Response to Wexford County Council LRD Opinion

For Development at Kilnahue, Gorey, Co. Wexford

on behalf of Glenveagh Homes Ltd.

December 2025



McCutcheon Halley

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Contents

1. Introduction 3
2. Requested Specific Information 3

1. Introduction

This report addresses the specific information requirements and comments raised by Wexford County Council (WCC) in their Section 32D Large-scale Residential Development (LRD) Opinion issued on 2nd October 2025, under WCC Ref. P20250123-LRD in relation to the proposed LRD at Kilnahue, Gorey, Co. Wexford comprising 413 no. residential units, 1 no. creche and all associated development works.

The opinion was issued by the Council following the Section 247 meeting, which took place on April 29th, 2025, and the Section 32B meeting, which took place on September 11th, 2025.

Following the pre-planning meetings, the Council issued an Opinion in accordance with Section 32D of the Planning and Development (Housing) and Residential Tenancies Act (as amended) and advised that the documentation submitted constituted a reasonable basis on which to make an application for permission for the proposed LRD.

The specific information requested by WCC and our response to same is outlined in section 2 of this report. Details from the Opinion are provided in bold text with a response provided below each item.

2. Requested Specific Information

Development Plan Policy

The site is zoned for residential development and open space & amenity in the Gorey Town and Environs Local Area Plan. The proposed development can be processed under Section 32A of the Planning and Development Act 2000 (amended) as Large Scale Residential Development. The scale of the development is appropriate for Gorey Town which is designated as a Key Town in the Southern Regional Spatial and Economic Strategy and the Wexford County Development Plan 2022 to 2028.

It is noted that a number of reports will be submitted with the application:

- **Appropriate Assessment (AA) Screening Report**
- **Construction Environmental Management Plan (CEMP)**
- **Resource Waste Management Plan (RWMP)**
- **Operational Waste Management Plan (OWMP)**
- **Mobility Management Plan (MMP)**
- **Traffic and Transportation Assessment (TTA)**

All of the above reports have been submitted in support of this application.

Design and Layout

It is considered that the design and layout of the proposed development is of a very high quality. The layouts comply with the neighbourhood framework plans, and the proposed design will

enhance the initial concepts as set out in the in the Gorey Town and Environs Local Area Plan 2017 (extended) and the Wexford County Development Plan 2022 to 2028.

The design and layout of the proposed development was maintained throughout the final stage of the LRD application process, with only minor changes to accommodate other items raised by WCC.

Open Space and Landscaping

Usable open space is well located throughout the development and reflects the neighbourhood framework plan for the area. The landscaping concepts are well considered and will add strong sense of place to the development. The plans will create new habitat areas and should result in net ecological gain. This should be shown on the submitted ecological assessments and landscaping plans.

The useable open space remains well located throughout the development, as submitted at S.32B Stage.

Section 3.7 of the Landscape and Green Infrastructure Report notes how the project prioritizes net biodiversity gain through carefully designed planting schemes that support native pollinators and strengthen local ecosystems.

Transportation

It is noted that the site layout complies with DMURS standards. The applicant is requested to address the points raised at the preplanning meeting including, -

- **R725 junction with Kilnahue Lane - Traffic Lights required - Details to be agreed with Roads Department**

The existing junction is not currently suitable for conversion to a signal-controlled layout, as this would provide limited benefit to pedestrians given the absence of a footpath along the southern side of the R725.

The existing junction does not suffer from capacity issues, with a low volume of traffic using the junction. While a temporary increase in traffic occurs during the AM peak period, this is primarily associated with school related trips and quickly dissipates after 9am.

Junction capacity analysis presented within this TTA report confirms that the junction will continue to function satisfactorily with the proposed development in place. Introducing traffic signals at this location, given the single-lane approaches, would likely generate unnecessary queuing and delays outside of peak periods and also introduce unnecessary signals maintenance issues for WCC.

Please refer to the Traffic & Transport Assessment Report prepared by NRB Consulting Engineers for further information.

- **R725 Right Hard turning pocket required- Details to be agreed with Roads Department**

A ghost island junction, with a dedicated right hand turning pocket is now proposed on the R725. The proposed layout, as provided in Appendix A of the Traffic and Transport Assessment Report, has been agreed in principle with Wexford County Council.

- **Main Spine Road 6m - Secondary Roads 5.5m**

The Main Spine road is proposed as 6.0m wide, with Secondary Roads 5.5m wide.

