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Supporting Planning Statement

Proposed Development of 58 no. units at Slievekeale,
Waterford

Waterford County Council



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DEVELOPMENT PLANNING | ENVIRONMENTAL PLANNING | MASTERPLANNING

Limerick | Dublin | t: 061 435000 | f:061 405555 | e:info@hraplanning.ie | w:www.hraplanning.ie

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Prepared by:	 	
Signed:	Gary Rowan Senior Planner & Director	Approved by: Mary Hughes (Director)
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1.0 INTRODUCTION

The Government's Social Housing Strategy 2020 includes a programme for delivery of approximately 1,500 new social housing units nationally via an 'availability based' Public Private Partnership (PPP) model. The proposed development is part of the second bundle of sites to be developed under this programme.

The subject site, located south of the Slievekeale Road and east of Vincent White Road, neighbouring the Waterford Health Park is included in Bundle II and has been identified to deliver 58 no. social housing units. The other sites identified in Bundle II include three sites in Co. Cork located in Clonakilty, Skibbereen and Macroom, one in Ballyburke, Galway, and one in Shannon, Co. Clare.

1.2 Public Private Partnership Model

The units are to be delivered using, an 'availability-based PPP model'. Under this model a consortium designs (in accordance with the grant of planning permission), builds, finances and maintains the social housing units on behalf of the local authority subject to a contract. The maintenance and upkeep services are provided for a period of 25 years after construction. After this the units are returned to the local authority in good, pre-defined, condition.

The sites for this project always remain in State ownership and are made available to the PPP Company by way of a license. No private housing units are developed on the site as part of the PPP project. As the model is 'availability-based', the private sector partner is responsible for ensuring that units are available for occupation. The local authority is the landlord and is responsible for nominating tenants from the local authority social housing waiting list, based on the local authority's allocation scheme.

This model has previously been used successfully in Ireland to build a number of roads, schools and courts projects with a primary care centre project currently under construction. Although new to social housing in Ireland, the model has been used successfully in other countries for such projects.

2.0 SITE CONTEXT

The 1.4 hectare site is located in the south-western suburbs of Waterford City. It is bound to the north by the Slievekeale Road, to the west by Vincent White Road, to the south by Colaiste Na Maighdne secondary school and to the east by the boundary with the Waterford Health Park. The site consists of a former basketball court, and some hedgerows / mature treelines. Based on historical aerial photography of the site, it would appear that the site was previously part of the sports fields for the adjacent Presentation Secondary School located beyond the Health Park to the east.

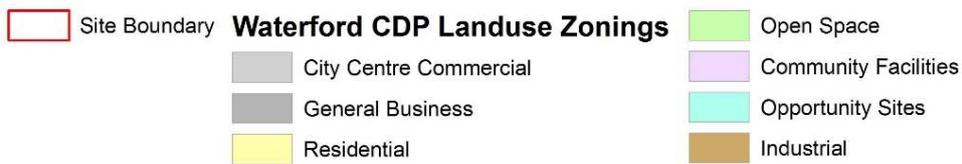
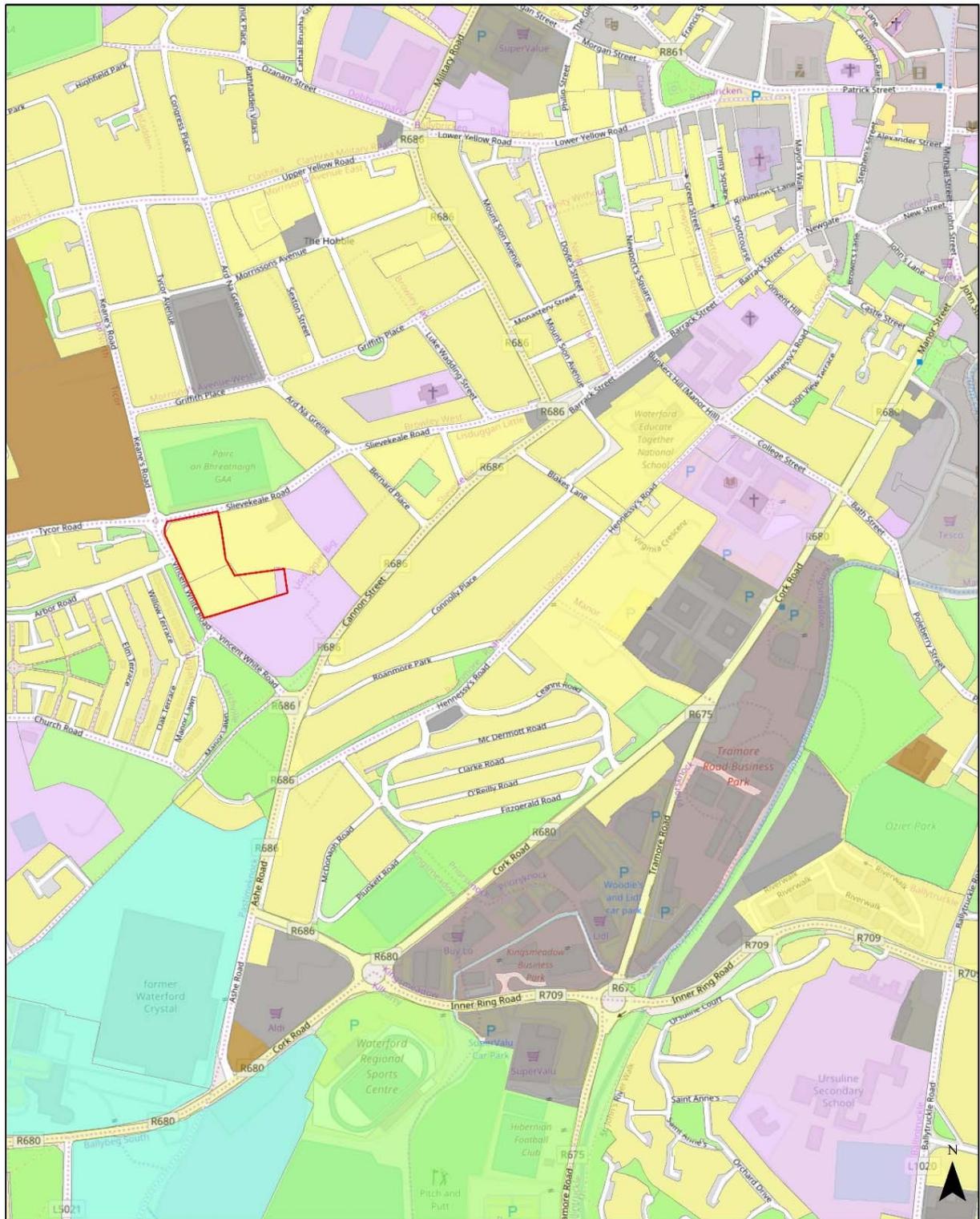
The site comprises mature trees which are identified to be of amenity value in the Waterford City Development Plan 2013 – 2019 and there is an objective to protect and preserve them. . An established wayleave runs through the southern part of the site in an east west direction.



