

Statement of Response to An Bord Pleanála Opinion

**For a
Strategic Housing Development at a Site to the south of Clonattin
Village, Clonattin, Gorey**

Prepared By

**On Behalf of
Axis Construction Ltd**

February 2021

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Introduction

We, McGill Planning Ltd, are instructed to prepare this Statement of Response to An Bord Pleanála's Notice of Pre-Application Consultation Opinion on behalf of our client Axis Construction Ltd.

The proposed development will consist of demolition of the existing dwelling and shed on site (c.334.27sqm); construction of 363 no. residential units, comprising 42 no. 1 bed apartments, 59 no. 2 bed apartments, 134 no. 3 bed houses, 124 no. 4 bed houses and 4 no. 5 bed houses, in a range of building typologies ranging in height from 2 to 3 storeys. The proposed development also includes a single storey creche (c. 513 sq.m), new public open spaces, provision of 690 no. car parking spaces and 222 no. cycle parking spaces. The proposal includes for new vehicular and pedestrian accesses and upgrades along Clonattin Village Road to the north, and a new access road (including bridge) to the R472 Courtown Road to the south via the existing access road serving the cinema (with associated upgrades to the existing road and at the junction with the Courtown Road).

All associated site development works (including site reprofiling), landscaping, boundary treatments and services provision including ESB substations.

This report aims to deliver an overview of the response to all matters raised in the opinion issued under ABP 306636-20 on the 24th June 2020. This response has been prepared with direct inputs from Reddy Architecture, CS Consulting Engineers, Altemar Ecologists, The Big Space Landscape Architects, and Treeline Arborists.

A Section 5 Pre-Planning Consultation Meeting was held with An Bord Pleanála on the 12th June 2020. Following on from this An Bord Pleanála issued a Direction, along with a Notice of Pre-Application Consultation Opinion, dated the 24th June 2020 under Reg. Ref.: ABP 306636-20 which stated that it *"is of the opinion that the documents submitted with the request to enter into consultations require further consideration and amendment to 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

Roads Layout and LAP Roads Objective

Further consideration/justification of the documents as they relate to the specific roads objective that applies to the site under the Gorey Town and Environs Local Area Plan 2017-2023, 'Clonattin Upper Avenue', as set out in the Clonattin Neighbourhood Framework Plan. This objective is to provide a north-south connection between the Clonattin Road and the Courtown Road, to include existing and proposed routes within the Clonattin Village development.

The proposed development may be premature pending the delivery of this LAP roads objective.

The applicant is to address the delivery, or otherwise of this objective. The following matters are to be addressed in this regard:

- 1) Rationale for the proposed layout with regard to a detailed Traffic and Transport Impact Assessment, to include consideration of the capacity of the junction between Clonattin Village and the Clonattin Road and other relevant junctions in the area;*
- 2) Achievement of satisfactory emergency access to the development site;*

- 3) *Comprehensive response to the concerns of Wexford County Council regarding the roads access from a single junction at Clonattin Road as outlined in the written submission dated 9th March 2020 and at the tripartite consultation meeting on 12th June 2020;*
- 4) *Compatibility of the proposed layout with other relevant objectives of the Clonattin Neighbourhood Framework Plan as set out in the Gorey Town and Environs Local Area Plan;*
- 5) *Consistency with DMURS;*
- 6) *Rationale for proposed parking provision with regard to development plan parking standards and to the 'Sustainable Urban Housing Design Standards for New Apartments – Guidelines for Planning Authorities' (2018), to include details of car parking management for the apartments;*
- 7) *Provision of any necessary upgrade works to the existing Clonattin Village road;*
- 8) *Achievement of satisfactory vehicular, cycle and pedestrian connections to adjoining zoned lands;*
- 9) *Road Safety Audit and Quality Audit.*

The further consideration of this issue may require an amendment to the documents and/ or design proposals submitted relating to the design and layout of the proposed development.

The Board also identified pursuant to article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017, and 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 set out below should be submitted with any application for permission.

