

Scott Hobbs Planning

Planning Statement on behalf of:

John Flanagan Development Ltd

Date:

16 May 2023

Wellwood, Ardan / Puttaghan, Tullamore

Planning Supporting Statement

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Info

LRD Application for residential and associated development:

Wellwood, Tullamore

Planning Supporting Statement

The Statement supports the application for large scale residential development at Wellwood. The application has been developed following pre-application discussion with Offaly County Council at S247 and LRD Opinion stage. The proposal has evolved to respond to the matters raised by OCC. A mixed residential development comprising houses and apartments of differing tenure; comprising 1, 2, 3 and 4 bedrooms; with private amenity space and public open space and with car and cycle parking, all to required standards. An ancillary creche is proposed and all associated infrastructure development to ensure the houses can be fully serviced, without impact on adjacent properties. The proposal complies with the requirements of the Offaly County Development Plan and other appropriate policy and guidance and is in accordance with the proper planning and sustainable development of the area.



Contents

1.0 Introduction

2.0 The Proposed Development

3.0 Application Site

4.0 Planning Policy and Assessment

5.0 Conclusion

Appendix 1 : EIAR Screening



1.0 Introduction

- 1.1 This Planning Statement supports the LRD application submitted by MCORM Architects on behalf of John Flanagan Developments Ltd (the Applicant) for development on land at Wellwood, Tullamore.
- 1.2 The application seeks planning permission for a **Large Scale Residential Development** of 148 dwellings with associated development, as detailed in the following section and in the application documentation.
- 1.3 This report should be read in conjunction with the comprehensive package of information submitted in support of the application, and to respond to Offaly County Council's formal Opinion relating to the LRD Pre-application submission, which includes :
- The application form, newspaper advert, copy of site notice and planning fee
 - site plans, floor plans, elevations, sections
 - concept plan and illustrative drawings showing coordinated development within wider area
 - supporting statements, reports and other documentation as detailed in the submitted Plans, Drawings and Reports Schedule.

Background

- The Applicant
- 1.4 The Applicant, John Flanagan Developments Ltd (JFD), is an established, well-known and local development company. It is formed by two Directors, who are local to Tullamore and have a vested personal interest in the economic and social improvement of the town and its environs. JFD has been active in development within the town for a considerable period of time and is experienced in residential and commercial developments with a good track record in the delivery of development projects. Being based in Tullamore, JFD contributes to the economy of the town through its development programme and local employment.
- 1.5 JFD has been engaged in development proposals at The Wellwood site since early 2000, and owns this site and the immediately adjacent land. It also has other land ownership in the town.
- Planning History
- 1.6 There is limited relevant planning history relating to the site but significant in the wider area and relevant to this planning proposal.
- Subject LRD Application
- 1.7 As this proposal is for residential, and associated, development for the erection of 148 dwellings (90 houses and 58 apartments) with creche on land zoned for residential development, it falls to be considered as Large Residential Development (LRD) under the requirements of the Planning and Development Act 2001, as amended (the Act).

- 1.8 A pre-application was submitted to OCC under S247 of that Act on 8 July 2022. OCC formally responded to the S247, following a meeting on 4 August 2022, during which all parties agreed that generally the proposal met the requirements of the Offaly County Development Plan as it proposed residential development on residentially zoned land. In its response on 12 August 2002, OCC indicated the information it wished to be submitted for the formal LRD Meeting.
- 1.9 Subsequently, and as required by the Act, a submission was made to OCC for its formal LRD Opinion regarding the LRD application, in which submission significant amounts of information were provided regarding the proposed development, consistent with the information in the S247 response. On 25 November 2022, OCC provided its formal Opinion (reference Ref No LRD 2022 OCC 005), following the LRD Meeting on 2 November 2022. This application is submitted within the requisite 6-month period.
- 1.10 Whilst the overall conclusion of OCC was that *'It is considered that the documentation submitted for the purposes of the LRD meeting does not constitute a reasonable basis on which to make an application for permission for the proposed LRD'*, the Opinion also stated that *'The relevant development plan for the proposed development is the Offaly County Development Plan 2021-2027. The bulk of the site is zoned 'New Residential' with a portion of the site (where rear gardens and public open space is located is zoned 'Community Services/Facilities'. The site is bound to the North by undeveloped lands zoned Community Services/Facilities. The site also forms a part of Opportunity Site 9, see Figure 7.4 of the OCC County Development Plan'* and indicated areas and issues :
- 'that if addressed by the relevant (application) documents, could result in the documents constituting a reasonable basis on which to make the application'.*
- 1.11 The discussion was overall positive towards the development and the proposed development is for the same form, type and content as that proposed at the Pre-application stage except where to address matters raised in the LRD Opinion.
- 1.12 The Opinion required that any subsequent LRD planning application relating to that proposed development should *'include a statement of response to the issues raised in this LRD Written opinion'*. The application documentation pack in its entirety provides information and response to the LRD Opinion and should be read in its entirety for full and comprehensive understanding of the proposal and the extent to which the issues have been addressed. To aid scrutiny, an LRD Compliance Statement is contained within the application pack, and which identifies each issue raised by OCC, with summary note and document in which the addressing information can be found.
- Consultation
- 1.13 The application forms identify the extent of pre-application consultation with OCC and its various departments and with other external consultees, and which are referenced as necessary within application documentation.
- 1.14 The Applicant also engaged with members of the public living in the areas of Tinnycross, Harbour Walk, Harbour Drive, Thornsbury Estate, Park Avenue and Ardan Vale via direct meeting from January 2023 to date. Meetings with some local Tullamore Municipal District Councillors have also taken place, on an informative basis so they were aware of the proposals should they be approached by members of the public, as detailed in the LRD application form.

- 1.15 As required by Regulation, the application will be advertised in a local newspaper (The Tullamore Tribune) on 18 May 2023, immediately prior to submission and a site notice erected on the same day
- 1.16 The Applicant has also established a project-specific website from which further information can be obtained, including inspection of and / or copy of the application documentation (at <https://www.wellwoodhousing.com>).
- Previous Permitted Development
- 1.17 There have been three planning permissions granted for the wider area, one which is now time expired and the two are extant.
- 2007 Acute Hospital and Primary Care Centre
- 1.18 Planning permission was granted (reference 07/360) for an acute hospital and primary care centre with associated accommodation including operating theatres, consultant rooms, recovery room, wards and clinics at the same site in 2007 and which was partially built out. Due to the significant change in economic circumstances from 2008, the appropriate period for the development was extended but circumstances did not recover sufficiently for the development to be completed. The steel structure has remained at the site since 2007.
- 2021 Nursing Home and Step – Down facility
- 1.19 More recently, planning permission was granted for the redevelopment of that partially built out building for a nursing home and step-down facility (granted July 2021, reference 20/503 – ‘the nursing home’) and which remains extant until 2026. The application site shares no mutual boundary with this subject application proposal and shares no boundary with any existing residential property. No letters of representation were submitted to OCC concerning that significant form of development and OCC, when considering the application, determined that no Environmental Impact Assessment or Appropriate Assessment was required, stating
- ‘The site is significantly below the 10ha threshold (the site being generally within a built-up area) and that the requirement for an EIAR can be readily screened out.*
- ‘No potential for significant effects / AA is not required’- there would be no likely significant impact on the European site from the proposed development due to the scale of the proposed development and the separation distance between the subject site and European site’.*
- 1.20 The application was accompanied by numerous plans, drawings and assessments, all of which demonstrated that the material factors relative to the development of the site, for example the use, scale, form, design, layout, access and parking are acceptable and are in accordance with the proper planning and sustainable development of the area.
- 1.21 It is important to note that the permission remains extant, and that no conditions or other requirement was imposed regarding boundary treatment outwith the application boundary.

