



## STATEMENT OF RESPONSE TO AN BORD PLEANÁLA PRE-APPLICATION CONSULTATION OPINION

---

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

Applicant: Gerard Gannon Properties

March 2022

## TABLE OF CONTENTS

<b>1.0</b>	<b>INTRODUCTION .....</b>	<b>3</b>
<b>2.0</b>	<b>ITEMS FOR FURTHER CONSIDERATION &amp; AMENDMENTS .....</b>	<b>3</b>
2.1	Item No. 1 – Design and Layout.....	3
2.2	Item No. 2 – Density.....	6
2.3	Item No. 3 – Surface Water Management and Flooding .....	8
<b>3.0</b>	<b>SPECIFIC FURTHER INFORMATION .....</b>	<b>10</b>
3.1	Item No. 1 – Addressing Refusal Reasons on Previous Application.....	10
3.2	Item No. 2 – Delivery of the Road Upgrade Works.....	10
3.3	Item No. 3 – Phasing Plan .....	11
3.4	Item No. 4 – Material and Finishes .....	12
3.5	Item No. 5 – Instruction on Drawings .....	13
3.6	Item No. 6 – Compliance with Design Standards.....	14
3.7	Item No. 7 – Life Cycle Report.....	14
3.8	Item No. 8 – Taking in Charge .....	15
<b>4.0</b>	<b>NOTIFICATION OF AUTHORITIES .....</b>	<b>15</b>
<b>5.0</b>	<b>CONCLUSION .....</b>	<b>15</b>

DOWNEY

© Downey 2022

Downey Planning Document Control			
	Name	Date	Version
Prepared by	Elahe Saki MIPI Consultant Planner	30/11/2021	DRAFT_V01
	Elahe Saki MIPI Consultant Planner	22/03/2022	DRAFT_V02
Approved by	Eva Bridgeman MIPI Director	25/03/2022	FINAL_V02

## 1.0 INTRODUCTION

This Statement of Response accompanies a planning application to An Bord Pleanála for a proposed Strategic Housing Development on lands at Kilnahue & Gorey Hill, Carnew Road & Kilnahue Lane, Gorey, Co. Wexford.

Following consultation with Wexford County Council under Section 247 of Planning and Development Act, 2000 (as amended), a request to enter into pre-application consultation with An Bord Pleanála was submitted on 30<sup>th</sup> January 2019, with An Bord Pleanála subsequently accepting the Section 5 pre-application consultation request. The pre-application consultation meeting was then held at the offices of Wexford County Council on 8<sup>th</sup> March 2019.

On 19<sup>th</sup> March 2019, An Bord Pleanála issued the notice of pre-application consultation opinion for the proposed development, under case reference ABP-303583-19.

Having regard to the above, the opinion states that An Bord Pleanála “*following consideration of issues raised during the consultation process, and having regard to the opinion of the planning authority, An Bord Pleanála is of the opinion that the documentation submitted requires further consideration and amendments to constitute a reasonable basis for an application for strategic housing development to An Bord Pleanála.*”

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

The statement now sets out a response to An Bord Pleanála’s pre-application consultation opinion. This statement of response should be read in conjunction with all drawings and documentation submitted as part of this Strategic Housing Development application.

## 2.0 ITEMS FOR FURTHER CONSIDERATION & AMENDMENTS

### 2.1 Item No. 1 – Design and Layout

---

#### **ABP Opinion**

“*Further consideration/justification of the documents as they relate to the layout of the proposed development particularly in relation to the 12 criteria set out in the Urban Design Manual which accompanies the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, 2009 and the Design Manual for Urban Roads and Streets, 2013. In this regard further consideration is required of the configuration of the layout particularly in respect of the nature and scale of the built form and the orientation of blocks as they address the central spine road and proposed neighbourhood park, coherence of unit types proposed particularly in respect of the design of the proposed housing units, distinctiveness of the proposed development including the treatment of the*

*proposed entrance to the development from the Carnew Road, location of the crèche, the creation of distinct character areas within the proposed development, internal permeability and connections within the site and connections to existing and proposed services in the area and the avoidance of cul-de-sacs. Further consideration of these issues may require an amendment to the documents and/or design proposals submitted.”*

