

Knockboy,  
Dunmore Road,  
Waterford.

An Bord Pleanála  
64 Marlborough Street  
Dublin 1  
D01 V902

10<sup>th</sup> March 2019

**STRATEGIC HOUSING APPLICATION 303630 - SITE ADJACENT TO THE  
PADDOCKS, GRANTSTOWN, WILLIAMSTOWN, DUNMORE ROAD,  
WATERFORD**

**1. INTRODUCTION - FAST TRACK HOUSE PLANNING**

In June 2017, The Minister for Housing, Planning, Community and Local Government, Mr. Eoghan Murphy, TD signed the necessary Regulations which enabled planning applications for large-scale housing developments of 100 units or more to be made directly to An Bord Pleanála.

The introduction of these temporary new fast-track planning arrangements for large-scale housing developments was to deliver on a key commitment under the Government's Action Plan for Housing and Homelessness – Rebuilding Ireland. The intention of this legislation was to facilitate the provision of increased housing supply through greater streamlining of efficiencies in the Planning System. Instead what it seems to have done is that it has created a fast track system for Receivers and Land Owners to flip a site with planning permission for huge profit with shovel in the ground delays then exacerbated. This appears to be the situation in relation to the proposed development of a totally unsuitable housing proposal in the middle of many mature estates between the Williamstown and Dunmore Road Waterford City. The design takes no cognisance of the layout, aesthetics, and environment currently in place in the environs of this site.

The current legislation is currently flawed with no facilitation of neighbouring resident and home owner input in advance of the Pre Planning submission stage.

As per the Strategic Housing Development Section 4, Applications to An Bord Pleanála Guidance for Planning Authorities, Local elected representatives were not notified upon receipt of the application or at the next appropriate Metropolitan Council Meeting of the consultations that had taken place or the details of the Notice of Opinion issued by An Bord Pleanála.

Following Councillor representations to the Executive, at a Council Workshop Meeting arranged on 6<sup>th</sup> March 2019, the Senior Planner was unable to inform the Councillors present, who was the Waterford Council planning official present who had 'sufficient knowledge and expertise in the matter concerned' as per subsections (5) & (6) of the Planning & Development (Housing) and Residential Tenancies Bill 2016. I do not feel sufficient knowledge on this area of our City was presented at the pre planning consultations

and contend that the proposed development is NOT broadly consistent with the development plan for the area concerned.

## **2. PROFIT TURNING & NOT SOD TURNING**

The situation with the Williamstown Road Planning proposal is that this is not Dublin! Whilst Developers of schemes such as the Marlet Property Group's 420 home Cabra Housing Scheme have praised the efficient under 16 week fast track planning process for a large scale development, this key Cabra site then came to the market five months later with a guiding price tag in excess of €32M and reports that the density of the site can further be increased to fit 400 apartments!

The biggest fundamental flaw of this fast track system is that it's not really efficient when there are intermediatory stages where there are further sales of the site and possible redesigns. I personally thought that the whole idea of the scheme was to get boots on the ground and shovels digging the ground ASAP. The Williamstown proposal will not provide immediate housing solutions for an already under resourced social, public and Community infrastructures in the Williamstown/Dunmore Road area of the City.

## **3. WILLIAMSTOWN DEVELOPMENT PROPOSAL**

I met with individual residents from surrounding estates, attended numerous public meetings organised by Residents Associations and then with representatives of Farmleigh, Booterstown, Grantstown Village, Bishopsfield and Williamstown Village Residents Associations in relation to the proposed Williamstown development. Whilst all were expecting this site to be developed with houses similar in design to those in the estates in the environs, they weren't expecting two towering four story apartment blocks and a heavily increased density from an original 220 homes to 324 residential units adjacent to the existing mature residential estates of The Paddocks, Ballygunner Village, Cnoc Caislean, The Anchorage, Farmleigh, Booterstown, Grantstown Village and Bishopsfield residential estates between the Williamstown Road and The Dunmore Road.

## **4. PUBLIC AWARENESS**

Whilst the Planning Application was advertised in the Irish Examiner on the 5<sup>th</sup> February, many were relying on information coming from word of mouth and then the local news reports as intended density of the development began to become apparent through local media commencing from 26<sup>th</sup> February 2019.

This was a direct result of the notification of the Strategic Housing Application not being advertised in 'one or more local newspapers before making the application for permission to the Board' as required by Section 8, sub Para (1) of the Planning and Development (Housing) and Residential Tenancies Bill 2016. The Irish Examiner is NOT a local paper!