 Site Boundary



Figure 1.0 Site Context & Location



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Figure 2.0 Site in the Context of Existing Zoning Map

The general area is residential in nature with the established residential developments of Manor Lawn and Willow Terrace located across the road to the west. In addition, there are extensive recreational and community infrastructure and services in the area including Walshe Park GAA Stadium immediately north of the site, the Waterford Health Centre on the adjoining site to the east, along with schools located further to the east and immediately adjoining the site to the south. Although the site is located 1.2km west of the town centre, it is serviced by public bus transport.

Located within Waterford City, the gateway to the south-east region, the city in its entirety lies within the metropolitan area. The city is identified for significant population growth. With a population of 48,369 persons in 2016, the population of the city grew by 3.5 per cent in the last inter census period. The Waterford City Development Plan 2013 - 2019 (CDP) strategically plans for the future growth of the city and the wider metropolitan area in accordance with the proper planning and sustainable development of the area and considers that the city and its suburbs is well placed to accommodate increased residential supply.

3.0 SITE SELECTION & CONSIDERATION OF ALTERNATIVES

3.1 Site Selection

The subject land is in the ownership of Waterford City & County Council and therefore can be efficiently utilised to meet some of the demand for social housing arising in Waterford city and its suburbs. Slievekeale is a well established residential area with little potential for significant expansion. Site selection was restricted to consideration of that land in the ownership of the City & County Council and which could be adequately serviced and integrated to provide much needed social housing.

Site selection has taken a plan led approach to development having regard to the residential zoning provisions in the Waterford City Development Plan 2013 – 2019 (CDP). Identified as a 'developed residential site', the CDP seeks *"to protect and improve existing residential areas and their amenities and provide for appropriate residential infill opportunities where feasible"*. The subject site is essentially an infill site within an established residential area.

The position of the site within an established residential neighbourhood, neighbouring two schools and a medical centre school with local services and facilities will facilitate integration of the development into the existing social and urban structure. The area is well served by public transport (route no.603) thereby significantly enhancing accessibility to and from the site.

3.2 Consideration of Housing Tenure & Type

The provision of social housing units on this site, will facilitate diversity in tenure and facilitate housing mix in the outer western suburb of the city and in an area, that is dominated by private housing.

The Census of Population 2016 confirmed that there were 334 houses in the Electoral District (ED) of Slievekeale in 2016 with 29 of these vacant or almost 9 per cent. Of the total 296 households in the ED, 88 per cent of the total housing stock is privately owned or rented. Only 10 per cent comprise social housing, either rented from the local authority or a voluntary housing body. The proposed addition of 58 no. social housing units increases the total provision of social housing in the area to just over 25 per cent.