### **Applicant’s Response**

Prior to demonstrating the rationale behind the layout of the proposed scheme in detail, it is noted that the layout has been informed by the site setting and the quantum of developable land with respect to the site constraints and locational attributes of the lands, the 12 criteria set out in the Urban Design Manual and other relevant guidelines and development frameworks, and the pre-application consultation meetings with the Local Authority and An Bord Pleanála. This has resulted in various design iterations of the proposed development, all of which is fully detailed within the supporting planning statement prepared by Downey and submitted under separate cover.

With an approximate area of 19.17 hectares (including the off-site upgrade works), the application lands are a greenfield site spreading across irregular shaped fields, and is located to the south-west of Gorey Town Centre between Kilnahue Lane (L10112) and Carnew Road (R725). Given the location of the subject lands situated on a hill, the terrain on site is undulating, bounded by mature hedgerow and slopes steadily from the southeast to its summit in the northwest.

In response to the site constraints and locational attributes of the lands and with respect to the relevant planning policy and guidelines, the layout and design of the lands aims to efficiently utilise the unique characteristics of the lands setting within the design process to add to the distinctiveness of the scheme, and create a novel residential quarter comprising of various character areas so to better dissolve it within its wider context. The development is laid out in residential clusters and urban blocks as envisaged in the Gorey Town & Environs LAP, and it has been refined to promote permeability and accessibility through the site and across the new public parkland.

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

Primary vehicular circulation within the site is based on the three routes, i.e., the Park Avenue, the Middle Avenue and the Lower Avenue which follow the contours and topography of the site. The avenues create and define the urban design qualities of the scheme and allow the visual transition between different site levels. The avenues further define the Character Areas within the development. The Lower Avenue connects the entrance from R725 Carnew Road along the lower levels of the development and track the old rural lane which ceased to exist some time ago. A link road running northwards up the slope connects to the Middle Avenue and to the Park Avenue beyond, which provides the primary means of vehicular access and connects to all secondary routes within the development. The Park Avenue provides access for the residents and other users to the public

parkland. Housing is laid out in an ‘Urban Villa’ arrangement overlooking the park thus giving a strong edge to the public open space.

Legibility and wayfinding have been carefully considered, and strong edges have been emphasised along the primary routes and onto key open spaces. Furthermore, the whole scheme is anchored around an “entrance building”, as the focal point to the scheme, located strategically off the Carnew Road, evoking a strong image of the scheme by its height and physical characteristics and announcing the entrance to the new emerging community on suburb of Gorey.

The wide range of green open spaces which further ties the scheme to its distinct context appears as the special quality of the scheme. These range of spaces comprising of a large parkland, numerous pocket parks, communal and habitat spaces are to amplify the design and create an environment in which the future residents and other users would feel comfortable and want to the experience. Integrating the greenery with the provisioned hierarchy of open/communal spaces across the scheme is to facilitate an enhanced quality of life for its prospective residents, and contribute to the overall character of the development.

All new public open spaces within the development are overlooked by surrounding homes so that safety of residents is paramount. Within the provisioned parkland and other major green spaces, a network of circulation paths will be created which would provide a significant amenity for the site and its wider context. Significant consideration has been given to ensuring that all elements of the development are accessible and usable by persons of all ages and abilities. Safe formal and informal children’s play areas are located throughout the development.

The form and buildings envelope of the proposed residential scheme will be two to four storeys which has been designed for an appropriate variation from the surrounding residential areas, to create for a legible development comprising of various character areas, with respect to the unique site setting properties and topography. Design and materials will be of a high quality and there will be a mixture of unit configurations across the site to avoid a homogenous block appearance and to facilitate the various type of family units that will ultimately occupy the units. It is proposed to provide 421 no. units across a mix of one, two, and three bed apartments/duplexes, and three and four bed houses providing for a mix of units.