1. *Housing Quality Assessment with regard to the standards set out in the Sustainable Urban Housing Design Standards for New Apartments Guidelines for Planning Authorities. In this regard, the applicant is also advised to submit a Building Lifecycle Report.*
2. *A report that specifically addresses the proposed materials and finishes to the scheme including specific detailing of finishes, the treatment of balconies in the apartment buildings, landscaped areas, pathways, entrances and boundary treatment/s. Particular regard should be had to the requirement to provide high quality and sustainable finishes and details which seek to create a distinctive character for the development. The report should also demonstrate that the development provides the optimal architectural solution and sustainable development of the site and in this regard, the proposed development shall be accompanied by an architectural report and accompanying drawings which outlines the design rationale for the proposed height and design strategy having regard to inter alia, national and local planning policy, the site's context and locational attributes.*
3. *Rationale for proposed childcare provision (or lack of same) with regard to, inter alia, the 'Childcare Facilities Guidelines for Planning Authorities', circular letter PL 3/2016, and the 'Sustainable Urban Housing Design Standards for New Apartments – Guidelines for Planning Authorities' (2018), to provide details of existing childcare facilities in the area and demand for childcare provision within the proposed scheme.*
4. *Comprehensive landscaping scheme for the entire site to include (i) tree Survey, Arboricultural Report and Impact Assessment, to provide a detailed survey of trees and hedgerows at the development site and assessment of the quality and quantity of the specimens to be removed, along with measures to protect trees and hedgerows to be retained during construction; (ii) rationale for proposed public open space provision for the housing development, to include an open space hierarchy, details of play areas and detailed layouts for the public open spaces; (iii) detailed proposals for the linear park at the southern end of the site, to include its ongoing maintenance and management, ecological impacts and consideration of biodiversity*

enhancement measures and (iv) additional landscaping details including details of hard and soft landscaping, play equipment (if provided), boundary treatments, delineation of public and communal open space provision, pedestrian and cycle facilities, public lighting, car and cycle parking areas and refuse storage areas.

5. *Existing and proposed ground levels across the site. Detailed cross sections indicating proposed FFL's, boundary treatments, road levels, open space levels, SUDS measures, etc. relative to each other and relative to adjacent lands and structures. Also, topographical details and cross sections to indicate the relationship between the development and the watercourse to the south of the site with regard to the protection of the riparian zone as required by development plan policy.*
6. *A site layout plan, which clearly indicates what areas are to be taken in charge by the Local Authority.*
7. *Site Specific Flood Risk Assessment, to include consideration of downstream impacts.*
8. *Water infrastructure proposals to meet the requirements outlined in the submission on file of Irish Water dated 18th March 2020.*
9. *AA Screening Report.*

This document outlines what specific information has been provided to address these issues and provides a response to the Opinion issued by An Bord Pleanála following the meeting.

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. National Transport Authority
4. Relevant Childcare Committees

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 four of these consultees have requested a soft copy only be sent to them.

Statement of Response to Issues Raised

This report is in response to the issue raised 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-306636-20). Any amendments to the design submitted at stage 2 required to address the issues raised are also outlined in full in the Architectural Design Statement and in brief below.

However, the key changes to the scheme are as follows:

- The provision of a new link road connecting the site to the Courtown Road and connecting the Courtown Road to the Clonattin Village Road.
- Improvements to the Clonattin Village Road including new pedestrian crossing points
- Amendments to the internal layout of the development to accommodate the new road and future connections
- The inclusion of a creche within the development

Response to Issue: Roads, Layout and LAP Roads Objective

An Bord Pleanála stated the following:

Further consideration/justification of the documents as they relate to the specific roads objective that applies to the site under the Gorey Town and Environs Local Area Plan 2017-2023, 'Clonattin Upper Avenue', as set out in the Clonattin Neighbourhood Framework Plan. This objective is to provide a north-south connection between the Clonattin Road and the Courtown Road, to include existing and proposed routes within the Clonattin Village development.

The proposed development may be premature pending the delivery of this LAP roads objective.

Applicants Response

The Design Team have re-examined the layout of the proposed development and have included a new road "Clonattin Upper Avenue" to the south east of the site which will connect to Courtown Road. This is in line with the route set out in the Clonattin Neighbourhood Framework Plan in the Gorey Local Area Plan (2017 – 2023). This route now provides a north – south connection between the Clonattin Road and Courtown Road, connecting the existing and proposed routes within Clonattin Village. This route will be delivered as part of this SHD development and the location and design of same has been discussed and agreed with Wexford County Council Roads and Planning Departments since the tripartite meeting.