- **Road Construction in accordance with TIC Policy**

It is confirmed that road construction will be in accordance with TIC Policy.

- **Auto turn required on all junctions and turning areas.**

Autotracking has been provided by AKM as part of the submitted drawings.

- **Parking at Creche - Set Down Shown 7 Spaces-1 Accessible -Set down Shown.**

Parking has been provided at the creche, with 12 no. car parking spaces (including an accessible space) and a set down area.

- **Consideration should be given to the maximum car parking standards as set out on the Wexford County Development Plan 2022 to 2028**

Parking has been provided in accordance with maximum car parking standards as set out in the Wexford County Development Plan 2022-2028. A detailed overview of the proposed car parking allocation has been provided in the Design Statement prepared by Deady Gahan Architects.

- **Controlled Crossing on Kilnahue Lane to link Development with Schools and existing footpath. Zebra Crossing with Belisha Beacons required on Kilnahue Lane - Details to be agreed with Roads Department**

A controlled Zebra Crossing has been provided on Kilnahue Lane which will link the development with the schools. NRB have liaised with Wexford County Council on the proposed layout, as included as an appendix to the Traffic and Transport Assessment.

- **All footpaths 2m & on both sides of the Roads and adjoining green areas.**

All footpaths are provided 2.0m wide with appropriate connectivity provided through areas of open space which facilitates the SuDs measures throughout the site. It is further considered that this adds variety the streetscape and contributes to wayfinding and a sense of place within the scheme.

- **Raised Tables at junctions-uncontrolled crossing points & Traffic Calming**

Raised tables have been provided on all internal road junctions.

- **Permeable paving private parking only, this may not be included in calculation of overall surface water management.**

In order to facility appropriate SuDs measures, it is consider that permeable paving is appropriate and it is proposed inprivate parking areas. The responsibility of future residents to maintain this paving can be addressed at the time of purchased.

- **Root management system required for trees proposed adjacent to the footpath or road.**

Root management systems are proposed where footpaths are proposed close to trees as detailed in the Landscape and Green Infrastructure Report prepared by SRLA.

- **Electric Vehicle recharging points shall be provided in all driveways. At least 20% of public parking areas must be served by charging points and the remaining spaces must be culverted for future connection**

Three EV charging hubs have been provided throughout the scheme, providing a total of 6 no. communal EV charging spaces. These spaces will serve those without access to a private driveway for EV charging. Please see the EV Strategy Report prepared by Kerrigan Consulting for further details.

Part V Affordable

It is noted that the mix of 2B and 3B could be changed to better align with the current social housing demand for the area. It is requested that 10 of the D1 Type 3 bed houses be swapped for 10 additional E1 Type 2 bed houses. Resulting in 12no. D1 3 beds and 42no. E1 2 beds. The client, Glenveagh Homes, were agreeable to the proposal

Note: the full breakdown of units to be provided under the Part V agreement is set out on drawing '24058/P/008 Proposed Part V Allocation'. The house types contained in the allocation have been reviewed by Housing Capital and deemed acceptable as social housing units. The review considered the layout and storage provision of the units, proposed materials in terms of a maintenance burden, provision of bin stores, parking allocation, accessibility, and UD features of the proposed social housing units.

It is also noted that Wexford County Council Housing Department would consider that the development would be suitable for the affordable homes scheme and that the Council would be supportive should the applicant wish to proceed with this scheme.

A total of 82no. Part V units have been included within the proposed development, and these have been pepper-potted in small clusters around the site to ensure that an integrated approach is achieved. This equates to 20% of the 413no. residential units within the development.

As per Wexford County Council's request, the S32B Part V proposal has been updated to re[;ace 10 no. of the 3-bed units with 10 no. 2-bed units ..

The 82no. Part V units consist of:

- No. 12 - 3 bed townhouses

- No. 42 - 2 bed townhouse
- No. 10 - 3 bed duplex
- No. 08 - 1 bed maisonettes

Water Infrastructure

Uisce Eireann has confirmed engagement via a Pre-Connection Enquiry. Uisce Eireann has confirmed that a Confirmation of Feasibility CDS24007570 has been issued to the applicant advising that water and wastewater connections are feasible subject to upgrades stating;