All homes in the development will be designed to achieve a Building Energy rating of at least A2 to comply with the EU Nearly Zero Energy Building (NZEB) Regulations and meet the challenges of climate change. All terraced and semi-detached houses can have their attics converted or rear extensions added without diminution of the residential amenity. The nature of the design of the residential units will allow for adaptation and subdivision for changing uses such as the increasing demand expected for ‘Working from Home’.

The design of multi-residential units has been carried in a manner that maximises those with dual aspect. Design, acoustic insulation, and construction detail will prevent sound transmission between homes. The site layout and building designs have been carefully prepared to ensure that views from windows into other homes are avoided and recommended separation distances between residences have been complied with or exceeded. Storage space in excess of minimum standards is provided to all residential units as are external storage areas for recycling.

Careful consideration has been given to the design and disposition of car parking areas. Most parking areas, where located externally, are passively supervised. Where possible extensive areas of hard paved surface have been avoided or placed to the rear of buildings to ensure adequate trees and soft landscaping in the Avenues and Streets. All hard surfaces for car parking will be in high quality paving similar to pedestrian and cycle routes which are differentiated by colour. Dedicated bicycle storage is also provided to each apartment building.

The associated complementary land-uses such as a childcare facility, 2 no. multi-purpose community rooms and 2 no. retail units, and amenity spaces is also to be provided. This is to represent a sustainable development at an appropriate location that will facilitate in the sequential development of Gorey Town.

For further details on compliance of the proposed development with 12 criteria of Urban Design Manual, please refer to the enclosed Architecture Statement prepared by Connolly Architects.

## 2.2 Item No. 2 – Density

---

### ABP Opinion

*"Further consideration/justification of the documents as they relate to the density in the proposed development and in particular that the proposed development is at a sustainable density to provide for an acceptable efficiency in serviceable land usage balanced with the requirement to respect the context within which the site is located. Particular regard should be had to the avoidance of residual open spaces within the site. The documentation should express density as a net figure and the calculation of same should accord with Appendix A of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, 2009 in this regard and a drawing detailing the calculation of net density within the site boundary shall be submitted. The proposed development shall have regard to inter alia, national policy including the National Planning Framework, Urban Development and Building Heights Guidelines for Planning Authorities 2018, Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, 2009 and Sustainable Urban Housing: Design Standards for New Apartments March 2018, local planning policy and the sites context and locational attributes and context. The further consideration of this issue may require an amendment to the documents and/or design proposal submitted relating to density and layout of the proposed development."*

### Applicant's Response

The subject site is a Tiered 1 Serviced Zoned land within Gorey LAP lands, and is located to the west of the Railway line, southwest of Gorey Town Centre between the Kilnahue Lane and Carnew Road which leads from the town centre. With respect to the '*Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009)*', the proposed development falls within "*Outer Suburban/Greenfield' sites*". In this context, the Guidelines state that "*whilst the land take of the ancillary facilities remains relatively constant, the greatest efficiency in land usage on such lands will be achieved by providing net residential densities in the general range of 35-50 dwellings per*

*hectare and such densities (involving a variety of housing types where possible) should be encouraged generally. Development at net densities less than 30 dwellings per hectare should generally be discouraged in the interests of land efficiency, particularly on sites in excess of 0.5 hectares.”*

Furthermore, the ‘*Sustainable Urban Housing: Design Standards for New Apartments (Dec 2020)*’ identifies types of locations that may be suitable for apartment developments. In this regard, it is considered that the proposed development falls within “(3) Peripheral and/or Less Accessible Urban Locations” as it meets the criteria for this location in that the site is located approximately within circa 1.5km of Gorey Town Centre and is located within the town’s development boundary. Outlined in the Guidelines, “such locations are generally suitable for limited, very small-scale (will vary subject to location), higher density development that may wholly comprise apartments, or residential development of any scale that will include a minority of apartments at low-medium densities (will also vary, but broadly <45 dwellings per hectare net), including:

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

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

In addition to the location of the application site, the site itself is characterised with a unique setting which appears as both an opportunity to deliver a distinct development fused with topographical features of the site, and a constraint which restricts the quantum of developable land to provide for housing and directly associated uses.