- 2023 Hospital

- 1.22 In November 2022, an application was submitted for *'the change of use of the previously approved development under planning reference 20/503 (development consisting of the construction of a new 4 storey nursing home, step down facility and rehabilitation and convalescence unit reusing the existing structure on the site to accommodate a total of 244 bedrooms, communal spaces, dining areas, administration, ancillary service spaces and meeting and consulting rooms. The development also includes 197 car parking spaces, new site entrance from the Ardan roundabout, access roads, security kiosk, pump station, plant rooms, landscaping and all associated site works and services.) To a 99 in-patient bed space acute hospital to include operating theatres, diagnostic rooms, endoscopy services, consultant rooms and all associated ancillary spaces and services related to an acute hospital and all associated site works and services'*, reference 22621, by John Flanagan Developments Ltd. In physical terms, the application is identical to the nursing home proposal, the difference being a changed end use, but for a condition on the nursing home permission would be exempted development.
- 1.23 Planning permission was granted for the Hospital development on 4 February 2023 subject to the same conditions as finally imposed on the 'Nursing Home' permission.
- 1.24 One letter of representation was submitted to that application, signed by some, but not all, residents of Harbour Drive. The representation sought the erection of boundary walls to the side / rear gardens of some properties on Harbour Drive and no access from Harbour Drive.. In the Planners report, it is stated that : *'the site boundaries..... are a considerable distance from Harbour Drive..... This application for a change of use has no relationship to the housing estate of Harbour Walk which is a considerable distance from the proposed site I note that neither the current proposal PL2 22/621 or parent planning permission PL2 20/503 proposes access to Harbour Drive and the conditioning of a wall for this estate would therefore be ultra vires and therefore outside the legal authority of the Planning Authority'*.
- 1.25 The documentation included within the hospital application includes a Masterplan which incorporates the subject application site as a means by which the site could be developed, to ensure a comprehensive overall approach to the Opportunity Site with both proposals co-existing. In the Planners report, it is stated that : *'I note that a Masterplan (Drawing SK-01-27) and a generalised Design Statement has been submitted. Given that the proposal is a change of use for a previously granted development and the proposed change of use will not prejudice the development of the remainder of the masterplan area, as the proposed change of use will expire with the parent planning permission, I consider in the context of the current application that the submitted Design Statement and Masterplan meet the requirements of section 7.2.4 of the County Development Plan 2021-2027'*. This subject LRD residential application similarly shows the development on the hospital site in a consistent manner.
- 1.26 OCC deemed that neither EIA or Appropriate Assessment were required, considering that *'The site is significantly below the 10ha threshold (the site being generally within a built up area) and that the requirement for an EIAR can be readily screened out'* and that *'the development is unlikely to have significant effects on European sites'* .

Environmental Impact Assessment

- 1.27 As with the above mentioned applications, due to the scale of the development, it is necessary for OCC to screen the proposal in relation to Schedule 5 of the Planning and Development Regulations 2001 (as amended).

- 1.28 The requirements of Schedule 5, as relevant to this proposal, require an environmental impact assessment of any development project which :

Infrastructure projects

(b) (iv) Urban development which would involve an area greater than 2 hectares in the case of a business district, 10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere.

15 Any project listed in this Part which does not exceed a quantity, area or other limit specified in this Part in respect of the relevant class of development, but which would be likely to have significant effects on the environment, having regard to the criteria set out in Schedule 7.

- 1.29 As the proposal is for a form of urban development on a site of approximately 4.2 ha, but not in a business district, this site and proposal is 'sub-threshold', meaning that EIA is not a prerequisite as it falls within the 10-hectare threshold. OCC previously determined that no EIA was required for the nursing home development as *'The site is significantly below the 10ha threshold (the site being generally within a built-up area) and that the requirement for an EIAR can be readily screened out'*. Whilst this site is larger than the nursing home and hospital site, it remains less than 50% of the threshold, and therefore, it is considered that an EIA can also be screened out for this subject proposal.
- 1.30 Appendix 1 to this report provides an assessment of matters relating to Schedules 5, 6, 7 and 7a of the Planning and Development Regulations 2001, as amended. It is considered that the circumstances as are applicable to this residential proposal as to the nursing home proposal in relation to character, scale and location and accordingly this sub-threshold development should also be screened out from any requirement for EIA. OCC is invited to make a consistent determination in this case.

Appropriate Assessment

- 1.31 Similarly, no Appropriate Assessment was required for the Nursing Home or Hospital applications, notwithstanding the greater bulk and floor space of development. There is a significant similarity between those sites and the subject site in relation to distance from any site of ecological and biodiversity sensitivity and importance. The Planners reports for the Hospital permission states *' A screening exercise for an appropriate assessment has been carried out and it has been deemed that the development is unlikely to have significant effects on any European sites'*.
- 1.32 The Ecology Report highlights no issue with regard to development on such sites and accordingly no Appropriate Assessment is required.

2.0 The Proposed Development

2.1 The application seeks planning permission for a **large scale residential development** of 90 houses, 58 apartments, creche and associated development at the site.

- Description of Application

2.2 The application description is :

Large scale Residential Development Application for planning permission for the demolition of existing buildings and the construction of large scale residential development comprising 148 dwellings which will consist of: 90no. houses (comprising 89 no 2-storey and 1 no single storey; 08 no. 2 bedroom houses, 58 no. 3 bedroom houses and 24 no. 4 bedroom houses.); 20 dwelling apartments (Block A, comprising 4 no. 1 bed units and 16 no. 2 bed units) and 38 no. age friendly assisted living units (Block B, comprising of 28 no. 1 bed units and 10 no. 2 bed units) with associated communal and administrative facilities, both at 4 storeys; a Creche; and all ancillary site development works including access, roads and footpaths, landscaping and boundary treatments, public and private open space areas, car parking, bicycle parking, ESB substations, bin and bicycle stores, replacement waste water pumping station and drainage connections; and all ancillary site development works on land at Wellwood Housing site. The application may also be inspected online at the following website set up by the applicant <https://www.wellwoodhousing.com>

on land at Wellwood Housing site at Tyrells Road, Puttaghan, Tullamore

2.3 A detailed Housing Quality Audit is submitted with the application pack, and which indicates all relevant detail relating to the proposed houses and apartments, including floor area, size, type, amenity provision and parking provision. The application is also detailed in the supporting assessments relative to the matters important to that assessment and, in particular, reference should be made to the Design and Access Statements. To avoid repetition, full and detailed description of the proposed development is not detailed here, unless to further explain material matters, and reference should be made to all associated reports.

