase the permeability of the site. This application is accompanied by a Traffic Impact Assessment prepared by Transport Insights.

As mentioned above the scheme achieves c. 35 UPH which is broadly in line with the Town Plan and National Policy. The proposal consists of a mix of houses, apartments and duplex units. All of the houses are 2-3 storeys in height, with the duplex and apartment blocks stepping up to 4 storeys in height.

All of the dwellings overlook the open space and roads throughout the development offering excellent passive surveillance. Across the site there is c. 24,000sq.m of open space provided which exceeds the plan requirement. These open space areas are broken into a number of different character areas which are landscaped to a very high standard. Mature trees, vegetation and hedgerows are retained where possible. This further adds to the amenity value of the site while also protecting the site from traffic noises from the surrounding road networks.

Please refer to documentation prepared by Landscape Design Services and Brian Dunlop Architects for further detail in relation to landscape proposals and boundary treatment works. The open space will be provided in tandem with the residential units. SUDS features have been implemented throughout the site.

The proposed development has been informed by the Enniscorthy Town & Environs Development Plan 2008-2014 (Extended to 2019) and has incorporated relevant policies and objectives as contained therein. Accordingly, it is submitted that the proposed development is consistent with the policies and objectives of the Town Plan.

It is respectfully submitted that the proposed development will provide an appropriate form of high-quality residential development for this residential zoned site and that is consistent with planning policy for the area.

The design and layout of the proposed development has been prepared following pre-application consultation with the Planning Authority under Section 247 prior to the submission to An Bord Pleanála.

It is respectfully submitted that the proposed development will provide an appropriate form of high-quality residential development for this substantial residential zoned site providing for an efficient use of lands which are accessible to public transport and existing/planned social infrastructure.

This statement has demonstrated the compliance of the development with the following:

- *Ireland 2040 Our Plan - National Planning Framework (2018);*
- *Rebuilding Ireland Action Plan 2016;*
- *Regional Spatial and Economic Strategy for the Southern Region (2020);*

- *Guidelines for Planning Authorities on Urban Development and Building Heights (2018);*
- *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009), and the accompanying Urban Design Manual;*
- *Delivering Homes, Sustaining Communities (2008) and the accompanying Best Practice Guidelines- Quality Housing for Sustainable Communities (2007);*
- *Guidelines for Planning Authorities on Sustainable Urban Housing: Design Standards for New Apartments (2018);*
- *Design Manual for Urban Roads and Streets (2019);*
- *Guidelines for Planning Authorities on Childcare Facilities (2001);*
- *Smarter Travel – A New Transport Policy for Ireland (2009-2020);*
- *The Planning System and Flood Risk Management (2009).*

Compliance is also demonstrated with the policies and provisions of the Wexford County Council Development Plan 2013-2019 and Enniscorthy Town & Environs Development Plan 2008-2014 (Extended to 2019) such as the land use zoning, density, design standards for residential schemes, streets and open spaces.

In conclusion, it is respectfully submitted that the proposed development is consistent with the proper planning and sustainable development of the area, and with all relevant national, regional and local planning policies and guidelines.

CHAPTER 8 MATERIAL CONTRAVENTION STATEMENT

This section of the report seeks to address the issue of potential material contravention of the Wexford County Development Plan 2013 – 2019 and the Enniscorthy Town & Environs Development Plan 2008 – 2014 (as extended) as required under SHD legislation.

Legislative Context

The Planning and Development (Housing) and Residential Tenancies Act, 2016 outlines how the Board may grant permission for a development which materially contravenes a Development Plan or Local Area Plan:

Section 9(6) of the Act states:

“(a) Subject to paragraph (b), the Board may decide to grant a permission for a proposed strategic housing development in respect of an application under section 4 even where the proposed development, or a part of it, contravenes materially the development plan or local area plan relating to the area concerned.