An Bord Pleanála stated the following:

The applicant is to address the delivery, or otherwise of this objective. The following matters are to be addressed in this regard:

- 1) Rationale for the proposed layout with regard to a detailed Traffic and Transport Impact Assessment, to include consideration of the capacity of the junction between Clonattin Village and the Clonattin Road and other relevant junctions in the area;*

Applicants Response

The LAP Objective for a new north-south road connection between Clonattin Road and Courtown Road will now be provided as part of this SHD planning application.

CS Consulting have also completed a Traffic Impact Assessment and a Road Infrastructure Design Report which provides a rationale for the proposed layout of the development and a detailed assessment of the traffic implications associated with the proposed development, in term of integration with existing traffic in the area. It determines the impact of the proposed development on the existing road network, in particular through the operational assessment of 4 no. key existing and proposed junctions on Clonattin Road and on the R742 regional road. As highlighted above, the proposed development includes a new link road that shall connect Courtown Road to Clonattin Village and Clonattin Road.

These reports examine the existing traffic flows on the surrounding road network along with the existing road network characteristics. The report also sets out proposed local infrastructure improvements. It takes into account nearby permitted development, as well as assessing the impact of the development of the land to the north of the application site (also within the control of the applicant) for a future new primary school, should the need arise.

The Traffic Impact Assessment demonstrates that all approaches to the junctions assessed remain within their effective capacities with a maximum degree of saturation of 80% reached on any junction approach in either peak hour period. This Design Year Sensitivity Assessment takes into account the

background traffic flows, the existing traffic redistributed via the new link road, the vehicular trips generated by the 2 permitted developments nearby, the proposed development the subject of this application and any traffic flows generated by the future development of a primary school (shown as an indicative future use on the community zoned lands within the applicant's ownership but not part of this application. It is worth noting that a school was chosen as this is the worst case scenario in terms of traffic for that future application site). Overall, it has been found that the proposed development shall not generate excessive vehicular traffic flows.

These reports also highlight that the development will join into the existing surrounding road network at 7 different locations. A new priority junction on Clonattin Village Road at the northern boundary of the subject development, the northward continuation of the Cinema Road to the south east and 5 no. vehicular access points located on Clonattin Village Road at the northern boundary of the development. Provision has also been made for future connectivity between the subject development and adjacent development of the lands to the south at 2 no. locations along the new link road. All connections between the proposed development's internal road network and the external road network have been designed in accordance with the requirements of DMURS.

The proposed development ensures good pedestrian and cyclist access and permeability, including the provision of continuous cycle track and footpath connections between Clonattin Road and Courtown Road.

The TIA concludes that the *"proposed shall not have a significant detrimental effect on the operation of the surrounding existing road infrastructure, that the parking provision for the proposed development generally conforms to Local Authority and the DoHPLG standards, and that the development access design and internal layout are fit for purpose and comply with the Design Manual for Urban Roads and Streets."*

An Bord Pleanála stated the following:

- 2) *Achievement of satisfactory emergency access to the development site;*

Applicants Response

The proposed application includes the development of a new link road "Clonattin Upper Avenue" which connects the Courtown Road to Clonattin Village and Clonattin Road. The development of this new link road ensures that emergency access into/out of the development is feasible at all times. This is designed to appropriate road design standards and both roads can provide access to all emergency vehicles. This improves the existing situation for existing residents in the area, as well as future residents from this proposed development.

An Bord Pleanála stated the following:

- 3) *Comprehensive response to the concerns of Wexford County Council regarding the roads access from a single junction at Clonattin Road as outlined in the written submission dated 9th March 2020 and at the tripartite consultation meeting on 12th June 2020;*

Applicants Response

CS Consulting have been liaising with Wexford County Council throughout the design development of the road infrastructure. They have had several conversations over email and phone, as well as face to face meetings, with the most recent meeting on the 23rd October 2020. Through this process, it has been agreed that vehicular access will be provided from multiple locations including the development of the new proposed link road in order to address the concerns raised by Wexford County Council.

