Chief Executive's Report on the Submissions and Observations Received on the Draft Wexford County Development Plan 2021-2027

April 2021

BOOK 1

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Comhairle Contae Loch Garman
Wexford County Council

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Section 1 Introduction

1.1 Legislative Requirements

This report has been prepared in accordance with the requirements of Section 12(4) of the Planning and Development Act 2000 (as amended) and is submitted to the Members of Wexford County Council for their consideration as part of the process of preparing the Wexford County Development Plan 2021-2027. The report presents a summary of the issues raised in the submissions and observations received on the Draft Plan and outlines the Chief Executive's response to, and recommendations on, the issues raised therein.

In accordance with Section 12(4) of the Act, the report:

i. Lists the persons or bodies who made submissions or observations.

ii. Summarises the recommendations, submissions and observations made by the Office of the Planning Regulator, and thereafter, the submissions and observations made by other bodies or persons.

iii. Gives the response of the Chief Executive to the issues raised, taking account of:

- any directions of the Members
- the proper planning and sustainable development of the area
- the statutory obligations of any local authority in the area
- any relevant policies or objectives of the Government
- if appropriate, any observations made by the Minister for Arts, Heritage, Gaeltacht and the Islands under subsection (3)(b)(iv).

iv. Summarises the observations, submissions and recommendations made by the Office of the Planning Regulator under section 31AM.

v. Summarises the issues raised and recommendations made by the Southern Regional Assembly in its written submission prepared in accordance with section 27B and outlines the recommendations of the Chief Executive in relation to the manner in which those issues and recommendations should be addressed in the development plan.

1.2 Format of the Report

The Report is divided into six Books.

Book 1 (this Book) is presented in 19 sections as follows:

- Section 1 provides an overview of the current stage of the plan preparation process, the public consultation undertaken on the Draft Plan, details of the submissions and observations received and the legislative framework for consideration of the report by the Members.
- Section 2 provides a summary of the issues raised in the submission of the Office of the Planning Regulator (OPR) and sets out the Chief Executive's response to, and recommendations on, the issues raised in the submission
- Section 3 provides a summary of the issues raised in the submission of the Southern Regional Assembly and sets out the Chief Executive's recommendations on the issues raised therein.
- Section 4 provides a summary of the issues raised in the submission of the Eastern and Midlands Regional Assembly (EMRA) and sets out the Chief Executive's response to, and recommendations on, the issues raised in the submission
- Sections 5-19 provides a summary of the submissions and observations received on Volume 1 Written Statement, chapter by chapter, and sets out the Chief Executive's response to, and recommendations on, the issues raised.

Books 2-5 provide a summary of the submissions and observations received on other Volumes of the Draft Plan, and set out the Chief Executive's response to, and recommendations on, the issues raised, Volume by Volume.

Book 2 deals with submissions on the following Volumes:

- Section 1 - Volume 2 Development Management Manual
- Section 2 – Volume 3 Bunclody Town Settlement Plan
- Section 3 - Volume 3 Rosslare Harbour and Kilrane Settlement Plan
- Section 4 - Volume 3 Castlebridge Settlement Plan
- Section 5 - Volume 3 Rosslare Strand Settlement Plan

- Section 6 - Volume 4 Section 28 Statement of Compliance

Book 3 deals with submissions relating to Volume 5 Record of Protected Structures.

Book 4 deals with submissions relating to the following Volumes:

- Section 1 - Volume 8 Retail Strategy
- Section 2 - Volume 9 Housing Strategy
- Section 3 - Volume 11 Strategic Flood Risk Assessment.

Book 5 deals with submissions relating to Volume 10 Energy Strategy.

Book 6 includes the Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) Screening of the Proposed Material Amendments.

Where amendments are recommended to the Draft Plan by the Chief Executive these recommendations are set out at the end of every section. Where text in the Draft Plan is proposed to be deleted this is shown in ~~strike through text~~ and where additional text and objectives are proposed these are <u>underlined</u>. For Book 3 which deals with submissions relating to Volume 5 Record of Protected Structures the recommendations on whether to add or delete structures are set out in table format.

The Proposed Amendments in the Chief Executive's Report, if made by the Members, will result in some additional formatting (e.g. re-numbering of objectives and consequential wording changes) in the Plan. These formatting changes will be made in the final version of the Plan.

1.3 Current stage of the Plan Preparation Process

This report forms Stage 8 of the Plan preparation process and follows the public display of, and consultation on, the Draft Plan. This stage is highlighted in yellow in Table 1.

Table 1: Stages in the plan preparation process

Stage	Stage
1	Initial public consultation and display of 'Issues Papers'
2	The Chief Executive prepares a report for the Members on the submissions received during the consultation stage and recommends policies to be included in the new Plan. The report is submitted to the Members for their consideration.
3	The Members have 10 weeks to consider the Manager's Report. During this period the Members may issue directions to the Chief Executive with regard to policies to be included in the new Plan.
4	The Chief Executive prepares the pre-draft Development Plan and submits it to the Members.
5	The Members consider the pre-draft Development Plan and make the Draft Plan which will be placed on public display.
6	The Draft Development Plan is prepared for public consultation.
7	The Draft Development Plan is placed on public display for a minimum period of 10 weeks during which time the public and other interested bodies may make written submissions/observations on the Draft Plan.
8	The Chief Executive prepares a report on the submissions/observations received during the public consultation stage. This report will summarise the issues raised and outline the Chief Executive's response to, and recommendations on, the issues.
9	The Members consider the Chief Executive's Report and may decide to amend or make the Plan***
10	If the Members propose to amend the Draft Plan, the amendments are prepared for public display.
11	The proposed amendments are placed on public display for a minimum of 4 weeks during which time the public and other interested bodies may make written submissions/observations on the proposed amendments **only.**
12	The Chief Executive prepares a report on the submissions and observations received on the proposed amendments. This report will summarise the issues

	raised and outline the Chief Executive's response to, and recommendations on, the issues.
13	The Members consider the Chief Executive's Report and make the Plan with or without the proposed amendments.
****There is provision for the Chief Executive to order an additional period to carry out an Appropriate Assessment and/or Strategic Environmental Assessment of material amendments to the Draft Plan.*	

1.4 Public Consultation on the Draft Plan

1.4.1 Public display

The Draft Plan was placed on public display from Monday, 28th September 2020 to 4pm on Wednesday, 9th December 2020. Notice of the publication of the Draft Plan was given in the local newspapers and on www.wexford.ie , the Council's Twitter page and MapAlerter.

The Draft Plan was available to view online at https://consult.wexfordcoco.ie/ and by appointment at the Planning Department in County Hall and at public libraries in Wexford, New Ross, Enniscorthy, Gorey and Bunclody. Hard copies of the Draft Plan were also made available to purchase.

During Level 3 Covid-19 protocols, the libraries reverted to online and click and collect services only and copies of the Draft Plan were available to lend by prior arrangement. The Draft Plan remained available to view at https://consult.wexfordcoco.ie/ and by appointment at the Planning Department in County Hall.

During Level 5 Covid-19 protocols, the Draft Plan was no longer on public display in, or available to borrow from, Wexford County Council public libraries. The Draft Plan remained available to view at https://consult.wexfordcoco.ie/ and by appointment at the Planning Department in County Hall.

Written submissions and observations were invited online via the Wexford County Council Online Consultation Portal https://consult.wexfordcoco.ie/ or in hard copy by post.

1.4.2 Prescribed Authorities, Infrastructure Providers and Stakeholders

The Draft Plan was sent to the relevant prescribed authorities and environmental authorities. It was also sent to infrastructure providers and stakeholders who play a role in the delivery of key infrastructure and facilities in the County.

1.4.3 Public Consultation Evenings

A number of online consultation meetings were held during the course of the public display period following requests from environmental groups, the public and stakeholders.

1.5 Submissions and Observations

The Planning Authority received 168 submissions and observations which were deemed to be have been received within the consultation period. Table 2 lists the persons and bodies who made submissions or observations and the main issues raised.

Table 2 List of persons and bodies who made submissions or observations

Submission Number WXF-C3-	Name of Person/Body
1	Naomi Kloss
2	Eamonn O'Connor
3	Peter Branigan
4	Richard Gem
5	John Gregg
6	John Devereux
7	Ann Furlong
8	Theresa Somers
9	N/A
10	Geological Survey, Ireland
11	David Quinn
12	Maurice Treacy
13	Sarah Fleming
14	Our Lady of Lourdes N.S, Bunclody Town

Submission Number WXF-C3-	Name of Person/Body
15	Sandra Henry - Cherish Project
16	Tony Dennison
17	Simon and Áine Donohoe
18	Patrick Lynch
19	Eastern and Midland Regional Assembly
20	Brian Toomey
21	Naomi Kloss
22	Brian Toomey
23	N/A
24	Environmental Protection Agency
25	An Post
26	Clonattin Residents Association
27	Nicholas Power
28	Anne Dunne
29	Wexford Healthy County Committee
30	Rosslare Development Association
31	Helen Flood & Paul Flood
32	O'Leary International
33	Department of Transport
34	Transport Infrastructure Ireland
35	Jim Hurley
36	Mr Donohoe
37	Tracy McGuinness
38	Michael Breen
39	Ballygilliane Residents Association
40	Jenny Balfe
41	Oisín O' Conail
42	Alice Denner
43	Courtown Community Council

Submission Number WXF-C3-	Name of Person/Body
44	Courtown Community Council
45	Kenneth & Julie Chapman
46	Gerard Larkin
47	Gerard Larkin
48	Courtown Community Council
49	Noel Cleary & Murt Fleming
50	Joseph Ferguson & Marcella Ferguson
51	Sports Active Wexford
52	Nutricia Infant Nutrition Ltd
53	Nova Connect
54	Executors in the Estate of the late Marie Frizelle
55	Greenville Court Residents Group
56	Conor Murphy
57	William J. Mernagh
58	John Redmond
59	Stephen O'Brien
60	Sean Browne
61	Kieran Dunne
62	WexBUG
63	Peter Branigan
64	Construction Industry Federation
65	Department of Transport
66	Glanbia Ireland
67	Martin Sinnott
68	Matthew Roche
69	Camolin Town Team
70	Re-Imagining Enniscorthy Town Team
71	Eddie Bolger
72	Office of Public Works

Submission Number WXF-C3-	Name of Person/Body
73	Denis Cronin
74	Noel Heatley
75	Seal Rescue Ireland
76	Peter Crean
77	Harmony Solar
78	Cúl na Gréine Residents Association
79	Seal Rescue Ireland
80	O'Leary Sludds Architects on behalf of Billy Mythen
81	Dara Ward
82	Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media
83	Nicholas Kehoe
84	Owen Dunbar
85	Wexford PPN
86	Jean Gregg
87	Debbie Ewing
88	William Dunbar
89	Jean Gregg on behalf of Pat Gregg
90	Fiona O'Shea
91	Niall Fortune on behalf of Clohamon Development Group
92	Paula Redmond
93	Barty O'Connor
94	Wexford Environmental Network
95	Niall Fortune
96	Gas Networks Ireland
97	Ian Doyle on behalf of John Kehoe
98	Monika O'Brien
99	Roadstone Ltd

Submission Number WXF-C3-	Name of Person/Body
100	Ian Doyle on behalf of Bigwood Properties
101	Róisín Markham
102	Trish Crowe
103	Mary Colbert
104	Rory Fanning, Slaney Foods
105	National Transport Authority
106	Sinead Dowling
107	P Flood and Sylvia Flood
108	Carr and O'Connor
109	3 Counties Energy Agency
110	Tara Hill Development Association
111	Claire Langrell
112	Cathal Byrne on behalf of Barry Donohoe
113	Anthony Mullen
114	Stephanie Byrne
115	Department of Education
116	Coillte
117	Michéal Mahon
118	Carr and Conroy
119	Martina Byrne
120	Róisín Markham
121	Eoghan Ó Mathúna
122	Owen Dunbar
123	Ann Walsh
124	Kenneth Chapman
125	CoAnt Developments
126	Ambrose Dowling
127	South East Track
128	Joe Bonner Planning Consultant on behalf of Damien Culloton

Submission Number WXF-C3-	Name of Person/Body
129	Danny Forde
130	Joseph Ferguson and Marcella Ferguson
131	Joe Bonner on behalf of Tom and Pat Redmond
132	Barry Donohoe
133	Paul Kehoe on behalf of Barry Donohoe
134	Irish Water
135	ESB
136	IWEA (Irish Wind Energy Association)
137	Southern Regional Assembly
138	Ferns Development Association
139	Darran Quinn QR Properties
140	Murt Joyce
141	Tesco Ireland
142	HSE
143	An Taisce
144	Terra Solar
145	Iarnroad Éireann
146	Wexford Greens
147	Oisín Ó Conail
148	Ballymoney Community Group
149	Colm Callery
150	Patsy Cosgrave
151	Keep Ireland Open
152	Barry Murphy
153	Helen Corish Wylde and Cllr David Hynes
154	Frances O'Grady
155	Mahon Fox
156	Larry Dunne

Submission Number WXF-C3-	Name of Person/Body
157	Larry Dunne
158	Michael Molloy
159	Michael Molloy
160	Michael Molloy
161	Michael Molloy
162	Michael Molloy
163	Michael Molloy
164	Office of the Planning Regulator
165	Ciaran Breen
166	Fáilte Ireland
167	Eirgrid
168	SSE Electricity
169	Karin Dubsky
170	Seamus O'Hagan

1.6 Consideration of the Chief Executive's Report

In accordance with Section 12 (5) of the Act, the Members shall consider the Draft Plan and the report of the Chief Executive and this consideration shall be completed within 12 weeks of the submission of the Chief Executive's Report to the Members.

It should be noted that where the Planning Authority, after considering a submission of, or observation or recommendation from the OPR or the Southern Regional Assembly, decides not to comply with any recommendation made it shall so inform the OPR and/or Southern Regional Assembly, as the case may be, as soon as practicable by notice in writing and the notice shall contain the reasons for the decision.

Following consideration of the Draft Plan and the Chief Executive's Report, the Members may, by resolution accept or amend the Draft Plan. Where it is proposed to make material amendments to the Draft Plan, the proposed material amendments must be placed on

public display for period of not less than four weeks, during which time submissions and observations may be made on the proposed amendments only. A further modification to an amendment may only be made where it is minor in nature.

In accordance with Section 31AM (6) of the Act, the Planning Authority shall notify the OPR within 5 working days of the making of the Plan and send a copy of the written statement and maps as duly made. Where the Planning Authority decides not to comply with any recommendations made in the report of the OPR, or otherwise make the Plan in such a manner as to be inconsistent with any recommendation made by the OPR, then the Chief Executive shall inform the Office accordingly in writing and give the reasons for the decision.

Section 2 WXF-C3-164 Office of the Planning Regulator

2.1 Introduction

WXF-C3-164, the submission of the Office of the Planning Regulator (OPR), was made in accordance with Sections 31AM of the Planning and Development Act, 2000 (as amended).

Section 2.2 contains the OPR's Recommendations and Observations and provides the Chief Executive's Response to each Recommendation and Observation. Where necessary it also provides a summary of the commentary that prefaces the Recommendation/Observation.

Sections 2.3 contains the Chief Executive's recommended amendments to the Draft Plan arising from this submission.

The OPR submission is prefaced by a General Comments section, followed by Recommendations and Observations set out under eight themes:

- Core Strategy and Settlement Hierarchy;
- Compact Growth, Regeneration and Approach to Land Use zoning;
- Rural Housing and Regeneration;
- Economic Development and Employment (including retail);
- Sustainable Transport and Accessibility;
- Climate Action and Energy;
- Environment, Heritage and Amenities; and
- General and procedural matters

2.2 Summary of Issues Raised and Chief Executive's Response

OPR - Preface and General Comments

The OPR acknowledge the considerable and evident work the planning authority has put in to the preparation of the Draft Plan. The OPR state that they have examined the Draft Plan under Section 31AM (1) and (2) of the Act.

The OPR notes that:

The pattern of development in County Wexford in recent times has been disproportionately influenced by Dublin generated commuting in areas proximate to the M11 corridor, rather than self-sustaining development centred around its historic town and rural structure such as the Wexford to New Ross and Enniscorthy triangle.

Coupled to that, it would appear that recent decades have witnessed a rapid and spatially extensive proliferation of locally quite substantial housing developments, mostly commuter based, added on to a very wide range of small villages and rural clusters, often in the absence of enabling infrastructure, especially water services. This has led to very serious legacy issues with Developer Provided Infrastructure.

The risk, accordingly, is that if the plan as presently drafted remains, at the end of the plan period, Wexford will:

- Continue to experience a drift of development northwards up the M11;
- Not realise the considerable potential of its maritime Viking towns, which will continue to stagnate;
- See a continued expansion of inappropriately scaled and located housing development in locations ill-served to accommodate such growth, particularly from a water services perspective; and
- Continue to move down the path of a pattern and form of development that is particularly car-dependent, energy intensive and extremely difficult to service with public transport in any coherent and competitive manner.

Chief Executive's Response - Preface and General Comments

Wexford has indeed been disproportionately influenced by Dublin generated commuting in areas proximate to the M11 corridor as a result of the lack of affordable or appropriate housing solutions for people who work in Dublin. This has resulted in a serious issue in the local housing market whereby local residents are competing with those who are unable to access dwellings in Dublin. The settlements within an easy commute of Dublin will continue

to be under pressure to accommodate Dublin related growth until such time as housing supply and affordability issues are addressed in the Dublin region.

While controlling the allocation of growth/quantum of zoning in settlements within influence of the M11 will ensure that these settlements do not grow to accommodate market demand generated by natural growth and in-migration, it will not ensure that the people working locally are accommodated or indeed that the new dwellings will not be occupied by persons commuting.

During the period between 1996 and 2006, when there were housing demand/supply pressures at national level, housing developments were constructed in some smaller towns and villages in County Wexford. In some instances these developments were serviced with developer provided infrastructure. This development was permitted at a time when Councils were being urged to progress house building to address housing supply pressures and when no sewage capacity was available in Wexford, Enniscorthy and Gorey towns. The developer provided infrastructure referred to (which has not been permitted in County Wexford for almost a decade) was permitted in accordance with EPA Guidance for such infrastructure. Notwithstanding that this policy document or type of infrastructure is not referenced in the Draft Plan for residential development, the Council note that this guidance is still the prevailing guidelines, and which continues to be used to permit development by other Councils.

Core Strategy and Settlement Hierarchy

OPR Recommendation 1 - Population Distribution on Settlement Hierarchy

The OPR state that the distribution of population growth across the Settlement Hierarchy represents a continuation of the existing pattern of development (referred to above) and does not provide a strategy that sufficiently reflects the policies and objectives of the National Planning Framework (NPF) and Regional Spatial and Economic Strategy (RSES) on compact growth and reversal of rural decline in villages as set out in National Planning Objectives – NPO 3, 6, 7, 16, 18a and Regional Planning Objectives – RPO 3, 34, 35. It is stated that there should be a greater focus on Levels 2, 3 and 4 on the Settlement Hierarchy, focusing on settlements with adequate infrastructure capacity. It is noted particularly that

the growth allocated to Levels 5, 6 and Level 7 Open Countryside is greater than that allocated to Levels 2, 3 and 4. It is considered that there is a disproportionate allocation to these levels.

Text of Recommendation 1

The planning authority is required to revisit, in an evidence-based approach, the distribution of new population growth across the seven tiers of the settlement hierarchy to ensure greater alignment between the Draft Plan's stated Core Strategy Guiding Principles including, in particular, E-Compact Growth and liveable sustainable settlements, F-Regeneration and J-Vibrant rural areas and the allocation of growth. Specifically, additional growth should be allocated upwards to Levels 2-4 from lower tiers 6-7.

Recommendation 1 - Chief Executive's Response

The apportionment of future growth is the direct result of the application by the Council of NPO 9 and RPO 3 and RPO 11a.

NPO9 requires that:

In each Regional Assembly area, settlements not identified in Policy 2a or 2b of this Framework, may be identified for significant (i.e. 30% or more above 2016 population levels) rates of population growth at regional and local planning stages, provided this is subject to:

- Agreement (regional assembly, metropolitan area and/or local authority as appropriate);
- Balance with strategies for other urban and rural areas (regional assembly, metropolitan area and/or local authority as appropriate), which means that the totality of planned population growth has to be in line with the overall growth target.; and
- A co-ordinated strategy that ensures alignment with investment in infrastructure and the provision of employment, together with supporting amenities and services.

RPO 11(a) states that:

Local Authorities are supported in targeting growth of more than 30% for each Key Town subject to capacity analysis and sustainable criteria under Section 3.3 A Tailored Approach, RPO 3 Local Authority Core Strategies and the sustainable requirements under the following sub sections of RPO 11 Key Towns. The appropriate level of growth is to be determined by the Core Strategy of Development Plans.

Accordingly, the Council allocated 30% or less to all settlements in Levels 2-4 of in the Hierarchy other than the Key Towns[1]. Following the application of a capacity test to all settlements during the preparation of Draft Plan, it was decided to allocate 30% growth to settlements with adequate infrastructural capacity and to allocate less than 30% growth to settlements where infrastructure capacity was not adequate.

The sum of these maximum allocations for Levels 2-4 (plus what was considered an appropriate allocation for Level 1) was subtracted from the total County allocation in the NPF Roadmap. The allocation to Levels 5-7 is by default that remainder and it is high as a direct result of being limited to allocating a maximum 30% to any individual settlements not identified in the RSES. Table B.1 in the Appendix B demonstrates the application of these percentages in the Draft Plan and the resulting distribution on the hierarchy.

Notwithstanding, the Council is happy to allocate increased population from Levels 5, 6 and Level 7 Open Countryside further up the Settlement Hierarchy. In order to do this, while not exceeding 30% growth to 2040, it will require front loading of population growth for settlements that have infrastructural capacity. In the longer term it may require increasing population above 30% in some settlements – this will be reviewed at the next plan period.

[1] With the exception of Rosslare Harbour and Kilmore Quay where an allocation of 40% was allocated due to the specific economic port/harbour function of these settlements.

While the OPR state that there should be a greater emphasis on Levels 2, 3 and 4, the potential to allocate to Level and 3 and 4 settlements is limited by available infrastructural capacities. In this regard:

- Of the 14 settlements at Level 3 three do not have wastewater capacity; and
- Of the 24 settlements at Level 4, eight do not have wastewater capacity.

Further to this, front loading growth in some Level 3 settlements is not considered appropriate as these settlements were placed on this level in order to target economic/employment, social and infrastructural growth (and not population growth) to enable them to progress as self-sustaining settlements.

The Council has carefully reviewed each individual settlement at Level 3 and 4 and considers that it has allocated the maximum number of households that the settlements would be able to assimilate during the lifetime of the plan.

Accordingly, having regard to the forgoing, and the current distribution of population in the County (with a significant majority of the population residing in settlements below 1,500 persons), achieving a substantial shift in population away from Levels 6 and 7 can only be achieved by allocating more population primarily to Levels 1 and 2 on the Settlement Hierarchy.

Level 1 -Wexford Town

It is appropriate to target significant growth to Wexford Town as the County Town and administrative capital of the County. It is identified in the RSES as one of six Key Towns that have major populations, are major centres for delivery of public services, have third level institutions, have national government functions, significant economic functions and high order retail roles. The RSES notes that these Key Towns function as self-sustaining regional drivers which have a comparable role to the five regional growth centres identified in the NPF. Wexford Town has a high quality public realm, rich cultural, heritage and recreational and sporting amenities. It has a campus of IT Carlow and will host a campus of the Technological University of the South East. It is an important location for employment and

economic uses, has a strong and developing professional and financial services sector and strong retail and tourism sectors. It has a jobs-ratio of 1.551.

The Council has been proactive in the regeneration and development of the town including the new Min Ryan Park, the redesign of the quay front and the successful application for planning permission and URDF grant funding for a substantial mixed use development/urban quarter at Trinity Wharf on a centrally located brownfield site.

It is recommended to increase the percentage growth in Wexford Town from 40% to 45% up to 2040 (with 29% to 2027). This is considered justified and in line with the RSES. However, due to the incorporation of the new Section 28 Housing Supply Targets Methodology for Development Planning – Guidelines for Planning Authorities (published in December, 2020) and hereon referred to as the HST and the differences in the treatment of households as a result of OPR Recommendation 5, while population allocation has been increased, household numbers and zoning has decreased. The implementation of the HST Guidelines is discussed further in Chapter 4 Sustainable Housing and Volume 9 Housing Strategy.

Level 1 – Gorey Town

The RSES identifies Gorey town as one of a network of eight supporting Key Towns that will play a significant role in strengthening the urban structure of the region. These towns were selected based on their strategic location and influence, record of performance and delivery, employment and service function, potential for economic led growth. Gorey is a thriving town, with an attractive public realm, a regional reputation for high quality boutiques retail, a thriving cultural scene and abundant high-quality amenities. Physical, social and recreational amenity infrastructure has comfortably kept pace with residential development, meaning that it is a very attractive and liveable place. Furthermore, notwithstanding its location in such close proximity to the M11 and Dublin, it is a self-sustaining town with a jobs-ratio of 0.967. This ratio will have significantly improved with recent additions to the town's employer profile.

Demographic indicators for Gorey show a town and Municipal District performing well (see Socio-Economic Profiles – AIRO 2018 | Wexford County Council). The Health Check, Shopper

and Household surveys carried out for the Retail Strategy found satisfaction level with the amenities, facilities and retail function of the town to be very high.