- Housing Delivery

2.4 It is anticipated that, following the granting of permission for this current planning application by early Summer 2023, that building operations will begin in Autumn 2023 and the first residential unit will be available for occupation by end 2024. A phasing plan is submitted with the application, which shows implementation predominately in a westerly direction, with the Initial Phase starting at the Tyrell's Road access, flowing into the Interim Phase which includes the apartments. The Final Phase comprises the remaining units at the western edge of the site and the larger open area. It is expected that the development will be completed within the 5-year period of the planning permission. There is no specific yearly output as the development will evolve to meet housing demand. The creche will be development when a tenant is available.

- Part V Provision

2.5 Due to the size and scale of the development, it falls within the requirements of Part V, Section 96, of the Planning and Development Act 2001, as amended. A Part V Statement accompanies the application document and reference is also made to the Part V accommodation in the Design Statement. Reference should be made to these documents, the policy and Assessment sections below and to the Part V drawings. An Expression of Interest letter has also been provided with Cluid, with whom the Applicant has held discussion regarding the Part V provision.

2.6 It is proposed that the Part V provision is included within the age-friendly unit, which is proposed centrally within the scheme adjacent to the main area of open space, to be developed as the Interim Phase.

- Site, Design and Layout

2.7 A sustainable, mixed residential area will be provided through the development of a total of 148 residential units, with creche and associated development, in a mix of 1-bed to 4-bed dwellings. The houses will predominately be 2 storeys, with one single storey, all of which promotes greater mix of housing types within the development. Changes have been made to the housing mix and design during the course of Pre-application consultation to address issues of overlooking and boundary treatment raised by neighbours. The apartments will be in two blocks, 4-storey in height, arranged around the main area of open space.

2.8 The Design Statement and associated plans provide full detail of the proposed development, including specific details of scale, visual appearance and materials. The Access Statement demonstrates how matters relating to accessibility are addressed.

2.9 The landscaping plans and strategy indicated the proposed site boundary treatment, which include 2.4m block walls rendered and fair faced, concrete post and rail fencing and railings, depending upon the location and requirement of the boundary treatment. Some elements of the boundaries have been agreed with neighbours. Landscaping is proposed within and on the boundaries of the site, as detailed in the Landscaping Masterplan and Landscaping Design Statement.

- Open space

2.10 The Design Statement and Landscape Design Statement, and including the Open Space drawings, detail the areas of open space, their function, layout and proposed use, landscaping and maintenance proposals. A hierarchy of open space is proposed, with open space totalling 6,177 sqm representing 15% of the site's total area. Additional 'mini' open spaces will be provided throughout the site which offer further opportunity for landscaping. There will also be private gardens for all houses (minimum 55 sq. m) and balconies / amenity space between 5 – 7.7m for each apartment.

- Creche

2.11 The Creche will be provided as required to meet the needs of an interested occupier. It is anticipated that the creche will be completed towards the latter stages of the development, as demand is generated from occupiers of the proposed housing and when development traffic is minimised. It will be provided towards the frontage of the site, close to the Tyrells' Road access.

2.12 The creche will be able to accommodate 30 children at any one time. No definitive plans are in place at this time regarding the nature of creche, but it is likely to be for full or sessional care, operated within normal working hours of 8am – 6pm. Parking / drop off will be provided for staff and customers and which includes cycle parking. Open space is provided immediately to the creche for its own use, and which will be managed by the creche owners / operators

- Access

2.13 A number of access points are proposed :

- Vehicle – restricted to the access from Tyrell's Road only and provided to meet requirements. Reference should be made to the Transport report and road layout plans, all of which demonstrate the full detail of proposed access.
- Cycle – access will be provided from Tyrell's Road, mid-way through the site at Harbour Drive and at its western edge at the Thornsberry Estate. The latter two access points will not be associated with car movements.
- Pedestrian - access will be provided in a manner similar to the cycle access – i.e., from Tyrell's Road, mid-way through the site at Harbour Drive and at its western edge at the Thornsberry Estate. Appropriate materials, markings and lighting will be provided to ensure safe access to the site.

- Other Works

2.14 Other works normally associated with a large scale residential development including drainage, lighting, road works etc will be provided on site to ensure it is properly serviced. A new pumping station is proposed to replace an existing. All works are shown on the submitted plans.

3.0 Application Site

- 3.1 The application site is located close to the Ardan roundabout on the N52 bypass, which connects to the M6 national motorway network. It lies adjacent to the Midland Regional Hospital Tullamore (to the west) and to the north of the residential properties of Harbour Drive and Harbour Walk and the Thornsberry Estate. The housing area of Ardan lies to the north, beyond an area of undeveloped (zoned) land and the approved hospital site lies to the east.
- 3.2 The site comprises an area of 4.2 ha of undeveloped land and vacant warehousing and other minor structures which lie at the eastern edge of the site. Access can be gained to the site from Tyrell's Road on the eastern boundary and Thornsberry estate to the south-west with a closed gated entrance from Harbour Drive and Harbour Walk.
- 3.3 The site is well located, in close proximity to Tullamore town centre, just 10 minutes walking or 5 minutes cycling. The site is surrounded by well-established neighbourhoods, and this application represents the final section of lands zoned for "New Residential" in the area.
- 3.4 The site also contains a wayleave area for existing sewerage and drainage pipes which connect to an existing pumping station to the north of the site. Upgrade works are proposed to the pumping station.

4.0 Planning Policy and Assessment

- 4.1 Relevant policy and guidance for this form is development is primarily contained within the recently adopted Offaly County Development Plan 2021-2027 (OCDP) and upon which this assessment is centred. It is acknowledged that there is regional and national guidance, but such requirements have largely been incorporated in the OCDP, in light of its recent adoption.
- 4.2 Based on planning history, the location of the site and the specific development, it is considered that the development issues, and which will be addressed below, are :
- Development Plan Policy
 - Principle of Development
 - Siting and Design
 - Residential Amenity
 - Roads and Traffic Safety
 - Drainage and Flooding
 - Landscape
 - Biodiversity
 - Appropriate Assessment
 - Other Screening

Development Plan Policy

- 4.3 The land is zoned for 'new residential' in the Offaly County Development Plan (OCDP) which states :

12.4.3 New Residential

This zoning shall be taken to primarily include the use of land for new residential units. It may also provide for a range of other uses particularly those that have the potential to foster the development of new residential communities, for example, schools, childcare facilities, open spaces etc. The development of new residential areas shall allow for and ensure multi-modal connectivity to existing development and facilities and to adjacent lands which are zoned for development or which may be zoned for development in the future.

Land Use Zoning Objective – New Residential

It is an objective of the Council to:

LUZO-04 Provide for new residential development and other services incidental to residential development.