The proposal also includes upgrade works to lands within Wexford County Council's control for which a Letter (email) of Consent has been provided dated the 6th November 2020. Wexford County Council are now satisfied with the design approach to the existing surrounding roads, the connection to these and the proposed new roads within the development and all of the issues raised have been addressed in full.

An Bord Pleanála stated the following:

4) *Compatibility of the proposed layout with other relevant objectives of the Clonattin Neighbourhood Framework Plan as set out in the Gorey Town and Environs Local Area Plan;*

Response

The proposed development includes a new link road as part of the application. This will connect Clonattin Road to Courtown Road in line with the *Clonattin Neighbourhood Framework Plan as set out in the Gorey Town and Environs Local Area Plan 2017 – 2023*. The proposed design and internal layout of the development also facilitates the future provision of a second link road along other routes identified in the plan if the need should arise. The proposed design is now fully compliant with the relevant objectives of the Clonattin Neighbourhood Framework Plan and the Gorey Town and Environs Local Area Plans. This set out in full in the Design Statement by Reddy Architecture and the Statement of Consistency by McGill Planning Ltd.

An Bord Pleanála stated the following:

5) *Consistency with DMURS;*

Applicants Response

CS Consulting Group have provided a DMURS Statement on the proposed development. It highlights that the scheme has been designed in accordance with the Design Manual for Urban Roads and Streets (2019); Wexford County Development Plan (2013 - 2019); Gorey Local Area Plan (2017 – 2023); National Cycle Manual (2011) and the Department of Transport, Tourism and Sport Smarter Travel guidelines. The result is that the development incorporates features that benefits vulnerable road users by encouraging low vehicle speeds ensuring that the roads serve the proposed community and do not dominate it. The proposed development will provide good permeability for cyclists and pedestrians.

An Bord Pleanála stated the following:

6) *Rationale for proposed parking provision with regard to development plan parking standards and to the 'Sustainable Urban Housing Design Standards for New Apartments – Guidelines for Planning Authorities' (2018), to include details of car parking management for the apartments;*

Applicants Response

As set out in the Traffic Impact Assessment and the Road Infrastructure Design Report by CS Consulting, the proposed car parking provision has been assessed with respect to the Wexford County Development Plan 2013 – 2019 for all of the housing on site, and the *Sustainable Urban Housing Design Standards for New Apartments – Guidelines for Planning Authorities' (2018)* for the apartments.

The proposed development includes the development of 393 no. residential units along with a creche for 83 children and 17 staff. The development provides for 690 no. residential car parking spaces. 671 no. spaces are for residential use (including visitors) and 19 no. spaces serve the creche. Of these

spaces, 521 spaces within the curtilage or behind the footpath proximate to the houses and apartments; 57 no. spaces are provide within small parking areas serving the apartments and 93 no. on street spaces arranged along the development’s internal road network. In total 134 no. spaces shall serve the development’s 81 no. apartments and 20 no. duplex units, this is broken down into 101 residents spaces and 33 visitor spaces.

Table 27 – Apartment & Duplex Car Parking Provision

Parking Type	Apt. Guidelines Recommendation	Development Quantum	Recommended Provision	Proposed Provision
Residents' Spaces	1 space per unit	101 units ⁶	101 spaces	101 spaces
Visitor Spaces	1 space per 3-4 units		25-34 spaces	33 spaces
Total			126-135 spaces	134 spaces

Figure 1 Extract from CS Consulting TIA.

The Apartment Guidelines requests “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” which equates to between 126 no. spaces and 135 no. spaces for the apartments which is below the minimum provision requirement of 152 no. spaces by the County Development Plan. This is considered appropriate to the location and context of the development. Please also see the Material Contravention Statement by McGill Planning Ltd.

An Bord Pleanála stated the following:

- 7) Provision of any necessary upgrade works to the existing Clonattin Village road;

Applicants Response

The proposed development includes the provision of new cycle lanes along the existing Clonattin Village road linking the subject site to Clonattin Road. Two new pedestrian crossing points are also proposed from the new development across Clonattin Village Road. Please refer to CS Consulting drawing no. CLO-CSC-ZZ-XX-DR-C-0003. Wexford County Council have agreed and approved these upgrades.