The Council has been proactive in the town's development, providing state of the art civic offices and library, a new district level park and The Avenue public realm project. The Council has also progressed the site amalgamation/compulsory purchase of the Market House in the town centre to facilitate its redevelopment. It has also recently completed the consent process for the redesign of Esmonde Street (the town's renowned boutique street) which includes innovative smart and sustainable travel related elements. The Council, in partnership, also delivered the M11 Business Campus. Located close within walking distance of the town centre and train station, this campus - houses the Hatch Lab which is an incubation/training/mentoring unit for start-ups operated by the Council. It also contains a number of large employers and high quality remote working facilities.

Having regard to the foregoing, it is proposed to increase the population allocation to Gorey Town from 35% to 40% up to 2040 (with 27% to 2027). This is considered justified in line with the objectives of the RSES. However, as a result of new HST figures and the difference in the treatment of households as a result of OPR Recommendation 5, while population allocation has increased, household numbers and zoning has decreased.

Level 2 – Enniscorthy Town

Following a review of the capacity test (See Appendix A) additional growth has also been targeted to Enniscorthy. However, this growth is more tempered as:

- It is not targeted for growth over 30% in the RSES;
- The recent M11 By-pass will mean it will be subject to pressure for commuter-based housing;
- It does not have the range of facilities envisaged under the Guiding Principles associated with RPO 3, e.g. third level facilities, and
- It has seen quite significant residential development (and permissions) in the last six years

In line with the RSES, 30% growth has been allocated to Enniscorthy Town to 2040 (with 21% to 2027).

Level 2 – New Ross Town

The Council also examined the growth allocated to New Ross Town in the Draft Plan with a view to increasing the population allocation. However, similar to Enniscorthy Town:

- It is not targeted for growth over 30% in the RSES; and
- It does not have the range of facilities envisaged under the Guiding Principles associated with RPO 3 e.g. third level facilities

Furthermore, the evidence examined indicated that the allocation in the Draft Plan was unlikely to be achieved during the plan period due to longitudinal growth patterns. Market demand and delivery of housing units in New Ross is low, with only 109 units granted permission in the town in the last five years. It is considered that growth arising from New Ross being a hinterland town of Waterford Metropolitan Spatial Area Plan (MASP) will not be realised until the MASP policies have time to take effect.
Accordingly, as for the Draft Plan and in line with the RSES, it proposed to retain the 30% growth up to 2040. It is recommended that the growth for the period 2021 -2027 be reduced to 10%. The number of households provided for is more than 2.5 times that the number granted in the last plan period.

Table A.1 in Appendix A details the capacity assessment that has been applied to settlements to inform both the rank of settlements on the hierarchy and the appropriate level of growth for each settlement. Table B.1 in the Appendix B provides the percentage growth that was allocated to each settlement in the Draft Plan and provides the comparative percentages now proposed as a result of OPR Recommendation 1.

The proposed amendments to Table 3.3 Allocation of Population to the Settlement Hierarchy and Table 3.4 Core Strategy Population Allocations and Housing Lands are set out under the Chief Executive's Recommendations.

OPR Recommendation 2 – Settlement Hierarchy

Regarding the Settlement Hierarchy, the OPR notes that:

- Levels 1 and 2 are considered consistent with the NPF and RSES;
- Level 3 has internal tiers with six settlements in excess 1,500 persons and eight smaller settlements with populations less than 500 persons; and
- Level 5 contain 15 settlements ranging in size from 126-524 persons.

While the OPR recognises that size alone is not the governing factor and that other social, economic and environmental factors must be considered , it nonetheless considers that there is significant discord internally within Level 3 and lower levels of the hierarchy that warrants reconsideration to ensure consistency with NPOs 3, 6, 7, 16, 18a and RPOs 3, 34 and 35.

Text of Recommendation 2

The planning authority is required to revisit, in an evidenced based approach, the settlement hierarchy and typology having regard to the RSES settlement typology (table 3.2) and the guiding principles set out in RPO 3. Consideration should be given to:

- Scale of population and its existing performance
- Extent to which a settlement is located inside or outside Waterford city-region catchment
- Scale of employment provision, number of jobs, jobs-to-resident workers ratio and net commuting flows;
- Compliance with the NPF (NPO 72) on a standardised, tiered approach to zoning
- Availability and deliverability of lands
- Compact growth targets
- Extent of local services and amenities provision, particularly higher education institutes, health, leisure and retail
- Extent to which sustainable modes of travel can be encouraged (walking, cycling or public transport)
- Rate and pace of past development and the extent to which there are outstanding requirements for infrastructure and amenities

- Accessibility and influence in a regional or sub-regional context
- Character of local geography and accessibility as a service centre for remote and long-distance rural hinterlands.

Chief Executive's Response – Recommendation 2

The OPR's reference to Table 3.2 Settlement Typologies in the RSES is noted. The Council is of the view that this table is not intended to be literally interpreted but rather the RSES states that 'When allocating for future growth in the Core Strategy of each city and county development plan, the Region's local authorities will have regard to the settlement typology' and apply the associated guiding principles. The RSES further recognises that the 'Towns and Villages' typology is broad and ranges from large commuter towns to more remote towns and villages. The potential and capacity for growth of settlements within this typology varies significantly across the region. The RSES envisaged that this would be decided at Development Plan level.

It is confirmed that, as stated in Section 3.3.2 of the Draft Plan, the Council had regard to the tailored approach and the guiding principles contained in Section 3.3 of the RSES when deciding on the settlement hierarchy.

The guiding principles cited by the OPR from RPO 3 are noted. However, it is important to state the following in relation to some of those principles cited:

- Regarding bullet 1 above which refers to scale of population, only nine settlements in the County have a population over 1,500 persons (and 100 settlements are below this size). In order to accommodate population growth which will achieve a proportional shift from rural areas to settlements without exceeding the growth capacity of the nine settlements, additional settlements will need to be prioritised for growth.
- Regarding bullet 2 above which refers to proximity to the MASP, while New Ross is a designated hinterland town to Waterford MASP, Ballyhack ED is the only ED in the County within the City Region of Waterford[1].

[1] Using the EU/OECD definition of a City Region

- Regarding bullet 7 above which refers to third level education, such institutions are limited to Wexford Town and Gorey Town.

Furthermore, there are other guiding principles in RPO 3which have not been cited by the OPR and are of particular relevance to rural counties like Wexford including:

- Track record of performance and delivery, as well as ambition and scope to leverage investment;
- Environmental and infrastructural constraints; and
- The need for attractive, alternative options to rural housing within smaller towns and villages.

All the principles of RPO 3 were used in the formulation of the tailored guiding principles set out in Section 3.4 of the Draft Plan. These tailored principles are deemed of primary importance to having regard to:

- The implementation of NPF including NPOs 3, 6, 16, 18a;
- The implementation of the RSES including RPOs 3, 34 and 35; and
- The Council's in-depth knowledge of the settlements in the County and their capacity and potential for growth.

In line with guiding principles E. Compact and Liveable Settlements, F. Regeneration, G. Address Legacies and J. Vibrant Rural Areas some settlements were given a rank of Level 3 or Level 4 not because of their size (or in order to facilitate growth in population) but in order to:

- Prioritise their development to fulfil and support their sub-county role as service centres to a wider rural hinterland;
- Prioritise growth of services and infrastructures in settlements where growth in these facilities and services has not kept pace with the development of housing;
- Provide a spatial balance of strong settlements, particularly in areas where with a weak settlement structure or d) provide an alternative to one off housing in areas under urban pressure; and

- Regenerate villages in areas with potential for development related to tourism or rural diversification.

Therefore, while some of the settlements are small, their function is very important to the proper planning and sustainable development of the county. For example, Wellingtonbridge with a population of 127 was selected as a Level 3 settlement for several reasons:

- It is estimated that there are in excess of 250 jobs in the settlement;
- It serves a strategic service function for a large rural catchment. The settlement and its rural catchment are outside the 20-minute isochrones of the four main towns. For this reason, it has developed a significant retail function (sixth in the County) and it is thriving commercially in serving its wide hinterland;
- It is located on the (disused) Rosslare Europort-Waterford railway line, the Norman Way and Eurovelo routes, and
- It is located at the gateway to the heritage rich Bannow Bay and Hook peninsular areas and has tremendous potential for associated regeneration and growth.

At present, while the settlement has abundant potential for sustainable, regenerative growth it has limited wastewater treatment capacity and thus there can be no development at present. Prioritising it on the Settlement Hierarchy will ensure plan-led infrastructure growth.

Settlements such as Courtown and Riverchapel, Bridgetown and Taghmon are placed at Level 3 to prioritise growth in physical and social infrastructure and services rather than population. These settlements are characterised by low HP Deprivation scores. This policy position is reflected in the objectives of the LECP and work of the LCDC in supporting and prioritising the growth of infrastructures, services and amenities in these settlements.

The Level 3 settlements will remain the Council's priority for growth (whether services or population) over the lifetime of the plan. Notwithstanding, having regard to OPR's Recommendation No. 3, it is recommended that Level 3 be amended as follows:

- Level 3a will be referred to as Service Settlements and are the larger sized settlements; and

- Level 3b will be referred to as Strategic Settlements and are the smaller sized settlements.

Within Level 4 and below it is considered that the level of population variance is not significant relative to the settlements and their functions and as such these have not been adjusted, and no amendment is proposed.

OPR Recommendation 3 – Development Approach for Settlements

The OPR welcomes the intention to prepare local area plans (LAP) for all Level 1 and 2 settlements in keeping with the requirements of the Act. The OPR notes that within Level 3 there are a mix of policy tools and frameworks to guide development within those service settlements:

- Four settlements are/were subject to LAPs - Clonroche, Courtown and Riverchapel Taghmon, and Ferns;
- Two settlements (Bunclody and Rosslare Harbour) are addressed in Volume 3 with a settlement plan and land use zoning;
- Two settlements are included in Volume 3 with a settlement plan and without land use zoning;
- There are no settlement maps, land use zoning or development boundaries for many of the Level 3 settlements or any of the Level 4 or 5 settlements; and
- The Draft Plan identifies 34 rural nodes and there is no map to indicate their location even if it is not deemed necessary to identify a development envelope

The inconsistency of approach, lack of settlement boundaries and land use zoning has the potential to lead to public confusion and provides a weak framework for the implementation of the plan's policy framework or monitoring the success of same. This is particularly important in the context of compact growth and regeneration including NPO 3, 6, 1, 16, 18a and RPOs 3, 34, 35.

Text of Recommendation 3

The planning authority is required to revisit the development approach for the settlements set out in Section 3.6 of the draft plan and provide a strategic and structured approach to the implementation of the plan's policy framework, and to ensure consistency with NPOs 3, 6, 7 and RPOs 3, 34, 35. Consideration should be given to the following:

a) Land use zoning maps for level 3 settlements
b) Settlement maps defining the settlement boundary and including specific local objectives e.g. village core area, focal spaces, amenities, opportunity sites etc. for all level 4 and 5 settlements
c) Composite map showing the location of all rural nodes (level 6).

Chief Executive's Response - Recommendation 3

The Planning and Development Act 2000 (as amended) requires the preparation of LAPs for all settlements with a population above 5,000 persons and requires the preparation of objectives for inclusion in the County Development Plan (or LAPs) for all settlements over 1,500 persons. This has been complied with. The forthcoming Development Plan Guidelines afford an opportunity to provide guidance on the planning policy frameworks which may be appropriate at the various levels in the settlement hierarchy and the Council looks forward to their release.

There is merit in achieving consistency in planning policy frameworks among the levels of the settlement hierarchy. The OPR's request however requires the preparation of:

- Land use zoning maps and objectives for 11 settlements; and
- Settlement boundary maps and specific objectives for 57 settlements.

It is not in feasible to carry out this work within the timeframe available. The preparation of land use zoning and objective maps is a detailed process that involves:

- Desktop studies including planning histories, land ownership patterns and constraints and sensitivities such as monuments, Natura 2000 sites, local biodiversity, monuments and Protected Structures;

- Consultation with internal departments of the Council to establish emerging plans and projects;
- Land use surveys and surveys of existing roads, footpaths and lighting
- assessment of needs including the need for new road links, amenities and infrastructures;
- The development of a tiered approach to zoning informed by an Infrastructural Assessment Report (IAR), which in itself is prepared following consultation with internal departments and Irish Water;
- The carrying out Strategic Flood Risk Assessment to inform the zoning of land. The requires the carrying out of detailed modelling to inform flood zone mapping (where not available). Site visits are required to carry out channel surveys to inform this modelling...
- Strategic Environmental Assessment and Appropriate Assessment including the gathering of baseline information and detailed assessment of zoning and individual objectives; and
- Consultation with communities in the development of objectives at all plan stages.

Similarly, the development of village boundaries and associated objectives (without zoning) requires desktop and on-site surveys, infrastructure capacity and needs assessments, the development of proposals/objectives, environment assessments and internal and community consultation at the appropriate stages in the plan process.

In both cases this work is more difficult at present due to operational issues and issues with health and safety arising from Covid-19.

It is considered that doing this work without the necessary time or attention to detail would have a detrimental impact on these settlements in the long term. Having regard to the limited number of planning applications in these settlements, proper planning and sustainable development would be best served by the area planners determining the relevant boundaries on a case by case basis until such time as this work can be given the appropriate attention.

However, in the long term it is accepted that this would be a positive development and it is recommended that the additional objectives are included in the Draft Plan:

- To prepare Settlement Plans for Level 3a settlements;
- To prepare boundaries and objectives for Level 3b settlements; and
- To prepare settlement boundaries for Level 4 and 5 settlements.

A composite map of all settlements, including Rural Nodes, (Figure 3.2) has been prepared as requested (See Appendix C) and it is recommended that this map be included in the Draft Plan.

Compact Growth, Regeneration and Approach to Land Use Zoning

OPR Recommendation 4 - Compact Growth - Development within built-up footprints

It is an objective of the NPF (NPO 3c) that 30% of all new homes are delivered within the existing built up footprint of settlements. The OPR welcomes that compact growth and regeneration is included in the Core Strategy, the Towns and Villages Chapter and the Housing Chapter. OPR recognises that while the detailed task of land use zoning will, by and large, be undertaken at the review of the various LAPs following adoption of the County Development Plan, greater clarity and direction as to how these objectives will be achieved is required in order to ensure the Draft Plan is consistent with both the NPF (NPO 3) and RSES (RPO 34 and 35).

Text of Recommendation 4

In order to ensure that the delivery of 30% of all new homes targeted within settlements is provided within their existing built-up footprints, and for consistency with NPO 3 and RPOs 34- 35, it is required that the development plan defines the planning authority is required to define in its development plan (sic) the areas within the county's settlements that will contribute to this target and include details of same in core strategy table 3.4.

In this context, the planning authority should have regard to the definition of brownfield and the range of infill development provided for under the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009).

Chief Executive's Response - Recommendation 4

The Council had regard to the requirement to deliver 30% of all new homes within the existing built-up footprint of the settlements (as required by NPO 3) and included appropriate objectives in the Draft Plan to deliver this objective (Objective CS05) and to identify appropriate sites at LAP level (Objective TV33). Notwithstanding, it is considered appropriate to strengthen the commitment to deliver these units and provide definitions of the types of locations/land where the achievement of this objective will be realised. It is recommended that narrative is added to Section 3.7.2 and that it is linked to Section 5.9.1 which deals with infill and regeneration. It is also recommended that narrative is added to Section 5.9.1 to include:

- A definition of brownfield land; and
- Details of the range of types of infill lands

Having regard to the fact that additional settlement plans will be prepared as result of OPR Recommendation 3, it is recommended that Objectives TV33 and TV34 are amended to refer to the identification of appropriate sites when such plans are being prepared.
The request to include details of the delivery of homes on infill and brownfield sites within the Core Strategy table is noted. However, in advance of the preparation of the LAPs or settlement plans it is not possible to assign figures to settlements due to the varying availability of sites and constraints in individual settlements. Notwithstanding, it is proposed to introduce a figure to the Core Strategy at detailing the total number of units to be delivered within the built-up footprint of the various settlements.

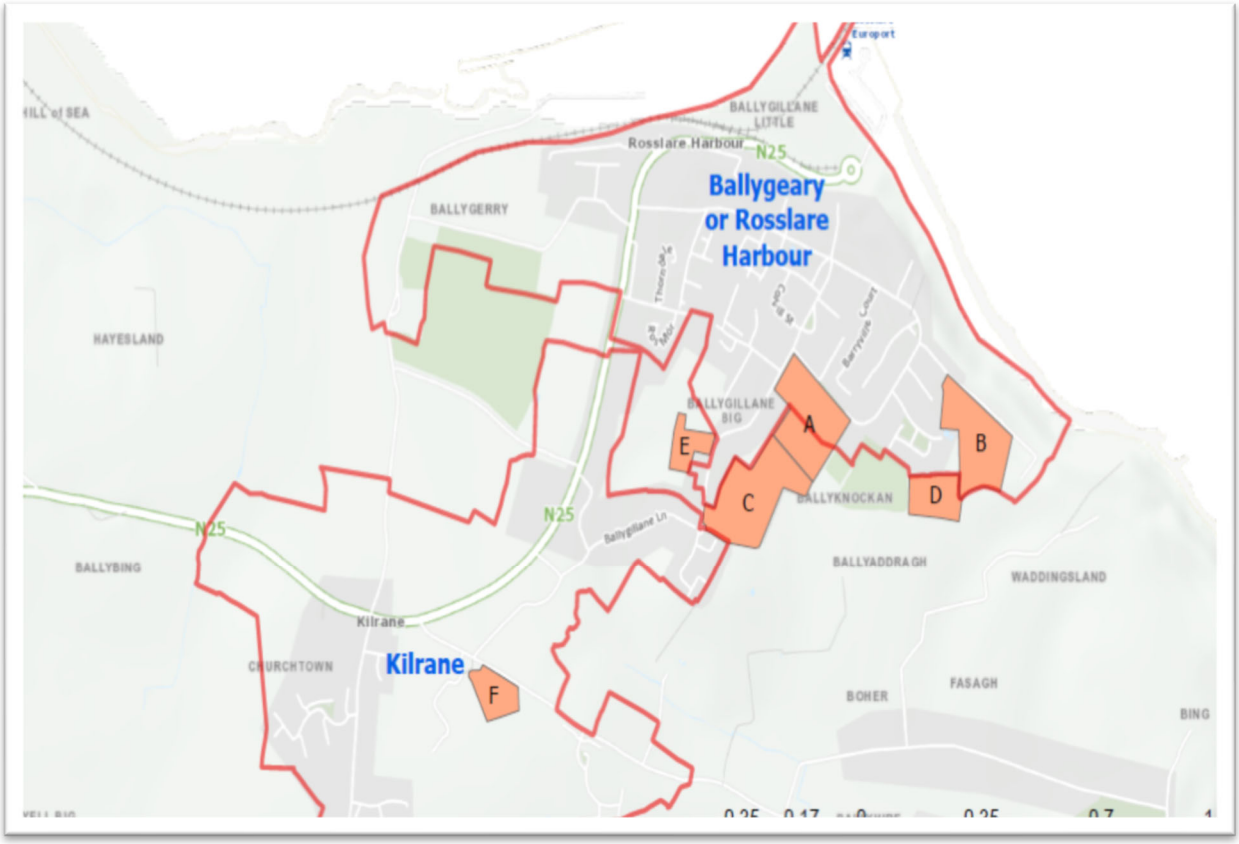
Regarding Rosslare Harbour and Kilrane, it is noted that the delivery of residences on central infill sites will be limited for a few reasons including:

- There is an emerging masterplan for the redevelopment of the Europort;
- Significant infrastructural upgrades will be delivered during the lifetime of the plan including the delivery of the Europort Access Road;
- A number of sites that have become available within the built up area are and will be used for port-related activity (such as the recently constructed customs facility to deal with matters arising from Brexit), and

- A number of significant sites in the centre of the village have existing permissions /proposals for their redevelopment which are principally commercial development without residential elements.

Figure 1-1 below shows the Census settlement boundary for Rosslare Harbour and Kilrane and the parcels of land zoned for residential use in Phase 1 (the current plan period).

Figure 1.1 Rosslare Harbour and Kilrane CSO Census Settlement Boundary and Land Zoned for Residential Use



In this regard is should be noted that:

- No residential units were delivered in the Village Centre land use zoning during the last plan period. While there are some vacant hotels these sites are not likely to come forward for residential use. One hotel has a live planning application for a nursing home. Previous planning permissions on the other hotel sites include a family leisure and amusement centre and a replacement hotel. These permissions

were not implemented. Having regard to the commercial nature of previous permissions, it is highly unlikely that any residential units will be delivered in this area over the lifetime of the plan. This area has been for the purposes of the Urban Regeneration and Housing Act (as amended) and the Council is committed to ensuring the regeneration of this area.

- Approximately 50% of Parcel A is within the CSO defined settlement boundary. This portion would have a potential yield of c.43 houses.
- Parcel B is located within the CSO defined settlement boundary. It is also a brownfield site and an infill site being the site of an unfinished estate where partially built houses were cleared. This site will facilitate the delivery of c.56 units.
- Parcel F is also within the CSO defined settlement boundary. It has the capacity to deliver 30 units.

The Core Strategy has allocated 172 housing units to Rosslare Harbour and Kilrane to 2027. As Parcels A, B and F will yield c.129 units, this will account for more than 30% of the allocated units being delivered within the existing built-up footprint

In Bunclody Town the potential to deliver infill housing within the central built-up area is limited due to the relatively dense grain of the built form in the central areas and the absence of available sites.

Figure 1-2 Bunclody CSO Census Settlement Boundary and Land Zoned for Residential Use

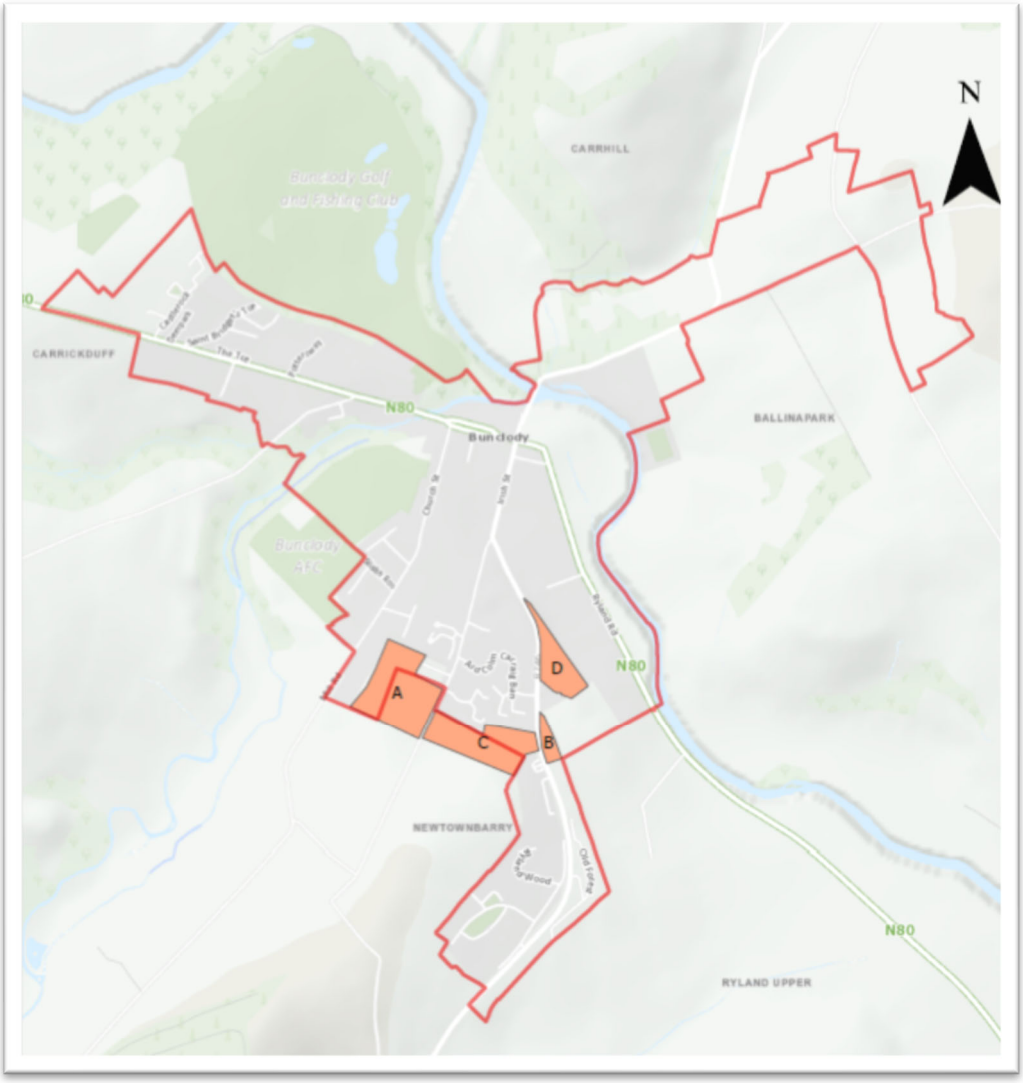


Figure 1-2 shows the CSO settlement boundary for Bunclody Town and the parcels of land zoned for residential use in Phase 1 (the current plan period). It is noted that:

- With regard to the Town Centre zoning only two residential units were delivered within this area during the last plan period. It is considered unlikely that further units will be delivered in this area. The largest portion of land is comprised of the curtilage of a Protected Structure. Notwithstanding, this area has been designated for the purposes of the Urban Regeneration and Housing Act (as amended) and the Council is committed to ensuring the regeneration of this area and will use all appropriate powers to achieve this.