With respect to the aforementioned Guidelines and other relevant planning policy, pre-planning consultation meetings with both the Local Authority and An Bord Pleanála, and upon designing several scenarios yielding various residential densities, the proposed net density aims to deliver an efficient use of lands by creating a balance of residential and open green spaces with respect to the site setting properties. It is noted that the proposed density has also been acknowledged by the view expressed in An Bord Pleanála Reference PL 26.448159 in that net densities below 30 units per hectare should be discouraged. The ABP Pre-Application Consultation Opinion emphasised the necessity to provide for ‘*an acceptable efficiency in serviceable land usage*’.

Having taken account of the slope and topography of the site and its location on the edge of Gorey Town together with the ABP Opinion, the Stage 3 design proposes a higher density at 37.7 units per hectare. Excluding the Neighbourhood Park, central distributor road, and un-buildable/severely sloped lands, the development area stands at 11.15 hectares, and with respect to the overall proposed number of units at 421 dwellings, the density of 37.7 units per hectare would be achieved. This is consistent with HP08 of the Gorey Local Area Plan 2017-2023, and has been calculated as per the

provided guidance on the Appendix A of the “*Sustainable Residential Development in Urban Areas and Best Practice Urban Design Guidelines (2009)*”, as follows:

- Overall Site Area: 19.17 ha
- Net Site Area: 11.15 ha
- Net Density:  $421 \text{ units} \div 11.15 \text{ ha} = 37.7 \text{ uph}$

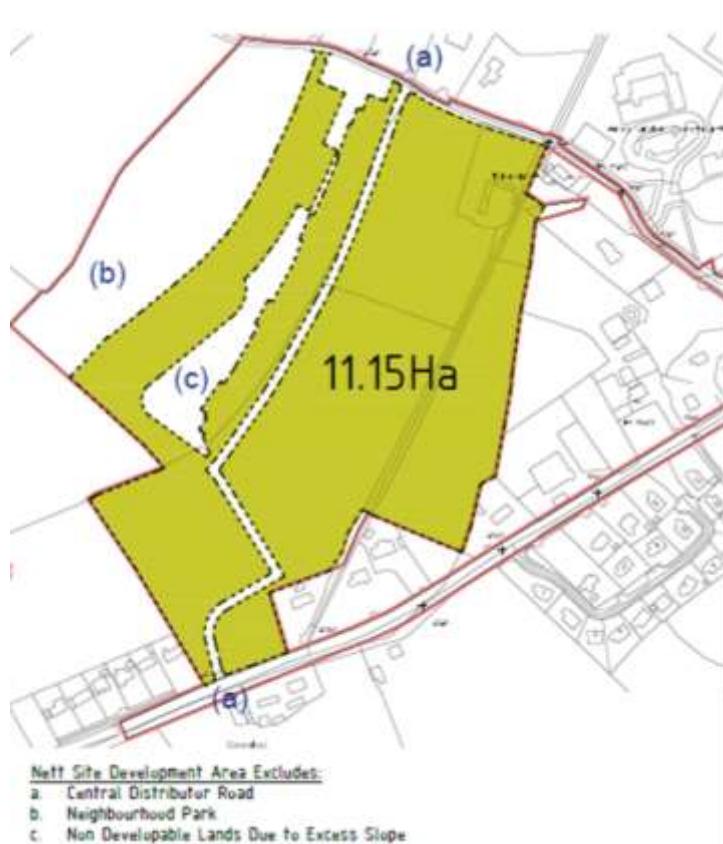


Figure 1. Indication of Net Density Calculation for the Proposed Scheme

This is considered to provide for an efficient use of a Tier 1 Serviced Lands, facilitating sustainable development of the lands, and therefore, is in keeping with the decision of An Bord Pleanála and is consistent with the DEHLG Guidelines on “*Sustainable Residential Development in Urban Areas and Best Practice Urban Design Guidelines (2009)*”, accompanying Design Manual, and the recent Circular on Residential Densities in Towns and Villages (Circular Letter: NRUP 02/2021).