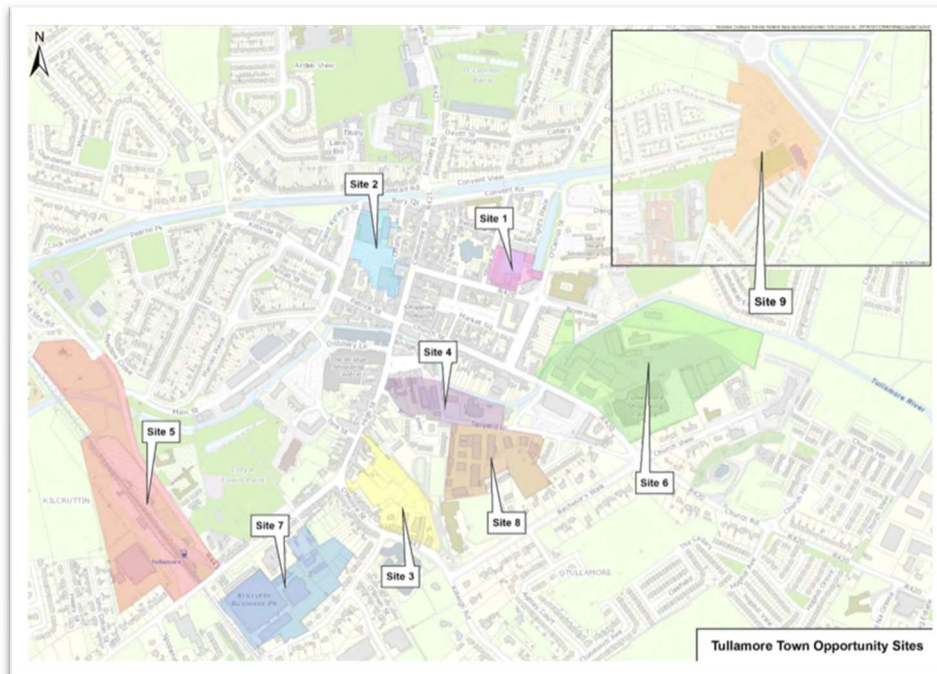
Page 364

Childcare Facilities – Crèche, Nursery and Playschool	✓	✓	✓	X	✓	○	✓	✓	X	○
Residential – Multiple (two or more units)	✓	✓	✓	X	X	X	X	X	X	○
Residential – Single	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

4.4 The proposal is for 148 residential units, creche, open space and all associated development including roads, footpaths and services. Interconnectivity is proposed to the existing road network, for vehicle and pedestrian and cycle accessibility, the latter being to areas of open space and for proximity for access to the town centre. In principle, therefore the proposal complies with the land use strategy of the development plan and should be supported, subject to consideration of matters of detail.

- Opportunity Site

4.5 The zoned residential site, the subject of this application, lies within an overall area identified as 'Opportunity Site 9' in the OCPD:



7.2.4 Opportunity Sites

Opportunity Sites are identified below for Tullamore (Key Town), Birr (Self-Sustaining Growth Town), Edenderry and Portarlington (Self-Sustaining Towns), and those within other settlements are identified in Volume 2 and Local Area Plans. These sites were chosen because of their prominence and underutilisation. In addition to promoting local economic growth, it is considered that their redevelopment would contribute greatly to the renewal, enhancement and regeneration of the towns and villages in which they are located. These sites also provide the greatest potential for development and consolidation. Regeneration lands as defined in the Urban Regeneration and Housing Act 2015 (as amended) include these Opportunity sites.

Opportunity site boundaries have not been identified definitively and can be added to, to provide for logical site boundaries or the inclusion of other potential Opportunity Sites. Some of the sites may be owned by different parties and would require an element of site assembly for a coherent development strategy to progress. This approach to re-development is encouraged over a piecemeal approach. To help realise the full potential for the development of these sites, any application put forward should

Page 247

consider the Development Plan policies, objectives and standards and shall include an **Urban Design Statement and Masterplan** taking cognisance of the following **development principles**:

The OCDP then goes on to identify the principles of Site Assembly, Land Use, Design and Layout, Movement and Access, Built and Cultural Heritage, Biodiversity, Other.

- 4.6 The application has been developed to meet these development principles, as detail below and in the other supporting documents and particularly the Design Statement. The Masterplan demonstrates a potential for coherent development of the entire residentially zoned land within the Opportunity Site. Notably this Masterplan is for the same form of land use and layout as that which supported the hospital permission. In assessing that application, the planner stated that: *'I note that a Masterplan (Drawing SK-01-27) and a generalised Design Statement has been submitted. Given that the proposal is a change of use for a previously granted development and the proposed change of use will not prejudice the development of the remainder of the masterplan area, as the proposed change of use will expire with the parent planning permission, I consider in the context of the current application that the submitted Design Statement and Masterplan meet the requirements of section 7.2.4 of the County Development Plan 2021-2027.'*
- 4.7 The appropriateness of all uses as may be proposed for the remainder of the opportunity site must only be considered when subject to specific application. Annotation on any masterplan accompanying this application is for illustrative purposes only.

- 4.8 No part of this current proposal will prevent the remainder of the Opportunity Site coming forward for development, and indeed, enhances such opportunity through the environmental and visual improvement as the site will be completed and full access provided. It is clear that the proposed road infrastructure will be able to accommodate additional development within the wider masterplan area, and which will be tested in relation to capacity when detailed proposals are known for those remaining parcels of land. Such development does not form part of this application.
- 4.9 It is clear, therefore, that this proposal meets the requirement for this site being a consistent land use and demonstrating that the overall Opportunity site can be developed in a coherent matter, consistent with the proposed planning and sustainable development of the area.

Principle of Development

- 4.10 As demonstrated above, the proposal, therefore is compliant with section 7.2.4, Table 12.1 and the Zoning Map and Opportunity Site 9 of the OCPD. The principle of housing development is therefore acceptable.
- 4.11 The LRD Compliance Statement identifies all site specific policies applicable to the site, as contained within the Offaly County Development Plan 2021 – 2027 and as deemed relevant to the proposals and to other policy by OCC. In addition to the above commentary, it is clear from the document that the policy is compliant with policy. Explicit policy assessment is not addressed in this PSS to avoid repetition.
- [Part V Housing](#)
- 4.12 Paragraph 2.6.4 Part V Provision is relevant :

2.6.4 Part V Provision

Part V housing refers to social and affordable housing. Section 94 of the Planning and Development Act 2000 (as amended) provides that a specified percentage, not being more than 10% of land zoned for residential use, or for a mixture of residential and other uses, shall be reserved for the provision of social and affordable housing, in an effort to address housing segregation. This shall be provided through a Part V Agreement, through one of the specified options in accordance with Section 96 of the Planning and Development Act 2000 (as amended) unless deemed exempted under Section 97.

The Housing Strategy addresses the following key issues:

- The identification of housing need within County Offaly;
- The identification of social and specialist housing needs within County Offaly;
- The identification of supply side requirements to satisfy identified needs; and
- The consideration of specific policy responses to the above.