- Approximately 30% Parcel A is included within the CSO defined settlement boundary. This portion has the potential to deliver c. 30 units.
- Parcel B is fully located within the CSO defined settlement boundary and this site has the capacity to deliver 16 units.
- Parcel D is fully located within the CSO defined settlement boundary and this site has the capacity to deliver 35 units

The Core Strategy has allocated 133 housing units to Bunclody Town during the plan period. Parcels A, B and D have the potential to yield 81 units and this is more than 30% of the allocated growth to 2027.

OPR Recommendation 5 – Compact Growth - Housing Demand and Housing Land Requirements

The OPR note that Table 3.4, which sets out the core strategy population allocations and housing land requirements, is based upon a number of variables. These include household size, average densities and mixed use development.

The OPR considers that the household sizes utilised in the Core Strategy are not fully transparent. The OPR state that the application of higher or lower household occupancy rates impacts on the total housing and zoning required in settlements and must to be justified.

The OPR states that the 25 units/hectare density assumptions used in the Core Strategy are not consistent with the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (DEHLG, 2009). The OPR note that, for Level 1 and Level 2 settlements the density targets set out in Chapter 5 of the guidelines should be reflected i.e. not less than 30 units per hectare; 35-50 units per hectare generally and 50 units per hectare on transport corridors.

The OPR states that Sections 10(2A)(c) and (d) of the Act require core strategies to contain information on the area of land already zoned in the development plan for residential use or a mix of residential and other uses and the amount of land proposed to be zoned for such uses. The Core Strategy in the Draft Plan identifies an overarching measurement of the

'existing zoning' within settlements but fails to specify the potential housing yield on lands zoned for residential or other mix of uses.

Text of Recommendation 5

(i) The household sizes applied in the devising of the Core Strategy, as detailed in table 3.4, appear to be inconsistent with what is forecast in the NPF and RSES. The planning authority is required to justify the approach applied in the core strategy, and/or amend the core strategy and housing demand figures accordingly, as appropriate.

(ii) The planning authority is required to modify the core strategy tables to ensure that the density assumptions used to calculate the housing and land requirements for the plan period are consistent with requirements of 10(2A), Guidance Notes and the section 28 Planning Guidelines for Sustainable Residential Development in Urban Areas (2009).

(iii) The planning authority is required to modify table 3.4 of the core strategy to include the area and potential housing yield of both residential zoned lands and other lands zoned for a mixture of residential and others uses.

(iv) Should any revisions to the core strategy arise under from above, the planning authority is required to revisit the approach to zoning for residential use as set out in the core strategy and, Table 3.4 in particular.

Chief Executive Response - Recommendation 5

Household Size

The household sizes were appropriately tailored so that the household size in each individual settlement tracked from its size in 2016 towards convergence with the 2.5 persons per household envisaged in the NPF by 2040. This explanation is provided in Footnote 8 on page 79 of the Draft Plan. The footnote also explains that household levels were already lower than 2.5 in Wexford, New Ross and Enniscorthy towns. Having regard to long term trends in those settlements it was considered that household size was unlikely to increase to 2.5 by 2040 and accordingly the household sizes were kept at the same level. The Council deem the application of household sizes to be an appropriate, well-considered and reasonable approach.

Notwithstanding, the publication of the Section 28 HST in December 2020 and the associated figures provided by the Department of Housing, Local Government and Heritage (DHLGH) have made this process redundant as the number of households in the county are now set by the guidelines. Unfortunately, insufficient information has been provided to tailor these figures for individual settlements and there are no details available about varying headship rates in order to tailor house size mix. This means that an average county figure is provided when this is not appropriate for the main settlements in Wexford where household size is well below the county and national average. This will result in inadequate land being zoned, associated housing supply pressures and will increase the likelihood that the type of units provided will not match those which are required.

It is recommended that the figures arising from the HST guidelines be incorporated into the Table 3.4 Core Strategy Population Allocations and Housing Land 2016-2027.

Density

The OPR's comments regarding population density are noted. Minimum density levels are identified in the Sustainable Residential Development in Urban Areas - Guidelines for Planning Authorities (2009) and reinforced for greenfield or edge if city/town locations under Specific Planning Policy Requirement 4 (Building Height Guidelines, 2018) which states:

> **SPPR 4** *It is a specific planning policy requirement that in planning the future development of greenfield or edge of city/town locations for housing purposes, planning authorities must secure: 1. the minimum densities for such locations set out in the Guidelines issued by the Minister under Section 28 of the Planning and Development Act 2000 (as amended), titled "Sustainable Residential Development in Urban Areas (2007)" or any amending or replacement Guidelines; 2. a greater mix of building heights and typologies in planning for the future development of suburban locations; and 3. avoid mono-type building typologies (e.g. two storey or own-door houses only), particularly, but not exclusively so in any one development of 100 units or more.*

Under Section 28 (1c) of the Planning and Development Act 2000 (as amended) it is now a requirement to comply with all SPPRs. On the 13th May 2020 the Minister for Housing, Planning and Local Government responded to a question on this matter stating;

> *The Guidelines on Sustainable Residential Development in Urban Areas are specifically referred to in SPPR 4 of the Urban and Building Height Guidelines, published in December 2018. It should be noted that SPPR 4 sets out a specific planning policy requirement in relation to the development of greenfield, or edge of city/town locations, for housing purposes, particularly in relation to appropriate building height, that Planning Authorities are required to follow.*
>
> *An Bord Pleanála is a statutory independent body and it would be inappropriate for me to make any comment in relation to individual decisions it makes. However, in general, it should be noted that An Bord Pleanála typically upholds national policy where there is divergence apparent in local policy.*
>
> *The Guidelines on Sustainable Residential Development in Urban Areas generally require densities in the range of 35-50 dwellings per hectare (dph) on outer suburban/greenfield sites. This has been established Government policy for a significant period of time, dating back to 1999. The Guidelines, however, also provide scope for densities below 35 dph on more peripheral sites in smaller towns and villages, in particular to assist in delivering more sustainable alternatives to dispersed urban-generated rural houses.*

Having regard to the above it is recommended that the Plan is amended to fully comply with the Guidelines.

Yield for land zoned for a mixture of residential and others uses

It is noted that these lands may comprise lands zoned for mixed use but also lands zoned for town centre, village centre, neighbourhood centre uses etc. In order to identify a yield from such zonings it would be necessary to carry out significant on-site and desk-based research to identify undeveloped sites, examine the yield from such sites and assess whether they

would be capable of delivering units within the period of the plan by reference to the sites' particular constraints. It would be necessary to examine the need for infrastructure such as roads (but also SuDS, green infrastructure, amenity, flood protection etc) which may need to be provided within such sites and which would reduce the net yield. It is not possible to carry-out this work in advance of the detailed master planning of these areas which will take place as part of LAPs and Local Transport Plans (LTP).

In any case, as the new LAPs for Wexford Town, Enniscorthy Town and New Ross Town will commence upon adoption of the County Development Plan and the land use zoning will be reviewed as part of this process, the yield from such zonings would be inaccurate almost immediately.

It is the Council's intention that, other than in locations such town centres, neighbourhood centres and village centres, the new LAPs will not contain include a mixed use type zoning.

Accordingly, it is not recommended that any amendment be made to the Draft Plan with regard to this matter, and instead it should be addressed as part of LAPs.

OPR Observation 1 -Tiered Approach to Zoning

The OPR state that while they understand a tiered approach to zoning (TAZ) has been applied for Rosslare Harbour and Kilrane and Bunclody no Infrastructural Assessment Report (IAR) is attached to the Draft Plan and it is not evident which lands are already serviced or can connect to services and what lands are to be provided with full services within the life of the plan.

Text of Observation 1

The planning authority is requested to demonstrate that the tiered approach to zoning required under the NPF has been applied in the determining of objectives for the zoning of land in volume 3 of the development plan. The planning authority it requested to specifically provide details of an infrastructural assessment applying the tiered approach to zoning (NPO72a, NPO72b and NPO72c refer), in accordance with the methodology set out in Appendix 3 of the NPF.

Chief Executive's Response - Observation 1

IARs were provided in the Draft Plan for both Rosslare Harbour and Kilrane and Bunclody Settlement Plans (see pages 49-58 and page 115-127 of Volume 3 – Settlement Plans respectively). These assessments informed the TAZ applied in the Draft Settlement Plans.

OPR Observation 2 – Compact Growth Implementation

The OPR welcomes the objectives contained in the Draft Plan regarding compact growth and active land management. The OPR suggests that a clear objective be included to implement this active land management together with a strategic approach and measurable targets (perhaps by settlement at the upper levels) and timeline against which implementation can be monitored.

Text of Observation 2

Having regard to RPO 34 on Regeneration, Brownfield and Infill Development, the planning authority is advised to:

(i) include a clear objective to implement the Active Land Management Strategy approach identified in RPO 34 within the development plan; and

(ii) set out a clear timeline and strategic approach to carrying out the Active Land Management approach and to set measurable targets (perhaps by settlement at the upper levels) and timelines against which the implementation can be monitored and measured.

Chief Executive's Response - Observation 2 Compact Growth Implementation

In order to implement RPO 34 the Council included:

- Objective TV32 which outlines the Council's commitment to active land management;
- Objective TV30 which outlines a commitment to land management including site assembly and Compulsory Purchase Orders (CPOs);
- Objective TV34 which outlines the Council's intention to identify obsolete areas with potential for renewal within town and village centres;

- Objectives TV 38 and 39 which will facilitate and promote the reuse of older buildings and upper storeys for residential use;
- Objective TV40 and TV41 which outline the Council's commitment to implementing Vacant Sites and Derelict sites legislation including the lands identified for the former (Table 5-1) and the priority locations assigned to the latter;
- Objectives SH44, 45 and 46 which outline the Council's support for the reuse of vernacular buildings; and
- Objective CS04 includes the Council's commitment to carrying out an audit of brownfield lands during the lifetime of the plan

It is further noted that much of RPO34 relates to remediation and construction and demolition waste and the relevant objectives in this regard are included in Chapter 9 Infrastructure.

Notwithstanding, the Council has no objection to including narrative and objectives in Section 5.9.1 and 5.9.2 to:

a) Identify priority locations for active land management strategies;
b) Identify specific projects and provide a target timeline against which their implementation can be assessed subject to available resources and funding;
c) Include an objective to implement (a) and (b) and an objective identifying a target number of sites which will be pursued under Derelict and Vacant Sites legislation; and
d) Include narrative from RPO 34 on remediation requirements for brownfield and infill development

Rural Housing and Regeneration

OPR Observation 3 – Rural Regeneration

The OPR acknowledge the strategic approach to lower tier rural villages in the Draft Plan. The submission notes that the RSES seeks to promote rural regeneration in objectives RPO 26 (towns and villages), RPO 27 (rural economies and communities), RPO 213 (rural wastewater) and RPO 216 (serviced sites). In addition, the Section 28 Sustainable Rural Housing – Guidelines for Planning Authorities (2005) emphasise the need to ensure

settlements offer an alternative to one-off housing and strengthen rural villages and towns. The OPR considers that there is an opportunity to have a more strategic approach to facilitate same including active land management.

Text of Observation 3

The planning authority is advised that the development plan should include a more proactive strategy for the regeneration of its service settlements (level 3), large and small villages (levels 4 and 5) and rural nodes (level 6).

Consideration should be given to the inclusion of objectives to support and facilitate rural regeneration such as identifying areas that will be promoted as attractive alternative to one-off housing in the open countryside (level 7); effective use of funding streams for village and public realm improvement (including the RRDF, LEADER etc), working with community groups, and utilising available statutory powers such as derelict site and compulsory purchase powers. The inclusion of clear targets and provisions for monitoring and reviews of the strategy should also be considered.

Chief Executive's Response – Observation 3 Rural Regeneration

The Core Strategy (Section 3.6.3 - Section 3.6.6) contains the development approach for Level 3, 4, 5 and 6 settlements. It outlines that these settlements will serve as appropriate locations for housing and as alternatives to one-off housing. Objectives CS13, 14, 16, 17 and CS21 commit to:

- Strengthen the social and economic structure of rural towns and villages by supporting regeneration and reuse of buildings and sites;
- Strengthen the viability of rural settlements and support the retention of rural services such as post offices, shops and medical facilities;
- Seek investment and initiatives to deliver smart technologies and revitalisation in towns and villages;
- Promote appropriate development that would ensure revitalisation of the county's rural towns and villages; and

- Work with infrastructure providers such as Irish Water and local communities to provide serviced sites to attract people to build their own homes and live in the designated large and small villages.

In support of this approach, the Draft Plan also contains:

- Objective CS20 which specifically states that development in these settlements will include interventions in the public realm, the provision of amenities, the acquisition of sites and the provision of services.
- Chapter 5 Design and Place-making in Towns and Villages (specifically Section 5.5) contains the Strategy for **all** settlements to ensure that they are high quality, connected, compact and rejuvenated settlements. These elements are further detailed in Sections 5.6-5.10.
- Objective TV16 outlines the Council's commitment to work with developers, stakeholders and community groups to secure improvements to the public realm and pursue all avenues of funding to secure the same.
- Section 5.9.2 states that the Council will leverage the variety of available funds to in pursuit of active land management and regeneration.
- Section 5.9.3 details the Council's commitment to utilising available statutory powers such as derelict site and compulsory purchase powers.

Having regard to the limited human and financial resources available to the Council to implement regeneration proposals and public realm interventions the Council's focus will be on the Level 1 and Level 2 settlements. Accordingly, it is not considered appropriate to include objectives in the Draft Plan which are unlikely to be achieved. However, it is recommended to add some Level 3 settlements as priority locations for regeneration in response to Observation 2.

With regard to RPO 216 and the provision of serviced sites in rural villages, while it is agreed that this would be a positive initiative, it is likely that the Council's resources will be exhausted by responding to the delivery of social housing targets. It is recommended that an objective be included to identify potential regeneration and infill sites and potential

locations for housing when preparing the settlement plans for Level 3a settlements and settlement boundaries for Level 3b, 4 and 5 settlements.

OPR Recommendation 6 - Housing in the Open Countryside

The OPR notes that Wexford is a predominantly rural county and it is important that the countryside continues to be a living and lived-in landscape, focusing on the requirements of rural economies and rural communities as recognised by the NPF. At the same time, it is imperative that development plan policy protects against ribbon and over-spill development from urban areas, and supports the National Strategic Outcomes of compact growth, sustainable mobility, transition to a low carbon and climate resilient society and sustainable management of environmental resources.

On this basis, NPO 19 makes a distinction between only two types of areas for rural housing - (i) areas under urban influence and (ii) rural areas elsewhere, and recommends a policy approach to each area.

The OPR notes that the draft plan identifies three rural area types, based upon section 3.2 of the Sustainable Rural Housing Guidelines for Planning Authorities (2005) and a number of further areas such as coastal landscapes and sensitive landscapes and that this is inconsistent with NPO 19 which only makes a distinction between two types of area namely those under urban influence and other areas.

Text of Recommendation 6

The planning authority is required to revise the plan's policy in respect of Housing in the Open Countryside (section 4.9), associated map 1 and table 4.6 to comply with NPO 19. The planning authority is advised that it is a requirement of NPO 19 that in providing for development of rural housing, a distinction is made between (i) areas under urban influence and (ii) rural areas elsewhere.

Chief Executive's Response - Recommendation 6 - Housing in the Open Countryside

In preparing the rural housing policy for the Draft Plan the Planning Authority was guided by the advice of Circular Letter PL 2/2017. This circular related to the consideration of 'planning

applications for houses in rural areas – particularly urban generated rural housing in those areas under pressure in the environs of cities and towns and also in the context of future variations and revisions to development plans'. The Circular advised that the Department were in the process of reviewing the Sustainable Rural Housing Guidelines for Planning Authorities (SRHG) (2005, DEHLG) and that the NPF was at an advanced stage and that when both these processes were finalised the revised Section 28 guidelines would be issued. The Circular further advised that the existing guidelines remain in place and, pending conclusion of the two national policy review processes, local authorities should defer amending their rural housing policy/local housing need criteria in existing development plans either by way of cyclical review or variation process.

Notwithstanding that NPO 19 advises that rural areas should be divided into character - areas under urban pressure and areas not under urban pressure – it is considered there is nothing in the NPF which prevents further division of these areas into stricter policy areas to protect landscapes, sensitive areas and areas which exhibit specific threats (such as the threat of holiday home/speculative development in coastal areas).
The intention of policies restricting rural housing to those with a social or economic is to control the pace and scale of housing in these areas. It is considered reasonable and appropriate to also apply this policy approach in these sensitive areas in order to protect their inherent sensitivities from individual and cumulative impacts.

It is considered that this approach, which would control cumulative impacts by permitting housing for those with a rural generated need rather than a desire to live in these sensitive areas, should form part of the forthcoming guidelines. It is anticipated that the guidelines will address (as part of Strategic Environmental Assessment) whether applying only design and siting criteria outside urban pressure areas may increase populations in remote rural areas which in turn will increase commuting distances and carbon generation.

Having regard to the guidance issued in Circular Letter PL2/2017 it is considered premature to revise the rural area types at this time. However, the Council commits to review the rural housing policy when the guidelines emerge and will include an objective in this regard to confirm this commitment.

OPR Recommendation 7 - Housing in the Open Countryside

The OPR notes that, with respect to the qualifying criteria of applicants for a one-off dwelling in rural areas, the definition of 'local rural area' includes persons from large villages, small villages and rural nodes. It is stated that this is contrary to the promotion of compact growth and could undermine the objectives to reverse decline in small towns and villages.

Text of Recommendation 7

The planning authority is required to omit villages from the definition of 'local rural area' as defined in table 4.6 (section 4.9.1) and referenced in objective SH37, as doing so may undermine the national and regional objectives to regenerate and target the decline of small towns and villages (NPOs 6, 16, 18a and 18b).

Chief Executive's Response - Recommendation 7 Housing in the Open Countryside

While the OPR's recommendation is noted, the Council is cognisant of the reciprocal relationship between rural settlements and their wider rural community. In many cases the only opportunity that an individual may have to reside in their local community (ensuring that these areas remain vital) will be to purchase a site to provide their own dwelling. Such sites are extremely limited in existing settlements. Evidence suggests that landowners in smaller towns and villages are slow to release land for development and, over the lifetime of the plan, most of the County's small towns or villages will not receive an application for a multi-unit scheme.

Furthermore, in many cases public communal infrastructure is not available to serve new dwellings and the use of individual treatment systems would result in unacceptable concentrations of such systems. While the roll out of the Small Towns and Villages Programme is welcomed, the initial tranche (covering the first three years of the plan period) is only likely to deliver solutions in two of the Council's 109 settlements due to the

limited financial commitment for the County in the programme. The provision of serviced sites in villages is not feasible for the reasons outlined in response to Observation 3.

It is therefore recommended that, in order to ensure that these villages and rural areas remain vital, living, rural areas that that this element of the Draft Plan is not changed. This can be reviewed when the Section 28 Sustainable Rural Housing Guidelines for Planning Authorities are published

OPR Observation 4 – Economic Need to Reside in Rural Area

In relation to the definition of 'Category B Economic Functional Rural Housing Need', the OPR recognises the intention of the policy to define 'demonstrable economic need' as referred to in RPO 27. It is considered, however, that further clarity should be provided to avoid any ambiguity and uncertainty in interpretation which could ultimately undermine the overall objective.

Text of Observation 4

The planning authority is advised that the wording and definition of category B applicants, those making a demonstrable economic functional need to reside in a particular rural area, should be reviewed to ensure clarity, transparency and enable easy implementation through the development management process and post-plan monitoring**.**

Chief Executive's Response – Observation 4 Economic Need to Reside in Rural Area

Table 4.6 defines demonstrable functional economic need as persons who by the nature of their employment have a functional need to reside permanently in the rural area close to their work. It is stated that this will include full-time farming, horticulture, forestry or marine as well as others who can demonstrate a genuine need to reside in a rural location because of their occupation. It is further stated that similar part-time occupations can be considered where it is demonstrated to be the predominant employment.

It is recommended that this category be further defined to clarify that such employment must be related to a rural resource, that is, it must be necessary to live at the site of the business and that the applicant must be able to provide documentary evidence that the

business will be a full-time (or part-time but predominant) employment, a viable enterprise and the landholding must be such as to support the same. It is recommended that these proposed amendments are made to Table 4.6. Furthermore, having regard to this clarification on economic need, it is considered that the 'bona fides' applicants referred to in Section B (ii) and category B under Coastal Zone and Landscape and Heritage areas is extraneous (and is not clearly related to any economic need to reside in a specific rural area such as a rural resource). It is therefore recommended for deletion from Table 4.6 on the premise that 'economic functional need' applies equally to all persons, local and otherwise.

It should be noted that Table 4.6 below also contains further recommendations to the social or local need criteria arising from submissions under Section 3 and 5 of Book 1 of this Report.

Economic Development and Employment (including retail)

The OPR welcomes the overall approach in the draft development plan which reflects the RSES. The economic strategy also incorporates a strong emphasis on place making (ED37 - 45) which is very welcome. Albeit recognised that recommendations 1-3 will necessitate revisions to the core strategy, it is considered that in addressing those recommendations, the economic strategy will also be further strengthened. For example, the provision of LAPs, settlement maps and/or zoning objectives for smaller settlements will enable more effective implementation of the economic polices such as ED38 (commensurate development) and ED 55-61 which seek to direct and facilitate development within the service settlements and villages. The OPR also recognises that the economic chapter offers strong policies to support the county's blue economy, ports harbours and shipping together with the aquaculture and fisheries sectors.

OPR Observation 5 - Rural Economy

The OPR acknowledges that the plan gives particular attention to the rural economy. Given the importance of this sector to the county this is consistent with NPO 23.

Objective ED 89 of the plan sets out the requirements for development for commercial purposes in rural areas which is described as 'including agricultural, horticultural and rural diversification. While it is understood by the OPR that it is not the intention of the planning

authority to allow any/all types of commercial developments in rural areas, it is advised this policy is reviewed to remove any ambiguity and to clarify that commercial development should be location or resource specific in rural areas outside towns and villages.

Text of Observation 5

The planning authority is advised to review the wording of rural development objective 89 to ensure that the only commercial type development that is acceptable rural areas, outside towns and villages, is that which is location specific or resource based.

Chief Executive's Response - Observation 5 Rural Economy

Objective ED37 clarifies that the Council will direct commercial development to the settlements identified in the settlement hierarchy subject to the exceptions outlined in Chapter 6 Economic Development, Chapter 7 Tourism, Chapter 14 Recreation and Open Space and Volume 10 Energy Strategy. This statement is reiterated in Section 6.7.6 which deals with the rural economy in both rural settlements and the open countryside. Objectives ED80 to ED89 are the general objectives that may apply to all or any economic development in rural areas (both rural settlements and the open countryside).

Section 6.7.5.6 outlines the specific circumstances in which commercial development will be allowed in the rural areas.

Having considered the points raised by the OPR, it is recommended that a narrative be added to this section to clarify that Objectives ED 80-89 are subject to the developments being appropriately located in accordance with Objective ED37 and the other location-specific policies of the plan including those within Chapter 6 Economic Development, Chapter 7 Tourism Chapter 12 Coastal Zone Management and Marine Spatial Planning, Chapter 14 Recreation and Open Space, Volume 8 Retail Strategy and Volume 10 Energy Strategy. . It is also recommended that the wording of Objective ED89 be amended by deleting the words 'for commercial purposes' from the objective and adding text to confirm that the objective relates to development both in settlements and outside of settlements.

OPR Observation 6 - Agricultural Development

The plan makes provision for intensive agricultural units under Objective ED 94. The OPR notes that one parameter identified in ED 94 requires that intensive agricultural units are 'located more than 500 metres from any residential property not located on the holding, or at a greater distance if there is potential for significant impacts on residential amenity, particularly from odour'.

The planning authority is advised that Directive 2010/75/EU for the intensive rearing of poultry or pigs sets out best available techniques (BAT). The BAT conclusions make no reference a distance threshold, but take a more encompassing view of development sites based on their local circumstances. The planning authority is advised that the inclusion of a 500 metre threshold could have unintended implications for this type of agricultural development and should be re-examined by the planning authority.

Text of Observation 6

The Office requests that the Planning Authority clarify the evidential basis for agricultural development objective ED94 which relates to intensive agricultural units and specifies a 500metre separation distance from any residential properly not located on the holding.

Chief Executives Response - Observation 6 Agricultural Development

The OPR's comments and the contents of the Directive 2010/75/EU are noted. However, following extensive experience by the Council in pursuing enforcement proceedings against these establishments it has been found that it is ineffective and resolution is rarely satisfactory or permanent. Experience has shown that it is often not possible to prove compliance or non-compliance with conditions, particularly regarding odour, on a continued basis. Accordingly, it is recommended that no amendment is made to this objective.

OPR – Observation on Tourism

The OPR notes that Wexford's diverse range of natural, built and cultural heritage provides a strong tourism base and this is fittingly identified in the plan as a potential economic driver. The objectives of the plan are largely supportive of national and regional policies including: NPO 22 (greenways, blueways), NPO 60 (natural and cultural heritage), RPO 53 (tourism), RPO 54 (tourism and environment) and RPO 173 (tourism corridors).