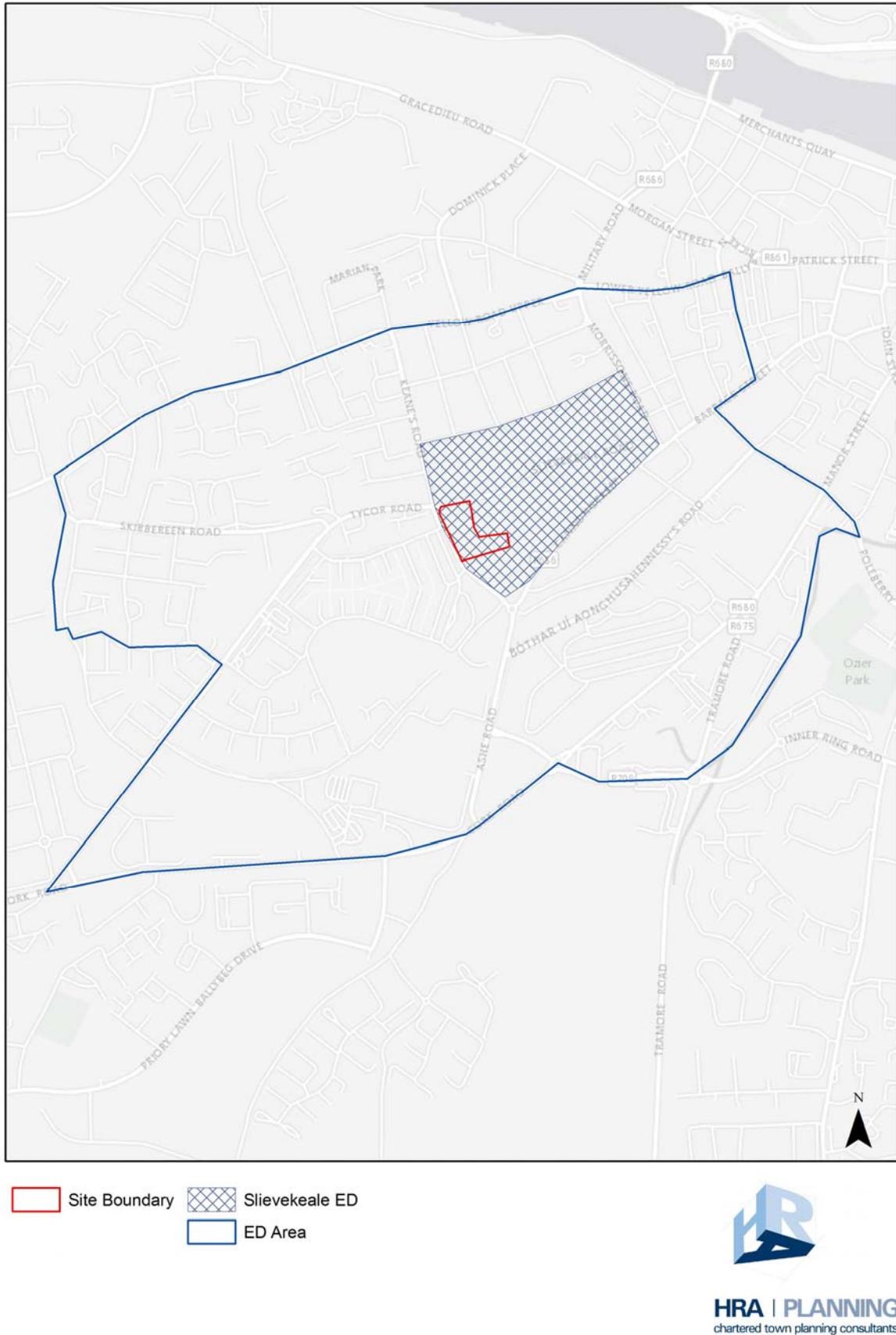


Figure 3.0 Housing Type Analysis Study Area

If one takes a wider view of the surrounding neighbourhood, as defined by ten ED's including Slievekeale, Morrison's Ave West; Morrisons Ave East; Morrisons Road; Newport Square; Roanmore; Kingsmeadow; Larchville; Lisduggan; and Ticor North, as defined by blue line in Figure 3.0, the situation is not dissimilar. According to the Census of Population 2016, there are 3,714 no. households within the defined area comprising 72 per cent of units in private ownership and 24 per cent of units rented from the local authority and / or voluntary body. Including the proposed development within the overall housing statistics does not substantially alter the provision of social housing in the area, only increasing social housing provision from 24 per cent to 24.5 per cent within the area as outlined in blue and defined in Figure 3.0.

This ratio of private to social housing mix is considered acceptable on the plausible assumption that dominance by any single tenure should not exceed 50 per cent. Accordingly, the proposed development must be considered appropriate to the area providing for balanced and integrated housing tenure in this area of the town

3.3 Consideration of Design

Much consideration has been given to the layout and design of the scheme with a particular focus on providing a high quality residential development, creating a sense of place for future residents, whilst integrating into the existing built environment. The aim has been to retain as many natural and built features on site as possible, with particular regard to the high stone wall on the northern and western site boundaries and the existing mature trees. Retention of these features have influenced the overall design approach. Maintaining the view of the old convent from Manor Lawn, has necessitated the provision of an open vista through the site at the proposed site entrance.

The client requirement and project brief was to accommodate 50 no. units on the site. Following consideration of the design approach and having regard to relevant standards and development policies in the Waterford City Development Plan, an additional 8 no. units were provided on the site. The mix of units required to accommodate housing need in the area is generally as per the original client requirements. The proposed density makes the most efficient use of zoned, urban land whilst also seeking to integrate with and consolidate existing and permitted development in the area.

4.0 NEED FOR DEVELOPMENT

The Summary of Social Housing Assessments 2017 Report prepared by the Housing Agency counts the total number of households qualified for social housing support across the country on June 28th 2017. There was a 6.3 per cent decrease in the total number of households qualifying for social housing support and whose social housing need is not being met between 2016 and 2017, with a total of 85,799 qualified households in 2017 compared to 91,600 in 2016. Almost a quarter of the 85,799 households qualified for support are waiting more than seven years for a social housing support. These national figures demonstrate the need for action and the supply of social housing right across the country.

Within the administrative area of Waterford City & County Council the number of households qualified for social housing support and whose social housing need is not being met, decreased by 9.5 per cent between 2016 and 2017 from 1,596 households to 1,444 households. Of the qualified households, 50 per cent comprised of single person households, 30.5 per cent comprised a single person with child / children and 18 per cent comprise a couple with/without children.

The proposed development will only accommodate just over 4 per cent of households that have a housing need in the city and county. Given the critical housing situation nationwide and in Waterford,

the proposed development is urgently required to address what is only a small proportion of the social housing need in the town.

5.0 PRE PLANNING CONSULTATION

The proposed scheme has been designed in consultation with Waterford City & County Council. Extensive communication has been undertaken with various internal departments including planning, water services, roads & transportation and the housing sections, to deliver a sustainable and integrated social housing scheme for the area.

6.0 DEVELOPMENT PROPOSAL

The public notice states that the proposed development seeks to provide for:

(a) 58 no. residential units comprising of: (i) 16 no. 3 bed houses; (ii) 22 no. 1 bed apartments; and (iii) 20 no. 2 bed apartments; with (iv) renewable energy design measures for each housing unit; and (b) supporting development works including (i) ESB substation; (ii) underground surface water attenuation; (iii) temporary construction signage; (iv) estate signage; (v) varied site boundary treatment comprising walls and fencing; (vi) management, maintenance and removal of trees identified as being of amenity value; and (vii) all associated site works.