(b) The Board shall not grant permission under paragraph (a) where the proposed development, or a part of it, contravenes materially the development plan or local area plan relating to the area concerned, in relation to the zoning of the land.

(c) Where the proposed strategic housing development would materially contravene the development plan or local area plan, as the case may be, other than in relation to the zoning of the land, then the Board may only grant permission in accordance with paragraph (a) where it considers that, if section 37(2)(b) of the Act of 2000 were to apply, it would grant permission for the proposed development.”

Section 37(2)(b) of the 2000 Act states:

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

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

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

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

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

In this instance, it is submitted that the Board can grant permission under Sections 37(2)(b)(i) & (iii). In the first instance given that the application is a Strategic Housing Development it is considered “*of strategic or national importance*”. Furthermore, as will be elaborated below, it is considered that, having regard to the National Planning Framework, and Section 28 Guidelines, there is justification for granting the proposed development despite any material contravention of the Development Plans.

POTENTIAL MATERIAL CONTRAVENTIONS

Density

The total number of units is 233 resulting in a net residential density of 35 units per hectare.

Section 11.2.1 of the Enniscorthy Town & Environs Development Plan 2008-2014 states that having regard to specific site characteristics, the standards outlined in the table below are given as an indication and will be dependent on site specific circumstances:

Table 1: Indicative Residential Densities

| Zone | *Maximum Dwelling units per | | Indicative appropriate locations |
|---|-----------------------------|--------|--|
| | Hectares | Acre | |
| Low Density Residential | 10 | 4 | Outer edge of the Urban-Rural transition |
| Low-Medium Density Residential (green-field/ edge of town) | 10 -17 | 4 - 7 | Generally new zoning within towns except where it is an urban – rural transitional area or a strategic location. |
| Medium-High Density Residential (existing built up area) | 17 - 25 | 7 - 10 | |
| Higher Density Residential (town centre/ strategic locations) | >27 | >11 | At Strategic locations including transport nodes and town centre and neighbourhood centres |

* Densities in excess of the upper limits will be considered on their merits

It is stated that *strict adherence to maximum and minimum density standards is not recommended; rather the creation of residential areas with a sense of place should be priority.*

With regard to height, the scale of the buildings ranges from a 2-3 storey houses and apartment blocks up to 4 storeys in height. The use of height within the development between the creche, houses and apartment blocks provide visual interest in the streets and legibility to the area. It is considered that the proposed height is in accordance with the Enniscorthy Town and Environs Development Plan’s objectives as well as recent planning guidelines “Urban Development and Building Heights” which encourages higher buildings within these areas.

Car parking

Section 18.29.7 of the Wexford County Development Plan 2013 – 2019 requires that parking provision at the rates set out in Table no. 39 should be incorporated within the design of development proposals:

Table No. 39 Car Parking Standards

| Residential | Car Parking Requirements |
|---------------------------------|--|
| House | 2 per House |
| House (Town Centre locations) | 1.5 per House |
| Apartment | 1.5 per apartment |
| Crèche/Childcare | 1 space per 4 children plus 1 space per employee |

This goes on to state that *“In the case of a use not specified in Table No. 39, the Council will determine the parking requirements having regard to the likely demand for parking associated with the proposed development and the characteristics of the roads system in the locality”*.

The proposed development will provide a total of 352 no. car parking spaces. The parking provision will be in the form of shared grouped parking allowing for much higher levels of availability and turnover of spaces as well as a reduction in idle spaces.

The proposed car parking provision will promote more sustainable modes of transportation by reducing the levels of private car usage. Current national planning policy, particularly the NPF (NPO 27) and the Building Heights Guidelines, are also noted in relation to reduced car parking provision for housing developments going forward.

MATERIAL CONTRAVENTION

Should the Board consider that the proposed density and car parking provision represent a Material Contravention of the Development Plan we submit that the Board can grant permission under Section 9(6) of the *Planning and Development (Housing) and Residential Tenancies Act 2016*, which states:

“(a) Subject to paragraph (b), the Board may decide to grant a permission for a proposed strategic housing development in respect of an application under section 4 even where the proposed development, or a part of it, contravenes materially the development plan or local area plan relating to the area concerned.