I would have expected that given the size and scale of the development that it would be advertised in the local media. In addition, my phone was overwhelmed by calls from residents and constituents who physically went to visit the site as they hear of the development through the grapevine have been unable to locate the required on site notices!

## **5. RESERVATIONS REPRESENTED**

- a. Traffic Management; The Environmental Impact Assessment in relation to the road sustainability infrastructure was based upon traffic movements on the Williamstown Road adjacent at peak times on 5<sup>th</sup> & 6<sup>th</sup> October 2017 with no due regard for the increased impact on the peak hour bottle necks at Farronshoneen Roundabout and or the University Hospital Waterford Roundabout or any other junction in the area. In addition, the projected increase in traffic anticipated is grossly underestimated as a result of it being estimated on the Paddocks Junction only!
- b. Public Transport; The current public transport network for the Williamstown area is under invested in and is NOT an efficient fit for purpose service.
- c. Sustainable Transport – Bicycle Lanes; There are no bicycle lanes on the Williamstown Road that will feed the only entry and exit from the proposed development site.
- d. New Paddocks/Estate Entrance; With a proposed traffic increase of 800+ cars, the new entrance design is not appropriate with the absence of filter lanes and main road speed reduction animation.
- e. Apartment Block Height; The provision of 15 metre high apartment blocks is exacerbated by their location on an incline which in addition to interfering with the visual quality of the existing developments in the area. The development of less height apartment locations on the Dunmore Road area such as Kingswood and Ballinakill has led to unsold apartments that area currently boarded up!
- f. By Residents
  - i. That the Photomontages do not reflect the true impact of the development on the aesthetics of the current housing in the Paddocks and the neighbouring estates at Farmleigh, Cnoc Caislean, & Booterstown.
  - ii. Four story apartment blocks will devalue the value of homes in the area.
  - iii. Overlooking will invade privacy rights.
  - iv. The design of the Apartment Blocks is not in keeping with the general design of estates in the area.
  - v. The Apartment Blocks will cause overshadowing to existing residences and this was never intended when these citizens bought their homes.
  - vi. Boundaries taking footpaths and open spaces that have been enjoyed by residents for 12 years into newer less enjoyable plans.
  - vii. Protected hedgerows being removed

## **6. LESS HOUSING DENSITY WITH IMMEDIATE BUILDING**

The Housing proposal mitigates housing demand Nationally as opposed to examining the local requirements, projects and demands as outlined in the City & County Development Plan.

The neighboring residents do not oppose the development of houses, which were always inevitably expected but I have to agree that their reservations in relation to residential unit saturation through the additional apartment blocks must be listened to.

The current proposed development will deliver a residential unit density of 35.6 per hectare.

The neighbours in the adjacent housing estates, primarily two and three bed roomed semi detached homes, bought their houses with a density closer to 21/22 residential units per hectare and based upon this would welcome a development as they expected with a number of residential units designed taking surrounding estates into account and a house number of approximately 210 to 220 houses.

The residents in the area bought their houses to enjoy the amenities and planned low density of residential estates in the area. These are the residents who are currently suffering traffic congestion during peak hour traffic, a complete absence of a fit for purpose public transport system, under resourced adjacent primary and secondary schools in addition to minimal teenage, youth and community recreational facilities.

I would like to see these reservations addressed and a guarantee from An Bord Pleanala that the Receiver is not using the housing and homeless crisis as a means to fast track a planning permission for financial gain as opposed to a housing deficiency solution. As McNerney Homes are no longer a construction entity, it should be conditioned that once the density issues are addressed, that the Receivers are not permitted to use this fast track facility to turn the site for multiple increase in site value and that they must immediately initiate development themselves employing the appropriate contractors!