> ***Water- In order to facilitate the proposed connection, the Uisce Eireann water network will have to be extended by approximately 150m along Kilnahue Lane. In addition to this required network extension, approximately 860m of network upgrades to the existing water network will be required to provide additional network capacity. Uisce Eireann does not currently have any plans to undertake these works, therefore the applicant will be required to fund these local network extensions and upgrades. These works will be carried out by Uisce Eireann and the costs for this will be included in the connection fee.***
>
> ***Wastewater - In order to facilitate the proposed connection, the Uisce Eireann wastewater network will have to be extended by approximately 120m from Carnew Road. In addition to this required network extension, approximately 2.2km of network upgrades to the existing wastewater network will be required to provide additional network capacity for the proposed scale of development. Uisce Eireann does not currently have any plans to undertake these works, therefore Uisce Eireann will likely request a Statement of Design Acceptance to be included with the application. It is possible that upgrades to the network will be required on completion of the hydrological assessment.***

Designs for the off-site upgrades to the Local Water Network and Local Foul Network are included as part of this application. A Statement of Design Acceptance has been issued by Uisce Eireann and included with the application documentation.

Surface Water

The surface water plan to attenuate water primarily through nature based solutions is to be encouraged.

The following SuDS components are being incorporated into the drainage design for the site.

- Permeable Pavement (infiltration type system)
- Swales
- Herring Bone Land Drain

- Wetlands
- Bioretention systems

Please refer to the Infrastructure Report prepared by AKM Design Group for further detail.

Creche/community

The provision of a creche is noted. There is a need for further community facilities in the form of a meeting room/hall that would enable the residents to meet and provide social activities. This should be provided in the general area of the creche or conversion/rebuilding of the farm buildings.

A community room has been provided within the creche building which will provide a space for residents to meet and cater for social activities.

Appropriate Assessment

It is noted that an appropriate assessment will be undertaken for the proposed development. If a NIS is required, this would include mitigation measures to prevent impacts which should also be reflected in the construction management plan.

An Appropriate Assessment screening has been undertaken for the proposed development by Altemar Marine and Environmental Consultants which has concluded that a NIS is not required.

Environmental Impact Assessment

The Environmental Impact Assessment Initial Summary Report is considered to be suitable outline for the EIAR.

Following on from the Initial Summary Report, the Environmental Impact Assessment Report (EIAR) has been completed as part of this application, and includes detailed assessments and mitigation measures.

Construction Management and Waste Management Plan.

The Planning Authority would seek details on noise and dust impacts to be included in the EIAR and the Construction Management Plan. Hours of working and mitigation measures to protect the residents on the adjoining properties should be identified in the detail of the planning application

The EIAR and Construction Management Plans outline mitigation measures to minimise the impact of noise and dust on local residents during the construction phase of development.

Flood risk

The site falls within flood area C-no identified flood risk.

Please refer to the Flood Risk Assessment prepared by AKM Design Group and submitted within the Infrastructure Report for further detail.

Phasing

A detailed phasing plan will be required which identifies the delivery of essential infrastructure for the site.

The proposed development will be carried out over a period of 48 months. This will be completed throughout 4 phases, as per the below phasing plan.

Please see the CEMP prepared by AWN Consulting on the phasing and proposed construction.