- 4.13 It then lists Housing Policies, which state:

HP-02 It is Council policy to seek to ensure that groups with special housing needs, such as older people (in accordance with the Age Friendly Strategy for Offaly 2018-2021 and any subsequent editions), single person households, persons with physical and / or learning disabilities, the homeless, the travelling community, asylum seekers and refugees, and those in emergency accommodation are accompanied in a way suitable to their specific needs.

HP-06 It is Council policy to ensure that new social and affordable housing developments are designed and constructed on the principles of universal design and life-long adaptability, are energy efficient, and of excellent design and contribute to healthy place-making.

HP-07 It is Council policy to ensure that a mixture of house types, tenures and sizes is developed to reasonably match the requirements of different categories of households, and ensure that the special requirements of older persons, persons with disabilities and persons with learning difficulties are developed in convenient, easily accessible and permeable locations.

HP-08 It is Council policy as required under Section 95 of the Planning and Development Act 2000 (as amended) that 10% of all land zoned for residential or for a mixture of residential and other uses shall be reserved for the provision of housing for the purposes of meeting social and affordable housing need arising in the county.

HP-09 It is Council policy to promote social inclusion by ensuring that new social and affordable housing developments are strongly integrated into the structure of existing settlements at locations with access to public transport services and community facilities, to ensure that settlements grow in a manner that is self-sustaining with sufficient social and economic infrastructure.

HP-16 It is Council policy to provide social housing through a combination of mechanisms including through Part V of the Planning and Development Act 2000 (as amended), through direct build subject to funding, turnkey developments and the acquisition of second-hand housing in accordance with the county's settlement hierarchy to meet the identified social housing needs outlined in the Council's Housing Strategy.

- 4.14 The Applicant considers that the age-friendly accommodation, in apartment type accommodation and taken over by an organisation such as Cluid is appropriate to comprise the Part V accommodation at this site. It is recognised in the OCDP and its Housing Strategy and Housing Needs Demand Assessment 2021 – 2027 and in Policy HP- 02 that older people have particular housing needs that must be met.
- 4.15 The Offaly Age Friendly Strategy 2018-2021 seeks, in summary, outcomes whereby older people :
- have accommodation which is appropriately located and walkable to access services, including recreation and amenities, and so can use them more readily;

- feel safe and more confident to stay active and to participate in the wider community; with housing design and choices addressing a broader range of needs, aspirations and financial circumstances
 - have more seamless and appropriate continuum of housing choices and options as they age
 - experience less isolation and loneliness than when living alone
 - are supported to age comfortably in the community they belong to
 - are able to be involved in the wider community to maintain and develop their social networks
 - experience less social isolation and maintain greater autonomy, control and independence when living independently in the community and have the confidence and capacity to maintain social networks and participate in all that is going on in their community.
- 4.16 Please refer to the correspondence from Clúid which is included in the application package, expressing their interest in the development of this facility subject to the necessary permissions.
- 4.17 The detailed manner within which the Part V accommodation will be provided is addressed in the Part V Report.
- 4.18 In summary, it is intended that the developer builds out the Part V housing, for transfer to the housing provider (Part V (2)(i), and as required (ii) details of the (calculations and methodology for calculating values of land, site costs are detailed in the Part V report, which is identified as Private and Confidential due to commercial sensitivities.
- 4.19 It is proposed to site all Part V housing in one block (B), centrally within the site and immediately adjacent to the prime area of open space, as age-friendly accommodation, which will ensure that its occupiers are integrally connected with the other houses and apartments within the development, ensuring the residents are fully integrated and avoiding the isolation of sensitive / vulnerable people. The communal open space associated with Block B accommodation is shared with the 'open-age' Block A apartment block. This will allow for integration between all members of society particularly as the open space is located immediately adjacent to the main public open space where play facilities for the younger residents are proposed. This proximity will encourage an overlap of uses and higher levels of interaction between residents. It will cater for a range of activities, which will contribute to the creation of a diverse and sustainable neighbourhood.
- 4.20 In these circumstances, it is considered preferential that the Part V accommodation is provided in this manner and is in compliance with policy.

Siting and Design

- 4.21 The Design Statement and the associated layout plans, floor plans and elevations indicate how the proposed 2-storey house and 4-storey apartment block will be in accordance with the existing established character and appearance of the neighbouring developments (2-storey residential and the larger 4-storey proposed hospital and the substantial existing regional hospital). Scale, design and external finishing will be complimentary to the area and of high quality.

- 4.22 Open space will be provided to meet requirements and there will be sufficient space between existing and proposed development to ensure a sense of place without overcrowding.
- 4.23 The Development Management Standards of the OCDP identify standards required, and which are addressed in the Design Statement and the LRD Compliance Statement. It is clear from those documents that all required standards are met, or exceeded, demonstrating a high quality residential development wholly in accordance with and compliant with policy.

Residential Amenity

- 4.24 There are a number of aspects against which residential amenity are assessed, and amenity relates to current and proposed occupiers of the existing and proposed accommodation. Generally, the development of the site will provide a high quality and good level of residential amenity to future occupiers by virtue of its good locational context in close proximity to the regional hospital, the new hospital / nursing home, centres of employment and the town centre, with its good supply of amenities and facilities. It is a location beneficial to a wide range of occupiers, therefore, which will provide opportunity for a mix sustainable neighbourhood. This will particularly be enhanced through the provision of age-friendly accommodation via Part V at the site.
- 4.25 The proposed housing meets the requirements of policy and guidance regarding house and room size, garden / amenity area, all as detailed in the HQA. Care has been taken to orientate and site the housing as far as practicable to make best use of the southerly directions, to protect privacy and to avoid overshadowing, all as demonstrated in the Design Statement. Adequate areas of private, communal and public open space will be provided to enhance proposed residential amenity. This protects the existing residents and provides high quality residential accommodation for future occupiers.
- 4.26 Car parking and cycle parking will be provided to meet requirements and two points of pedestrian / cycle access will be provided in addition to the main access (vehicular) to the site, which allows for safe and convenient movement around and outwith the wider town area. The proposal has evolved following the required statutory consultation process with OCC, which has required such linkages through the site.

- Open Space

- 4.27 A clear boundary delineation between communal open space and public open space will be proposed with a low wall and railing proposed on the interface between semi-private and public open space. This will allow for visual permeability while also retaining a robust delineation between the 2 areas. All areas of public open space will be fully accessible to all residents with a path bisecting the Public open space in between the playground and kickabout space.
- 4.28 The linkages connect the proposed areas of open space, which exceed requirements, and which will be designed as a hierarchy of space to allow for varied use but by all members of the community, promoting a good sense of place and seeking to avoid individual isolation. This will be a benefit to existing residents as the availability and proximity of open space is enhanced.

4.29 Appropriately landscaped boundary treatment to meet the requirements of the existing residents is proposed, but with pedestrian access to allow for integration between existing and new. This will create a sense of place and identity and will improve amenity and is in the best interests of the proper planning and sustainable development of the area. However, should OCC deem such access for existing residents is not appropriate, the Applicant would be willing to accept a condition requiring the submission of plans showing the accesses closed off and the area landscaped.