Additionally, the OPR recognises that tourism objective TM13 specifically seeks to support and develop the towns and villages and rural heritage sites and that the tourism policies promote the regeneration of the towns and villages by directing tourist uses such as: tourist retail (TM16 & TM17), business tourism and conferencing (TM37), tourist resorts (TM43) to towns and villages. These are welcome. The OPR considers that these policy objectives, together the settlement boundaries and land use zoning plans required under Recommendation 3, will serve to further contribute to the achievement of the plan's tourism objectives, promote rural regeneration and compact growth.

However, the OPR notes that section 7.7.5 of the plan sets out the objectives for tourist accommodation, and whilst these uses are directed to the towns and villages in general, there is a degree of flexibility in relation to hotels (TM48), holiday home developments (TM49) and caravan/mobile home parks (TM51). These policies should be closely monitored and reported in the two-year review to ensure that through the implementation of the plan this flexibility does not undermine direction of growth to towns and villages.

Chief Executive's Response - Tourism

The OPR's positive comments on the Tourism Strategy are welcomed, and as requested, the Council will monitor the referenced tourist accommodation objectives. Having reviewed these objectives, it is noted that Objective ED51 refers to the extension of authorised mobile home parks. It is recommended that an additional objective be included relating to the development of new mobile home parks.

OPR Observation 7 - Retail

The OPR welcomes the broad alignment of the core settlement hierarchy and retail hierarchy and considers the designation of Wexford town as the sole level 1 regional town and Gorey, together with New Ross and Enniscorthy as level 2 large sub-regional towns, to be appropriate. The OPR notes that level 3 of the retail hierarchy directly corresponds to the service settlements within the settlement hierarchy, which may be further refined in response to recommendation 2 above. The OPR is satisfied that the retail strategy, and the detailed quantitative analysis therein, is based on a strong evidence-base and sound

assumptions and fulfils the requirements of the section 28 Retail Planning Guidelines (2012), in terms of identifying core retail areas together with opportunity sites for the four main towns and policies that are town centre focused.

The OPR acknowledges the conclusions of the quantitative aspect of the county retail strategy and the projected retail floorspace requirements, including the conclusion that there is no additional capacity for comparison bulky floorspace by 2027. The planning authority may wish to include an explicit statement to this effect in the plan in relation to development proposals for this type of development.

Text of Observation 7

Recommendations 1-3 above will require a review and refinement of the core strategy settlement hierarchy and allocation of growth. The planning authority is therefore advised to review and make any necessary changes to the retail strategy in volume 8, in order to ensure the plan is fully aligned and there are no internal consistencies.

Chief Executive's Response – Observation 7 Retail

The OPR's positive comments about the Retail Strategy are welcomed. It is recommended that Table 3.5 in Chapter 3 Core Strategy, which relates to the alignment of the Settlement Hierarchy and the Retail Hierarchy, be amended to reflect Recommendation 2 relating to the revised Settlement Hierarchy. It is also recommended that the associated tables in Volume 8 Retail Strategy are amended.

Due to challenges in integrating settlement specific allocations to the future distribution of population across the retail catchment areas (produced at Electoral Division scale to reflect driving time and other factors), the Draft Plan contained a fixed assumption that each catchment would maintain its Census 2016 proportionate share of total County population, for each forecasted NPF year to 2027. New Ross catchment, for example, had 15.6% of county total in 2016 and so it was estimated to maintain 15.6% of the NPF County total population in any given year across the plan period. Any changes to the assumed catchment shares arising from the amended population allocations for the key towns are minimal due to the population size of the catchment areas. With increases or decreases within the catchment being accommodated by its the share of overall NPF County total. Using again

the example of New Ross, the town's revised share of the New Ross catchment in 2027 would adjust it from being 35.4% of catchment total to 35.7% (in 2027). It is considered therefore, that these changes are immaterial at catchment level, due to the size of each catchment.

Notwithstanding, the Council will be monitoring the Retail Strategy, including the quantitative elements, as a full review may be necessary once the likely significant changes in the retail landscape as a result of the Covid-19 pandemic are fully understood.

The OPR statement that the planning authority may wish to include an explicit statement with regard to bulky-goods retailing in the County is noted. This statement is already included on page 200 of the Retail Strategy. Notwithstanding, and in line with the Retail Planning Guidelines, appropriately located bulky goods retail developments, such as centrally located stores on brownfield sites, will still be considered by the Planning Authority. Section 3.6 of the Retail Planning - Guidelines for Planning Authorities (2012) states that 'Estimates of future retail requirements are only intended to provide broad guidance as to the additional quantum of convenience and comparison floorspace provision; they should not be treated in an overly prescriptive manner, nor should they serve to inhibit competition'. It is not the intention of the Retail Planning Guidelines to inhibit competition or inhibit improvements to the offer where proposals are for appropriately located developments which would not diminish the vitality and vibrancy of the town centre.

Sustainable Transport and Accessibility

OPR Recommendation 8 - Sustainable Transport and Accessibility

The OPR notes that Chapter 8 of the draft plan sets out the transport strategy which at the outset underscores, at a strategic level, the planning authority's commitment to the climate agenda and the actions in its Climate Change Adaption Strategy (2019) that will be delivered by the planning authority. The OPR also notes other strategic transport objectives of the plan including the Eastern Economic Corridor, TEN-T networks (Policies TS04 & TS0S), reference to the '10-minute town' concept (RPO 176), the necessity to prepare Local Transport Plans for the four main settlements (RPO 157) and references to the Design Manual for Urban Roads and Streets (DMURS). In general, the OPR considers that the

strategic transport objectives will provide a robust and comprehensive policy framework for sustainable transport subject to the response to Recommendation 3 which is equally important to the achievement of the plan's strategic transport objectives.

Subject to the changes required by Recommendation 3 (definition of settlement boundaries and the zoning of lands in settlements which will ensure integration of land use and transport) and the inclusion of specific modal share targets for the four main settlements and an aggregate for rural towns and villages, the OPR, is satisfied that plan can provide a sustainable transport strategy.

Text of Recommendation 8

In order to ensure the effective planning, implementation and monitoring of the development plan requirements under 10(2)(n) of the Act, the planning authority is required, in consultation with the NTA (and TII), as appropriate, to:

(i) Supplement tables 8. 3 and 8.4 existing baseline figures for modal share for the overall county to include baseline details and targets for settlements. It is recommended that this could best be provided at individual settlement level for the larger settlements, and at aggregate level for rural towns and villages and the open countryside, as identified in the Core Strategy as revised in accordance with recommendations 1-3 above.

(ii) Provide an effective monitoring for the implementation of the planning authority's sustainable transport strategy and the modal share targets in particular.

Chief Executive's Response Recommendation 8

It is recommended that modal share targets for the four main towns be included in the Draft Plan. These will be treated as interim targets pending the detailed profiling and consultations that will be carried out (including with the NTA) for the LTPs and which will inform the relevant LAPs.

The monitoring of the modal share objective will take place as part of the two-year review of the Plan and as part of the monitoring required under the Strategic Environmental

Assessment of the Plan (at such intervals as this information becomes available from the CSO).

Observation 8 – Local Link Rural Transport Programme

The OPR acknowledges that the strategic transport objectives (TS01-TS20) set out a comprehensive policy framework to ensure that the plan is consistent with national and regional level policy in respect of transport. However, having regard to the fact that County Wexford has a predominantly rural population base and that c. 60% of the population reside in areas/settlements with a population less than 1,500, the planning authority is advised to include a specific policy and/or reference to the importance of the Local Link Rural Transport Programme.

Chief Executive's Response Observation 8 Local Link Rural Transport Programme

The positive comments of OPR are welcomed. Section 8.6.2 contains specific reference to Local Link Rural Transport programme, and states the following:

'Bus Eireann, Wexford Bus and Local Link also provide services in rural areas of the county and Wexford Bus provides a town service in Wexford Town. The Local Link service funded under the Rural Transport Programme and managed locally on behalf of the National Transport Authority, links many of the smaller settlements and rural areas around the county. The services range from door to door, scheduled weekly, daily and evening services through to full 7-day commuter services. The services are contracted to private operators. For rural communities, these services provide access to urban services and play a vital role in addressing social isolation.'

There are numerous public transport objectives in the Draft Plan (TS27-TS36). Objective TS32 specifically references Wexford Link, while Objectives TS29, 30, 32, 33 and 36 refer to bus services and infrastructures generally. Accordingly, no amendment is recommended.

OPR Recommendation 9 –National Roads

The OPR considers that there is scope to strengthen and expand on the policy objectives for national roads, in accordance with the Spatial Planning and National Roads Guidelines for

Planning Authorities (2012) and to improve cross linkage between sections within the plan to ensure that the policy on national roads is clear and unambiguous.

In particular, the OPR does not consider that Policy TS59 is consistent with the guidelines or is based on a plan-let approach.

Text of Recommendation 9

The planning authority is requested to re-examine the policy objectives across the plan for national roads to ensure that the plan is consistent the Spatial Planning and National Roads Guidelines for Planning Authorities (2012). In this regard, the planning authority is requested to strengthen and expand the policy objectives as follows:

(i) Strengthen the Core Strategy Objectives to reflect strategic objectives relating to safeguarding the strategic function of the existing national road network, and associated junctions.

(ii) Include a specific policy in the plan to safeguard the strategic capacity of national road junctions in accordance with Section 2. 7 of the DoECLG Spatial Planning and National Roads Guidelines.

(iii) Revise Objective TS59, (Section 8.7.1.2) to remove reference to 'significant' increase traffic to the national network, as the guidelines refer to 'the generation of increased traffic' in absolute terms (Paragraph 2. 5 refer).

(iv) Revise the exceptions set out in TS59 to only provide for site specific plan-led exceptions. In this respect, the Office consider that category 1 and 4 are non-specific and do not comply with the S28 requirements which stipulates that an area must be identified and specifically justified through the plan making process. (Paragraph2.6); and

(v) Provide enhanced cross referencing between the plan chapter no.4 (Housing), no. 6 (Economic development) and no. 7(tourism) where these interface with matters relating to access to national roads.

Chief Executive's Response - Recommendation 9 National Roads

The request to include objectives relating to the protection of national roads in the Core Strategy is noted. It is considered that Objective TS50 in Chapter 8 Transportation Strategy

‘to work with Transport Infrastructure Ireland to protect and improve the safety, capacity and efficiency of the existing national roads network in County Wexford’, together Objective TS58 and Objective TS59, provide this policy context. Similarly, the request to include an objective to protect national road junctions is already covered by Objective TS58 which refers to the entire network and specifically references junctions. No amendment is therefore recommended.

Regarding Objective TS59 it is recommended that the word ‘significant’ is removed from the second line of the objective to underline the Council’s commitment that development that results in an increase in traffic onto the national road network (not just a significant one) will only be considered in the limited exceptional circumstances outlined.

Regarding Category 1 of Objective TS59 it is not possible to foresee all developments that might arise during the plan period that would be of national or regional strategic importance. Given that, by their nature they would have an over-riding reason to be considered, an objective which would prohibit t their consideration would be inappropriate. Furthermore, these developments will only be considered in very exceptional circumstances and will only be deemed appropriate where they can be facilitated safely and without impact on the national network such as on non-motorway or dual-carriage way sections of roads. Accordingly, it is recommended that Category 1 be retained, and further text be added to clarify the circumstances under which such a development may be considered by the Council.

It is recommended that Category 4 be deleted from Objective TS59.

The national roads objectives in the Plan apply equally to all development types and not just to the development types considered under Chapters 4, 6 and 7. It is considered that cross referencing certain chapters and not others may add confusion and is unnecessary. No amendment is recommended.

Climate Action and Energy

OPR Observation 11 Climate Action

The OPR commends the planning authority's commitment to placing climate action to the fore of the plan's strategy and the approach to preface each chapter with a commentary on the linkage to climate action. This format is commendable and should be put forward as a best practice model, at this time.

The OPR considers that the definition of settlement boundaries, the zoning of lands for specific uses (section 10(2)(a) of the Act), the establishment of guiding policies for smaller towns and settlements as required under recommendations 1-3 will also promote the effective integration of land use and transportation and in securing the plan's stated strategic objectives on climate change objectives.

Text of Observation 11

Given the importance attributed to climate action by Government, as evidenced by, inter alia, the recent Climate Action and Low Carbon Development Bill (October 2020) and the Climate Action Plan 2019, the planning authority is advised that section 2. 4 should also include an objective to consider a variation of the development plan within a reasonable period of time, or to include such other mechanism, as may be appropriate, to ensure the development plan will be consistent with the approach to climate action recommended in the revised Development Plan Guidelines as adopted or any other relevant guidelines.

Chief Executive's Response - Observation 11 Climate Action

The positive comments on the Council's approach to climate action are welcomed. It is recommended that an objection be included in Chapter 2 Climate Action to commit to review the Plan to ensure compliance with the recommendations in the forthcoming Development Plan Guidelines when such guidelines are published.

OPR Recommendation 10 - Renewable Energy

The OPR acknowledges and welcomes the inclusion of a specific detailed energy strategy for the county, which includes an energy balance and renewable energy targets and addresses solar energy, onshore wind, bioenergy and other renewable sources (e.g. off shore wind, tidal, wave, geothermal etc) as well as supporting infrastructure. The OPR considers that the draft plan has the potential, subject to the following, for positive impacts in terms of energy

reduction and greenhouse gas (GHG) emissions reductions as required by section 10(2)(n) of the Act for new development.

The OPR notes the provisions and range of policies and objectives supporting renewable energy development volume 10 (Energy Strategy) and development management standards in volume 2.

The OPR also notes that section 4.2 of the energy strategy states that exclusion zones are required around the larger settlements within the county 'to allow for the future expansion of these settlements in a compact and sequential manner'. These exclusion zones are illustrated on Map 5 and include 1 km exclusion zones from level 1-2 settlements with a 250m exclusion zone around level 3 settlements. Objective ESQ 1 seeks to facilitate solar PV only outside those exclusion zones. The OPR further notes that the core strategy identifies that there is an excess of lands zoned within settlements in the county and no evidence-based rationale is presented to support the universal need to provide for the future expansion of all settlements. It is considered that this policy is not evidential based and contradicts the stated overarching objectives of the plan in relation to climate action. Accordingly, this policy would not be considered consistent with section 10(2)(n) of the Act.

Text of Recommendation 10

The planning authority is requested to remove reference to exclusion zones for solar PV development.

Chief Executive's Response - Recommendation 10 Energy

Solar PV developments are open for consideration in an extensive area of the County and the there is significant capacity to facilitate further development in these areas. To date, the Council has granted planning permission for 475MW of solar PV within these areas. This represents 95.2% of the projected Energy consumption within the County at 2030.

While there is a surplus of land zoned for residential use in Level 1 and Level 2 settlements, the Council will be reviewing the requirements for addition lands for economic and employment, community and recreational uses in those settlements as part of the

preparation of the LAPs. The Council will also give consideration to providing significant areas of land at the urban edges to provide for green infrastructure to deliver ecosystem services, amenity s to serve the resident population and carbon sinks in furtherance of climate mitigation aims. The Council is also aware of the need to provide significant tracks of lands to accommodate physical infrastructure in the vicinity of some of these settlements.

Regarding settlements below Level 2, it is considered that an area around these villages should be reserved for future development including the development of necessary physical and social infrastructure. It is also considered that 250m is a small exclusion zone. Permitting solar PV developments within these areas may be prejudice the Council's regeneration aims and objectives for these settlements.

In the absence of Section 28 Guidelines relating to solar PV it is considered that this policy is reasonable and in the interests of proper planning and sustainable development. Accordingly, it is not recommended to amend this policy.

OPR – Observation on Wind Energy

Chapter 5 of the Energy Strategy addresses On-Shore Wind Energy. The OPR recognises that this takes full account of the Specific Planning Policy Requirement (SPPR) in the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change (2017) and establishes renewable energy production targets (table 6).

The wind energy section contains the following statement, which is inconsistent with the section 28 guidelines:

' ... Similarly, turbines shall not be permitted within 250metres of the boundary of an adjacent landholding, unless the written consent of the owner is given.' (Page 54, refers)

The OPR acknowledges that this statement is not actually reflected in the policy objectives ES06- ES15, nor is it carried forward to the development management standards in section 5. 7 and therefore may be erroneous. Notwithstanding this minor point it is considered that the plan is consistent with section 28 Wind Energy Development Guidelines (2006) and associated

2017 Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change.

Chief Executive's Response - Wind Energy

Having regard to the impact that wind turbines can have on land uses (including agricultural uses, workplaces and the sterilisation of other rural developments) within their immediate vicinity it is considered that this statement is reasonable, and it is not recommended that it be removed from the Draft Plan. It is recommended that it be added to Section 5.7. Development Management Standards in Volume 10 Energy Strategy.

The Planning Authority had regard to the prevailing guidelines when preparing the wind energy strategy. It is noted that this standard is not included in the guidelines but that this does not preclude the Council from including it in its development plan in the interests of the proper planning and sustainable development of the county.

Environment Heritage and Amenities

OPR Observation on Environmental Reports

The role of this OPR is not as an environmental authority under article 6(4) of the SEA directive, however within the context of the section 28 guidelines, it is appropriate and relevant to comment upon the environmental reporting. In this respect, the OPR considers that there is scope to enhance the integration between environmental reporting and the draft plan preparation process. For instance, the environmental report does not include any analysis or discussion of the Council's deliberations of the draft plan prepared by the Executive or any analysis of the directions or motions of the Elected Members in the process of the draft plan for public display.

The planning authority is advised that in order to give full meaning to the strategic environmental assessment process as set out in the directive, it should ensure that as/when the material amendments stage arise, the environmental reporting is iterative and transparent with the decision-making process at that stage.

Chief Executive's Response - Environmental Reports

The OPR's comments are noted. The Section 28 Guidelines do not contain advice about displaying the deliberations for these stages of the plan SEA process. It is confirmed that both the pre-draft plan submitted to the Elected Members and subsequent amendments made to the plan by the Elected Members, were subject to Strategic Environmental Assessment.

Notwithstanding the Chief Executive has no objection to documenting the assessment of motions/Elected Members proposed amendments and placing them on display with the Proposed Amendments to the Draft Plan.

OPR Observations on General and Procedural Matters

The draft plan comprises 13 volumes, with the principal volumes 1-3 extending to almost 900 pages long. The OPR appreciates the various volumes are, to an extent, informed by the legislative requirements. Nonetheless, the extent of the document does make it more difficult for the public to access. Likewise, it may also be difficult for those generally familiar with the planning system to navigate and appreciate the nuance and linkages between policy objectives.

In responding to the recommendations of the OPR, it is likely that further mapping will be necessary which may add to the volume of the plan. The planning authority should therefore consider rationalising elements of the plan and references to other policy documents, where possible, in attempt to streamline. A synopsis or summary of the plan may be a useful addition to help users navigate the final plan.

In terms of public availability, the Office recognises that the draft plan was placed on display following the introduction of level 3 Covid-19 protocols. The OPR notes that the plan was made available in libraries and was regularly promoted on the planning authority's Twitter page. Notices relating to the public consultation were also included on the planning authority's text messaging service, meaning all those signed up to it were informed of the consultation.

By way of further reference, the planning authority is advised that the OPR has prepared a communications toolkit which may be useful to the planning authority. The toolkit is available on the Office's website.

Chief Executive's Response General and Procedural Matters

The OPR's comments are noted. Development plans are necessarily lengthy due to the extent of content required and recommended by both planning legislation and the plethora of Section 28 and other ministerial guidelines. The Council has also gone to significant lengths to fully comply with such guidelines as the Retail Planning Guidelines and to provide a detailed Energy Strategy in furtherance of the Council's ambitious climate action ambitions.

It is considered essential to include the policy background to the various chapters as it explains, both to the Elected Members and to the public, the origins and necessity to include the many onerous policies in the plan. It also provides a summary of Section 28 Guidelines which are often inaccessible to the public and acts as a signpost to practitioners to these guidelines.

It is further noted that a significant number of submissions, including those from prescribed authorities, requested additional text (including additional policy references) be added to the Draft Plan. Accordingly, while no amendment is recommended in this regard, consideration will be given to the preparation of a synopsis of the plan its adoption.

2.3 Chief Executive's Recommendations

It is recommended that the following proposed amendments be made to the Draft Plan:

Chapter 2 Climate Action

CE OPR 1

Add Strategic Climate Objective on page 35:

To review the County Development Plan following the publication of the new Section 28 Development Plan - Guidelines for Planning Authorities to ensure that the approach to climate action is consistent with the guidelines and to vary the Plan, if necessary.

Chapter 3 Core Strategy

CE OPR 2

Insert a new figure, Figure 3.2 Settlements, after page 52

This map shows the location of all Level 1 – 6 settlements in the county. See Appendix C.

CE OPR 3

Amend Table No 3-2 County Wexford Settlement Hierarchy in Section 3.5 on page 52 as follows:

Settlement Hierarchy	Settlement [1]
Level 1 Key Towns	Wexford Town and Gorey Town
Level 2 Large Towns	Enniscorthy Town and New Ross Town
~~Level 3 Service Settlements~~	~~Bridgetown, Bunclody Town, Campile, Castlebridge, Clonroche, Coolgreany, Courtown and Riverchapel, Ferns, Kilmuckridge, Kilmore Quay, Rosslare Harbour and Kilrane, Rosslare Strand, Taghmon and Wellingtonbridge.~~
Level 3a Service Settlements	Bunclody Town, Castlebridge, Courtown and Riverchapel, Ferns, Rosslare Harbour and Kilrane, Rosslare Strand.
Level 3b Strategic Settlements	Bridgetown, Campile, Clonroche, Coolgreany, Kilmuckridge, Kilmore Quay, Taghmon and Wellingtonbridge.

Level 4 Large Villages	Adamstown, Ballaghkeen, Ballycanew, Ballycullane, Ballindaggin, Ballyhogue, Ballymurn, Ballywilliam, Barntown, Blackwater, Bree, Camolin, Carrig-on- Bannow, Clongeen, Craanford, Duncannon, Fethard, Killinerin, Murntown, Oilgate, Oulart, Piercestown, Ramsgrange, Tagoat.
Level 5 Small Villages Category 1	Arthurstown, Caim, Davidstown, Duncormick, Glenbrien, Glynn, Kilmore, Kilmyshall, Kiltealy, Lady's Island, Marshalstown, Monagear, Newbawn, Rathnure and Screen.
Level 5 Small Villages Category 2	Ballinaboola, Ballygarrett, Ballyhack, Ballymitty, Ballymoney, Boolavogue, Carne[4], Carrowreagh[4], Castledockrell, Cleriestown, Courtnacuddy[4], Crossabeg, Curracloe, ~~Duncormick~~[5], Foulkesmills, Gusserane, Killinick[2], Holyfort, Monamolin, Monaseed, Rathangan, Tomhaggard.
Level 6 Rural Nodes	Ballycarney, Ballycogley, Ballyduff, Ballyedmond, Ballyellis, Ballyfad, Ballyoughter, Ballyroebuck, Ballythomas[4], Baldwinstown, Cahore, Cassagh, Castletown, ~~Clearistown~~[3], Clologue, Clohamon, Cullenstown, Cushinstown, Donard, Galbally, Horeswood, Killann, Killenagh, Killurin, Mayglass[4], Poulpeasty, Raheen, Rathgarogue, Saltmills, Tara Hill, Tellarought, Tempeshambo, The Harrow, The Rock, Tombrack, Watchhouse Village.
Level 7 Open Countryside	The open countryside outside of the settlements listed in Levels 1 to 6.

CE OPR 4

Amend Section 3.6.3 Level 3 Settlements and insert a new Section 3.6.4 from page 65 as follows: This will require the subsequent renumbering of the remaining sub-sections in Section 3.6.

[2] See Chief Executive's Response to Submission WXF-C3-06 Devereux. These settlements will also be added to Section 3.6.5 and 3.6.6.
[3] Note deletion due to typographical error. These settlements will also be deleted in Section 3.6.5 and 3.6.6.

3.6.3 Level 3a Service Settlements

There are six settlements included at this level: Bunclody Town, Castlebridge, Courtown and Riverchapel, Rosslare Harbour and Kilrane, Rosslare Strand~~,~~ and Ferns, ~~Bridgetown, Campile, Clonroche, Coolgreany, Kilmore Quay, Kilmuckridge, Taghmon and Wellingtonbridge.~~

Role and Function

While the size of these settlements varies, the settlements all share a common characteristic of being important service settlements for their local communities and their wider rural hinterlands. Some of the settlements are important contributors to economic activity in the county including Rosslare Harbour and Kilrane (marine and port), ~~Kilmore Quay (marine, fisheries and tourism)~~, Rosslare Strand (tourism) and Courtown and Riverchapel (tourism, marine and fisheries) ~~and Clonroche (agri foods)~~. ~~and o~~Others ~~offer economic potential~~ including Bunclody Town and Ferns have potential for tourism related development in particular.