(b) The Board shall not grant permission under paragraph (a) where the proposed development, or a part of it, contravenes materially the development plan or local area plan relating to the area concerned, in relation to the zoning of the land.

(c) Where the proposed strategic housing development would materially contravene the development plan or local area plan, as the case may be, other than in relation to the zoning of the land, then the Board may only grant permission in accordance with paragraph (a) where it considers that, if section 37(2)(b) of the Act of 2000 were to apply, it would grant permission for the proposed development.”

Section 37(2)(b) of the 2000 Act states:

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

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

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

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

In this regard we submit the following under Section 5(6) of the 2016 Act:

- **Section 37(2)(b)(i) of the 2000 Act:** The proposed development is a “Strategic Housing Development”, as defined under Section 3 of the 2016 Act.
- **Section 37(2)(b)(iii) of the 2000 Act:** The Board is referred to the National Planning Framework (NPF) and the Section 28 Ministerial Guidelines, in particular, Urban Development & Building Heights: Guidelines for Planning Authorities (2018), Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009) (And accompanying Design Manual); and Sustainable Urban Housing: Design Standards for New Apartments (2020).

National Planning Framework

The NPF enables a flexible approach to planning policies and standards requiring developments to be *“focusing on design led and performance-based outcomes, rather than specifying absolute requirements in all cases... planning standards should be flexibly applied in response to well-designed development proposals that can achieve urban infill and brownfield development objectives in settlements of all sizes.”*

In particular Section 4.5 highlights that *“general restrictions on building height or universal standards for car parking or garden size may not be applicable in all circumstances in urban areas and should be replaced by performance-based criteria appropriate to general location..”*

The NPF also states that that *“to avoid urban sprawl and the pressure that it puts on both the environment and infrastructure demands, increased residential densities are required in our urban areas”*. Key National Policy Objectives (NPOs) outlined in the NPF which are directly relevant to this site and development proposal are set out below:

National Policy Objective 13

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

National Policy Objective 11

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

National Policy Objective 27

Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments and integrating physical activity facilities for all ages.

National Policy Objective 33

Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.

National Policy Objective 35

Increase residential density in settlements, through a range of measures including reductions in vacancy, reuse of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.

Apartment Guidelines

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

The Guidelines emphasise the policies of the NPF to increase levels of residential development in urban centres and increase building heights and overall density by both facilitating and encouraging the development of increased heights and densities by Local Authorities and An Bord Pleanála.

We note the following compliances with the Specific Planning Policy Requirements (SPPRs) of the Guidelines:

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| SPPR 1 Apartment developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms. Statutory development plans may specify a mix for apartment and other housing developments, but only further to an evidence based Housing Need and Demand Assessment (HNDA), that has been agreed on an area, county, city or metropolitan area basis and incorporated into the relevant development plan(s). | The proposal for 31% one bed apartments along with 17% two bed units which provides a total of 48% smaller units within the development. This mix is in line with this SPPR objective. It also provides a greater mix of choice of housing types within the area. |
| Peripheral and/or Less Accessible Urban Locations: Section 4.22 As a benchmark guideline for apartments in relatively peripheral or less accessible urban locations, one car parking | The proposed development provides for one car parking space per apartment plus visitor car parking. This is in compliance with this guidance. |