6.1 Residential Units

The development proposes 16 no. houses and 42 no. own door apartments. The nature and extent of development has been influenced by the type and size of households on the waiting list for social housing units and the overall demand arising in the area as advised by Waterford City & County Council. Some 38 per cent of the houses are in the form of one bed units and there is a requirement in Section 4.1 of the Development Management Standards Variation No.1 (DMS) of the Waterford City Development Plan 2013 - 2019 (CDP) that proposals including a high proportion of one bedroom dwellings (more than 10%) shall be required to demonstrate a need for such accommodation, based on local demand and the demographic profile of the area. In this regard reference must be made to Section 4.0 of this report which highlights the need for development and the fact that, of the qualified households with a housing need, 50 per cent comprised of single person households. The provision of 22 no. one bed units in this instance is intended to satisfy some of that housing need.

House size and provision of private open space has been designed in accordance with the minimum standards set out in the DMS of the CDP. The own door apartments have been designed in accordance with minimum standards set out in Sustainable Urban Housing: Design Standards for New Apartments (2018), as required in Section 4.2 of the DMS. A Housing Mix Statement providing a schedule and breakdown of each room within the residential units is included within the Architectural Design Statement prepared by Simon J. Kelly Architects. The design statement has been prepared in compliance with Section 13.1 of the CDP which requires the submission of a design brief for residential development on sites over 0.5 ha in area or for more than 15 units. This is reiterated in Section 3.1 of the DMS.

The CDP seeks to increase the energy performance of future buildings in the city by encouraging energy efficiency and energy conservation in the design and construction of development. The plans accompanying the development proposal detail the provision of solar panels at roof level on every residential unit, capable of achieving a Building Energy Rating in accordance with the provisions S.I.No.

666 of 2006 European Communities (Energy Performance of Buildings) Regulations 2006. The solar panels have been provided in accordance with best practice and to satisfy the objective of the CDP in relation to Energy Performance of Buildings. Although the solar panels are identified on the plans, it may be a case that the form and type of sustainable energy technology provided on site may change during construction, such that any alternative is at a minimum equal to the Building Energy Rating achieved by the solar panels and the proposal would not adversely impact or materially alter the external appearance of the buildings. This flexibility is necessary to facilitate construction of the development by a PPP Company and which could bring added value to the project by providing for better rated and more innovative energy technologies.

An Energy Efficiency Design Statement has been prepared by Matt O'Mahony & Associates Consulting Engineers. This statement is included within a Compliance Report on Part L & HC 12 Building Energy Rating Assignment and Compliance with TGD Part L of the Building Regulations. The report concludes that the development has the opportunity to deliver a low-cost solution for home owners through a number of energy efficient, low emission sustainable solutions.

6.2 Open Space Provision

In excess of the development plan standards, the proposed development accommodates 17.5 per cent of public open space, strategically located and naturally overlooked in so far as possible. The open space comprises 4 no. distinct areas, with 2 no. areas located either side of the access road into the site and the other two areas located on the south eastern boundary of the site.

The location, layout and usability of the public open space areas are of the highest quality and will contribute positively to the residential amenity of future residents. The centrally located open space will accommodate a playground / recreational area. Although not specifically detailed at this time, to allow for added value during the PPP Tender process, at a minimum, the children's play area will provide for a Young Children's Area for Play (YCAP), or a Local Equipped Area for Play (LEAP) or a Natural Play Area.

Of significance, and unique to this development proposal, is the ongoing maintenance requirement demanded of the PPP Company for the next twenty five years. This maintenance approach will ensure that residents continue to enjoy a high quality and maintained public realm for a substantial period of time, whilst also ensuring that the grounds of the development mature and evolve appropriately in accordance with the submitted plans and particulars, including the Landscaping Plan.

6.3 Boundary Treatment

A comprehensive schedule of boundary treatment is proposed within the development proposal and is detailed on the Boundary Plan Drawing.

Internally within the development site, residential plots will be defined to ensure that private open spaces are enclosed within perimeter blocks behind the building line and that they are subdivided by suitably robust boundary treatments of a sufficient height and composition to provide adequate privacy and security.

6.4 Access & Car Parking

The proposed development will be accessed from a proposed priority junction onto the existing Vincent White Road. A Traffic & Transportation Assessment has been prepared by Roadplan and forms part of the plans and particulars supporting the proposed development. It confirms that all existing junctions

operate within capacity with some queues and delays when the proposed residential development is completed in 2019, 2024 (5 years after completion) and in 2034 (15 years after completion).

Consideration was given to a potential access onto the Skievekeale Road, However, the summary predictions indicate that the existing Slievekeale Rd / Vincent White Road / Tycor Rd roundabout junction will reach its ultimate capacity in 2034 resulting in long queues and delays at the roundabout. Accordingly, an access onto the Slievekeale Road was not considered viable.

A total of 89 no. car parking spaces are provided inclusive of 5 no. disabled parking spaces in accordance with the requirement to provide 5 per cent of the overall total of car parking spaces provided in disabled spaces.

Internally within the development site, the access strategy has been influenced and designed in accordance with the requirements of the Design Manual for Urban Roads and Streets (DMURS). All junctions have been designed to accommodate the adequate and safe manoeuvring of vehicles including waste collection vehicles. In terms of pedestrian connectivity provision has been made for access onto the Slievekeale Road at three defined points in the existing wall.

6.5 Water Infrastructure

Surface water runoff from roofs and paved surfaces will be attenuated on site via a Stormcell attenuation chamber, positioned under the central public open space. Stormwater will then be discharged to the adjoining surface water drainage system located on Vincent White Road. This proposal is in accordance with development plan policy which seeks to ensure the use of Sustainable Urban Drainage Systems (SUDS) and sustainable surface water drainage management.

An existing 225mm foul sewer pipe runs through the southern end of the site in an east west direction from the adjoining Health Centre to the east. It is proposed to lay a new 150mm foul sewer line within the development and to connect into an existing drainage system located on Vincent White Road. A water supply is to be secured from a connection point also on Vincent White Road.