All of these settlements perform important functions including retail, commercial, education, residential, service and amenity functions. The location of these settlements, together with targeted growth and investment in services, will contribute to the balanced spatial development of the county. ~~While some of these settlements have sufficient wastewater capacity, investment is required in Ferns, Bridgetown, Campile, Kilmore Quay and Wellingtonbridge to allow these settlements to further develop.~~

Development Approach

The development approach for the Service Settlements is to:

- ~~Focus on moderate population growth in these settlements~~. ~~The allocated growth is relative to their existing baseline populations, existing and possible potential for economic development and infrastructural capacities.~~ Tailor population growth for each settlement having regard to their existing baseline populations, existing and possible potential for economic development and infrastructural capacities. In

allocating population r~~R~~egard was also had to the rate and pace of past development and the need to deliver social and community facilities to keep pace with recent development e.g. Courtown Harbour and Riverchapel. ~~and Bridgetown.~~

- Apply the sequential approach to the development of land, requiring residential development to take place within the existing footprint of the settlement. The leap frogging of infill/brownfield lands to undeveloped or greenfield lands will not be considered. Promote economic and enterprise development appropriate in scale to the settlements, such as expanding the potential of the marine economy and tourism in Courtown and Riverchapel ~~Kilmore Quay,~~ the port and port-related development in Rosslare Harbour and developing the tourism potential of Rosslare Strand, Bunclody Town and Ferns.
- Support learning, education and training initiatives, economic regeneration initiatives and enterprise to address unemployment and deprivation legacies which are evident is some of these settlements, e.g. ~~Clonroche, Taghmon,~~ Bunclody and~~,~~ ~~Bridgetown~~ Courtown and Riverchapel.
- Focus on maximising opportunities presented to settlements located on, or in close proximity, to planned greenway routes and at coastal locations.
- Focus on the regeneration and renewal of these settlements.
- Ensure that new development contributes to the creation of attractive, liveable, well-designed, high quality settlements and the local communities enjoy a high quality of life and well-being.
- Support community organisations who are working to develop community facilities and promote and facilitate initiatives in the public realm.
- Protect and enhance amenities, heritage, green infrastructure and biodiversity in these settlements.

Bunclody Town and Rosslare Harbour and Kilrane have populations >1,500. Settlement Plans including ~~S~~specific objectives and land use zoning for these settlements are included in Volume 3. Castlebridge and Rosslare Strand also have populations >1,500. Settlement Plans including ~~S~~specific objectives for both settlements are included in Volume 3 ~~for these settlements~~. The Council intends to vary the Plan to include land use zoning maps for

Castlebridge and Rosslare Strand and a Settlement Plan for Ferns following the preparation of LAPs for Wexford, Enniscorthy and New Ross.

The lifetime of the Courtown and Riverchapel Local Area Plan has been extended by five years to 2026 and provides the spatial planning framework for this settlement.

3.6.4[4] Level 3b Strategic Settlements

There are eight settlements included at this level: Bridgetown, Campile, Clonroche, Coolgreany, Kilmore Quay, Kilmuckridge, Taghmon and Wellingtonbridge.

Role and Function

There is a strategic imperative to prioritise the development of these villages. Some of the settlements are important contributors to economic activity at sub-county level with existing large employers such as Kilmore Quay (marine, fisheries and tourism), Clonroche (agri foods) and Taghmon (food production and logistics). Some of the settlements, such as Wellingtonbridge, Kilmuckridge and Kilmore Quay, have potential to be regenerated though tourism related development. All of these settlements perform important functions including retail, commercial, education, residential, service and amenity functions for wide sub-county hinterlands. In general, these functions are far in excess of that required to support their own population.

A number of these settlements have not been targeted for significant population over the lifetime of the plan but have been included on this level of the hierarchy in order to prioritise the growth of infrastructure, employment and community and amenity services and improve socio–economic outcomes.

While some of the settlements have sufficient wastewater capacity, investment is required in Campile, Kilmore Quay and Wellingtonbridge to allow these settlements to further develop.

[4] Renumber sections hereafter

Development Approach

The development approach for these Strategic Settlements is to:

- Tailor population growth for each settlement having regard to their existing baseline populations, potential for economic development and infrastructural capacities. When allocating population, regard was also had to the rate and pace of past development and the need to deliver social and community facilities to keep pace with recent development e.g. Bridgetown.
- Apply the sequential approach to the development of land, requiring residential development to take place within the existing footprint of the settlement. The leap frogging of infill/brownfield lands to undeveloped or greenfield lands will not be considered.
- Promote economic and enterprise development appropriate in scale to the settlements, such as expanding the potential of the marine economy and tourism in Kilmore Quay and developing the tourism potential of Kilmuckridge and Wellingtonbridge.
- Support learning, education and training initiatives, economic regeneration initiatives and enterprise to address unemployment and deprivation legacies which are evident is some of these settlements, e.g. Clonroche, Taghmon, and Bridgetown.
- Focus on maximising opportunities presented to settlements located on, or in close proximity to planned greenway routes and the coast.
- Focus on the regeneration and renewal of these settlements.
- Ensure that new development contributes to the creation of attractive, liveable, well-designed, high quality settlements and the local communities enjoy a high quality of life and well-being.
- Support community organisations who are working to develop community facilities and promote and facilitate initiatives in the public realm.
- Protect and enhance amenities, heritage, green infrastructure and biodiversity in these settlements.

The Council will vary the Plan to include settlement boundaries and specific objectives (and identify infill and regeneration sites) for these settlements following the preparation of the LAPs for Wexford Town, Enniscorthy and New Ross.

CE OPR 5

Amend Section 3.6.4 at paragraph 4 on page 68 as follows:

The spatial planning approach for these villages is to concentrate new residential growth within the exiting footprint of the village. The Council will apply the sequential approach to the development of land, focusing on the development of lands within and closest to the village centre first. 'Leap-frogging' of undeveloped lands and greenfield lands will not be considered. The Council will vary the Plan to include settlement boundary maps for these settlements following the preparation of the LAPs for Wexford Town, Enniscorthy and New Ross.

CE OPR 6

Amend Section 3.6.5 at paragraph 5 on page 69 as follows:

The development approach for these villages is to facilitate incremental growth in a sustainable manner. These villages will be consolidated by concentrating new growth in the village centre. The planning authority will apply the sequential approach to the development of land, focusing on the development of lands within the existing footprint and closest to the village centre first. 'Leap-frogging' of undeveloped lands will not be considered. The Council will vary the Plan to include settlement boundary maps for these settlements following the preparation of the LAPs for Wexford Town, Enniscorthy and New Ross.

CE OPR 7

Amend Section 3.6.5 at paragraph 6 of page 70 as follows:

These villages will be consolidated by concentrating new growth within the existing footprint of the village. The Council will vary the Plan to include settlement boundary maps for these settlements following the preparation of the LAPs for Wexford Town, Enniscorthy and New Ross. The planning authority will apply the sequential approach to the development of land, focusing on the development of lands within the existing footprint

and closest to the village centre first. 'Leap-frogging' of undeveloped lands will not be considered. New developments should contribute to the protection and enhancement of amenities, heritage, green infrastructure and biodiversity and recreation and open spaces.

CE OPR 8

Amend Section 3.7.2 from paragraph 4 on page 73 as follows:

The NPF states that where a local authority includes all of these five categories of housing location, at least three of these settlement types (i.e. i, ii and iii) must also include specific consideration of infill/ brownfield and greenfield capacity. NPO 3c requires that at least 30% of all new homes targeted in settlements other than the five cities and their suburbs, to be delivered within the built-up footprints. ~~The transitional level of growth to 2027 will provide sufficient scope to enable City and County Development Plans to be reviewed, land zonings to be prioritised and Local Area Plans and planning permissions to be worked through, while also allowing for agility and ambition, as well as monitoring and review, as we move towards full implementation of the NPF and NDP.~~

As the County Development Plan does not include zoning for the towns (other than Rosslare Harbour and Kilrane and Bunclody) it is not possible to identify at this stage which sites will be classified as infill and which will be classified as greenfield. The appropriate sites will be identified when Settlement Plans and Local Area Plans are being prepared. It is likely that a significant portion of the allocated population will be capable of being accommodated on lands which would fall within definitions of infill or brownfield. The delivery of housing within the built up footprint of settlements will be crucial to achieving compact growth and sustainable settlements where opportunities to use sustainable modes are maximised. Section 5.9.1 provides details of the types of land which are considered infill or brownfield and where it is anticipated such housing will be delivered.

Similarly, as the land use zoning plans for the towns are not included in this Plan it is not possible to tailor densities to particular sites (such as central sites or those on public transport corridors). Thus while the allocated population is set by the County Development Plan, the quantum of zoned land cannot be set until each of the specific towns are examined in their LAPS or Settlement Plans to determine their ability to achieve infill or brownfield

development, compact growth and higher densities. As such for the purposes of the Core Strategy an assumed density of ~~25~~ 35 units/hectare has been given to Wexford Town, ~~and~~ Gorey Town, ~~25 units/hectare to~~ Enniscorthy Town and New Ross Town and 25 units/hectare to the ~~zoned~~ Level 3a Settlements.

The density in the remaining ~~Level 3~~ settlements will be determined by reference to the settlement size and the guiding densities set out in ~~Chapter 6~~ of the Guidelines for Planning Authorities on Sustainable Residential Guidelines in Urban Areas (DEHLG, 2009). See Section 4.7.2.1 for further details.

CE OPR 9

Amend Section 3.7.3 from paragraph 3 on page 75 as follows:

In this regard and in order to achieve centres of scale, the Core Strategy allocates ~~40%~~ 45% and ~~35%~~40% growth to 2040 to Wexford Town and Gorey Town respectively. In order to achieve a shift in population from rural areas to urban areas growth in settlements has been front loaded where appropriate following the application of a capacity test for these settlements.

CE OPR 10

Delete Table 3 -3 Allocation of Population to the Settlement Hierarchy on page 75-77 and replace with a new Table 3 -3.

~~*Table 3- 3 Allocation of Population to the Settlement Hierarchy*~~

~~Settlement Hierarchy~~	~~Settlement~~	~~2016~~	~~2021~~	~~2027~~	~~2031~~	~~2040~~
~~Level 1 Key Towns~~	~~Wexford Town~~	~~20,188~~	~~22,611~~	~~25,264~~	~~26,187~~	~~28,263~~
	~~Gorey~~	~~9,822~~	~~10,853~~	~~11,983~~	~~12,376~~	~~13,259~~
~~Level 2 Large Towns~~	~~Enniscorthy Town~~	~~11,381~~	~~12,405~~	~~13,527~~	~~13,917~~	~~14,795~~
	~~New Ross Town~~	~~7,780~~	~~8,480~~	~~9,247~~	~~9,514~~	~~10,114~~
~~Level 3 Service Settlements~~	~~Bunclody Town~~	~~1,430~~	~~1,519~~	~~1,627~~	~~1,698~~	~~1,859~~
	~~Castlebridge~~	~~1,840~~	~~1,955~~	~~2,093~~	~~2,185~~	~~2,392~~
	~~Courtown and Riverchapel~~	~~3,591~~	~~3,741~~	~~3,920~~	~~4,040~~	~~4,309~~
	~~Ferns~~	~~1,415~~	~~1,503~~	~~1,610~~	~~1,680~~	~~1,840~~
	~~Rosslare Harbour and Kilrane~~	~~1,847~~	~~2,001~~	~~2,186~~	~~2,309~~	~~2,586~~
	~~Rosslare Strand~~	~~1,620~~	~~1,721~~	~~1,843~~	~~1,924~~	~~2,106~~
	~~Bridgetown (462), Campile (448), Clonroche (326), Coolgreany (376), Kilmore Quay (372), Kilmuckridge (722),~~	~~3428~~	~~3,628~~	~~3,868~~	~~4,028~~	~~4,389~~

~~Settlement Hierarchy~~	~~Settlement~~	~~2016~~	~~2021~~	~~2027~~	~~2031~~	~~2040~~
	~~Taghmon (585), Wellingtonbridge (137).~~					
~~Level 4 Large Villages~~	~~Adamstown (293), Ballaghkeen (515), Ballycanew (516), Ballycullane (318), Ballindaggin, Ballyhogue (269), Ballymurn (524), Ballywilliam, Barntown (459), Blackwater (339), Bree(193), Camolin (415), Carrig on Bannow (258), Craanford, Clongeen (234), Duncannon (305), Fethard (311), Killinerin (244), Murntown (365), Oilgate (358), Oulart (274), Piercestown (535), Ramsgrange (126), Tagoat (439).~~	~~7,290~~	~~7,700~~	~~8,192~~	~~8,520~~	~~9,258~~
~~Level 1-4~~	~~-~~	~~71,632~~	~~78,118~~	~~85,359~~ -	~~88,378~~	~~95,170~~
~~Level 5, 6 and Open Countryside~~	~~-~~	~~78,090~~	~~79,742~~	~~81,941~~ -	~~84,122~~	~~90997~~

~~Settlement Hierarchy~~	~~Settlement~~	~~2016~~	~~2021~~	~~2027~~	~~2031~~	~~2040~~
~~NPF Roadmap County Total~~	-	~~149,722~~	~~157,860~~	~~167,300~~	~~172,500~~	~~186,167~~

Table 3 -3 Allocation of Population to the Settlement Hierarchy

Settlement Hierarchy	Settlement	2016	2021	2027	2031	2040
Level 1 Key Towns	Wexford Town	20,188	22,849	26,043	27,036	29,273
	Gorey	9,822	11,027	12,474	12,867	13,751
Level 2 Large Towns	Enniscorthy Town	11,381	12,467	13,771	14,086	14,795
	New Ross Town	7,780	8,134	8,558	9,037	10,114
Level 3a Service Settlements	Bunclody Town	1,430	1,593	1,788	1,810	1,859
	Castlebridge	1,840	1,965	2,116	2,201	2,392

Settlement Hierarchy	Settlement	2016	2021	2027	2031	2040
	Courtown and Riverchapel	3,591	3,673	3,771	3,881	4,130
	Ferns	1,415	1,511	1,627	1,693	1,840
	Rosslare Harbour and Kilrane	1,847	2,057	2,309	2,394	2,586
	Rosslare Strand	1,620	1,730	1,863	1,938	2,106
Level 3b Strategic Settlements	Bridgetown (462), Campile (448), Clonroche (326), Coolgreany (376), Kilmore Quay (372), Kilmuckridge (722), Taghmon (585), Wellingtonbridge (137).	3,428	3,628	3,869	4,019	4,356
Level 4 Large Villages	Adamstown (293), Ballaghkeen (515), Ballycanew (516), Ballycullane (318), Ballindaggin, Ballyhogue (269), Ballymurn (524), Ballywilliam, Barntown (459), Blackwater (339), Bree(193), Camolin (415), Carrig on Bannow (258), Craanford, Clongeen (234), Duncannon (305), Fethard (311), Killinerin (244), Murntown (365),	7,849	8,346	8,942	9,330	10,204

Settlement Hierarchy	Settlement	2016	2021	2027	2031	2040
	Oilgate (358), Oulart (274), Piercestown (535), Ramsgrange (126), Tagoat (439).					
Level 1-4	-	72,191	78,981	87,130	90,291	97,405
Level 5, 6 and Open Countryside	-	77,531	78,880	80,170	82,209	86,795
NPF Roadmap County Total	-	149,722	157,861	167,300	172,500	184,200

CE OPR 11

Amend Section 3.8.4 paragraph 2 on page 78 as follows:

As outlined above the zoned land requirement for each level in the settlement hierarchy was determined based on an allocated average density for that settlement, e.g. Level 1 Key Towns 35 ~~25~~ units/ha, Level 2 Large Towns 35 ~~25~~units/ha and 25 units/ha to the ~~zoned~~ Level 3.a settlements. There will be no zoning in Levels 3.b, 4, 5 and 6 on the Settlement Hierarchy.

CE OPR 12

Delete Table 3.4 Core Strategy Population Allocations and Housing Land in Section 3.8.4 on 79-80 and replace with a new Table 3.4 as follows[5]:

[5] Note that this Table has been further amended to take account of the Housing Supply Target methodology for Development Planning (December 2020) and associated Circular and supplementary data from the DHPLG as discussed under the submissions received under Chapter 4.

Table No 3.4 Core Strategy Population Allocations and Housing Land 2016-2027

~~Settlement Level~~	~~Settlement~~	~~Core Strategy Population Allocation~~	~~Households/ Housing Units~~	~~Average Density Unit/HA~~	~~Zoned Land Required~~	~~Existing Zoning (Ha)~~	~~Shortfall/ Excess (Ha)~~
~~County Wexford~~	~~-~~	~~-~~	~~-~~	~~-~~	~~-~~	~~-~~	~~-~~
~~Key Town~~	~~Wexford~~	~~5,076~~	~~2410~~	~~25~~	~~96~~	~~406~~	~~+310~~
	~~Gorey~~	~~2,161~~	~~998~~	~~25~~	~~40~~	~~99~~	~~+59~~
~~Large Town~~	~~Enniscorthy~~	~~2,146~~	~~972~~	~~25~~	~~39~~	~~321~~	~~+282~~
	~~New Ross~~	~~1,467~~	~~509~~	~~25~~	~~20~~	~~39~~	~~+19~~
~~Service Settlements~~	~~Bunclody Town~~	~~197~~	~~96~~	~~25~~	~~4~~	~~0~~	~~-4~~
	~~Castlebridge~~	~~253~~	~~104~~	~~-~~	~~-11~~	~~-~~	~~-~~
	~~Courtown and Riverchapel~~	~~329~~	~~145~~	~~25~~	~~5.8~~	~~1.812~~	~~4~~
	~~Ferns~~	~~195~~	~~66~~	~~-~~	~~-~~	~~-~~	~~-~~

	~~Rosslare Harbour and Kilrane~~	~~339~~	~~85~~	~~25~~	~~3.4~~	~~0~~	~~3.4~~
	~~Rosslare Strand~~	~~223~~	~~148~~	~~-~~	~~-~~	~~-~~	~~-~~
~~-~~	~~Bridgetown, Campile, Clonroche, Coolgreany, Kilmore Quay, Kilmuckridge, Taghmon, Wellingtonbridge~~	~~-~~	~~-~~	~~-~~	~~-~~	~~-~~	~~-~~
~~Level 4~~	~~Adamstown, Ballaghkeen, Ballycanew, Ballycullane, Ballyhogue, Ballymurn, Barntown, Blackwater, Bree, Camolin, Carrig on Bannow, Clongeen, Duncannon, Fethard, Killinerin, Murntown, Oilgate, Oulart, Piercestown, Ramsgrange, Tagoat.~~	~~-~~	~~-~~	~~-~~	~~-~~	~~-~~	~~-~~
~~Level 5, 6 and Open Countryside~~	~~-~~	~~3, 911~~	~~-~~	~~-~~	~~-~~	~~-~~	~~-~~

Table No 3.4 Core Strategy Population Allocations, Housing Units and Housing Land 2021-2027

Settlement Level	Settlement	Core Strategy Population Allocation	Housing Units	Units to be delivered within built area	Average Density Unit/HA	Zoned Land Required (Ha)[6]	Existing Zoning (Ha)	Shortfall/ Excess (Ha)
Key Town	Wexford	3,194	2,174	652	35	62.11	406	+343.66
	Gorey	1,447	985	296	35	28.14	99	+70.86
Large Town	Enniscorthy	1,304	888	266	35	25.37	321	+295.63
	New Ross	424	289	87	35	8.25	39	+30.75
3a Service Settlements	Bunclody Town	195	133	40	25	5.32	0	-5.32
	Castlebridge	151	103	31	25	4.12	0	-4.12
	Courtown and Riverchapel	98	67	20	25	2.68	1.8	-0.88
	Ferns	116	79	24	25	3.16	0	-3.16

[6] Infill and greenfield.

	Rosslare Harbour and Kilrane	252	172	52	25	6.88	0	-6.88
	Rosslare Strand	133	90	27	25	3.6	0	-3.6
Level 3b		241	164	49	-	-	-	-
Level 4		596	406	122	-	-	-	-
Level 5, 6 and open countryside		1,291	879	n/a	-	-	-	-

CE OPR 13

Amend paragraph 2 in Section 3.10 Retail on page 82 as follows:

The Strategy is aligned to the Corey Strategy and the Settlement Hierarchy. It focuses on maintaining and further developing the Key Towns and Large Towns as the main retail centres in the county. The development of retail services in the Service Settlements, Strategic Settlements, Large Villages, Small Villages and Rural Nodes will be focused on providing support services for their respective populations and rural hinterlands.

Table 3.5 County Wexford Retail Settlement Hierarchy

Retail Planning Guidelines Settlement Type	Wexford Settlement Hierarchy	Retail Settlements	Appropriate Scale and Type of Retail
Level 1: Regional Town	Key Town	Wexford Town	Major Convenience and Comparison
Level 2: Large Sub-Regional Towns	Key Town	Gorey Town	Large to Medium scale convenience and medium scale comparison
Level 2: Large Sub-Regional Towns	Large Town	Enniscorthy Town / New Ross Town	Large to Medium scale convenience and medium scale comparison
Level 3: Small Service Towns	Service Settlements	~~Bridgetown,~~ Bunclody, ~~Campile,~~ Castlebridge, ~~Clonroche, Coolgreany,~~ Courtown and Riverchapel, Ferns, ~~Kilmuckridge, Kilmore Quay,~~ Rosslare Harbour and Kilrane, Rosslare	Medium scale convenience along with small to medium scale comparison including tourism related comparison

Retail Planning Guidelines Settlement Type	Wexford Settlement Hierarchy	Retail Settlements	Appropriate Scale and Type of Retail
		Strand~~, .Taghmon and Wellingtonbridge~~	
	Strategic Settlements	Bridgetown, Campile, Clonroche, Coolgreany, Kilmuckridge, Kilmore Quay, Taghmon and Wellingtonbridge	Medium scale convenience along with small to medium scale comparison including tourism related comparison
Level 4: Local Shopping or Neighbourhood Centres	Various Villages and Rural Settlements		Predominantly lower order convenience, but not excluding tourism related comparison

CE OPR 14

Amend Objective CS20 on page 87:

To ensure growth and development in the Service Settlements, Strategic Settlements, Large Villages and Small Villages across the county is proportionate to the scale, size and character of the settlement and well designed so as to contribute to the regeneration of these settlements. To implement as resources allow ~~including~~ interventions in the public realm, the provision of amenities, the acquisition of sites and the provision of services and ensure good quality of life and well-being for the local communities.

CE OPR 15

Add a new objective on page 87 and renumber all objectives thereafter:

To vary the County Development Plan to include Settlement Plans for Level 3a settlements and prepare boundaries and objectives for Level 3b settlements and prepare settlement

boundaries for Level 4 and 5 settlements. Potential sites for infill, regeneration and appropriate locations for housing will be identified for all Level 3a, 3b, 4 and 5 settlements.

Chapter 4 Sustainable Housing

CE OPR 16

Amend paragraph 2 in Section 4.6 Locations for Future Housing on page 107 as follows:

The NPF also includes an objective that at least 30% of all new homes should be delivered within the existing built-up footprint of settlements and RPO 176 of the RSES introduces the 10 Minute Town Concept. As set out in Objective CS05, this will be complied with when local area plans and settlement plans are being prepared for the towns and villages of the County.

CE OPR 17

Amend the last paragraph in Section 4.7.2.1 Density of Residential Developments on page 109 as follows:

~~Residential densities will generally be applied in accordance with the Sustainable Residential Guidelines for Urban and Rural Areas.~~

~~Table 4-5 sets out the indicative densities that will be applied to residential developments in Levels 1-4 of the Settlement Hierarchy. This table is provided for guidance purposes only. As outlined in the Core Strategy, the LAPs Plans for the Key Towns and Large Towns will specify the densities that will apply to specific sites/areas within those plans.~~

High-quality design is fundamental in creating sustainable residential neighbourhoods. Density is one of a number of key measures which helps to achieve this objective and it is also a measure to promote compact growth in towns and large villages. In order to maximise the use of public infrastructure, reduce travel, reduce energy consumption minimum density standards are recommended in the Sustainable Residential Development in Urban Areas, Guidelines for Planning Authorities (2009). Table 4.5 outlines the density requirements in accordance with the Guidelines for settlements with populations above 5,000 persons and villages and town which have populations between 400 and 5,000 persons.

CE OPR 18

Replace Table 4-5 on page 110 as follows:

~~Table 4-5 Indicative Density and Scale Levels 1-4 in the Settlement Hierarchy~~

~~Level No.~~	~~Settlement Type~~	~~Units/Ha~~
~~1~~	~~Key Towns~~	~~25 units/ha~~
~~2~~	~~Large Towns~~	~~25 units/ha~~
~~3~~	~~Service Settlements~~	~~25 units/ha for zoned settlements. The density in the remaining settlements at this level will be determined by reference to the settlement size and the guiding densities set out in Chapter 6 of the Guidelines for Planning Authorities on Sustainable Residential Guidelines in Urban Areas (DELG, 2009).~~ ~~In line with the Core Strategy and with the exception of Rosslare Harbour and Kilrane and Kilmore Quay, the population of each settlement is not to grow by more than 30% by 2040. Accordingly, the combined permitted residential development should not increase the population of a settlement by more than 20% of its 2016 population during the lifetime of this Plan.~~ ~~The appropriate scale/number of units in each residential scheme will be determined based on the scale and characteristics of the individual settlement.~~
~~4~~	~~Large Villages~~	~~12 units/ha~~ ~~In line with the Core Strategy, the population of each settlement is not to grow by more than 30% by 2040. Accordingly, the combined permitted residential development should not increase the population of a settlement by more than 20% of its 2016 population over the period of this Plan.~~

~~Level No.~~	~~Settlement Type~~	~~Units/Ha~~
		~~In general, in villages with a population of <400 people, the scheme size should be no more than 10-12 units, and in villages with a population of >400 people, the scheme size should between 10-15 units.~~

Table 4-5 Indicative Density and Scale Levels 1-4 in the Settlement Hierarchy

Cities and Town Centres
In order to maximise inner city and town centre population growth, there should, in principle, be no upper limit on the number of dwellings that may be provided within any town or city centre site, subject to the following safeguards: • compliance with the policies and standards of public and private open space adopted by development plans or local area plans; • avoidance of undue adverse impact on the amenities of existing or future adjoining neighbours; • good internal space standards of development; • conformity with any vision of the urban form of the town or city as expressed in development plans, particularly in relation to height or massing; • recognition of the desirability of preserving protected buildings and their settings and of preserving or enhancing the character or appearance of an Architectural Conservation Area; and • compliance with plot ratio and site coverage standards adopted in development plans or local area plans. **Brownfield Sites** Where such significant sites exist and, in particular, are close to existing or future public transport corridors, the opportunity for their re-development to higher densities, subject to the safeguards expressed above or in accordance with local area plans, should be promoted, as should the potential for car-free developments at these locations.