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| <p>space per unit, together with an element of visitor parking, such as one space for every 3-4 apartments, should generally be required.</p> <p>Section 4.23 For all types of location, where it is sought to eliminate or reduce car parking provision, it is necessary to ensure, where possible, the provision of an appropriate number of drop off, service, visitor parking spaces and parking for the mobility impaired. Provision is also to be made for alternative mobility solutions including facilities for car sharing club vehicles and cycle parking and secure storage. It is also a requirement to demonstrate specific measures that enable car parking provision to be reduced or avoided.</p> | |
| <p>Building Height</p> <p>Section 2.23 The National Planning Framework signals a move away from rigidly applied, blanket planning standards in relation to building design, in favour of performance based standards to ensure well-designed high quality outcomes. In particular, general blanket restrictions on building height or building separation distance that may be specified in development plans, should be replaced by performance criteria, appropriate to location</p> | <p>The proposed building height ranges from 2 to 4 storeys. The three and four storey buildings are apartments and are considered to be appropriate within the context of the area, close to Enniscorthy town. The site is of sufficient size to be able to establish its own building heights, and character area, enabling it to provide a variety of building heights throughout the development in order to provide legibility and visual interest to the area.</p> |
| <p>Density</p> <p>Section 2.4, 3) Peripheral and / or less accessible locations</p> <p>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:</p> <ul style="list-style-type: none"> - Sites in urban development areas that do not meet proximity or accessibility criteria; - Sites in small towns or villages <p>Section 2.5 goes on to highlight that 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,</p> | <p>The proposed development provides a mixture of apartment dwellings and housing in order to provide visual interest, a greater housing mix and typology, and provide legibility throughout the development. This results in a density of 35 uph. This is considered to be appropriate for this location, which is in an urban location however, while it has good access to public transport, it is not excellent.</p> |

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| <p>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.</p> | |
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Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, (2009)

The ***Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas***, (2009) relating to Outer Suburban locations indicate a density range of 35-50 units per hectare, which the current application accords with.

The Guidelines also promote social integration and seek to provide for a diverse range of household types, age groups and mix of housing tenures.

Section 2.18 of the ***Sustainable Urban Housing: Design Standards for New Apartments***, (2020) states that in the context of sustainably increasing housing supply, targeting a greater proportion of urban housing development, and matching to the type of housing required, there is a need for greater flexibility in unit mix removing restrictions that result in different approaches to apartment mix on the one hand, and to other forms of residential accommodation on the other.

SPPR 1 of the ***Urban Development & Building Heights: Guidelines for Planning Authorities*** (2018) states the following:

*In order to optimise the effectiveness of this investment in terms of improved and more sustainable mobility choices and enhanced opportunities and choices in access to housing, jobs, community and social infrastructure, development plans must actively plan for and bring about **increased density** and height of development within the footprint of our developing sustainable mobility corridors”.*

The total number of units is 233 resulting in a net residential density of 35 units per ha, (based on the residential zoned area of 6.64 ha).

352 car parking spaces are proposed which is below the Development Plan requirement but still equates to 1.51 per residential units and is considered sustainable and in accordance with national guidance.

CHAPTER 9 CONCLUSIONS

The proposed residential scheme is on residential zoned land and is in line with the zoning objective set out in the Development Plan. The design and layout of the proposal, with the mix of houses and apartments, along with a proposed creche, is of high quality and makes the best use of available allocated land in line with best practice. It is a well-designed scheme that provides a sense of place and identity on this vacant underutilised piece of land.

It has been demonstrated that in conjunction with the proposed new pedestrian link, the surrounding road network is appropriate to serve the proposed developments while providing a safe, permeable and legible layout throughout the scheme in line with DMURS.

There are ample open spaces provided throughout the development in the form of a hierarchy of open spaces which meet the recreational and amenity needs of the existing and future population in the area. The proposed development will enhance the existing watercourse to the south by providing a linear park in this area.

The design and layout of the proposal, with the mix of houses and apartments, along with a proposed creche, is of high quality and makes the best use of available allocated land in line with best practice. It is a well-designed scheme that provides a sense of place and identity on this vacant underutilised piece of land.

We trust the above and enclosed documentation and information provides a reasonable basis sufficient to allow the proposal to be granted permission as a Strategic Housing Development.