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

## 2.3 Item No. 3 – Surface Water Management and Flooding

### ABP Opinion

*“Further consideration of the documents as they relate to surface water management for the site. This further consideration should have regard to the requirements to maximise SuDS measures within the development site. Any surface water management proposals*

*should be considered in tandem with any Flood Risk Assessment, which should in turn accord with the requirements of 'The Planning System and Flood Risk Management' (including the associated 'Technical Appendices'). Further consideration of these issues may require an amendment to the documents and/or design proposals submitted."*

### Applicant's Response

Waterman Moylan Consulting Engineers have addressed this response within their Engineering Pack, which the Board are invited to refer to. The pack is also accompanied by a Water Environment Potential Impact Appraisal Report prepared by Dr. Pamela Bartley. Flood Risk Assessment has been carried out in accordance with the *DEHLG/OPW Guidelines on the Planning Process and Flood Risk Management* published in November 2009, and it identifies the risk of flooding at the site from various sources and sets out possible mitigation measures against the potential risks of flooding. Sources of possible flooding include coastal, fluvial, pluvial (direct heavy rain), groundwater and human/mechanical errors. This report provides an assessment of the subject site for flood risk purposes only.

As indicated in the table below, the various sources of flooding have been reviewed, and the risk of flooding from each source has been assessed. Where necessary, mitigation measures have been proposed. As a result of the proposed mitigation measures, the residual risk of flooding from any source is low. For further details in this regard, please refer to the enclosed Flood Risk Assessment prepared by Waterman Moylan Consulting Engineers.

*Table 1. Summary of the Flood Risks from the Various Components (source: Waterman Moylan)*

Source	Pathway	Receptor	Likelihood	Consequence	Risk	Mitigation Measure	Residual Risk
Tidal	Irish Sea	Proposed roads and open spaces	Extremely Low	None	Extremely Low	None	Extremely Low
Fluvial	Banoge River, surrounding ditch system	Proposed roads and open spaces	Extremely Low	None	Extremely Low	None	Extremely Low
Pluvial	Private and Public Drainage Network and Overland	Proposed roads and buildings, and downstream properties and roads	Ranges from Low to High	Moderate	Ranges from Low to High	Appropriate drainage, and SuDS design, overland flood routing and setting of floor levels	Low
Ground-water	Ground	Underground Services, roads and buildings	High	Moderate	High	Appropriate setting of floor levels, flood routing, damp proof membranes	Low
Human/Mechanical Error	Drainage Network	Proposed roads and buildings	High	Moderate	High	Overland flood routing, setting of floor levels and regular inspection of SW network	Low

### 3.0 SPECIFIC FURTHER INFORMATION

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

#### 3.1 Item No. 1 – Addressing Refusal Reasons on Previous Application

---

##### **ABP Opinion**

*"A planning report which coherently addresses the reasons for refusal in previous reason for refusal."*

##### **Applicant's Response**

Downey have carried out a full examination of the planning history pertaining to the subject lands, and this has been included within a separate cover submitted as Supporting Planning Statement, which the Board are invited to refer to (section 3 of the Statement). Section 4 of this Statement particularly addresses the previous application on the subject site (Reg. Ref. 20160623 - ABP Ref. PL26.248159), which was granted planning permission by Wexford County Council on 20<sup>th</sup> February 2017, and subsequently was refused by An Bord Pleanála on 17<sup>th</sup> July 2017 following a third party appeal lodged on the decision on 14<sup>th</sup> March 2017.

In response to the foregoing item requested by ABP, the Statement also addresses the reasons for the refused planning permission on this application. For full details please refer to the Supporting Planning Statement, Section 4, page. 7, which is enclosed with the following application.

#### 3.2 Item No. 2 – Delivery of the Road Upgrade Works

---

##### **ABP Opinion**

*"A report which outlines the timing and responsibility for the delivery of the proposed road upgrades."*

##### **Applicant's Response**

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

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

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

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

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

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

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

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

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

The proposed junction signalisation works are shown on Waterman Moylan Drawing No. 13-119-P4131.

All of the proposed road upgrade works are to be carried out during the first phase of construction, and all of the proposed upgrade works are to be fully completed prior to any of the units in the development being occupied. For further information, please refer to the specific report prepared by Waterman Moylan Consulting Engineers to address this matter titled: 'Proposed Phasing Plan for Delivery of the Proposed Road Upgrades'.