- Sunlight and daylight

4.30 The design and layout has also evolved to address matters such as sunlight and daylight / overshadowing and loss of privacy to existing properties. The shortest distance between an existing garden wall and proposed new window serving a habitable room of a 2-storey house is 11.5m, with a minimum of 14.47m between new blank gable wall (2-storey house) and rear wall of an existing house. It is considered that such minimum distances protect the amenity of existing properties from unacceptable changes to levels of privacy, as mutual overlooking exists between those houses at present. Some alteration to the design and layout has been made to the proposal to address matters raised by residents during consultation.

4.31 The sun lighting and daylighting assessments demonstrate that there is no unacceptable loss of amenity through the erection of the proposed singly storey, 2-storey and 4-storey buildings at the site.

4.32 There will also be benefit to existing properties as the current site is vacant, with redundant building in part and also other relatively unkempt land in part. The development will remove the existing unsightly buildings and upgrade the land, improving the appearance of the area.

- Noise

4.33 The houses will be located further from the N52 than the approved nursing home and hospital, but some houses will have windows facing onto / in some close proximity to the N52, which is seen as a noise generator onto the sensitive receptor. The noise report demonstrates that, potential noise associated with the road can be mitigated through design.

4.34 As stated above, the OSCP DMS identify residential amenity standards including unit and room size, orientation, separating distance and garden size, and which are addressed in the Design Statement and the LRD Compliance Statement. It is clear from those documents that all required standards are met, or exceeded, demonstrating a high quality residential development wholly in accordance with and compliant with policy.

4.35 It is considered, therefore, that whilst there will be a change to the immediate environment, that change is in accordance with the development plan, will provide much needed mix of housing for the community and will be developed without a negative impact on the amenity of the existing houses. High quality housing will be provided, all of which are positive to residential amenity and the proposal, therefore, is in compliance with planning policy. On this basis, as a high quality residential development will be provided which will contribute to meeting housing need and demand in the area, to the benefit of the community of Tullamore, the proposal should be supported as being compliant with the OSCP.

- Ancillary Uses - Creche

- 4.36 The proposed creche is single storey and lies 11.17m from the boundary enclosure with no 28 Harbour Drive. There is sufficient separation distance such that the amenity of that property will not be adversely affected, particularly as it is expected that the creche will not be occupied by children outwith the 8am – 6pm period.
- 4.37 Car and cycle parking and drop off areas are proposed specifically to the creche, which will have its own area of open space. The creche is well located to be accessible to residents of the new development, as well as those of existing housing and also to users of the nearby existing and approved hospitals without there being a need to access passed the proposed housing.
- 4.38 Pedestrian access is proposed adjacent no to 28 and the proposed site, provided in the interests of good planning and to improve accessibility in the area. This will specifically benefit the properties on Harbour Drive as there will be safe and good access to areas of open space, and close walking distance to the creche.
- 4.39 It is considered that the provision of the creche, to meet needs as and when an occupier is found, will help create a mixed development and is acceptable and in compliance with policy.
- 4.40 The OCDP is clear that developments which include uses which are ancillary to the principal use are likely to be acceptable, subject to the Land Use Zoning Matrix (objective LUZO-13). It is clear that a creche is ancillary to the main, and zoned, residential development of the site and has been included within the development following Pre-application discussion with OCC. Policy SICCDP-08:

Childcare

SICCDP-08 It is Council policy to encourage the provision of childcare facilities in residential areas, employment areas, retail centres and other areas as appropriate, when development proposals are put forward for consideration.

- 4.41 There is no proposed occupier for the creche at this stage, which is not surprising bearing in mind the planning status of the land, that development has not yet begun and there is no existing 'community' on site for the creche to serve. It is anticipated, however, that as the development nears completion, when it is safe for access for children and when critical mass exists on site, there may be demand for the creche, which will be provided at that time.
- 4.42 As childcare facilities are supported by policy, and are appropriate within residential areas, this element of the proposal is consistent with the development plan.

- Associated Development

- 4.43 As a quality residential development is being proposed, the full set of associated development will be provided including matter such as street lighting, sustainable drainage, water and wastewater infrastructure (including new pumping station to serve this and the wider community; being an additional benefit to the proposal), access, parking (cycle and car).

- 4.44 This full extent of associated development is compliant with the requirement to provide a high quality residential development, complying with policy.

Roads and Traffic Safety

- 4.45 A full and detailed assessment has been carried out regarding the proposed access to Tyrells Road, the ability of the road network to accommodate the development and the acceptability of the proposed internal road network for accommodate the safe users of the road and footpath network. This is detailed in the Transport Statement and associated plans.
- 4.46 Changes have been made to the proposal during the Pre-application process to address concerns raised by OCC Roads, particularly relating to the internal road network.
- 4.47 The OCDP contains a number of policies to seek to reduce car movements, and to encourage a modal shift to alternative forms of travel. This is a site within the existing built envelope of Tullamore and the Transport Statement addresses the high accessibility of the site to the town centre and areas of local employment, services and transport systems. As detailed in the Transport Statement, the proposal is consistent with OCDP and related policy.

Drainage and Flooding

- 4.48 A Flood Risk Assessment and Drainage Strategy accompany the application, together with associated infrastructure plans.
- 4.49 The OCDP contains policies and objectives relating to water services, seeking in conjunction with Irish Water, the appropriate connection to the water infrastructure and to ensure that all sites can be appropriately serviced and not result in flooding (on site or elsewhere). Pre-application dialogue has taken place with both OCC and Irish Water, and necessary consents provided. The submitted plans and reports detailing the proposed water infrastructure demonstrates that the site can be serviced and that the site is not liable to floodings and its development will not result in flooding elsewhere. Sustainable drainage is proposed, and the proposal is wholly consistent with the development plan policies.

Landscape and Biodiversity

- 4.50 The site is not one identified as being sensitive in landscape or biodiversity terms, and contains a number of trees at risk. The site is a low sensitivity area, in landscape terms, for which a wide range of development is acceptable (as consistent with its residential / Opportunity Site 9 zoning). OCDP states the high need for landscaping and appropriate design.
- 4.51 The application is accompanied by a detail landscaping strategy, following through assessment of the site and proposed development. Generally, open space, which will be landscaped, comprises 15% of the site area. The landscaping plans have been developed following consultation with local residents, as boundaries are formed by mutual garden lines.
- 4.52 Whilst trees will be removed as at risk, those trees are not individually of any particular importance to visual amenity and significantly more trees will be planted to provide a sense of place, identity and green area of considerably greater proportion of the site than adjacent developments thus enhancing the attractiveness of the site and promoting green networks.

- 4.53 A detailed set of landscaping information accompanies the application pack, which identifies the fact that within the extensive landscaping proposals, there will be a promotion of biodiversity enhancement, with over 60% of all species selected being recognised as a positive pollinator and following completion of the development, the locality will become enriched with a large range of flora & fauna, resulting in a positive green future for this urban site.