An Bord Pleanála stated the following:

- 8) Achievement of satisfactory vehicular, cycle and pedestrian connections to adjoining zoned lands;

Applicants Response

The proposed internal road layout of the site has been designed to accommodate vehicular, cycle and pedestrian connections through the development site and connecting to the existing developments and future potential connections to adjacent zoned lands. An attractive linear park, running along the southern boundary of the site, with pedestrian only facilities, further improves the attractiveness and connectivity of the site to future neighbouring development lands.

An Bord Pleanála stated the following:

9) Road Safety Audit and Quality Audit.

Applicants Response

An independent Quality Audit has been conducted by Roadplan Consulting and as a result design changes have been made in response to the recommendations made in this Audit and these measures have been accepted by the Audit team.

Statement of Response to Specific Information Required

The following sets out how the applicant has addressed the Board's request for additional specific information in respect of the proposed development. Please note that these specific information requests should be read in conjunction with the accompanying detailed documentation prepared by McGill Planning, Reddy Architecture, CS Consulting Engineers, TBS Landscape Architecture, Altemar Ecologists, and Treeline Arborists.

Response to Specific Item 1: Housing Quality Assessment

An Bord Pleanála stated the following:

Housing Quality Assessment with regard to the standards set out in the Sustainable Urban Housing Design Standards for New Apartments Guidelines for Planning Authorities. In this regard, the applicant is also advised to submit a Building Lifecycle Report.

Applicants Response

Reddy Architecture + Urbanism have prepared a Housing Quality Assessment which outlines how each of the apartments meets the standards set out in Sustainable Urban Housing Design Standards for New Apartments Guidelines for Planning Authorities.

Reddy Architecture + Urbanism have also prepared a Building Lifecycle Report.

Response to Specific Item 2: Materials and Finishes

An Bord Pleanála stated the following:

A report that specifically addresses the proposed materials and finishes to the scheme including specific detailing of finishes, the treatment of balconies in the apartment buildings, landscaped areas, pathways, entrances and boundary treatment/s. Particular regard should be had to the requirement to provide high quality and sustainable finishes and details which seek to create a distinctive character for the development. The report should also demonstrate that the development provides the optimal architectural solution and sustainable development of the site and in this regard, the proposed development shall be accompanied by an architectural report and accompanying drawings which outlines the design rationale for the proposed height and design strategy having regard to inter alia, national and local planning policy, the site's context and locational attributes.

Applicants Response

Reddy Architecture + Urbanism have prepared an Architectural Design Statement which outlines the design and development of the scheme. Section 04.9 Materiality specifically addresses the proposed materials and finishes to the scheme including treatment of balconies in apartments, landscaped areas, pathways, entrances and boundary treatment. This section incorporates TBS Landscape Architects design.

Section 04.10 of the Reddy Design Statement addresses Character Areas and provides details on the distinctive character of the area, and the variations between each area in terms of materials to create distinct areas within the development.

The Design Statement also sets out the evolution of the proposal in the context of the surrounding area and the design objectives, circulation and permeability, built form and design along with design standards and guidance. The proposed height within the development is 2 to 3 storeys in height which is in keeping with the character of the surrounding area, and its location in close proximity to Gorey centre.

In addition to the Design Statement by Reddy Architecture, a Landscape Development Report is also submitted which sets out the design and layout strategy for the public open spaces within the development.

Response to Specific Item 3: Childcare Provision

An Bord Pleanála stated the following:

Rationale for proposed childcare provision (or lack of same) with regard to, inter alia, the 'Childcare Facilities Guidelines for Planning Authorities', circular letter PL 3/2016, and the 'Sustainable Urban Housing Design Standards for New Apartments – Guidelines for Planning Authorities' (2018), to provide details of existing childcare facilities in the area and demand for childcare provision within the proposed scheme.

Applicants Response

The proposed scheme is for 363 no. residential units comprising 42 no. 1 bed apartments; 59 no. 2 beds apartments; 134 no. 3 beds houses; 124 no. 4 beds houses and 4 no. 5 beds houses.

The 2001 Childcare Facilities Guidelines for Planning Authorities provides a standard of 20 no. childcare spaces to be provided for every 75 no. residential units proposed in a development. Applying this standard to the proposed development would require c. 97 no. childcare spaces to be provided (363 no. units/75*20 no. spaces). The Guidelines note that this standard is a guideline and will depend on the particular circumstances of each individual site. Appendix 2 of these guidelines note that the threshold for provision should be established having regard to the existing geographical distribution of childcare facilities and the emerging demographic profile of areas.