### 3.3 Item No. 3 – Phasing Plan

---

#### ABP Opinion

*"A phasing plan which provides for the early delivery of the proposed neighbourhood park."*

## Applicant's Response

It is submitted that the proposed development will be constructed in four phases, as follows. It is noted that in this phasing schedule, delivery of the proposed neighbourhood park has been prioritised in response to the above-mentioned item requested by ABP.

**PHASE 1:** The site will be opened from the R725 Carnew Road and the first phase will comprise the Public Park and 71 Residential Units.

- The Landmark Entrance Apartment building (10 Units)
- One Duplex Block (8 Units)
- Six Hybrid Duplex Blocks (24 Units)
- Detached, Semi-detached and Terraced House types (29 Units)

**PHASE 2:** This phase will incorporate the completion of the Park Avenue, connection to Kilnahue Lane and construction of 120 Residential Units Community and Retail facilities and the Childcare building.

- Kilnahue Lane Exit Building (10 Units)
- Two MAB Apartment Blocks (56 Units)
- One Urban Block of Semi-detached and Terraced (26 Units)
- 7 Hybrid Duplex Blocks (28 Units)

**PHASE 3:** In this phase the Lower and Middle Avenues will be completed and 158 Residential Units comprising three final Urban Blocks and three Apartment Buildings

- Two MAB Apartment Blocks (56 Units)
- Three Urban Blocks of Semi-detached and Terraced (78 Units)
- One Lower Apartment Block (24 Units)

**PHASE 4:** The final phase will be the completion of the Lower Apartment Buildings and completion of Taking-in charge works and procedures

- Three Lower Apartment Block (72 Units)

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

## 3.4 Item No. 4 – Material and Finishes

---

### ABP Opinion

*"A report that specifically addresses the proposed materials and finishes of the proposed structures, the treatment of private amenity areas, landscaped areas, pathways, entrances and boundary treatment/s. Particular regard should be had to the requirement to provide high quality and sustainable finishes and details which seek to create a distinctive character for the development, avoiding blank façades and render and creating active frontages and corners. The documents should also have regard to the long term management and maintenance of the proposed development."*

### Applicant's Response

The detailed design of the buildings incorporates materials and finishes which are in common use in development in the environs of Kilnahue and will ensure a high-quality low maintenance environment into the future. External finishes for houses will be primarily finished in a clay brickwork with selected elements of render. Roofs will be fiber cement slated or matching concrete roof tiles in a blue-black color. Apartment and duplex buildings will be finished in brickwork and stone paneling thus reducing maintenance. This will be combined within proprietary-colored panels to provide variation in color and reduce maintenance. Roofs to these buildings will be metal clad in an appropriate color to maintain visual consistency. Some timber or proprietary cladding is used to define service and utility areas. Balcony guarding will generally be of frameless glass with an aluminum base frame. Ancillary fixtures such as rainwater goods will be color coated metal which will be visually complimentary to the uPVC windows and external doors.

Please refer to the plans, sections, and elevation drawings and the reports, Architectural Statement and Building Lifecycle Report, prepared by Connolly Architects for specific further details on the designs, materials, and finishes, and their long-term management and maintenance. Please also refer to the photomontages and CGIs prepared by Digital Dimensions for visualisations of the proposed development. Downey also invites the Board to refer to the Landscape Rationale document prepared by RMDA Landscape Architects which provides detailed specifications on the amenity spaces, landscape areas, hard and soft landscaping, and boundary treatments proposed for the development.

### 3.5 Item No. 5 – Instruction on Drawings

---

#### ABP Opinion

*"A report should include full and complete drawings including levels and cross sections showing the relationship between the development and adjacent residential units, public pathways and interfaces with the public realm."*

### Applicant's Response

Connolly Architects have addressed this response within their Architecture Pack, which the Board are invited to refer to. The drawing pack includes cross sections, contiguous elevations and associated level details to show the relationship between the development and adjacent residential units, public pathways and interfaces with the public realm. Particular regard should also be given to the numerous verified views/photomontages prepared by Digital Dimensions which provide true visualisations of the proposed development within its built context and environs. Please also refer to the Landscape Pack prepared by RMDA Landscape Architects + Consultants for further information in relation to public open space provision.