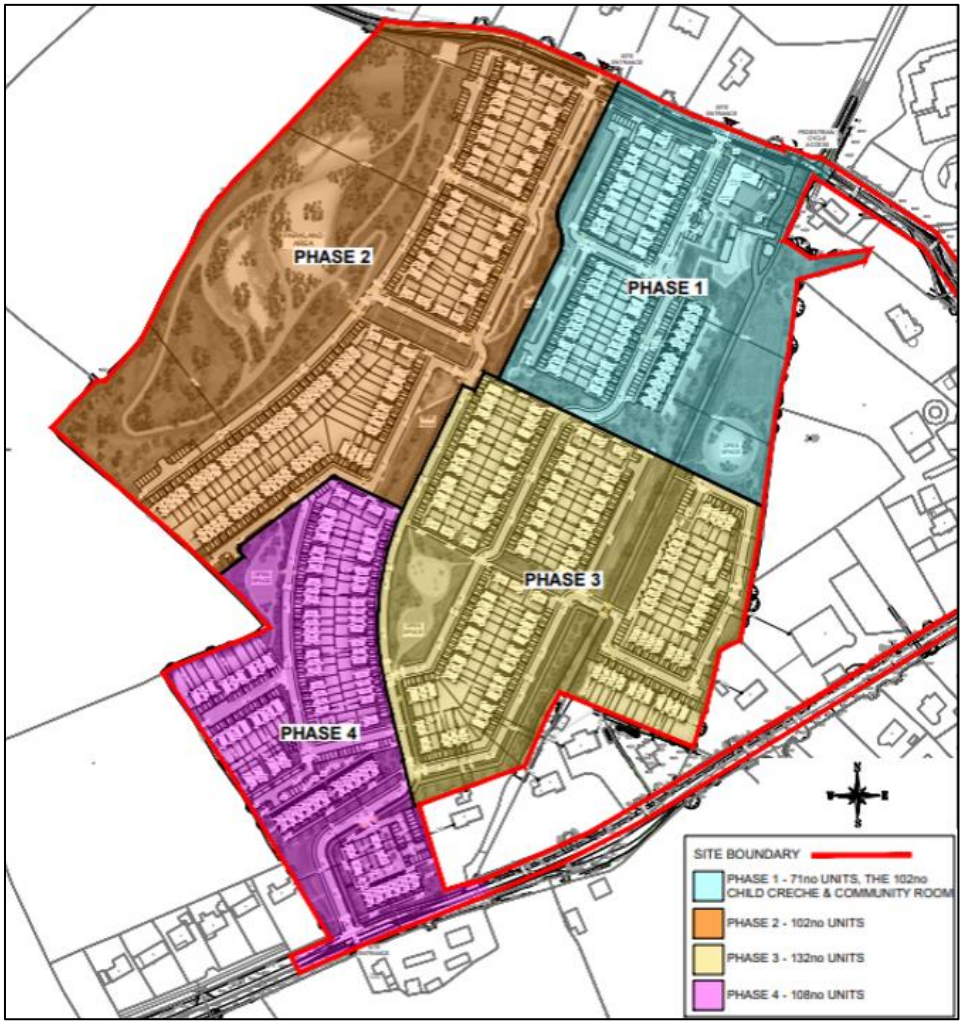


Figure 1 Phasing Plan

Fire Certification

The applicant should be advised that under Article 12 of the Building Control Regulations, 1997 to 2022, a Fire Safety Certificate may be required in respect of each separate building in the proposed development which is not a standalone dwelling house i.e. creche and apartments/duplex where there is horizontal separation between units.

The applicant should be advised that the proposed dwelling houses should comply fully with the requirements of Technical Guidance Document B (Volume 2 Dwelling Houses}, as prepared by the

department of Housing, Planning, Community and Local Government.

Hydrant system and water supply to be as per the "Standard Requirements for fire hydrants and water supplies in developments in County Wexford" (attached).

Access and turning facilities on site for fire service vehicles should comply as a minimum the Recommendations for site development works for housing areas 1998, as published by the Department of the Environment and Local Government.

The proposed homes and creche will be constructed in accordance with standard technical standards and a fire certificate will be sought where required.

Hydrants shall comply with the requirements of BS 750:2012 and shall be installed in accordance with Uisce Eireann's Code of Practice and Standard Details & TGD Part B. Refer to AKM drawings for the watermain layout which also shows hydrant locations.

The proposed whole development was designed to accommodate all types of anticipated vehicles which include cars, refuse vehicles and fire tender vehicles. (Refer to drawing 25007-AKM-XXXX-XX-DR-C01-510001). A swept path analysis has been carried out on the proposed road layout to demonstrate that the site's proposed corner radii and turning heads will accommodate everyday vehicles such as cars. Other vehicles such as refuse trucks and fire tender have also been tracked to ensure they can turn and manoeuvre around the development.

Access

20% of the units must be adaptable for people with disabilities.

Access statement is required for more than 5 dwellings.

Accessible parking must be provided as a level at least 5% of the total number of spaces with a minimum provision of at least one such space.

Accessible units that implement the key principles from the Universal Design Guidelines for Homes in Ireland document, have been incorporated into the scheme in order to ensure an inclusive development is created. These units include:

- 8no. 1 bed maisonettes,
- 28no. 1 bed Apartments
- and 28no. 3 bed Duplex Apartment units.

Adaptable units have also been included within the scheme and provide flexibility that can respond to the changing requirements of residents. These include:

- 16no.4 bed semi-detached units
- and 6no. 3 bed townhouse units**.**

This brings the total number of Universal Design units (accessible/adaptable) to 86no, which exceeds the 20% requirement.

Please refer to the Universal Design Statement prepared by Deady Gahan Architects for further detail.

Accessible Parking Spaces have also been provided, including 8 no. of spaces, making up 7.8% of the 103 no. communal spaces. This exceeds the 5% requirement outlined by WCC.