The 2018 Sustainable Urban Housing Design Standards for New Apartments – Guidelines for Planning Authorities note that 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'.

McGill Planning Ltd have carried out a Childcare Assessment in Chapter 4 of the EIAR of the Gorey area to determine whether a childcare facility is required as part of the proposed development. This assessment determined that there are 12 no. childcare facilities within Gorey, 6 no. of which are within 1km of the subject site. As set out in the Childcare Assessment, these childcare facilities were contacted in January 2020 to determine their capacity. It was found that there were 2 vacancies available at that time.

The Childcare Assessment also carried out an analysis of the local area demographics. This found that c. 8.2% of the local area's population was aged 0-4 in 2016. Applying this percentage to the expected

population of the proposed development (363*2.7) indicates that c. 80 of the population generated by the development will be aged 0-4 (980*0.082).

When the one and two bed apartment units are excluded from the calculations, the proposed development is expected to generate a population of c. 58 no. children aged 0-4 (8.2% of the population generated by 262 no. units with 2.7 persons per household). It is also noted that the Quarterly National Housing Survey found that only 17% of children aged between 0-4 actually attend childcare in this area.

	Total Units (363 no. units)	Units without 1 beds (321 no. units)	Units without 1 and 2 beds (262 no. units)
2001 Childcare Guidelines (20 no. spaces per 75 no. units)	97 no. spaces	86 no. spaces	70 no. spaces
Total Population Estimate (2.7 persons per household)	980	867	707
Total Population Aged 0-4 (8.2% of population)	80	71	58
Total 0-4 years requiring private childcare (QNHS 17% of those aged 0-4)	14	12	10

Considering the local demographics, the proposed developments projected population, and the current capacity of childcare facilities in the area the proposed development will provide a childcare facility which will cater for c. 83 no. children. This childcare facility is located to the south of the subject site, which will ensure that the childcare facility is within a short walking distance of the houses further away from the existing creche located to the north of the site. This is considered appropriate given the expected need arising from this development which will be in the range of 58 to 80 no. childcare spaces.

This Childcare Assessment is included within Chapter 4 of the EIAR submitted with this application.

Response to Specific Item 4: Landscaping

An Bord Pleanála stated the following

Comprehensive landscaping scheme for the entire site to include (i) tree Survey, Arboricultural Report and Impact Assessment, to provide a detailed survey of trees and hedgerows at the development site and assessment of the quality and quantity of the specimens to be removed, along with measures to protect trees and hedgerows to be retained during construction; (ii) rationale for proposed public open space provision for the housing development, to include an open space hierarchy, details of play areas and detailed layouts for the public open spaces; (iii) detailed proposals for the linear park at the southern end of the site, to include its ongoing maintenance and management, ecological impacts and consideration of biodiversity enhancement measures and (iv) additional landscaping details including details of hard and soft landscaping, play equipment (if provided), boundary treatments, delineation of public and communal open space provision,

pedestrian and cycle facilities, public lighting, car and cycle parking areas and refuse storage areas.

Applicants Response

Treeline Limited have completed an Arboricultural Development Report along with drawings which provide an assessment of Arboriculture Impacts, a Tree Protection Plan and a Tree Constraints plan. These provide a detailed survey of trees and hedgerows at the development site, along with an assessment of the quality and quantity of the specimens to be removed along with protection plan for the trees and hedgerows to be retained.

The recommendations of the report sets out that *“There is no arboricultural justification to refuse the proposed development, it is recommended from an arboricultural prospective that the proposed development be granted provided the following are implemented*

- *The preliminary works highlighted in the Tree Schedule are complete by a professional and competent tree surgeon*
- *The Arboricultural Method Statement is implemented*
- *The Tree protection Plan is implemented”*

TBS Landscape Architects have designed the proposed provision of public open space including the hierarchy of spaces, the details of the play areas and the layouts of each public open space including the linear park. The proposed landscape strategy develops a strong identity and distinctive sense of place within the proposed development which will foster connection and attachment between people and their living space. The network of spaces include:

- Space for informal play
- Play facilities
- Provision of exercise stations
- Pedestrian paths for use by all
- Kick about area
- Linear park