Public Transport Corridors

Walking distances from public transport nodes (e.g. stations / halts / bus stops) should be used in defining such corridors. It is recommended that increased densities should be promoted within 500 metres walking distance18 of a bus stop, or within 1km of a light rail stop or a rail station. The capacity of public transport (e.g. the number of train services during peak hours) should also be taken into consideration in considering appropriate densities. In general, **minimum net densities of 50 dwellings per hectare**, subject to appropriate design and amenity standards, should be applied within public transport corridors, with the highest densities being located at rail stations/bus stops, and decreasing with distance away from such nodes.

Inner suburban/Infill

Potential sites may range from small gap infill, unused or derelict land and backland areas, up to larger residual sites or sites assembled from a multiplicity of ownerships. In residential areas whose character is established by their density or architectural form, a balance has to be struck between the reasonable protection of the amenities and privacy of adjoining dwellings, the protection of established character and the need to provide residential infill. The local area plan should set out the planning authority's views with regard to the range of densities acceptable within the area

Sub-division of dwellings

Many inner suburbs contain large houses on relatively extensive sites whose conversion to multiple dwellings without a dramatic alteration in the public character of the area is achievable. In such areas, particularly those of falling population but which are well served by public transport, their conversion to multiple occupancy should be promoted subject to safeguards regarding internal space standards, private open space and maintenance of the character of the area.

Institutional Lands

A considerable amount of developable land in suburban locations is in institutional use and/or ownership. Such lands are often characterised by large buildings set in substantial

open lands which in some cases may offer a necessary recreational or amenity open space opportunity required by the wider community. In the event that planning authorities permit the development of such lands for residential purposes, it should then be an objective to retain some of the open character of the lands, but this should be assessed in the context of the quality and provision of existing or proposed open space in the area generally. In the development of such lands, average net densities at least in the range of 35-50 dwellings per hectare should prevail and the objective of retaining the open character of the lands achieved by concentrating increased densities in selected parts (say up to 70 dph).

Outer Suburban/Greenfield sites

These may be defined as open lands on the periphery of cities or larger towns whose development will require the provision of new infrastructure, roads, sewers and ancillary social and commercial facilities, schools, shops, employment and community facilities Studies have indicated that whilst the land take of the ancillary facilities remains relatively constant, the greatest efficiency in land usage on such lands will be achieved by providing net residential densities in the general range of 35-50 dwellings per hectare and such densities (involving a variety of housing types where possible) should be encouraged generally**. Development at net densities less than 30 dwellings per hectare should generally be discouraged** in the interests of land efficiency, particularly on sites in excess of 0.5 hectares.

Provision for Lower Densities in limited cases

To facilitate a choice of housing types within areas, limited provision may be made for lower density schemes provided that, within a neighbourhood or district as a whole, average densities achieve any minimum standards recommended above

Small Towns and Villages

Centrally Located Sites

Within a given smaller town or village, there can be marked variations in development context which affect the density of development and external space standards needed to take account of those contexts. Because of the variety of contexts and the probability of

mixed use developments, it is difficult to be prescriptive about the level of density recommended. However, within centrally located sites, densities of **30-40+ dwellings per hectare for mainly residential schemes may be appropriate or for more mixed use schemes.**

Edge of Centre Sites

The emphasis will be on achieving successful transition from central areas to areas at the edge of the smaller town or village concerned. Development of such sites tend to be predominantly residential in character and given the transitional nature of such sites, densities to a range of **20-35 dwellings** per hectare will be appropriate including a wide variety of housing types from detached dwellings to terraced
and apartment style accommodation.

Edge of Small Town/Village

In order to offer an effective alternative to the provision of single houses in surrounding unserviced rural areas, it is appropriate in controlled circumstances to consider proposals for developments with densities of less than **15 - 20 dwellings per hectare** along or inside the edge of smaller towns and villages, as long as such lower density development does not represent more than about 20% of the total new planned housing stock of the small town or village in question. This is to ensure that planned new development in small towns and villages offer a range of housing types, avoiding the trend towards predominantly low density commuter-driven developments around many small towns and villages within the commuter belts of the principal cities and other similar locations. Such lower density development also needs to ensure the definition of a strong urban edge that defines a clear distinction between urban and the open countryside.

CE OPR 19

Amend Table 4-6 on page 130 as follows:

Table 4.6 Criteria for Off One Rural Housing

Rural Area Type Area	Category A	Category B
	Housing for persons who have a demonstrable social functional rural housing need to live in a particular rural area and who are building a permanent home for their own use	Housing for persons who have a demonstrable economic functional rural housing need to live in a particular rural area and who are building a permanent home for their own use
Strong Urban Influence	A person who has lived fulltime for a minimum of 10 years in that local rural area and the site is within 5 ~~15~~km radius of where the applicant has lived or is living and who has never owned a rural house. (See Point 4 in Definitions and Notes regarding owning a rural house). The person can work from home or commute to work daily.	B (i) Persons who by the nature of their work have a functional need to reside permanently in the rural area close to their place of work. Functional economic need must be related to a rural resource based activity such as full-time agriculture or horticulture and the nature of the activity or business must require the person to live at on or in close proximity to the business. ~~will include persons involved in full-time farming, horticulture, forestry or marine related activities as well as~~

Rural Area Type Area	Category A	Category B
Stronger Rural Area	A person who has lived full time for minimum period of 10 years in that local rural area and the site is within 7 ~~20~~km radius of where the applicant has lived or is living and who has never owned a rural house. (See Point 4 in Definitions and Notes regarding owning a rural house). The person can work from home or commute to work daily.	~~others who can demonstrate a genuine need because of their occupation to live in the rural area~~. Similar part-time occupations can also be considered where it can be demonstrated that it is the predominant occupation. The applicant must be able to provide documentary evidence that the employment is full-time or predominant employment when part-time. The applicant must be able to demonstrate that the landholding is such to support a viable enterprise.
Structurally Weak Area	A person who has lived full time for a minimum of 10 years in that local rural area and the site is within 10 ~~25~~km radius of where the applicant has lived or is living and who has never owned a rural house. (See Point 4 in Definitions and Notes regarding owning a rural house). The person can work from	~~Or~~ - ~~B (ii) Bode fide applicants who are not considered eligible under either A or B(i) may qualify to build a permanent home in this rural area subject to satisfying the Planning Authority of their commitment to operate a full-time rural business from their proposed home in a rural area. Applicants must as part of~~

Rural Area Type Area	Category A	Category B
	home or commute to work daily.	~~their planning application submit evidence to satisfy the Planning Authority that:~~ - ~~(a) Their business will contribute to enhance the rural community and bring employment to the area in which they seek to live,~~ - ~~AND~~ ~~The nature of their employment or business is compatible with those specified in the local needs criteria for rural areas so as to discourage applicants whose business is not location-dependent (e.g telesales or telemarketing), that is, they are serving a need in their local rural area.~~ -
Coastal Zone	A person who has lived fulltime within the Coastal Zone for a minimum period of 10 years and the subject site is within 3km radius of	Such persons shall be defined as persons who by the nature of their work have an over-riding economic functional need to reside permanently in the specific Coastal

Rural Area Type Area	Category A	Category B
	where the applicant has lived or is living and who has never owned a rural house. (See Point 4 in Definitions and Notes regarding owning a rural house).	Zone or Landscape and Heritage Area and do not have access to appropriate land outside that area. Such circumstances will normally apply to land or business owners involved in full-time farming, horticulture~~, forestry,~~ marine or tourism (not including B&Bs) related activities and where the business requires them to be located on the premises/holding. The applicant must be able to provide documentary evidence that the employment is full-time. The applicant must be able to demonstrate that the landholding is such to support a viable enterprise. ~~Or~~ ~~Bode fide applicants who are not considered eligible under the preceding category but may be considered as qualifying to build a permanent home in the rural area, subject to being able to satisfy the Planning Authority that the nature of their employment requires them to be located in the Coastal Zone or~~
Landscape and Heritage Areas . Designated ecological areas including SACs, SPA and NHAs, . Upland, River Valley or Coastal	A person who has lived fulltime within that particular landscape or heritage area for a minimum period of 10 years and the subject site is within 3km radius of where the applicant has lived or is living and who has never owned a rural house. In the Slaney River Valley Landscape Unit, the subject site must be within 5km	

Rural Area Type Area	Category A	Category B
landscape units[9] or a Distinctive Landscapes	radius of where the applicant has lived or is living and who has never owned a rural house (See Point 4 in Definitions and Notes regarding owning a rural house).	~~Landscape and Heritage Areas based on the services they would need related to that specific designated area and that they would enhance the specific designated area.~~
	Single rural housing will only be facilitated in these areas where the particular landscape unit, i.e. Upland, River Valley or Coastal landscape or the Distinctive landscape has the capacity to absorb the development. Where the Council considers that there is a risk of individual or cumulative adverse impacts, the Council will only consider proposals for single rural housing where the applicant has demonstrated an overriding need (either social or economic) to reside in the particular location in accordance with this table and Point 5 in Definitions and Notes.	

CE OPR 20

Insert a new objective in Section 4.9 Housing in the Open Countryside on page 136 as follows:

To review the rural housing policy contained in the County Development Plan following the publication of the new Section 28 Guidelines for Planning Authorities on Sustainable Rural Housing, and to vary the Plan if necessary

Chapter 5 Design and Place-making in Towns and Villages

CE OPR 21

Amend Section 5.9.1 Infill, Regeneration and Renewal on page 168-169 as follows:

5.9.1 Infill, ~~Regeneration and Renewal~~ Brownfield and Greenfield Development

There are many opportunities to increase the number of jobs and people within central areas through infill which achieves the dual objectives of compact growth and regeneration. The development of these sites will prevent car-dependent sprawl and resulting unsustainable patterns of commuting and service provision. It will also rejuvenate these areas, many of which have been declining in population, by bringing new people to the area and create demand and customers for existing services. There will therefore be a presumption in favour of development which can encourage more people, jobs and activities within our towns and villages. The Council has outlined in Objective CS04 its commitment to prepare an audit of available brownfield sites over the plan period.

~~**Infill/Greenfield Expansion**~~

In accordance with the requirement of the NPF the Council will ensure that 30% of all new homes that are targeted in settlements will occur within their existing footprint[7]. The NPF states that this will apply to all settlements as defined by CSO. This will be implemented through the various local area plans and settlement plans. There are a range of opportunities for the delivery of housing units on infill and brownfield sites within our town and villages.

Types of Brownfield and Infill Lands

Infill Sites

Potential sites may include gap infill sites, unused or derelict land, institutional lands and backland areas, up to larger residual sites assembled from a multiplicity of ownerships. Smaller scale infill may be achieved through:

- Conversion of non-residential properties to residential use;
- Subdivision of larger residential plots to provide residential units; or
- Subdivision of larger residential properties to provide individual units within them

[7] Built-up footprint of the settlement is defined as the CSO urban settlement boundary in accordance with NPO3c footnote 19.

Brownfield Sites

Brownfield land is defined as 'any land which has been subjected to building, engineering or other operations, excluding temporary uses or urban green spaces'[8]. It may comprise redundant industrial or commercial lands, docks, barracks, hospitals or obsolete housing areas. The Council will identify appropriate brownfield land upon which housing could be delivered when preparing local area plans and settlement plans.

Remediation of Brownfield Sites:

The Council will ensure that appropriate environmental appraisals are carried out early in the project development for brownfield sites and will require the preparation of Construction and Development Waste Plans carried out in accordance with the 'Best Practice Guidelines for the Preparation of Waste Management Plans for Construction and Demolition Projects' published by the Department of Environment, Community and Local Government. Further details are included in Section 9.7.5 in Chapter 9 Infrastructure and Volume 2 Development Management Manual.

Greenfield Expansion

In settlements which do not have a local area plans or settlement plans or defined boundaries ~~zoning~~ under this Plan, the Council will only consider the sequential development of the village. In villages such as Rosslare Strand and Castlebridge, which have significant potential for inner and outer infill, development will only be permitted within the existing built-up area. Greenfield expansion outside the existing built up area will not be permitted. The Council will also protect the edge of all settlements from ribbon development in order to allow for their orderly development in the future.

CE OPR 22

Amend the title of Section 5.9.2 on page 170 as follows:

5.9.2 Regeneration – Active Land Management and Local Authority Intervention

[8] SRDUA, 2009.

CE OPR 23

Insert the following text after paragraph 2 on page 171 (and renumber existing tables thereafter):

Table 5-1 below shows the Council's priority locations for active land management and regeneration. In some cases, these will be major development proposals and in smaller settlements this may be limited to support for public realm proposals and implementation of the Derelict Sites and Urban Regeneration and Housing Acts. In all cases this will be subject to appropriate resources and funding and it is not intended that all actions will take place in all locations. Table 5-2 contains priority projects and target delivery timelines.

Table 5-1 Priority Locations for Active Land Management and Regeneration[9]

Settlement	**Proposed Interventions**
Wexford Town	Master-planning/design briefs, developments consents, site assembly including CPO, site remediation, enabling infrastructure, site development works, property development, public realm development, Derelict Sites, Vacant Sites/Urban Regeneration legislation.
Gorey Town	Master-planning/design briefs, developments consents, site assembly including CPO, sites remediation, enabling infrastructure, site development works, property development, public realm development, Derelict Sites, Vacant Sites/Urban Regeneration legislation.
Enniscorthy	Master-planning/design briefs, developments consents, site assembly including CPO, site remediation, enabling infrastructure, site development works, property development, public realm development, Derelict Sites, Vacant Sites/Urban Regeneration legislation.

[9] Note that this list is not exhaustive and the Council may carryout out further active land interventions in these and other settlements.

New Ross	Master-planning/design briefs, developments consents, site assembly including CPO, site remediation, enabling infrastructure, site development works, property development, public realm development, Derelict Sites, Vacant Sites/Urban Regeneration legislation.
Courtown and Riverchapel	Public realm, derelict sites, Derelict Sites, Vacant Sites/Urban Regeneration legislation.
Rosslare Harbour	Public realm, derelict sites, Derelict Sites, Vacant Sites/Urban Regeneration legislation.
Bunclody	Public realm, derelict sites, Derelict Sites, Vacant Sites/Urban Regeneration legislation.
Castlebridge	Public realm, derelict sites, Derelict Sites, Vacant Sites/Urban Regeneration legislation.
Rosslare Strand	Public realm, Derelict Sites, Vacant Sites/Urban Regeneration legislation.
Ferns	Public realm, Derelict Sites
Kilmore Quay	Public realm, Derelict sites, CPO and land assembly.
Bridgetown	Public realm, Derelict Sites.
Taghmon	Public realm, Derelict Sites.

Table 5.2 Timeline for Key Active Land Management Proposals

Project	Proposal	Timeline
Wexford		
Monck Street Public Realm	Public realm intervention	Construction commence – Sept 2021

Project	Proposal	Timeline
Trinity Wharf Urban Quarter, Marina and Boardwalk	Redevelopment of central, brownfield site, land assembly, development consent, remediation, infrastructure and realm development.	Planning permission granted by ABP – April 2020 Access road – construction commence - Q2 2021 Site development works – commence – Q4 2022
Crescent Quay Regeneration - Old Tesco Site	Redevelopment of central vacant properties, land assembly, design brief, infrastructure provision.	Planning permission granted by ABP – April 2020 Construction commence – September 2021
Gorey		
Market House	Land assembly/CPO, infrastructure provision.	Local Authority consent - May 2018
Esmonde Street	Public realm intervention.	Local Authority consent - December 2020 Construction commence – Q4 2021
Ballytegan	Masterplan for sustainable neighbourhood, land acquisition, infrastructure provision, realm development.	Masterplan preparation to commence 2021
Enniscorthy		
Enniscorthy Tourism Project	Major public realm and tourism regeneration development surrounding/including Enniscorthy Castle in centre of town.	Application for planning permission – Q2 2022
Enniscorthy Heritage Led Regeneration – under Heritage Towns Initiative	Public realm intervention/regeneration Slaney Street and Mary Street in centre of town.	Completion 2022
Templeshannon – Regeneration project	Master-planning/design, developments consents, site assembly including CPO, site remediation, enabling infrastructure, site development works, property development, public realm development, Derelict	Application for planning permission – Q1 2022

Project	Proposal	Timeline
	Sites, Vacant Sites/Urban Regeneration.	
New Ross		
New Ross Destination Town	Way finding, public realm improvement, place making and identification, Derelict/Vacant sites/Urban regeneration	
High Hill Public Realm	Site assembly, public realm development.	Commence Construction – Q2 2021
Removal Oil Tanks on Quays	Site assembly, public realm development,	Start Construction – Q2 2021
John Street Hatch Lab	site assembly, public realm development.	Application for planning – Q3 2021

CE OPR 24

Insert a new Objective after Objective TV32 (and re-number all objectives thereafter) on page 177 as follows:

In pursuit of RPO 34 the Council will implement an Active Land Management Strategy including the measures outlined in Tables 5.2 and 5.3 and subject to available resources and appropriate funding sources.

CE OPR 25

Amend Objective TV33 on page 177 as follows:

To identify ~~sites which are capable of~~ infill and brownfield sites and provide details of the expected density, height and housing yield when preparing future local area plans and settlement plans.

CE OPR 26

Amend Objective TV34 on page 177 as follows:

To identify obsolete and potential renewal areas within town and village centres and facilitate the re-use and regeneration of these areas and derelict lands and buildings~~.~~ when preparing future local area plans and settlement plans.

CE OPR 27

Insert a new Objective after Objective TV41 (and re-number all objectives thereafter) on page 179 as follows:

Objective

In pursuit of Objectives TV40 and TV41 it is the objective of the Council, subject to available resources, to pursue a minimum of:

- Five sites per Municipal District per annum under Derelict Sites legislation; and
- Three sites per annum under the Urban Regeneration and Housing Acts.

Chapter 6 Economic Development Strategy

CE OPR 28

Amend Objective ED37 on page 210 as follows:

To direct commercial development to the settlements identified in the Settlement Hierarchy. Economic development proposals will be permitted within settlements on suitably zoned land or within towns and villages defined within the Core Strategy / Settlement Hierarchy, subject to the proper planning and sustainable development of the area. Exceptions to the objective will be permitted in accordance with those outlined in this chapter, Chapter 7 Tourism, Chapter 12 Coastal Zone Management and Marine Spatial Planning, Chapter 14~~5~~ Recreation and Open Space, Volume 8 Retail Strategy and Volume 10 Energy Strategy of the Plan.

CE OPR 29

Replace paragraph 2 in Section 6.7.6 on page 227 as follows:

~~In general, economic and commercial development should be located in the existing towns and villages where they will benefit from services and the development of synergies. This~~

~~section deals with appropriate development in rural areas, primarily being related to agriculture and other rural related resources/sectors. Further exceptions are outlined in Chapter 7 Tourism, Chapter 12 Coastal Zone Management and Marine Spatial Planning and Chapter14 Recreation and Open Space Volume 8 County Retail Strategy.~~

As outlined in Objective ED37 and Objective ED41 it is the Council's policy to direct commercial development to the settlements identified in the Settlement Hierarchy. Exceptions to these objectives will be permitted in accordance with those outlined in this chapter, Chapter 7 Tourism, Chapter 12 Coastal Zone Management and Marine Spatial Planning, Chapter 14 Recreation and Open Space, Volume 8 Retail Strategy and Volume 10 Energy Strategy and Retail Strategy. Developments referred to in Objectives ED80-89 must comply with the location specific objectives of the Plan.

CE OPR 30

Amend Objective ED89 on page 229 as follows:

To ensure all developments ~~for commercial purposes~~ in rural areas, including agricultural, horticultural and rural diversification do not impact negatively on the quality of the environment or character of the rural area or rural settlement. Applications for all such developments will be required to submit details to demonstrate that the proposed development:

- Will not result in the contamination of potable water, surface or ground waters, or impact on natural or built heritage;
- Is appropriate in terms of scale, location, design and that the character of the farm or settlement is retained and enhanced where possible;
- When located on a farm, it ~~is~~ located within, or adjacent to, existing farm buildings, unless where the applicant has clearly demonstrated that the building must be located elsewhere for essential operational or other reasons;
- Is appropriately sited so as to benefit from any screening provided by topography or existing landscaping and does not seriously impact on the visual amenity of the area;
- Will not result in an unacceptable loss of residential amenity by reason of noise, odour or pollution;

- Will not result in a traffic hazard, ~~and~~
- Will provide for adequate waste management; and
- Where possible will restore and/or enhance built and/or natural heritage

Chapter 7 Tourism Strategy

CE OPR 31

Add a new objective on page 277 after Objective TM50 (and renumber all objectives thereafter) as follows:

To consider, on a case-by-case basis, proposals for new holiday chalet/caravan/mobile home parks:

a) Within existing settlements where there is not a proliferation of such developments and subject to them having a critical mass of onsite amenities and facilities (such as pools/playgrounds/indoor activity centres/restaurants) over and above what would have traditionally been the case for such developments. The Council will not consider proposals which would result in a reduction in the capacity in the public waste-water treatment system that would be detrimental to the delivery of necessary permanent housing.

b) In rural areas with specific locational qualities such as a forest or lake and which are part of an integrated development with associated activities such as trails, adventure activities and organised water-sports together with a critical mass of activities such as pools/playgrounds/indoor activity centres/restaurants.

All such developments shall be required to have the highest standards of accommodation (minimum specifications shall be provided and will be conditioned as part of the development), layout, design and landscaping.

Chapter 7 Transport Strategy

CE OPR 32

In Section 8.4.4 Modal Shift, amend the text on page 292 and 293 and replace Tables 8-1, 8-2, 8-3 and 8-4 as follows:

RPO163 of the RSES reflects existing and emerging national policy in proposing that targets are set in development plans, local area plans and local transport plans to increase the share of journeys undertaken by sustainable transport. ~~Table 8-1 contains details of the mode of travel to work and to school/college of people normally resident in County Wexford in 2016~~.

~~Table 8-1 Travel to Work~~

~~Total1~~	~~Car and motorcycle Driver/Passenger~~	~~Bus/Train~~	~~Walk~~	~~Cycle~~
~~44,783~~	~~36,484/2,846~~	~~682/102~~	~~4,232~~	~~437~~
~~% of overall total~~	~~81.5/6.4~~	~~1.7~~	~~9.4~~	~~1~~

~~Table 8-2 Travel to School/College~~

~~-~~	~~Total~~	~~Car, Van Motorcycle Passenger/ Driver~~	~~Bus/Train~~	~~Walk~~	~~Cycle~~
~~5-12~~	~~17523~~	~~12492/0~~	~~2144/2~~	~~2806~~	~~79~~
~~%~~	~~-~~	~~71.3~~	~~12.2~~	~~16~~	~~0.5~~
~~13-18~~	~~11594~~	~~5423/293~~	~~4041/15~~	~~1788~~	~~34~~
~~%~~	~~-~~	~~49.3~~	~~35~~	~~15.4~~	~~0.3~~
~~19+~~	~~3811~~	~~522/1302~~	~~721/93~~	~~1056~~	~~117~~
~~%~~	~~-~~	~~47.9~~	~~21.4~~	~~27.7~~	~~3~~

~~-~~	~~Total~~	~~Car, Van Motorcycle Passenger/ Driver~~	~~Bus/Train~~	~~Walk~~	~~Cycle~~
~~overall~~	~~32928~~	~~20032~~	~~7016~~	~~5650~~	~~230~~
~~%~~	~~-~~	~~60.8~~	~~21.3~~	~~17.2~~	~~0.7~~

~~Source: CSO StatBank/Profile 6 Commuting in Ireland/E6011~~

Achieving significant modal shift is dependent on a wide range of factors, much of which is outside the remit of the Council such as national economic performance, Government investment in sustainable transport infrastructure and school and private bus service provision. Notwithstanding this, Tables ~~8.3 and 8.4~~ 8-1 to 8-10 ~~and Objective TO08 below~~ contain ambitious targets for travel to work and school. These targets will be reviewed as part of the LTP process for the four main towns.