### 3.6 Item No. 6 – Compliance with Design Standards

---

#### ABP Opinion

*"A detailed schedule of accommodation which shall indicate compliance with relevant standards in the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities' 2018."*

#### Applicant's Response

In this regard, the proposed development subject to this SHD application provides for a total of 421 residential units comprising 133 no. houses (115 no. 3 beds and 18 no. 4 beds), 228 no. apartments (76 no. 1 beds, 145 no. 2 beds, and 7 no. 3 beds), 60 no. duplex units (4 no. 1-bed units, 26 no. 2-bed units, and 30 no. 3-bed units), all with associated car and bicycle parking spaces, areas of amenity space and indeed upgrades to public realm on Kilnahue Lane and R725 Carnew Road, 1 no. childcare facility, and 2 no. community rooms and 2 no. retail units. The proposed development also provides residents with the required level of amenity as outlined within the Guidelines, and therefore, it is submitted that the proposed development complies with the SPPRs of the current '*Sustainable Urban Housing: Design Standards for New Apartments 2020*'. For further details in this regard, please refer to the Statement of Consistency prepared by Downey and enclosed with the application under a separate cover.

This Strategic Housing Development application also includes a Housing Quality Assessment (HQA), and a Building Lifecycle Report, in accordance with Chapter 6 of the Guidelines and in response to the above-mentioned item requested by An Bord Pleanála. For further details in this regard, please refer to the enclosed architectural drawings, Architectural Statement, and Housing Quality Assessment (HQA) prepared Connolly Architects, which provide confirmation that the proposed development is consistent with the design standards of these Guidelines.

### 3.7 Item No. 7 – Life Cycle Report

---

#### ABP Opinion

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

#### Applicant's Response

In accordance with Section 6.13 of the Apartment Guidelines 2020 and in response to the foregoing item requested by An Bord Pleanála, Connolly Architects have prepared a Building Life Cycle Report submitted under a separate cover within the Architecture Pack, which the Board are invited to refer to.

### 3.8 Item No. 8 – Taking in Charge

#### ABP Opinion

*"A site layout that details any areas to be taken in charge by the local authority."*

#### Applicant's Response

In response to this item, Connolly Architects have prepared a separate drawing illustrating the site layout plan with the proposed areas to be taken in charge by the local authority. The Board are invited to refer to the submitted drawing within the Architecture Pack.

## 4.0 NOTIFICATION OF AUTHORITIES

The Board also requested that, pursuant to Article 285(5)(a) of the Planning and Development (Strategic Housing Development) Regulations 2017, the following authorities should be notified in the event of the making of an application arising from this notification in accordance with Section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016:

- Transport Infrastructure Ireland
- Minister for Culture, Heritage and the Gaeltacht
- The Heritage Council
- An Taisce - the National Trust for Ireland
- Irish Water
- Wexford County Childcare Committee

Downey can confirm that the above list of bodies has all been notified of the making of this planning application and copies of the relevant correspondence to them are included under separate cover as part of this application to the Board.

## 5.0 CONCLUSION

This Statement of Response to An Bord Pleanála's Notice of Pre-Application Consultation Opinion indicates how the specific information requested by An Bord Pleanála has been addressed and identifies the source or location of the response within the accompanying planning submission documentation. The relevant prescribed authorities identified in the pre-application consultation opinion from An Bord Pleanála have also been notified of the submission of the planning application in accordance with Section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016. The proposals incorporated into the final scheme, and in particular, due consideration has been given to the 3 items requiring further review/design amendments which has resulted in a high-quality development being presented to An Bord Pleanála for approval. It is submitted that the further documentation and additional studies undertaken and now being submitted, further support this application for Strategic Housing Development at Gorey. In light of the foregoing, it is respectfully submitted that the proposed development is consistent with the proper planning and sustainable development of the area, and is consistent with the relevant national, regional and local planning policies and guidelines.