The landscaping takes advantage of the existing topography, trees and river and other attractive features within the site and incorporates them successfully within the landscaping scheme. The proposed landscaping of the linear park is sensitive to the nature of this area in terms of ecological and biodiversity value. This area includes the retention of many of the existing trees and hedgerows as well as supplementing this area with additional tree planting. As a result, the proposed planting enhances its role. The proposed nature of the walk along with the proposed native planting reinforces the ecological value of the development as set out in the Biodiversity chapter of the EIAR. The proposed development will enhance the biodiversity of the area, by ensuring a managed and well maintained landscape into the future.

The proposed landscaping drawings and report by TBS Landscape Architecture, in addition to the details in the Architects Design Statement, provides details of hard and soft landscaping, play equipment, boundary treatments, and the delineation of public and communal open space provision. The masterplan for the site and landscape layout provides details of the pedestrian and cycle facilities within the site and connection to the wider area.

Each house has on curtilage or on street in close proximity to the house of car parking facilities, while the cycle parking and bin storage is within the curtilage of the house. For the apartments, the majority of car parking is provided within the curtilage of the development, with some on street, managed car parking within close proximity of the apartments. Cycle parking and bin storage is located within the curtilage of the apartments and meets the requirements as set out in the Apartment Guidelines.

Details of public lighting is set out in the Public Light Report and Drawing by JAK Consulting Engineers. This takes into account the design of the development and any sensitivities in terms of ecology along the area.

Response to Specific Item 5: Levels across the site

An Bord Pleanála stated the following:

Existing and proposed ground levels across the site. Detailed cross sections indicating proposed FFL's, boundary treatments, road levels, open space levels, SUDS measures, etc. relative to each other and relative to adjacent lands and structures. Also, topographical details and cross sections to indicate the relationship between the development and the watercourse to the south of the site with regard to the protection of the riparian zone as required by development plan policy.

Applicants Response

Reddy Architecture + Urbanism, CS Consulting Engineers and The Big Space Landscape Architecture have prepared detailed drawings to address this item. Reddy's have provided information on the cross sections including FFL's, road levels, open space levels relative to each other and adjacent lands and structures.

TBS provide details on their drawing no. 301 indicating boundary treatments and open space levels. Section F-F, D-D and E-E on drawing number 302 provide details of the relationship of the proposed development and the watercourse to the south of the development. It provides a clear protection of the riparian zone as required within the County Development plan.

Drawing no CLO-CSC-ZZ-XX-DR-C-0003 to 0007 Proposed Road Plan Layout Sheets 1 to 5 by CS Consulting includes the road layout of the development and levels included.

- CLO-CSC-ZZ-XX-DR-C-003 Proposed Road Layout Sheet 1 Of 5
- CLO-CSC-ZZ-XX-DR-C-004 Proposed Road Layout Sheet 2 Of 5
- CLO-CSC-ZZ-XX-DR-C-005 Proposed Road Layout Sheet 3 Of 5
- CLO-CSC-ZZ-XX-DR-C-006 Proposed Road Layout Sheet 4 Of 5
- CLO-CSC-ZZ-XX-DR-C-007 Proposed Road Layout Sheet 5 Of 5

The following drawings prepared by CS Consulting provide details of all of the SUDS measures proposed across the site and how they interact with each other.

- CLO-CSC-ZZ-XX-DR-C-0016 SUD's Layout Sheets 1 of 3
- CLO-CSC-ZZ-XX-DR-C-0017 SUD's Layout Sheets 2 of 3
- CLO-CSC-ZZ-XX-DR-C-0018 SUD's Layout Sheets 3 of 3

Further detail of this is also provided in CS Consulting's Engineering Services report which details the SUDS proposals including infiltration trenches, swales, rainwater harvesting, and permeable paving.

Response to Specific Item 6: Site Layout Plan

An Bord Pleanála stated the following:

A site layout plan, which clearly indicates what areas are to be taken in charge by the Local Authority.

Applicants Response

Reddy Architecture + Urbanism have prepared a site layout plan which clearly indicates the areas to be taken in charge by Wexford County Council. Please see drawings P19-147K-RAU-XX-XX-DR-A-31701 and P19-147K-RAU-XX-XX-DR-A-31702 Indicative Taking-In-Charge Part 1 and 3 Drawings submitted with this application.