Table 8-1 Travel to Work - County Aggregate (%)

Year	Private car/motorbike	Public transport/walking /cycling
Baseline 2016	93.4	6.6
Target 2027	90	10

Table 8-2 Travel to Work – Wexford Town (%)

Year	Private car/motorbike	Public transport/walking/cycling
Base line 2016	75.6	24.4
Target 2027	70	30

Table 8-3 Travel to Work – Gorey Town (%)

Year	Private car/motorbike	Public transport/walking/cycling
Baseline 2016	76.8	23.2
Target 2027	70	30

Table 8-4 Travel to Work – Enniscorthy Town (%)

Year	Private car/motorbike	Public transport/walking/cycling
Baseline 2016	79.3	20.7
Target 2027	70	30

Table 8-5 Travel to Work – New Ross Town (%)

Year	Private car /motorbike	Public transport/walking/ cycling
Baseline 2016	80.7	19.3
Target 2027	70	30

Table 8-6 Travel to School – County Aggregate (%)

Year	Private car/motorbike	Public transport/walking/cycling
Baseline 2016	62.4	38.6
Target 2027	55	45

Table 8-7 Travel to School – Wexford Town (%)

Year	Private car/motorbike	Public transport/walking/cycling
Baseline 2016	57.9	42.1
Target 2027	49	51

Table 8-8 Travel to School – Gorey Town (%)

Year	Private car/motorbike	Public transport/walking/cycling
Baseline 2016	54.5	45.5
Target 2027	49	51

Table 8-9 Travel to School – Enniscorthy Town (%)

Year	Private car/motorbike	Public transport/walking/cycling
Baseline 2016	50	50
Target 2027	45	55

Table 8-10 Travel to School – New Ross Town (%)

Year	Private car/motorbike	Public transport/walking/cycling
Baseline 2016	56.6	43.4
Target 2027	49	51

CE OPR 33

Amend Objective TS09 on page 296 as follows:

To seek to achieve a modal shift from greenhouse gas generating vehicles to sustainable modes in accordance with the targets in Table ~~8-3 and Table 8-4~~ 8-1 to Table 8-10. Th~~i~~ese target~~s~~ will be further developed in the local area plans and local transport plans for Wexford, Gorey, Enniscorthy and New Ross towns. The Council will monitor and review th~~iese targets~~ over the lifetime of the County Development Plan.

CE OPR 34

Amend Objective TS59 on page 319 as follows:

To avoid the creation of any new direct access points to development or the generation of ~~significant~~ increased traffic from existing direct access points to the national road network to which speed limits of greater than 60 kmh apply. The Council may apply a less restrictive approach, for access onto non-motorway sections of national roads, for development in the following four categories:

Category 1

Developments of national and regional importance which by their nature are most appropriately located outside of urban areas, and where the locations concerned have specific characteristics that make them particularly suitable for the development proposed. In considering the appropriateness of making any such exception the Planning Authority will also take the following matters into account:

- The relevance and appropriateness of the proposed development in supporting the aims and objectives of the National Planning Framework and Region Spatial and Economic Strategy for the Southern Region.
- The requirements of other planning guidelines issued under Section 28 of the Act, including the Retail Planning Guidelines (2012) which include a general presumption against large retail centres being located adjacent or close to existing, new or planned national roads, including motorways.
- The nature of the proposed development and the volume of traffic to be generated by it and any implications for the safety, capacity and efficient operation of national roads. <u>Retail or residential development will not be considered under this category.</u>
- Demonstration of satisfactory demand management measures.
- Any plans for future upgrades of national roads and other transport infrastructure/services.
- The suitability of the location compared to alternative locations.
- The pattern of existing development in the area.
- The precedent that could be created for cumulative development in the area and the consequent implications for the national road network.

<u>The Council will only consider developments of national or regional importance under this</u>

category where access is proposed to/from non-motorway and non-dual carriageway national roads. The Council will have regard to whether or not that national road is to be by-passed in its considerations. Applicants for development will be required to undertake pre-planning consultation with Transport Infrastructure Ireland.

Category 2

Developments relating to the existing established large enterprise/employer on the national road network at Slaney Meats (N80) which is identified on Figure 8-4.

Figure 8-4 Slaney Meats

Category 3

Developments on lands zoned under the Clonroche Local Area Plan 2009 (as extended), in order to facilitate necessary and orderly development of the village.

~~**Category 4**~~

~~Intensification of use of existing accesses onto the national road network where there is an existing development but that such intensification would not result in a material intensification such that the proposed development would compromise the safety, capacity and efficiency of the national road network.~~

In all ~~four~~ three categories of such exceptional circumstances:

- It must be demonstrated by the applicant that there is no alternative access point available other than to the national road network at a location where a speed limit greater than 60 kmh applies and that the envisaged usage of the access point will not compromise the safety, capacity and efficient operation of national roads.
- The applicant will be responsible for preparing the required Road Safety Audit and Transport and Traffic Assessment reports. The Council shall use the assessments provided, together with available data, to establish an evidence base. Permission will only be granted where it can be demonstrated that any proposed development does not compromise the safety, capacity and efficiency of the national road network.
- The Council will work with Transport Infrastructure Ireland to review the speed limits in areas where existing employers or existing or proposed zoned land exists with the intention of reducing, where required, the speed limits subject to the appropriate statutory process.
- The applicant will be required to provide details of, and funding for, any capacity enhancements or traffic or demand management measures required.

Volume 10 Energy Strategy

CE OPR 35

Add a bullet point to Section 5.7 Siting, Layout and Design after bullet point 2 on page 74 as follows:

- <u>Wind turbines will not be permitted within 250 metres of the boundary of an adjacent landholding, unless the written consent of the owner is given.</u>

Section 3 WXF-C3-137 Southern Regional Assembly

3.1 Introduction

The Southern Regional Assembly (SRA) acknowledge and commend the work that has been undertaken in the preparation of the Draft Plan as well as the challenge that is faced in delivering on this task. It is stated that the Draft Plan provides a comprehensive basis for addressing the challenges faced by Wexford and that the observations and recommendations set out in this submission are intended to assist and support the Plan through successful alignment with the RSES and National Policy Objectives (NPOs).

The SRA welcome the underlying themes of Sustainable Development, Climate Action and Social Inclusion set out in Chapter 1 and the focus on the integration of the UN Sustainable Development Goals (SDGs) into the Development Plan strategy and policy objectives. This carries through the commitment to the UN SDGs from the NPF and RSES to local authority level and supports implementation across all tiers of Government.

The SRA welcome the priority given to climate as a key policy theme in the Draft Plan, the recognition of the wider policy framework for Climate Action (including RSES) and the identification of how climate change could impact on the County.

3.2 Main Issues Raised and Chief Executive's Response

SRA Recommendation 1 Core Strategy Allocation

The SRA recommends that, in order to reflect the ambition evident in the Core Strategy principles and alignment with national and regional policy for compact growth in the Larger Towns and the future viability of smaller towns and villages, along with tackling the legacies of dereliction, vacancy and urban decay, the Council should review the options for providing additional population allocations to these settlements. The aim of this is to support the strengthening of the urban structure and urban renewal in the Larger Towns and to support the future viability of services and regeneration of smaller towns and village settlements (Levels 3 and 4).

Recommendation 1 Core Strategy Allocation - Chief Executive's Response

The comments of the SRA are noted. As outlined in the response to OPR Recommendation 1 the allocation of population on the Settlement Hierarchy is a direct result of the application of NPO 9 of the NPF and RPO 3 and RPO 11a of the RSES. This meant that only the Key Towns of Wexford and Gorey were identified at regional level for growth above 30%. In response to OPR Recommendation 1 the Council has re-examined the capacity test which informed the allocation of population in the Draft Plan (see Appendix B). The Council also re-examined trends in population growth, housing delivery and demand with a view to allocating further growth to Levels 2-4 on the hierarchy. Having regard to the OPR's requirement to achieve a significant shift from the smaller settlements and rural areas it was decided that, as well as allocating additional population to Levels 2-4, it would also be necessary and appropriate to increase the population allocated to Level 1 Key Towns.

The percentage population allocation over the Plan period has been increased in most settlements (while keeping it below the 30% to 2040 as required by NPO 9) with a few exceptions. The exceptions include:

- New Ross Town (See response to SRA Recommendation Number 8 and OPR Recommendation 1 in Section 2 for further details);
- A number of settlements which are targeted for social, community and employment growth due to specific issues in these settlements; and
- A number of settlements which do not have adequate infrastructure.

See Appendix B which details the percentage allocation in the Draft Plan and as now proposed.

SRA Recommendation 2 Clarity on Population Projections

The SRA states that they consider additional clarity and analysis on the population projections (including those for Wexford Town, Gorey Town, Enniscorthy Town and New Ross Town) is required. Any adjustments that might result from a review of this data would strengthen the Core Strategy and would assist in demonstrating that the approach followed is consistent with RSES RPO 11 and the Guiding Principles under Section 3.3 of the RSES for determining appropriate levels of growth in the Core Strategy.

Recommendation 2 Clarity on Population Projections – Chief Executive's Response

It is unclear which elements of the Core Strategy require clarification or further analysis. The manner in which population was allocated to the four main towns was detailed on page 75 of the Draft Plan and the methodology for determining households was referenced in the footnotes accompanying the Core Strategy table on page 79. It is confirmed that, as stated in Section 3.3.2 of the Draft Plan, the Council had regard to the Guiding Principles contained in Section 3.3 of the RSES when deciding on the Settlement Hierarchy. The Development Approach for each level in the hierarchy is outlined in Section 3.6 and is consistent with the Guiding Principles.

The response to OPR Recommendation 2 provides further detail on the Council's application of the Guiding Principles to the various settlements and levels. Appendix A provides detail of the capacity test which informed the allocation of population on the hierarchy, and Appendix B provides details of the allocation of population on the various levels in the hierarchy. It is not considered appropriate to include this information in the Plan.

SRA Recommendation 3 Strategic Environmental Assessment (SEA)

The SRA states that they consider the SEA should be strengthened to include more detailed consideration of the preferred Plan Scenario, including narrative on uncertain environmental effects identified, proposed mitigation measures and additional details on capacity analysis and other sustainability criteria that underpin the projected growth levels and phasing in the Core Strategy.

Recommendation 3 Strategic Environmental Assessment (SEA) – Chief Executive's Response

This comment is noted. The Environment Report (ER) has been updated to address this issue. Further updates of the ER have also been made as part of the ongoing and iterative assessment process. The updated ER will be placed on display again at Proposed Material Amendments stage, together with the Screening Report for the Proposed Amendments, in order to ensure that complete information is available to the public.

SRA Recommendation 4 Distinguish Between Key Towns

The SRA requests that the Council consider the terminology used to describe each Key Town to ensure the distinction between the differing roles of each is clear and, for example, reconsider if the use of the term 'centres of scale' for both towns is appropriate.

Recommendation 4 Distinguish Between Key Town – Chief Executive's Response

The Core Strategy outlines that Wexford Town is designated as a Key Town in the RSES and that, together with five other towns of significant size in the Southern Region, Wexford Town is a self-sustaining regional driver which has a comparable role to the five regional growth centres designated in the NPF. The Core strategy in the Draft Plan outlined that Wexford Town, as the County Town, was allocated a population growth of 40% to 2040. The Development Approach in the Core Strategy for Wexford Town also identifies a Strategic Employment Location and investment priorities commensurate with its County town role. Wexford Town is identified in the Retail Strategy as a Level 1 Regional Town suitable for major convenience and comparison retail development.

Gorey Town is identified in the Core Strategy as a Key Town which is thriving, and which is well placed to accommodate additional economic growth and become a more self-sustaining town. It is not identified as a regional driver. It was allocated 35% growth to 2040 in the Core Strategy contained in the Draft Plan. The Retail Strategy identifies Gorey as a Level 2 Large sub-regional town identified for medium to large scale convenience retail and medium scale comparison retail.

It is considered that difference in treatment of the two Key Towns in the Core Strategy and elsewhere in the Plan is clear but in the interests of providing further clarity it is recommended that the wording 'Allocate significant population growth to the town to contribute to the development of a Centre of Scale', as referenced in the Development Approach for Gorey Town, is replaced with the words 'Allocate significant population growth to the town to contribute to the development of a self-sustaining critical mass'.

SRA Recommendation 5 Infrastructure-led Growth

The SRA states that, in order to support the development approaches outlined for the larger towns and to address infrastructural issues and constraints identified in the Core Strategy, it is recommended that the Guiding Principles are strengthened to make reference to the requirement for phased infrastructure-led growth for larger scaled settlements including Key Towns. This will assist in aligning with RPO 11 Key Towns:

- (b) investment in holistic infrastructure and;
- (k) increasing population growth in all Key Towns should be planned on a phased basis in collaboration with Irish Water, the local authority and other stakeholders to ensure that the assimilative capacity of the receiving environment is not exceeded.

Recommendation 5 Infrastructure-led Growth – Chief Executive's Response

The comments of the SRA with regard to infrastructure-led growth are noted. It is also imperative that infrastructure providers provide infrastructure in a plan-led manner and facilitate development in accordance with the Core Strategy of the County Development Plan.

As outlined in Objective SH09 of the Plan, within individual settlements, the Council will apply the tiered approach to zoning required under the NPF. Objective SH10 outlines that housing will be delivered on a phased basis and that this phasing will be identified in the relevant LAPs. Objectives SH20 states that the Council will ensure that infrastructure is developed either prior to or in tandem with development.

Notwithstanding, in the interests of further emphasising this commitment, it is recommended that additional text be added to Guiding Principle E in Section 3.4 Core Strategy Guiding Principles.

SRA Recommendation 6 Housing Units in Core Strategy

In order to ensure compliance with the Core Strategy population allocations in Table 3.4, it is recommended that this table should take account of the Housing Needs Demand Assessment (HNDA) and include projected housing unit numbers required for all settlement levels and housing in the open countryside.

This will ensure that population and household projections are based on the successful implementation of the national and regional policy for compact growth, sustainable growth of towns and villages and suitable densities for all urban settings. Additionally, this will assist in ensuring the phased delivery of services including water, wastewater and transport and meeting the requirements of RPO 33 - HNDA.

Recommendation 6 Housing Units in Core Strategy – Chief Executive's Response

This request is noted. Section (2A)(vi) of the Planning and Development Act 2000 (as amended) requires the Core Strategy to provide the:

Aggregate projected population, other than population referred to in subparagraph (v), in –

(I) Villages and smaller towns with a population of under 1,500 persons, and

(II) Open countryside outside of villages and towns

The Council has provided the population and resultant households for the appropriate settlements and the aggregate areas as required. The HNDA contains the more granular detail for the smaller settlements, and this information must be considered as, at best, broad estimates. It is not realistic to consider that this will be the actual distribution or specific number of households in each of these settlements but rather an estimate based upon robust assumptions. In these smaller settlements, factors such as land ownership and issues relating to the stage in the family cycle of residents, will have an influence on the provision of units. However, the controls on housing in Section 4.7.2 Housing Land Management will ensure that the growth which is permitted in these settlements will be appropriate to the function and scale of the individual settlements.

SRA Recommendation 7 – Local Transport Plans

The SRA notes that Objective CS08 provides for the preparation of Local Transport Plans (LTP) for the Key Towns and Larger Towns. It is recommended that the Strategic Objectives for Wexford Town as a Key Town should be strengthened to specifically support a Wexford Town Local Transport Plan similar to Objective GTO4 for Gorey.

Recommendation 7 Local Transport Plans – Chief Executive's Response

This comment is noted. As well as Objective CS08 in Chapter 3 Core Strategy which provides for the preparation of LTPs for Key Towns and Larger Town, Objective TS08 in Chapter 8 Transportation Strategy also refers to the preparation of a LTP for Wexford Town.

The Gorey Town and Environs Local Area Plan 2017-2023 (LAP) identified specific infrastructures/proposals which should be delivered to develop a sustainable transport network in the town such as an intermodal transport hub. Accordingly, the specific objective was included for the LTP for Gorey Town in the Draft Plan to references these infrastructures. It is premature to identify such infrastructures for Wexford Town in advance of the development of proposals as part of the Wexford Town LAP/LTP. Notwithstanding, in response to the request from the SRA, it is recommended that a general objective is added in the Strategic Objectives in the Core Strategy for Wexford Town repeating Objective CS08 and Objective TS08 relating to the preparation of the LTP.

SRA Recommendation 8 – New Ross relationship to the Metropolitan Spatial Area Plan (MASP)

The SRA considers that greater emphasis on the role and context of New Ross as a Hinterland Town and its relationship to Waterford MASP should be reflected in the Core Strategy. This could include reference to improve sustainable linkages to Waterford and opportunities to develop employment growth and harness specialist roles for New Ross as a Hinterland Town and Port to complement the function of the Metropolitan Area. It is recommended that the population allocation for New Ross should be reviewed in this context.

Recommendation 8 New Ross Relationship to MASP – Chief Executive's Response

It is considered that further references to New Ross Town being a Hinterland Town to the Waterford MASP, the development of sustainable transport connections to the MASP, the development of specialist roles and the development of New Ross Port would be positive additions to the Core Strategy Development Approach for New Ross Town. It is recommended that text is added to the Development Approach and that associated objectives are added also.

Regarding the population allocation for New Ross Town, and as noted in the response to OPR Recommendation 1, the population has not been increased but rather decreased having regard to longitudinal population change trends and lack of demand for dwellings. Growth has been allocated at the maximum amount permitted to 2040 under NPO 09 (30%) but it is anticipated that this growth will primarily take place during the next plan periods when the benefits arising out of the policies and investments in the Waterford MASP have been realised.

SRA Recommendation 9 - HDNA and Density in the Core Strategy

The SRA considers that the HNDA provided in Chapter 4 Sustainable Housing and Volume 9 Housing Strategy should be referenced in the Core Strategy to provide projected housing unit numbers required for all settlement levels and the population and household projections should be based on the national and regional policy for compact growth, sustainable growth of towns and villages and suitable densities for all urban settings.

Recommendation 9 HDNA and Density in the Core Strategy - Chief Executive's Response

Regarding housing units in the Core Strategy this item has been previously responded to under SRA Recommendation 6. No amendment is recommended.

With regard to compact growth and density a number of amendments to the density standards in the Core Strategy and elsewhere in the Plan have been recommended in response to the OPR Recommendation 5 to ensure compliance with the Sustainable Residential Development in Urban Areas - Guidelines for Planning Authorities (DEHLG, 2009). It is considered that these amendments will also implement the changes requested by the SRA.

SRA Recommendation 9 – Monitoring of Residential Development

The SRA recommends that Objective SH16, which relates to the implementation of the Housing Strategy, should be amended to include the monitoring of all residential development. This would be reflective of RSES RPO 33 and NPF NPO 36 which outline that new statutory guidelines will be put in place under Section 28 of the Planning and

Development Act to improve the evidence base, effectiveness and consistency of the planning process for housing provision at regional, metropolitan and local authority levels.

Recommendation 10 - Monitoring of Residential Development -Chief Executives Response

This recommendation is noted. The Council looks forward to the publication of the HNDA Section 28 Guidelines. It is anticipated that the associated Toolkit will provide full details regarding implementation and monitoring.

The Council's intention to monitor the HNDA is provided in POL13 of Volume 9 Housing Strategy. However, there is no objection to repeating this commitment in Objective SH16 as requested. It is therefore recommended that Objective SH16 be amended accordingly.

SRA Recommendation 11 - Density

The SRA recommends the residential densities for the main settlements should be reviewed and amended upwards so as to align with national and regional policy taking account of the different categories of residential development which could contribute to higher densities and that the emphasis should be placed on developing quality living environments.

Recommendation 11 Density - Chief Executive's Response

As discussed in the response to SRA Recommendation 9 it is recommended that the density standards in the Plan are revised to comply with the Section 28 Guidelines - Sustainable Residential Development in Urban Areas (DEHLG, 2009). Please refer to the Chief Executive's response to OPR Recommendation 5 and the associated proposed amendments in this regard.

SRA Recommendation 12 -10 Minute Town

The SRA states that, in support of Objective SH04 and Objective TV06, Chapter 4 Sustainable Housing could be strengthened to include support for the 10 Minute City and Town Concepts (RPO 176). This will assist in linking objectives for sustainable approaches to residential density and locations under this chapter with the objectives for placemaking in Chapter 5 and sustainable mobility and permeability under Chapter 8 (Objective TS02).

Recommendation 12 -10 Minute Town- Chief Executive's Response

The 10 Minute Town Concept is referenced in Chapters 5 and 8. In response to this request it is recommended that this objective is repeated in Chapter 4 Sustainable Housing to link these chapters and further emphasise the Council's commitment to the delivery of this concept in LAPs. It is recommended that text is added to the Key Principles contained in Section 4.4.1 and Section 4.6 and that a new objective is added to the Strategic Housing Objectives.

SRA Recommendation 13 - **Rural Housing**

Prior to finalisation of the Draft Plan, the SRA recommends that the Council ensure that policy relating to housing in the open countryside is consistent with RPO 27, national policy (NPO 17 sic), Circular Letter PL Circular letter PL 2/2017 Re: Sustainable Rural Housing Guidelines for Planning Authorities and with other objectives in the Draft Plan relating to climate action and environmental management.

Recommendation 13 Rural Housing -Chief Executive's Response

This request is noted. RPO 27 and NPF 19 recommend that rural areas are divided into two area types, that is, areas under urban pressure and areas where rural housing will be considered subject to design and siting criteria. Please see the Chief Executive's response to OPR Recommendation 6 in this regard.

RPO 27 further states that within areas of urban influence the provision of single rural housing should be based on the core consideration of demonstratable economic, social or local exceptional need to live in a rural area. This objective is consistent with - the Sustainable Rural Housing Guidelines for Planning Authorities (SRHG) (2005, DEHLG) which are the prevailing guidelines with regard to housing in the open countryside. These guidelines provide that planning authorities must tailor policies that respond to:

(1) The differing housing requirements of urban and rural communities; and
(2) The varying characteristics of rural areas.

It is stated that those distinctions are necessary to ensure first and foremost the housing requirements of persons with roots or links in rural areas are facilitated. The guidelines note that persons who are an intrinsic part of the rural community will normally have spent

substantial periods of their life living in rural areas as members of the established rural community.

An established rural community is an interconnected area based around community interactions including those relating to education, social, sporting and family connections. Individuals who are intrinsic members of that community have a need to live in that specific area based on the fact that the majority of their interactions take place in this specific area. In reality it is a small geographic area and would not extend to adjoining communities.

As land is a finite resource, it is necessary to control development so that we do not compromise the ability of future generation's intrinsic members of the rural community to be accommodated in their areas. A policy which is based on a person's need, rather than wish, to live in these areas is considered a reasonable approach to ensure that development which takes place not does not compromise the ability of current and future generations to live in their own rural community. In areas subject to pressures or in sensitive areas the capacity to absorb new development is further limited and as such it is appropriate that restrictions are tighter in these areas.

It is considered that the policy contained in the Draft Plan, which would define a person's local rural area as up to 25km from where the person has lived or is living is not consistent with any definition of a person's established rural community and will:

- Significantly reduce opportunities for people with a genuine need to live in the particular rural area to live in that area;
- Result in additional pressure in areas under urban pressure and sensitive areas;
- Result in unsustainable patterns of commuting and increased carbon generation
- Diminish landscape character and impact on rural resources including water; and
- Be a lost opportunity for the regeneration of our rural towns and villages as unnecessary dwellings will be built in the open countryside rather than in villages

Accordingly, it is recommended that the distances included in the Draft Plan to define a local rural area are reduced. Please see Section 7 of this report which relates to Chapter 4 Sustainable Housing for the recommended amendments in this regard. That section also

contains further amendments to the rural housing policy arising from other submissions received.

SRA Recommendation 14 Housing Within Built-up Areas

The SRA recommends that, given the extensive content on Compact Growth in Section 5.9 of the Draft Plan, the requirements of RPO 35(c) to deliver at least 30% of all new homes that are targeted in settlements, within their existing built-up footprints should also be referenced in the Compact Growth Objectives in Chapter 5.

Recommendation 14 – Housing Within Built-up Areas – Chief Executive's Response

Objective CS05 in Chapter 3 Core Strategy includes the requirement that 30% of all new homes will be delivered within the built-up footprints of towns and villages. In response to WXF-C3 OPR (Recommendation 4) the Chief Executive has recommended that additional text is added to Objective TV33 to repeat the requirement that 30% of all households directed to settlements must be delivered within the built-up area of settlements. No further amendment is proposed.

SRA Recommendation 15 – Rejuvenation Priorities

The SRA states that they consider that the Draft Plan could be strengthened by identifying additional Rejuvenation Priorities.

Recommendation 15 Rejuvenation Priorities – Chief Executive's Response

This comment is noted. Submission WXF-C3-164 OPR (Observation 2) requested that the Council set out a clear timeline and strategic approach to carrying out Active Land Management and to set measurable targets and timelines against which the implementation can be monitored and measured. In response it is recommended that a table is added identifying priority locations for active land management to facilitate regeneration and a further table identifying specific projects together with key timelines to the Plan.

SRA Recommendation 16 –Brownfield and Rejuvenation Sites

The SRA considers that Objective CS04 could be strengthened by a stronger and more timely focussed delivery of identification and regeneration of Brownfield sites across the county.

Recommendation 16 Brownfield and Rejuvenation Sites – Chief Executive's Response

Objective CS04 outlines the Council's commitment to carry-out an audit of brownfield sites during the lifetime of the plan. Submission WXF-C3-164 OPR requested, in Observation 2, amendments with regard to the delivery of infill housing and in Recommendation 4 further details on active land management. The resultant amendments add further text to Section 3.7.2 and Section 5.9.1 which deal with infill, brownfield development and regeneration. Amendments are also proposed to Objectives TV33 and TV34 to require the identification of appropriate sites when local area plans and settlements plans and settlement boundaries are being prepared (See proposed amendments in response to OPR Observation 2 and Recommendation 4 for further details).