## **7. WATERFORD CITY DEVELOPMENT PLAN 2013 – 2019**

The proposed Strategic Housing Application is contrary to the City's Development Plan under the following areas;

- a. -1.1 OVERALL GOAL      The placing of an estate in the Paddocks site with a 53% increase of residential units, on those already in the area fails to '...ensuring the City develops in a balanced, sustainable, transport friendly and attractive way with good quality of life...'
- b. -1,2,3 PLUTS 2004      The current underdevelopment and investment in Waterford City's public transport system that ensures less than 1.9% (Census 2016) of the population use public transport. The planned location of the development would not ensure '...location of new housing close to public transport routes as possible...'
- c. -1.5.5 HOUSING DENSITY      Under '... sustainable housing provision...', the current proposal is not and would not be '...supported by community and recreational facilities...'
- d. -2.2.2 PROPOSED SETTLEMENT STRUCTURE      The current development is focusing on an area of the City that is currently reaching saturation in relation to current infrastructure and supporting community facilities and is contrary to the balanced hierarchy where the priority areas to bring balance to the City is the North west suburbs – Carrickpherish and Gracedieu followed by Ballybeg and Kilbarry!
- e. -2.2.5 RERSIDENTIAL DENSITY      The residential densities employed in this area of the City was to stem population leakage contrary to the '...recognized need for high quality low density...' needs identified in the residential density strategy to counter this trend
- f. -7.3.4      This section identifies how Dunmore Road, Farronshoneen and Ballinakill areas are largely developed with few remaining sites. Permitting planning for the few remaining sites with a density contrary to the design and

maturity of the area within the current infrastructural supports would be contrary to the spirit of this paragraph!

- g. -7,3,5 Contrary to this paragraph, there is an absence of a sustainable neighborhood or village structure in the Knockboy, Williamstown Road area of the Dunmore Road to facilitate an increased density of the proposed development.
- h. -8.1 HOUSING POLICY The proposed Strategic Housing Application fails to deliver ‘...Sustainable Communities...’ as it does not ‘...meet the needs of existing and future residents...’ nor is it ‘...sensitive to their environment...’ by the current design and over saturation of residential units through the introduction of four story apartment blocks on a steep incline!

## **8. SUMMARY OF POINTS WHY THE PADDOCKS STRATEGIC HOUSING DEVELOPMENT SHOULD BE REFUSED IN CURRENT FORMAT**

- a. The Receiver applying for the Planning Permission does not have the capacity to immediately carry out the development should the planning be granted and indications are that this site will be sold on for increased site value.
- b. Residents had no input to the design and or the compilation of the current Strategic Housing Application.
- c. Local Elected representatives were not notified in accordance with Regulation and Guidelines.
- d. Sufficient knowledge of the area was not presented by Waterford Council at Pre Planning Stage
- e. The Design of the proposed development is not in tandem with the design and density of all current housing estates bordering it.
- f. Site notices were not consistently maintained in situ for the duration of the statutory period.
- g. The intended Strategic Housing Application was NOT advertised in one or more local newspapers.
- h. The Road Sustainability Study was incorrectly carried out at only the entrance junction to the current Paddocks Estate and projections then incorrectly assessed. High traffic delays are the norm for residents in this area during peak hours.
- i. Public Transport servicing the area is NOT fit sufficiently invested in or fit for purpose.
- j. The proposed residential density and design is not in keeping with that in the surrounding estates and the expected development of the area when everyone bought their houses.
- k. Apartment blocks in mixed developments in the surrounding area have not sold and currently remain empty and boarded up.
- l. Proposed new entrance is not sufficiently designed with filter lanes to cope with increased road traffic volumes.
- m. The area is under resourced with community facilities for teenagers.
- n. There is an absence of a sustainable neighborhood or village structure in the Knockboy/Grantstown area of the Williamstown Road.
- o. The current Strategic Housing Application Proposal in its current format is contrary to the Waterford City Development Plan 2013 – 2019 under a number of goals, aspirations, guidelines and spirit of the Plan

## **9. RECOMMENDATION**

Authorising this development with its' current intended residential unit increase of above 50% of the current density enjoyed in the environs would be premature. The decision of the development in its current form must not be made without a new Waterford City & County Development Plan taking the National Planning Framework 2040 into account.

The views of the neighbouring homeowners and residents must be taken into account.

However, it is recognized and recommended that the current Strategic Housing Application only be permitted without the Apartment Block concept and a reduced residential unit density and design taking the surrounding residential estates, traffic management, public transport infrastructure, social and community facilities into account. Neighbouring residents would be happy with a development of approximately 210 to 220 Houses similar to previous Planning Permissions that were in place when they bought their homes!

Submitted for Consideration during the review process by An Bord Pleanala for which I submit my €20 observation fee and a €50 euro fee to request an oral hearing to articulate my case, total €70 enclosed.

**Regards**

**Cllr Eddie Mulligan  
Waterford City East**

Submission Supported by  
Cllr Sharon Carey Waterford City East