Response to Specific Item 7: Site Specific Flood Risk Assessment

An Bord Pleanála stated the following:

Site Specific Flood Risk Assessment, to include consideration of downstream impacts.

Applicants Response

CS Consulting Engineers have prepared a Site Specific Flood Risk Assessment which is submitted with this application. The site is located within Flood Zone C with all residential development within the Flood Zone C area, therefore, residential development on this site is considered appropriate. This report has identified that there is no recorded flood events on the site. The predicted flood mapping for pluvial, tidal and fluvial flood events shall not affect the subject lands. It also notes that the permitted development shall have a storm water attenuation system to address a 1 in 100 year extreme storm. This shall significantly reduce the volume of storm water leaving the site during extreme storms which in turn shall not affect the downstream existing public drainage system. The conclusion is that the likelihood of onsite flooding from hydrological ground conditions are deemed to be minor and within acceptable levels.

Response to Specific Item 8: Water Infrastructure Proposals

An Bord Pleanála stated the following:

Water infrastructure proposals to meet the requirements outlined in the submission on file of Irish Water dated 18th March 2020.

Applicants Response

CS Consulting Engineers have prepared the water supply and wastewater infrastructure proposals. Please see the following drawings for detailed information.

- CLO-CSC-ZZ-XX-DR-C-0008 Proposed Watermain Sheet 1 of 3
- CLO-CSC-ZZ-XX-DR-C-0009 Proposed Watermain Sheet 2 of 3
- CLO-CSC-ZZ-XX-DR-C-0010 Proposed Watermain Sheet 3 of 3
- CLO-CSC-ZZ-XX-DR-C-0030 Watermain Details Sheet 1 of 2
- CLO-CSC-ZZ-XX-DR-C-0031 Watermain Details Sheet 2 of 2
- CLO-CSC-ZZ-XX-DR-C-0011 Proposed Drainage Sheet 1 of 3
- CLO-CSC-ZZ-XX-DR-C-0012 Proposed Drainage Sheet 2 of 3
- CLO-CSC-ZZ-XX-DR-C-0013 Proposed Drainage Sheet 3 of 3
- CLO-CSC-ZZ-XX-DR-C-0027 Drainage Details 1 of 3
- CLO-CSC-ZZ-XX-DR-C-0028 Drainage Details 2 of 3
- CLO-CSC-ZZ-XX-DR-C-0029 Drainage Details 3 of 3
- CLO-CSC-ZZ-XX-DR-C-0016 SUDs Layout Sheet 1 of 3
- CLO-CSC-ZZ-XX-DR-C-0016 SUDs Layout Sheet 2 of 3
- CLO-CSC-ZZ-XX-DR-C-0016 SUDs Layout Sheet 3 of 3

The water infrastructure proposals have been carefully designed to meet the requirements outlined in the submission on file of Irish Water dated 18th March 2020. As a result, a Statement of Design

Acceptance from Irish Water has been received. Further details of this are set out in Section 6 of the Engineering Services Report.

Response to Specific Item 9: AA Screening Report

An Bord Pleanála stated the following:

AA Screening Report.

Applicants Response

Altamar Marine & Environmental Consultancy prepared an Appropriate Assessment Screening for the proposed development. This AA Screening notes that there are no Natura 2000 sites within the zone of influence of this development. Having taken into consideration the effluent discharge from the proposed development works, the distance between the proposed development site to designated conservation sites, lack of direct or indirect hydrological pathway or biodiversity corridor link to conservation sites and the dilution effect with other effluent and surface runoff, it is concluded that this development that would not give rise to any significant effects to designated sites. The construction and operation of the proposed development will not impact on the conservation objectives of features of interest of Natura 2000 sites.

This report presents a Stage 1 Appropriate Assessment Screening for the Proposed Development, outlining the information required to assess whether or not the Proposed Development, either alone or in combination with other plans and projects, in view of best scientific knowledge, is likely to have a significant effect on any European or Natura 2000 site.

On the basis of the content of the AA report it is found that there is no possibility of significant impacts on Natura 2000 sites, features of interest or site specific conservation objectives. A Natura Impact Statement is not required.