Appropriate Assessment

- 4.54 The proposed LRD residential application is very similar in locational terms as the site for the hospital development, with similar characteristics and distance to sensitive sites. The Ecological Assessment demonstrates no particular issue of sensitivity at the site.
- 4.55 OCC determined that no Appropriate Assessment was required for the hospital and nursing home proposals as *'it is unlikely to have any significant effects on European sites'* due to the scale and separation distance to those European sites (2.6km)
- 4.56 Accordingly, it is considered that this proposal falls to be considered in a similar manner – i.e., that no AA is required.

Other Screening

- 4.57 OCC previously determined that an EIAR was not required for the nursing home and hospital proposals and as similar context, location and scale apply to this development, it is considered that the development does not constitute EIA development. This is addressed above and in Appendix 1, and it is concluded that the development does not constitute EIA development.

Planning Conditions

- 4.58 A full and detailed planning application is submitted to seek planning permission for this large scale residential development which is expected to be developed over the next 5 years. It is normal and inherent within such major developments that changes are required during the development process and accordingly, OCC is requested to allow flexibility within its conditions to permit changes to the development to facilitate an efficient delivery of housing, which is the key goal of all stakeholders.
- 4.59 The plans have been prepared based on best knowledge at this time, to address matters which have been raised during the course of the evolution of the proposal and the pre-application consultation. It is also requested that should amendment be required to the proposal, that this is achieved through planning condition, again to allow the efficient delivery of housing.

5.0 Conclusion

- 5.1 The LRD application is accompanied by a full range of supporting plans, drawings and documents which assess the proposal in accordance to related legislation, policy and guidelines. Additional information is provided to that which accompanied the LRD Pre-application submission, addressing the alleged 'omissions' and demonstrating that the proposal is acceptable; as was intimated in the formal OCC LRD Opinion.
- 5.2 As the site is zoned for residential development, in principle, the development of this site for large scale residential development with associated and ancillary uses, wholly complies with the policy of the OCDP. The proposed development, therefore, is acceptable providing the detail meets requirements of OCDP policy. This accords with OCC's Opinion stated at S247 and LRD Pre-Application stage.
- 5.3 The site forms part of a wider area of land, identified as 'Opportunity Site 9' under the 'Retail and Town Centre Strategy and Regeneration' section of the OCDP, which includes land zoned for residential purposes. This enhances the potential for development at the site. Section 7.2.4 of the OCDP states that the redevelopment of Opportunity Sites will greatly contribute to the renewal, enhancement and regeneration of the town. Residential development provides synergy with the existing and approved hospital development and zoned community uses and will contribute to meeting the dire housing needs of the area. The Part V proposals will ensure the provision of much needed age-friendly housing, within the heart of this new community, to ensure full integration and to avoid issues relating to isolation and inaccessibility.
- 5.4 The Design Statement and masterplan addresses the manner within which this remaining part of the Opportunity Site could be developed, although nothing pre-empts the evolution of a different scheme(s) for the land and the consideration of any forthcoming application(s). That part of the Masterplan proposed as hospital development is the subject of a separate planning permission demonstrating consistency between the proposals and a coherent approach to the development of this land.
- 5.5 The proposal, comprising 2 – 4 storey development is consistent with existing buildings in the locality and is of a scale similar to existing development, respecting local character. A high quality development is proposed, which will create a sense of identity and place, as detailed in the Design statement and Landscape Statements.
- 5.6 The technical reports and plans, including the Transport Statement, Noise report and Engineering Report demonstrate that there is no technical constraint to the development.
- 5.7 The proposal must be assessed against the extant OCDP, which supports the proposed development. The application documentation demonstrates that the approach to the development is wholly appropriate to the site and its surroundings and will positively contribute to the economic, social and health environment of the town.
- 5.8 The proposal, therefore, is in accordance with the proper planning and sustainable development of the area and it is requested that planning permission be granted at the earliest opportunity to facilitate investment in this site for the benefit of the community of Tullamore and its environs.

Appendix 1 : EIAR Screening

Matters relating to Schedules 5, 6, 7 and 7a of the Planning and Development Regulations 2001, as amended

Table 1: Assessment Against Schedule 7: Characteristics of the Development

Table 2: Assessment Against Schedule 7: Location of the Development

Table 3: Assessment Against Schedule 7: Types and characteristics of the potential impact

Table 4: Assessment Against Schedule 7a: Types and characteristics of the potential

Summary and Conclusions

Table 1: Assessment Against Schedule 7: Characteristics of the Development

Characteristics of the Development	Consideration / Assessment for Screening
(a) the size and design of the development;	<p>The site is a relatively small area (4.2 hectares) within the defined urban area of Tullamore. It is a partially previously developed urban site.</p> <p>It is a site zoned for residential purposes in the Offaly County Development Plan 2021- 2027. OCC also defined the land as liable for the RZLT in its draft plan in December 2022. The proposal, for residential and associated development, wholly complies with that zoning.</p> <p>Planning permission has been granted for higher-density development (nursing home / hospital) in the vicinity. No EIA was required for those developments and the same considerations apply to this proposal.</p> <p>Other mixed uses (hospital and residential development) exist in the immediate area, consistent with the urban form of development proposed.</p> <p>There is an existing access onto Tyrell's Road and access-arms from the Thornsberry Estate and Harbour Drive. The proposal is consistent in so far as vehicular, pedestrian and cycle access are proposed from Tyrells' Road, pedestrian and cycle from the Thornsberry estate and pedestrian from Harbour Walk and Harbour Drive.</p> <p>The size and design of the proposal does not constitute EIA development.</p>
(b) cumulation with other existing development and/or approved development;	<p>There is no approved development within the immediate vicinity which changes the characteristics of the area to such an extent that there may be cumulative effect. The nursing home / hospital site is 2.6ha, cumulatively both falling well below the threshold. The remaining undeveloped land is zoned for Community and residential use. The illustrative concept plan and masterplan indicates a means of development of that zoned land, but it is not conclusive or mandatory. When and if that site(s) comes forward for development, separate decisions can be made regarding any need for EIA for that development at that time, based on the size and design of development. At this stage, there will be no unacceptable cumulative impact that constitutes EIA development.</p>
(c) the nature of any associated demolition works	<p>The existing structure on site are small scale, degraded and detract from the amenity of the area.</p>
(d) the use of natural resources, in particular land, soil, water and biodiversity;	<p>The existing site is partially developed land, and the development will wholly utilise this underutilised building and site. No additional land which is not zoned for development or natural resources will be utilised. The site has no particular biodiversity value and proposed landscaping will enhance the site. There is sufficient capability in relation to water supply.</p>

(e) the production of waste;	There will be waste generated through the build process and post operational; wastes will be properly disposed in accordance with requirements. Accordingly, waste products can be removed from the site without causing any significant effects on the environment and does not constitute EIA development.
(f) pollution and nuisances;	There will be no unacceptable levels of pollution and nuisance. The works will be carried out within normal periods of the day and week for construction and can be controlled by condition. The scale of any potential impact does not constitute EIA development.
(g) the risk of major accidents and/or disasters which are relevant to the project concerned, including those caused by climate change, in accordance with scientific knowledge;	The proposal is not considered to be of a use or scale which is at risk of any major accident or disaster. It is an urban development on an urban site.
(h) the risks to human health (for example due to water contamination or air pollution).	No significant effects are considered likely as a result of the proposed development.