6.6 Construction Management Strategy

It is envisaged that the development of the lands will occur over a 16 month period. A Construction Management Plan (CTMP) will be prepared by the Contractor and agreed with the planning authority prior to commencement of development. The underlying objective of the CTMP will be to inform contractors about the overall programme of works and the obligatory minimum standards of behaviour to ensure a safe workplace, to ensure that work practices are tailored to a shared site campus, and to ensure that construction activities are planned and executed to maximum effectiveness and efficiencies.

A Surface Water Management Plan for the protection of water quality has been devised for the site for the construction and operational phases of development. All potential pollutants (e.g. suspended sediments, fuels and cement) will be carefully controlled during the construction of the proposed development. A range of best-practice pollution-prevention measures will be implemented during construction works, in order to ensure that no pollutants can leave the boundaries of the proposed development site. These are standard mitigation measures, and there is a high degree of confidence in their success. They are considered to be a component part of the design of the development, as detailed in the accompanying engineering reports and shall be incorporated into the contractor's programme of works.

It is envisaged that development will commence on site in Q2 2019 and that the development will take up to 16 months to complete. Units will be made available for letting by the local authority immediately upon completion.

7.0 DEVELOPMENT STRATEGY

The overriding design intention has been to create an inclusive and coherent new community based on best practice urban planning principles, giving residents a sense of place, ownership and identity. Extensive reference has been made to the best practice criteria and guidelines contained in the Urban Design Manual – Sustainable Residential Development in Urban Areas published by the Department of Environment Community & Local Government and to the Design Manual for Urban Roads and Streets (DMURS).

Section 13.2 of the CDP highlights the 12 criteria from the Urban Design Manual to encapsulate the range of design considerations for residential development. A response to each of these indicators is proposed to demonstrate the proper planning and sustainable development considerations adopted within the development and to highlight the development of a socially integrated scheme within the Slievekeale area of Waterford City.

7.1 Context: How does the development respond to its surroundings?

Development on the subject site follows a plan led approach and is proposed on land that is appropriately zoned for residential use and the development of a new community in accordance with the zoning objective. The site layout presents a solution for building design, orientation and scale of development that has regard to the proximity of existing buildings including the Waterford Health Centre to the east and Colaiste Na Maighdne to the south. The orientation of the development onto two significant roads to the north and west also ensures that the development responds to its surroundings, including pedestrian connectivity, in particular onto the Slievekeale Road. Of significance is the retention, where possible and appropriate, of existing healthy and mature trees on site, contributing to the overall character of the development.

7.2 Connections: How well is the new development / site / neighbourhood connected?

It is proposed to access the site via Vincent White Road. Whilst consideration was given to the provision of an access onto the Slievekeale Road, a priority T-junction onto Vincent White Road is considered to be the most suitable access option, operating well within capacity in 2034..

Pedestrian access has been provided onto the Slievekeale Road via an intervention in the existing stone wall. Pedestrian access onto Vincent White Road is facilitated via the proposed vehicular entrance. Pedestrian movement and sustainable transport is promoted in the area which is served by the local bus network, with the No. 601 and No. 603 buses providing direct access to and linkage with the city centre.

7.3 Inclusivity: How easily can people use and access the development?

The proposed development comprises a mix of house types and sizes including 16 no. houses and 42 no. apartments. The development has also been designed in compliance with the requirements of Part M of the Building Regulations – Access for People with Disabilities. Presently, the site has one main access route serving the proposed development from Vincent White Road.

7.4 Variety: How does the development promote a good mix of activities?

The subject land is zoned for residential purposes with an objective to provide for new residential communities. The proposed development must be considered in the context of existing development adjoining the site, including educational facilities and health / commercial facilities. Having regard to these adjoining developments, the proposed development provides for a good mix of activities.

The development contains significant open space provision (17.5%) well in excess of the 15 per cent open space requirement of the development plan and accommodates active recreation in the form of a proposed playground.

The existing post primary school located adjoining the site to the south and existing childcare operators and creches in the area will provide immediate support services to the proposed development.

7.5 Efficiency: How does the development make appropriate use of resources, including land?

The subject site is located on brownfield land zoned for residential purposes. The development plan does not state minimum / maximum densities and accordingly reference has been made to the DoEHLG Guidelines on Sustainable Residential Development in Urban Areas 2009 for appropriate densities. A density of 42 units per hectare is provided on the proposed site in accordance with the recommended density standard of 35 – 50 unit per hectare in the Guidelines.

7.6 Distinctiveness: How do the proposals create a sense of place?

The Site Layout Plan has been devised to provide a legible, permeable layout with a range of dwelling types which, together with a varied use of materials and finishes engender a definitive sense of place in a new residential community. Provision of a comprehensive landscaping scheme ensures that the landscape integrates with the design of the new residential site and forms a strong and positive identity for the area. The existing health, mature trees on site are to be retained where possible thereby facilitating an immediate sense of place and distinctiveness.

7.7 Layout: How does the proposal create people-friendly streets and spaces?

The proposed development provides for a permeable interconnected series of routes that are easy and logical to navigate around, active street frontages with front doors directly serving the street, traffic speeds controlled by design and careful location of public and communal open spaces.

The internal layout has been designed with traffic safety a key priority. Reduction of vehicle speed is a fundamental principle behind the layout. In general, all roads are designed for maximum vehicle speeds of 30km/h or 20mph. Traffic calming features have also been designed into the development – all in accordance with best practice and DMURS.

7.8 Public realm: How safe, secure and enjoyable are the public areas?

The public areas are overlooked and have natural surveillance thereby ensuring that they are safe and secure. The open space has been adequately sized to accommodate both active and passive recreational uses, thereby ensuring that the open space is enjoyable and attractive to users.

7.9 Adaptability: How will the buildings cope with change?

The proposed development incorporates renewable energy design measures thereby ensuring energy efficient homes. An Energy Efficiency Statement accommodates this submission and highlights the key

elements of the development necessary to ensure the units are adaptable to the challenges anticipated from a changing climate.

The development plan requires that residential developments of 10 units and over shall normally provide a mix in type of residential units. The mix of unit sizes (1 bed – 3 bed) provided on site ensures that the overall development can adapt to changing household needs and sizes through the rehousing of families within the development as their needs change over time.

7.10 Privacy / amenity: How do the buildings provide a high quality amenity?

The residential units have been designed in accordance with national guidelines in relation to unit size and storage requirements thereby ensuring a high quality residential unit. Each unit has private amenity open space to the rear of the property in accordance with the specific requirements of the Development Management Standards Variation No.1 of the City Development Plan, thereby providing ownership of recreational space and facilitating individual use.

7.11 Parking: How will the parking be secure and attractive?

Waterford City Development Plan Variation No. 1, Table 5.0 sets out the car parking standards per land use. The proposed development requires a total of 89 no. car parking spaces and the required number of car parking spaces have been provided. The car parking is provided in grouped format and naturally surveyed by overlooking and adjoining properties.

7.12 Detailed design: How well thought through is the building and landscape design?

The Architectural Design Statement prepared by Simon J. Kelly Architects responds to this criterion and highlights the overall design approach and rationale to the proposed development. It is recognised that the finished quality of a scheme can have a significant effect on a development's character, sense of place and legibility and that the quality is in the detail of the architecture and landscaped design. It should also be noted that the PPP Co. will maintain the development for a period of 25 years thereby ensuring a continued quality scheme into the future, particularly with regard to the maintenance of public open space.

8.0 ENVIRONMENTAL CONSIDERATIONS

The development strategy and design approach has been influenced by a number of environmental variables and considerations on the site.

8.1 Landscape & Trees

The subject site is situated within an existing built-up area on the edge of the city centre. There are a number of mature trees on site which are identified as being of amenity value. These trees are identified on the landuse zoning map and Policy 10.5.4 of the CDP, *“seeks to protect, preserve and ensure the effective management of trees and groups of trees, considered to be of special amenity value”*.

A comprehensive Tree Survey & Report was undertaken by R & H Dool Landscape Architects and provides a detailed assessment on the health and viability of all trees on site. They confirmed the presence of 31 no. trees on site varying from a collection of young trees to more mature stand alone trees. The Tree Survey & Report recommends a comprehensive approach to tree management and retention on site, with those trees of poor health or of little significance being removed. Where trees must be removed for health or other reasons, a programme of supplementary planting is undertaken to mitigate any potential loss.

8.2 Ecology

The site is urbanised in nature and comprises disturbed development land (basketball court) which has re-vegetated over time. Most of the habitats and flora are common and widespread in Ireland and are considered to be of negligible ecological importance, with the mature trees along the northern boundary of the site are considered to be of local importance. It is proposed to retain these trees as part of the development proposal. The clearance of all other habitats in advance of the proposed development, will not have a significant impact on habitats or flora.

8.3 Archaeology

Much of the site has been subjected to significant modern impact. In particular a tarmac surfaced ball-court at the northern part of the site and a playing field/football pitch at the southern part of the site have been subject to significant ground alteration in the past resulting in the removal of old ground surfaces. A large cable trench and other associated trenches traverse the central part of the site and a formal garden and avenue in the southeast have also resulted in significant areas of modern ground disturbance.

A desk top assessment of potential archaeological features was undertaken on the site and in proximity to the site. No sites of archaeological or built heritage significance recorded were identified within or in close proximity to the proposed development site. The nearest archaeological site is located 683m north-northwest of the proposed development site. The site is not located within a Zone of Archaeological Potential, with the nearest zone surrounding the historic town some 721m to the northeast. Given the location of the site removed from these identified features, there is no predicted impact to any of the sites and therefore no ameliorative measures are recommended for these known sites.

8.4 AA Screening

An Appropriate Assessment Screening Report has been prepared by NM Ecology and is included with the plans and particulars accompanying this application. The report confirms that the proposed development site is not located within or adjacent to any Natura 2000 sites, but potential indirect impacts on distant sites were considered within a potential zone of influence of 2km. There is one Special Area of Conservation, Lower River Suir SAC within this distance but as there are no intervening watercourses that could provide a hydrological connection, there are no pathways for direct or indirect impacts on the SAC.

The report concludes that the proposed development will not result in any significant negative impacts on the designated sites.

8.5 EIAR Screening

An Environmental Impact Assessment Report (EIAR) is required to accompany a planning application for development of a class set out in Schedule 5 of the Planning and Development Regulations 2001-2016 which exceeds a limit, quantity or threshold set for that class of development. In the case of residential development an EIAR is required for the construction of more than 500 units. An EIAR will also be required by the planning authority in respect of sub-threshold development where the authority considers that the development would be likely to have significant effects on the environment (Article 103).

The proposed development does not exceed the quantity of residential units requiring the submission of an EIAR as set out in Schedule 5 of the Planning and Development Regulations 2001-2011. Accordingly, the preparation of an EIAR is not warranted in this instance.

9.0 PLANNING POLICY APPRAISAL

Of critical importance in consideration of the proposed development is compliance with relevant statutory policy and national guidance and in particular compliance with the relevant development plan for the area, namely the Waterford City Development Plan 2013 – 2019 (CDP) and the Development Management Standards Variation No.1, 2016.

9.1 National & Regional Planning Context

Both National and Regional Planning Guidance seek the location of new residential development in designated towns within the hierarchy of settlements contained in the National Planning Framework (NPF) and the Regional Planning Guidelines for the South East Region 2010 – 2022 (RPG's).