Table 2: Assessment Against Schedule 7: Location of the Development

Location of the Development	Consideration / Assessment for Screening
(a) the existing and approved land use;	The site is identified as part of an opportunity site in the development plan and is a partially developed and zoned site in the urban area. It is adjacent to existing development including similar residential and a hospital. The proposed residential use is wholly consistent with the surrounding uses.
(b) the relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground;	This is a partially developed and zoned site. No significant effects are considered likely.
(c) the absorption capacity of the natural environment, paying particular attention to the following areas—	
(i) wetlands, riparian areas, river mouths;	No likely impact.
(ii) coastal zones and the marine environment;	n/a
(iii) mountain and forest areas;	n/a
(iv) nature reserves and parks;	n/a
(v) European sites and other areas classified or protected under national legislation;	No significant effects considered likely due to separation distance.
(vi) areas in which there has already been a failure to meet the environmental quality standards, laid down in Union legislation and relevant to the project, or in which it is considered that there is such a failure;	The site is not located within or close to an area where there is a known failure to meet environmental quality standards.
(vii) densely populated areas;	The site is located towards the edge of Tullamore and residential development lies within the immediate environs of the site, to the further north and the southwest and southeast only. Those properties co-exist with the existing hospital. As with the nursing home / hospital proposals, any change to the area will be localised to the area immediately adjacent to the site. Existing development within the surrounding area is not high density. The proposal will result in the development of the existing unsightly buildings, which will be advantageous. The scale does not constitute EIA development.
(viii) landscapes and sites of historical, cultural or archaeological significance.	There are no buildings or features of merit on site or within the immediate locality.

Table 3: Assessment Against Schedule 7: Types and characteristics of the potential impact

Location of the Development	Consideration / Assessment for Screening
<p>(a) The magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected)</p>	<p>The proposal is not a significant scale of development but will bring considerable housing benefit to Tullamore and its environs, through early delivery of much-needed housing.</p> <p>Tullamore is a key town and is the service centre for a significant part of the county and parts of the Midlands region. It is easily accessible by road and rail, including two national secondary roads, the N80 and N52 and two regional routes, the R420 and R421.</p> <p>As the key and main service centre for the county, Tullamore is subject to high growth rates and offers a wide range of employment, retail, service, education, community / health, leisure and housing opportunities. Positive impact will result from the development of the residentially zoned land for housing purposes.</p> <p>The characteristics of the site and immediate surroundings are such that impacts are likely to be localised and limited in terms of the physical nature of the development but wider ranging in terms of contributing to the provision of housing to meet needs within Tullamore and its environs.</p>

(b) the nature of the impact	There will be some change to the immediate local townscape as a result of the proposed development, most notably positive from the redevelopment of the existing unsightly buildings. This impact is unlikely to be significant beyond the immediate area of the site. The impact is considered and assessed appropriately with the planning application in a full suite of supporting documents. The nature of the impact does not constitute EIA development.
(c) the transboundary nature of the impact	N/A
(d) the intensity and complexity of the impact	The proposal is for much-needed housing, typical of the area and which is consistent with the scale and form of development in the vicinity (existing and proposed). The supporting assessments have found that the development does not generate any significant adverse impact. It is considered that the nature of the development is not complex. A Construction Management Plan can be submitted, via condition following the grant of consent if required.
(e) the probability of the impact	Any potential impact will be localised and short term and will be mitigated appropriately so the proposal does not constitute EIA development. The supporting suite of documents outline any suitable mitigation measures as required.
(f) the expected onset, duration, frequency and reversibility of the impact	<p>The development would be permanent and therefore irreversible; but a positive impact based on the current deteriorating condition of the site. Any construction impact will be temporary and managed through an appropriate Construction Management Plan. The level of impact will be typical of any similar development and does not constitute EIA development.</p> <p>Hoarding will be erected prior to construction starting and will be retained during the duration of construction. Welfare facilities will be provided within the secured area.</p> <p>A Waste Management Plan will be planned and implemented prior to any construction. It will be based on the waste management hierarchy.</p> <p>The buildings will be designed to meet and exceed where possible current sustainability standards.</p> <p>Noise and pollution will only be generated to any significant extent during demolition / construction period and will be temporary.</p>
(g) the culmination of the impact with the impact of other existing and/or approved development	There is an extant permission for a nursing home / hospital, but on a smaller site. Cumulatively, the site areas comprise some 6.5 ha, well below the EIA threshold. The potential for development at that site has been known for a considerable period, and the subject site is zoned for development. Cumulative impacts will not be extensive. When and should the adjacent land come forward for development, that proposal(s) can be assessed at that time. There are no definitive proposals for that development at this time.

(h) the possibility of effectively reducing the impact	<p>The impact would be permanent as with any development, but any impact will be mitigated as required. The development will bring forward a site which has been identified for development for a considerable period, but which has not been delivered. The proposed development will ensure a significant positive impact on the town.</p> <p>Standard planning conditions can be imposed regarding hours of construction work, other controls over development (such as wheel washing if required) and hours of delivery and trading of the uses, all if required.</p>
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Table 4: Assessment Against Schedule 7a: Types and characteristics of the potential

<p>1 a and b</p> <p>Description of the Proposed development</p>	<p>Refer to the above tables, and information in each of the supporting documents, including the application form, Planning Supporting Statement, Design Statement, Access Statement, Transport Statement, Engineering Report, Ecology Report, Noise Report, Landscaping Design Statement and associated documents, Part V Report, LRD Compliance Statement</p>
<p>2 Description of Aspects</p>	<p>Refer to the above Tables 1, 2 and 3, and to the supporting documents</p>
<p>3 Description of Likely Effects</p>	<p>Refer to the above Tables 1, 2 and 3, and to the supporting documents</p>
<p>4 Criteria in Schedule 7</p>	<p>As addressed above</p>

Summary and Conclusions

The supporting documents conclude that the development can proceed in accordance with relevant policy without undue harm to the environment. Impacts will be short term and temporary only and related to construction, although that will generate benefit through employment. The development is similar to existing development in the area and consistent with emerging proposals, seeking sustainable mixed uses environments.

As a housing development on land zoned for that purpose and on an opportunity site, the proposal meets sustainable requirements, being the consolidation and improvement of a neglected area. There will be a positive impact on human beings due to the upgrading of the townscape and environment of the site, the provision of a mix of high quality housing to suit different life-term needs and tenures. There will be short term and temporary impact during construction only, but this will not be significant.

As any negative impacts as a result of the development will typically be short term and localised, mitigation measures will be introduced, where necessary, to reduce environmental impacts. Conditions can be imposed on any planning permission to ensure any mitigation required to reduce environmental effects is implemented.

It is therefore considered that the proposed development, being sub-threshold and of a minor nature in EIA terms, does not constitute EIA development and an EIA Report is not, therefore, required

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