The NPF prioritises a number of cities in Ireland for growth, including Waterford. It specifically identifies “infill and regeneration opportunities to intensify housing and employment development throughout city centre and inner suburban areas”, as a key future growth enabler for the city. The NPF specifies that 50% of all future housing must be accommodated within the existing footprint of Waterford. Developing the subject land, within an established residential area, contributes to this objective.

The RPG's promote Waterford city as the regional gateway of the South East of Ireland. The gateway is defined as comprising the city itself and its environs in the counties of Waterford and Kilkenny. Waterford as a regional growth centre is tasked with creating the synergies for wider prosperity in the south east region. The strengthening of the Gateway is considered to be mutually beneficial to the region and providing for housing demands is a critical factor in achieving this role. The RPG's indicates a population increase in the City for the Plan period of 6.5% or 3,250 persons.

9.2 Waterford City Development Plan 2013 – 2019 (CDP)

The CDP seeks to promote a more consolidated and compact urban form; to maintain and improve a sustainable economic base to create new employment opportunities; and to create sustainable and integrated communities together with the balancing of the natural environment with sustainable and appropriate development.

9.2.1 Core Strategy

The Core Strategy includes for a development scenario that supports significant further development within the city. Such development will be required to complement the character, sensitive environment, cultural legacy and built form of the city. An overriding focus will be to consolidate the built imprint of the city and keep it as physically compact as possible in the interests of sustainability.

Combining the RPG's estimate with the most recently population statistics at the time, the CDP actually forecasted and planned for a growth of 5,018 persons up to 2019. The results of the Census of Population 2016 suggest that the growth of the city is at such a pace that it is unlikely to reach this target by 2019.

The projected growth for Waterford City is significant and the proposed development of 59 no. residential units sits within the overall housing output target for the area. When considered cumulatively with other permitted development in the area, the proposed development sits comfortably within the growth targets identified in the Core Strategy of the CDP.

9.2.2 Zoning

The subject site is appropriately zoned for residential use. It is identified as a ‘developed residential site’. Chapter 12, Section 12.1 of the CDP states it is an objective “to protect and improve existing residential areas and their amenities and provide for appropriate residential infill opportunities where feasible”. The proposed development follows the plan-led approach and provides for well designed and sustainable residential development on appropriately zoned and serviced land.

9.2.3 Sustainable Neighbourhoods

An essential element of urban sustainability is the development of a compact city, which is characterised by the consolidation of existing neighbourhoods and the establishment of new neighbourhoods. The proposed development on a vacant, brownfield site seeks to enhance and contribute to the existing community of Slievekeale.

It is the policy of Waterford City Council to encourage the establishment and maintenance of sustainable residential communities within the City (POL 13.1.1). It states that this can be facilitated by ensuring the promotion of 6 no. key criteria. These criteria are assessed in the context of the proposed development to ensure the provision and integration of a sustainable community.

	Key Criteria	Design Response
1.	The creation and maintenance of a satisfactory residential environment which meets the needs and as far as possible, the preferences of residents and fosters the development of community.	With 1,444 households in Waterford City and County having a housing need, the proposed development will only provide limited but much needed residential development. This vacant, brownfield site is a prime location for development in proximity to existing services and facilities thereby ensuring new residents can become part of an established community.
2.	Promotion of sustainable transport by providing convenient and direct cycling and walking routes to nearby bus stops and services.	Direct pedestrian connection point onto the Slievekeale Road and pedestrian and vehicular access onto Vincent White Road ensures promotion of sustainable transport.
3.	The integration of new housing into the natural and built environment in a way that makes a positive contribution to the overall environment in the locality.	The proposed development is integrated into the existing landscape through the retention of existing trees and hedgerows insofar as possible.
4.	The encouragement of energy efficiency both during the construction phase and during the lifetime of the development by sensitive design and layout taking into account the topography, orientation and surrounding features of each site, the use of energy efficient materials and forms of construction and heating systems.	An Energy Efficiency Design Statement has been prepared by Matt O’Mahony & Associates Consulting Engineers. This statement is included within a Compliance Report on Part L & HC 12 Building Energy Rating Assignment and Compliance with TGD Part L of the Building Regulations. The report concludes that the development has the opportunity to deliver a low-cost solution for home owners through a number of energy efficient, low emission sustainable solutions.
5.	The use of design briefs and quantitative and qualitative criteria in assessing applications for residential development.	The proposed development has been designed in accordance with the quantitative and qualitative design criteria specified in the Waterford City Development Plan 2013 – 2019 (CDP) and the Development Management Standards Variation No.1, 2016.
6.	Securing adherence to and implementation of the quantitative and qualitative design standard controls implicit in the following Department Guidelines:	The proposed development has been designed in accordance with the quantitative and qualitative design criteria specified in the Design Standards for New Apartments: Guidelines for Planning Authorities (2018), which has dictated the minimum size of the apartment units; Quality Housing for Sustainable Communities Best Practice Guidelines, Department of Environment 2007; and the

		Guidelines on Sustainable Residential Development in Urban Areas, 2009
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Table 9.1 Sustainable Residential Development Key Criteria

Objective 7.5.1 of the CDP seeks “to ensure that major new development is accompanied by the provision of appropriate community and social and cultural facilities” and Section 3.2 of the Development Management Standards Variation No.1 seeks the preparation of a Development Impact Assessment. A comprehensive Development Impact Assessment has been prepared and accompanies the development proposal including an assessment of childcare facilities in accordance with Objective 7.5.4 of the CDP and an assessment of the capacity of primary and post primary schools in the area.

9.2.4 Appraisal Conclusions

The development proposal has adopted a plan led approach to development and accordingly is considered to be in compliance with pertinent policies and objectives in the CDP, in accordance with the proper planning and sustainable development of the neighbourhood of Slievekeale.

9.3 Relevant National Guidelines

In addition to statutory planning documents there are other guidance documents and guidelines which are intended to influence quality development and which have been complied with in advancing the development proposal for 58 no. residential units. These include:

- Design Manual for Urban Roads and Streets (DTTS and DECLG, 2012), which has influenced street design;
- Best Practice Urban Design Manual (2009), which has guided the overall design concept;
- Design Standards for New Apartments: Guidelines for Planning Authorities (2015), which has dictated the minimum size of the apartment units;
- Quality Housing for Sustainable Communities Best Practice Guidelines, Department of Environment 2007
- Guidelines on Sustainable Residential Development in Urban Areas, 2009 and
- Childcare Facilities Guidelines for Planning Authorities (2001), which set out minimum provisions and standards for childcare in new development; and

The principle objectives and aims of these guidance documents have been incorporated into and will be delivered throughout the development.

10.0 COMPLIANCE WITH STANDARDS OF WATERFORD CITY DEVELOPMENT PLAN

Whilst an innovative and bespoke design approach has been advanced for the site, the proposed development and housing units, have been carefully conceived in accordance with the quantitative standards set out in the Waterford City Development Plan (CDP) and the Development Management Standards Variation No.1 (DMS). Policy DM 1 of the DMS requires “that all new development proposals shall comply with the relevant standards identified in the Development Management Chapter across the entire Planning Authority area of Waterford City & County Council”.

Notwithstanding compliance with the development management standards set out in the CDP, the creation of a new residential area, with a sense of place, within an existing community, has been a priority. The following sections detail where compliance has been achieved having regard to key assessment criteria.

10.1 Density

The subject site is located on a brownfield site, surrounded by development and zoned for residential use. The development plan does not state minimum / maximum densities but Section 2.2.5 does promote adherence to the DoEHLG Guidelines on Sustainable Residential Development in Urban Areas 2009 for appropriate densities and where practicable to do so.

Section 3.3.2 of the DMS states that given the Gateway City status, it is not intended to prescribe a maximum residential density for development within the development envelope of the Waterford City Development Plan boundary. It confirms that appropriate density shall be determined by the planning authority on a site by site basis.

A density of 42 units per hectare is provided on the proposed site in accordance with the recommended density standard of 35 – 50 unit per hectare on outer suburban greenfield sites as set out in the DoEHLG Guidelines.

10.2 Plot Ratio

Section 4.2 General Residential Development Design Standards of the DMS provides that a plot ratio of 1 :1 for new residential development shall not normally be exceeded. A plot ratio of 0.33:1 is calculated on the site in accordance with recommended standards.

10.3 Housing Mix & Size

A detailed schedule of house and apartment sizes is attached to the Architectural Design Statement. The house unit sizes have been designed in accordance with the minimum standards set out in the Guidelines 'Quality Housing for Sustainable Communities', (2007), whilst the apartments have been designed in accordance with the minimum standards set out in the 'Design Standards for New Apartments: Guidelines for Planning Authorities' (2018). All units exceed the minimum requirements set out in the Guideline. The unit sizes are detailed in Table 10.1 below.

Unit Type	Guidelines Target Floor Area	Area of Proposed Unit
1 bed apartment	45sqm	48.9sqm – 58.7sqm
2 bed apartment	73sqm	77.4sqm – 82.0sqm
3 bed house	92sqm	97.4sqm

Table 10.1 Size of Proposed Units

10.4 Private Open Space Provision

A detailed schedule of private open space provision for the houses and apartments is attached to the Architectural Design Statement. Chapter 10 of the CDP specifies that within the Waterford City Development Plan area only there are minimum private open space standards for terraced houses of 50sqm. These are detailed in Table 10.2 below and assessed in the context of the proposed development.

The provision of private open space within the development generally exceeds the minimum standards as required in the Guidelines.

Unit Type	Guidelines Open Space Area	Area of Open Space of Proposed Unit
1 bed apartment	5sqm	7.8sqm – 48sqm
2 bed apartment	6sqm	13.2sqm - 56sqm
3 bed terraced house	50sqm	66sqm – 69sqm

Table 10.2 Private Open Space Requirement

10.5 Public Open Space Provision

The proposed development accommodates 17.5 per cent of public open space, well in excess of the 15 per cent requirement in the CDP. The development also provides for active recreation on site in the form of a proposed playground.

10.6 Car Parking

Waterford City Development Plan Variation No. 1, Table 5.0 sets out the car parking standards per land use. The proposed development requires and provides a total of 89 no. car parking spaces. The car parking is provided in grouped format and naturally surveyed by overlooking and adjoining properties.

11.0 CONCLUSION

The proposed development, on zoned and serviced lands, is entirely consistent with the policies and objectives of the Waterford City Development Plan 2013 – 2019 and the Development Management Standards Variation No.1, 2016.

The proposed development provides a suitable mix of housing, separation distance and car parking together with the quantitative requirements for private and public open space, all in accordance with the provisions of the statutory Development Plan. The overall building form and layout responds to its site and context and satisfactorily assimilates into the urban landscape. Further the density proposed is appropriate for a brownfield, edge of centre site having regard to the pattern of both permitted and adjoining development and the topography of the site.

There is adequate service infrastructure in the area to accommodate the development proposal including water and transport infrastructure. The proposed development seeks to address and meet some of the critical need for housing in the Waterford city area, providing much needed accommodation for those on the Housing Waiting List.

The 'Do Nothing' scenario in this instance is not an option as the Government's priority is to deliver housing under the 'Rebuilding Ireland Action Plan for Housing and Homelessness. The land is in public ownership, is appropriately zoned for residential use, and social housing can be delivered using private finance which is separate and additional to Exchequer funding. The PPP format allows more social housing to be built in the context of constrained State resources and in a time of chronic need.

A plan led approach to development has been adopted on the site and the proposed development is deemed to be in accordance with the proper planning and sustainable development of the area. The proposed development comprises the sustainable use of zoned residential lands, situated close to the city centre and within a range of community, educational and commercial services including employment opportunities.