It is recommended that Objective CS04 is amended to state that brownfield sites will be identified when local area plans, settlement plans and settlement boundaries are being prepared.

SRA Recommendation 17 – Education and Training Boards (ETBs)

The SRA notes that the ETBs provide an important part of the business ecosystem, particularly in the context of the COVID-19 economic shock and re-skilling requirements and therefore should be considered for inclusion under Section 6.6.1 People in Chapter 6 Economic Development.

Recommendation 17 ETBs – Chief Executive's Response

The important role played by the ETBs in the social and economic development of the County is recognised the Council and their development is supported in Objective SC19 in Chapter 15 Sustainable Communities and Social Infrastructure Strategy. It is recommended that additional text is added to Section 6.6.1 People to reference the important role of adult education and ETBs in the business ecosystem and that an objective is also added to that section in support of their development.

SRA Recommendation 18 – Smart Specialisms and Clustering

The SRA recommends that Section 6.6.1 People is also strengthened to reference Smart Specialisation and Clustering. The RSES includes a positive example on page 101 relating to Cyber Ireland.

Recommendation 18 Smart Specialisms and Clustering – Chief Executive's Response ED27

The development of Specialisms and Clustering forms part of the Council's Economic Development Strategy as identified on Figure 6.7 in Chapter 6.

Figure 6-7 Economic Development Strategy

Section 6.6.3 of the Economic Development Strategy states that a number of pillars will be pursued in order that benefits will accrue from market forces such as agglomeration and specialisation. It is further stated that pursuing such a strategy will assist in creating clusters of highly skilled individuals who are attracted together as firms agglomerate.

Objective ED27 also indicates that the Council will facilitate the development of enterprises related to the identified pillars for growth and facilitate the provision of facilities and infrastructure which will to enable clustering and specialisation in the county. Objective ED47 provides that the Council will encourage clustering and the development of specialisations along the Eastern Economic Corridor both within the County and with other towns/cities on the Corridor outside the County.

Notwithstanding the foregoing, it is recommended that Smart Specialisation is also added to Section 6.6.2 Profile and Figure 6.7 (the Infographic for the Economic Development Strategy) and that further objectives are added to this section.

SRA Recommendation 19 Economic Development – Property and Place

The SRA states that within Sections 6.6.4 Property and 6.6.5 Place, consideration should be given to using the broader term of "Placemaking" as used in the NPF, RSES and other policy documents. This would provide an umbrella term for all the elements that make great places and attract and retain skills and talent e.g. climate resilience measures, nature-based SuDS, public realm enhancements, green infrastructure, inter alia.

Recommendation 19 Property and Place – Chief Executive's Response

While this request is noted the strands of 'Property' and 'Place' in the Council's Economic Development Strategy are intended to be separate and it is not considered appropriate to combine them. 'Place' on the one hand refers to all the elements that make for great places and this section should be read together with other chapters such as Chapter 2 Climate Action, Chapter 5 Design and Place-making in Towns and Villages and Chapter 11 Landscape and Green Infrastructure. 'Property' on the other hand refers to the Council's targeted and proactive strategy to be a participant in the marketplace to stimulate economic development and to provide property solutions. The objectives in this section set out the Council's intention in this regard, support the Council's Active Land Management strategy outlined in Chapter 5 and will support applications for grant funding and interventions such as CPOs. No amendment is recommended.

SRA Recommendation 20 – Capacity Building

The SRA recommends that Chapter 6 Economic Development Strategy should be strengthened to include policies and objectives that support 'capacity building' to build economic resilience and funding resources, including international good practice, bidding capacity and the use of /development of a shared evidence base.

Recommendation 20 - Capacity Building – Chief Executive's Response

It is considered that the SRA's recommendation would strengthen the Plan's Economic Development Strategy. It is therefore recommended that an objective is added to Section 6.6 with regard to developing economic resilience. It is also recommended that 'capacity building' is added to the Figure 6-7 under the People heading and that text and objectives relating to resilience, capacity buildings and bidding capacity are added to Section 6.6.1 'People'.

SRA Recommendation 21 – Learning Region

The SRA considers that the Economic Development Strategy could be strengthened by the inclusion of an objective to support the development of a Learning Region, along with the Regional Assembly and other stakeholders such as the Waterford and Wexford ETB.

Recommendation 21 Learning Region - Chief Executives Response

It is considered that the Economic Development Strategy would be strengthened by the addition of text and an objective regarding the development of a Learning Region as envisaged by the RSES. It is recommended that these proposed amendments are made to Section 6.6.1 People.

SRA Recommendation 22 – Regional Skills Fora

The SRA recommends that, in order to support the Regional Skills Fora, Objective ED16 in Chapter 6 is strengthened to include reference to the role of the South-East Regional Skills Forum.

Recommendation 22 - Regional Skills Fora – Chief Executive's Response

It is considered that the Economic Development Strategy would be strengthened by the addition of text and the amendment of Objective ED16 to reference the Reginal Skills Fora, and it recommended that proposed amendments are made in this regard.

SRA Recommendation 23 – Healthy Place Audit

The SRA states that Section 6.6.5 Place could be strengthened by providing for a Health Place Audit (HPA) for Place-making in the County as identified in the RSES. The Planning Authority could also consider the inclusion of guiding principles to identify and frame locations for strategic employment development in this section which are set out in Section 4.7 of the RSES.

Recommendation 23 Healthy Place Audit -Chief Executive's Response

The RSES outlines that a HPA 'will be developed with input from the Department of Business, Enterprise and Innovation, IDA Ireland, Enterprise Ireland and other relevant stakeholders to use as an audit of places'. It consists of a checklist of elements required to attract enterprise. It can be used to target future funding.

It is considered appropriate that HPAs are developed to inform the economic development strategies that will form part of the future LAPs for the four main towns. It is recommended that Objective ED49 be amended to include reference to the preparation of HPAs.

SRA Recommendation 24 - Economic Development and Infrastructure

The SRA states that while the importance of providing land to support economic development and jobs growth is supported in Chapter 6– particularly at Section 6.6.4 Property, it is recommended that Objectives ED32 and ED34 are strengthened to reference co-ordination with the relevant infrastructure stakeholders to ensure that the distribution of jobs growth and designation of lands for economic development are infrastructure led in alignment with RSES RPO 68.

Recommendation 24 Economic Development and Infrastructure – Chief Executive's Response

Objective CS01 in Chapter 3 Core Strategy states that the Council will 'ensure that required infrastructure and services are provided by infrastructure providers, either in advance of or in tandem with development'. This objective applies to all development. In the interests of clarity it is recommended that an additional objective is added to Chapter 6 Economic Development Strategy repeating this commitment.

SRA Recommendation 25 Retail

The SRA states that Chapter 6 Economic Development could be strengthened to include the retail sector explicitly as an employment sector, noting that retail employs a significant number of people and is also a critical function in the life and vitality of towns and villages.

Recommendation 25 Retail - Chief Executive's Response

The Council recognises the importance of the retail sector to the County's economy and to the vitality and vibrancy of our towns and villages and to this end prepared a detailed County Retail Strategy which is contained in Volume 8 of the Plan. Chapter 4 of the Retail Strategy contains Key Actions and Recommendations for improving the retail environment of the main settlements in the County. Chapter 6 of the Retail Strategy contains detailed policies required to support retail development in the four main towns and to protect and improve the vitality and vibrancy of these settlements. Notwithstanding, it is recommended that narrative is added to Section 6.6.3 Pillars to reflect this commitment to the retail sector.

SRA Recommendation 26 TEN-T Network

The SRA comments that in relation to the TEN-T Network, Objective TS04 could be strengthened by including explicit reference to the extension of the Dublin –Belfast Corridor to Rosslare Europort as the Eastern Corridor. This additional reference would support RSES RPO 140 – International Connectivity.

Recommendation 26 TEN-T Network – Chief Executive's Response

While the Plan contains numerous objectives with regard to both economic development and the development and improvement to transport infrastructure on the Eastern Economic Corridor, it is recommended that Objective TS04 in Chapter 8 Transportation Strategy, which relates to the TEN-T network, is amended to specifically reference the extension of the Eastern Economic Corridor.

SRA Recommendation 27 Rail

The SRA recommends that Objectives TS05 and TS06 are strengthened to reference the role that enhanced rail infrastructure and services can make in the provision of multi-modal travel and in supporting the transition to a low carbon future. This will strengthen alignment with RPO 170 Rail.

Recommendation 27 Rail – Chief Executive's Response

While there are multiple references in the Plan relating to the development of the rail network (as a sustainable alternative to other forms of transport), it is considered that the SRA's recommendation would strengthen this section of the Plan. Accordingly, it is recommended that Objectives TS05 and TS06are amended to strengthen reference to rail transport.

SRA Recommendation 28 Intensification of Land Use

The SRA recommends that the objectives for the integration of land use and transport planning are strengthened to support the role of sustainable higher densities in the County and Local Area Plans. This will ensure the consolidation of both residential and employment development within existing urban centres with a focus on locations where it can be demonstrated that such development supports the use of walking, cycling and public transport (RSES RPO 165).

Recommendation 28 Intensification of Land Use – Chief Executive's Response

See Chief Executive's response to SRA Recommendation 29 and the associated proposed amendment which refers to consolidating and intensifying residential and employment uses. No further amendment is required.

SRA Recommendation 29 Integration of Land Use and Transportation

The SRA recommends that objectives underpinning Land Use and Transport Planning Integration are strengthened to achieve the Council's goals of reducing travel demand, achieve greater modal shift and achieve targets in Table 8-3 and Table 8-4 (Transport Strategy Objective TS09). The submission notes that objectives in the Draft Plan such as TS10, TS15, TS20-26 and TS28 positively address RSES RPO 151 Integration of Land Use and Transport and RPO 152 Local Planning Objectives. The SRA considers that adding further requirements through these objectives will strengthen existing content to achieve the outcomes of the Council's Transport Strategy and the RSES, where RPOs 151 and 152 require for example:

- For urban-generated development, the development of lands, within or contiguous with the existing urban areas will be prioritised over development in less accessible locations;
- Residential development will be carried out sequentially, whereby lands which are, or will be, most accessible by walking, cycling and public transport– including infill and brownfield sites – are prioritised;
- Larger scale, trip intensive developments, such as offices and retail, will be focused into central locations highly accessible by sustainable transport modes;
- New employment and residential development will be consolidated and intensified in a manner which renders it serviceable by public transport and ensures that it is highly accessible, by walking, cycling and public transport;
- Land use development in smaller rural towns will optimise public transport and sustainable travel integration within settlements. Public transport interchange will be facilitated to encourage modal shift to public transport and sustainable travel between settlements and on approach to settlements;

- All non-residential development proposals will be subject to maximum parking standards as a limitation to restrict parking provision to achieve greater modal shift;
- In locations where the highest intensity of development occurs, an approach that caps car parking on an area-wide basis will be applied;
- Planning at the local level will prioritise walking, cycling and public transport by maximising the number of people living within walking and cycling distance of their neighbourhood or district centres, public transport services, and other services at the local level such as schools;
- To the extent practicable, proposals for right of way extinguishments will only be considered where these do not result in more circuitous trips for residents accessing public transport, or local destinations; and
- Cycle parking will be appropriately designed into the urban realm and new developments at an early stage to ensure that adequate cycle parking facilities are provided and designed in accordance with cycle parking design guidelines.

Recommendation 29 Integration of Land Use and Transportation – Chief Executive's Response

Objectives which cover these principles are included in the Plan in Chapter 2 Climate Action, Chapter 3 Core Strategy, Chapter 4 Sustainable Housing, Chapter 5 Design and Placemaking in Towns and Villages and Volume 2 Development Management Manual. The principles of sustainable transport are an integral part of the overall strategy of the Plan and are integrated throughout.

It is considered inappropriate to repeat them all in Chapter 8 Transportation Strategy. However, it is recommended that Objective TS02 is amended to repeat the most critical of the principles. It is also noted that some of the recommendations, such as car-parking caps on an area-wide basis, will be considered as part of the development of LTPs and LAPs.

SRA Recommendation 30 Rail Freight

The SRA considers that Section 8.11 Ports could be strengthened to include an explicit objective for the provision of rail freight handling facilities and infrastructure. This would reflect the content of Section 8.11 and would support RSES RPO 170-Rail to optimise rail freight opportunities in the Southern Region Ports and would strengthen alignment with RPO 140 – International Connectivity and RPO 144 – Port Infrastructure.

Recommendation 30 Rail Freight – Chief Executive's Report

Section 8.11 of the Draft Plan outlines that the Council will support proposals which will improve linkages to the port by road, rail – passenger and freight - bus, walking and cycling. Objective RHK40 in Volume 3 Rosslare Harbour and Kilrane Settlement Plan states that it is the objective of the Council to support the development of additional freight and passenger capacity at Rosslare Europort and the provision of freight rail services and facilities to support sustainable increases in port operations. It is recommended that an objective is included in Chapter 8 Transportation Strategy to repeat this commitment.

SRA Recommendation 31 Digital Infrastructure and Strategy

The SRA considers that the policy objectives should be strengthened to refer to provision of and access to high speed high quality digital infrastructure in urban and rural areas and seek actions that deliver on the Local Authorities Digital Strategy, as supported by RSES RPOs 134-138. This would support Objective ED10 which relates to the delivery of the National Broadband Plan.

Recommendation 31 Digital Infrastructure and Strategy – Chief Executive's Response

Objective IS07 states that the Council will support the development of high speed, high capacity digital and mobile infrastructure in the towns, villages and rural areas across the county in order to provide high quality digital connectivity to support the social and economic growth of the county and the region. Objective TC03 states that the Council will implement the Digital Strategy for the County and seek investment for the actions identified. These objectives adequately cover this issue and no further amendment is recommended.

SRA Recommendation 32 Power Transmission for Renewables

The SRA recommends that power transmission objectives PT01-PT04 are strengthened by integrating to a stronger extent support for low carbon and renewable energy, the integration of renewable energy sources with power transmission infrastructure and support for community scaled renewable energy projects and connecting infrastructure; all of which are required through RSES RPO 221 Renewable Energy Generation and Transmission Network.

Recommendation 32 Power Transmission for Renewables – Chief Executive's Response

It is considered that the it would be appropriate to strengthen this section of the Plan by the inclusion of an appropriate objective to facilitate this infrastructure. It is recommended that an objective is added to Section 9.12 Power Transmission in support of such connecting infrastructure.

SRA Recommendation 33 Carbon Neutral Gas

The SRA recommends that the Council strengthens Objective GNO1 which refers to the gas network by integrating support for renewable gas and the transition of the gas network to a "carbon neutral" gas network by 2050. It is stated that this is supported through RSES RPO 225.

Recommendation 33 Carbon Neutral Gas - Chief Executive's Response

Having regard to RSES RPO 225 and the necessity to ensure a step down in high carbon generating fuels with a view to complete transition from the use of fossil fuels, it is recommended that Objective GN01 in Section 9.13 Gas Network is amended to reference renewable gas and a carbon neutral gas network by 2050. The Council will support all appropriate measures to achieve the complete transition from fossil fuel use in as short a time as is possible.

SRA Recommendation 34 Cross Reference with Environmental Objectives

The SRA states that the Council should ensure that the linkages and cross referencing between the objectives in Chapter 10 Environmental Management and those in Chapter 3

Core Strategy and Chapter 4 Sustainable Housing are clear. The linkages should be strengthened where necessary in order to ensure effective environmental protection.

Recommendation 34 Cross Reference with Environmental Objectives – Chief Executive's Response

The environmental protection policies contained in Chapter 10 Environmental Management apply equally to all sections of the Plan as do the protective policies in other chapters such as Chapter 9 Infrastructure, Chapter 11 Landscape and Green Infrastructure and Chapter 13 Heritage and Conservation. It is considered that linking some and not others may be somewhat misleading, and accordingly no amendment is recommended in this regard.

SRA Recommendation 35 Blue and Green Infrastructure

The SRA recommends that Section 11.12 Green Infrastructure should reference blue as well as green infrastructure to recognise the interaction between green infrastructure and rivers, streams and other water bodies.

Recommendation 35 Blue and Green Infrastructure – Chief Executive's Report

Section 11.12 states that green infrastructure describes the functionality of rivers, inland waterways, floodplains, wetlands, woodlands, farmland, coastal areas, parks and open spaces, natural conservation areas, gardens and allotments and the services provided by it. It states that it includes, for example, existing ditches to carry water rather than piped networks. Green infrastructure, as described in the Plan encompasses the integrated system of natural habitats and ecosystems and all their constituent parts including the 'blue' elements. Notwithstanding, in the interests of clarity, it is recommended that the title of Section 11.12 is amended to include reference to blue as well as green infrastructure. It is also recommended that an amendment is made to the first line of this section to outline that everywhere green infrastructure is referenced in the Plan that it also refers to blue infrastructure.

SRA Recommendation 36 Green Infrastructure on Transport Corridors

The SRA recommends that Objectives GI00-06 are strengthened to refer to the opportunities for transport corridors to act as green infrastructure (RSES RPO 125).

Recommendation 36 Green Infrastructure on Transport Corridors – Chief Executive's Response

It is considered that introducing an amendment relating the potential for transport corridors to act as green infrastructure corridors would be a positive addition to the Plan. It is recommended however that this is included as a Strategy Objective in Chapter 8 Transportation Strategy. An additional objective has also been included in that chapter to specifically reference roads as green infrastructure corridors in response to other submissions.

SRA Recommendation 37 Adult Education

The SRA states that the focus on Lifelong Learning could be widened and strengthened to include wider objectives for community and adult education in areas such as literacy, to improve quality of life with access to educational resources and facilities and to include participation in Wexford to build a Learning Region.

Recommendation 37 Adult Education – Chief Executive's Response

This recommendation is noted. It is considered that adequate objectives are included in Chapter 15 Sustainable Communities and Social Infrastructure to support adult education and associated infrastructure and services. It is considered that issues such as literacy and participation might more appropriately be addressed in the Local Economic and Community Plan which also must comply with the requirements of the RSES. No amendment is recommended.

SRA Recommendation 38 Monitoring

The SRA recommends that the final Wexford CDP 2021-2027 include a framework for the intended monitoring and implementation of the Plan's objectives, including a commitment to share data and engage with the regional tier during the monitoring stage.

Recommendation 38 Monitoring – Chief Executive's Response

This comment is noted. It is the intention of the Council to produce a schedule for monitoring once the Plan is adopted. The Council looks forward to working with the SRA at the monitoring stage.

3.3 Chief Executive's Recommendations

It is recommended that the following proposed amendments are made to the Draft Plan:

Chapter 3 Core Strategy

CE SRA 1

Amend Section 3.4 Core Strategy Guiding Principle E on page 48-49 by adding the following text at the end of the paragraph:

E. Compact growth and liveable sustainable settlements

The delivery of compact, sustainable growth will require the timely delivery of appropriate infrastructure in a plan led manner. In preparing local area plans the Council will ensure that the Tiered Approach to Zoning required by the NPF is applied and that land is developed in phased manner in accordance with the availability of infrastructure.

CE SRA 2

Amend Section 3.6.1 Level 1 Key Towns – Gorey Town on page 57 as follows:

Development Approach

In order to fulfil its designation as a Key Town in the RSES and in line with RPO 11 and RPO 25, the Council authority will:

1. Allocate significant population growth to the town to contribute to the development of a ~~Centre of Scale~~ a self-sustaining critical mass of population.

CE SRA 3

Amend the third paragraph on page 64 in Section 3.6.2 Level 2 Large Towns – New Ross Town as follows:

The town is strategically located between Wexford Town and Waterford City and is designated in the RSES as a Hinterland Town of the Waterford MASP. The town has

significant potential to benefit from a reciprocal relationship with the MASP, creating synergies and developing supporting specialisms. The town would also benefit from sustainable transport links with the MASP. The town has the advantage of having an inland port which provides the opportunity for further development in both port-related activities and in spin-off industries.

The town has a strategic location on the route from the Eastern Economic Corridor to the Southern Region and the Atlantic Economic Corridor. The completion of the M25 Bypass, its water services capacities~~, New Ross Port~~ and its significant tourism potential means that it is well positioned to accommodate additional growth.

CE SRA 4

Insert a new bullet point after bullet point 2 on page 64 in Section 3.6.2 Large Towns – New Ross Town as follows:

- To prepare, as part of the local area plan for the town, an Economic and Spatial Strategy which will identify and develop opportunities for synergies and specialisms to compliment the role of Waterford MASP.

CE SRA 5

Amend bullet point 5 on page 65 in Section 3.6.2 Large Towns – New Ross Town as follows:

- Prepare a local transport plan that will inform zoning decisions and identify opportunities to facilitate and implement sustainable transport connections to the Waterford MASP, Wexford Town and the towns of the region.~~,~~. The plan will also provide for the ~~include the~~ development of the town bus network, improvements to cycling and walking infrastructure and rural transport services into the town and secure investment to deliver the plan.

CE SRA 6

Amend the Core Strategy and Strategy Settlement Strategy Objective CS04 on page 84 as follows:

To achieve more compact growth by promoting the development of infill and brownfield/ regeneration sites and the redevelopment of underutilised land within the existing built up

footprint of existing settlements in preference to greenfield lands and to ~~undertake during the lifetime of this plan an audit of the brownfield sites in the four main towns.~~ identify infill, brownfield and regeneration sites when preparing local area plan, settlements plans and settlement boundaries.

CE SRA 7

Insert a new strategic objective for Wexford Town on page 88 as follows:

To ensure that the local transport plan prepared provides the framework to integrate land use, accessibility requirements and transportation, prioritise sustainable transport modes including walking, cycling and public transport and identifies the necessary infrastructure required to facilitate implementation.

CE SRA 8

Insert a new strategic objective for New Ross Town on page 93 as follows:

To prepare, as part of the local area plan for the town, an Economic and Spatial Strategy which will identify and develop opportunities for economic synergies and specialisms to compliment the role of Waterford MASP.

CE SRA 9

Insert a new strategic objective for New Ross Town on page 93 as follows:

To prepare a local transport plan that will inform zoning decisions and identify opportunities to facilitate and implement sustainable transport connections to Waterford MASP, Wexford Town and the towns of the region. The plan will also provide for the development of the town bus network, improvements to cycling and walking infrastructure and rural transport services into the town.

Chapter 4 Sustainable Housing

CE SRA 10

Amend the text in the first line of the third paragraph and insert a new bullet point after the first bullet point 1 in Section 4.4.1 Goal on page 101 as follows:

Using ~~the~~ key principles from the NPF and RSES this goal will be achieved as follows:

- Preparing Urban Design Frameworks as part of local area plans which implement the 10 Minute Town Concept and ensure the integration of key land uses such as housing, community, education, amenity and employment.

CE SRA 11

Insert a new objective after Objective SH04 on page 103 in Section 4.4.1 Goal as follows:

To prepare Urban Design Frameworks as part of local area plans which implement the 10 Minute Town Concept and ensure the integration of key land uses such as housing, community, education, amenity and employment.

CE SRA 12

Amend the text in paragraph 2 on page 107 in Section 4.6 Locations for Future Housing as follows:

The NPF also includes an objective that at least 30% of all new homes should be delivered within the existing built-up footprint of settlements and RPO 176 of the RSES introduces the 10 Minute Town Concept. As set out in Objective CS05, this will be complied with when local area plans and settlement plans are being prepared for the towns and villages of the County.

CE SRA 13

Insert a new objective on page 108 in Section 4.6 Locations for Future Housing as follows:

To ensure that at least 30% of all new homes targeted to settlements are that are delivered within the existing built-up footprint of those settlements.

CE SRA 14

Amend Objective SH16 on page 120 in Section 4.7 Future Housing Delivery as follows:

To implement ~~the~~ and monitor the objectives in the County Wexford Housing Strategy 2021-2027 and Housing Need Demand Assessment in accordance with the requirements of the Planning and Development Act, 2000 (as amended) and any relevant guidelines published.

Chapter 6 Economic Development Strategy

CE SRA 15

Amend Figure 6-7 on page 198 in Section 6.6 Economic Development Strategy as follows to add 'Smart Specialisation' to *Profile* and 'Capacity Building' to *People*:

CE SRA 16

Insert a new Strategic Economic Development objective on page 199 in Section 6.6 Economic Development Strategy as follows:

<u>To sustainably develop, deepen and enhance the county's regional economic resilience by widening economic sectors and boosting innovation, export diversification, and productivity and increasing access to new markets.</u>

CE SRA 17

Insert a new Strategic Economic Development objective on page 199 in Section 6.6 Economic Development Strategy as follows:

To work with infrastructure providers to ensure that economic development land and employment related uses are effectively serviced by all infrastructures and that new and existing uses are accessible by sustainable transport modes.

CE SRA 18

Amend Section 6.6.1 People by inserting the following text before the first paragraph on page 201:

Capacity building will be crucial to building economic resilience and responding to emerging challenges. The development of an economy which is diverse, resilient and responsive will ensure that the county is prepared for challenges and shocks such as those recently presented by Brexit and Covid-19.

As well as resilience there is a need to ensure sufficient capacity to bid for and win funding. Working together with the Council's partners in the region, using shared information, resources and knowledge will ensure that the combined resources of the region can be utilised to develop mass and add weight to bidding capacity.

The ability to develop, nurture, retain and attract talent is critical and education and training institutions are needed to develop our people's skills and talent. The development of a Learning Region, envisaged in the RSES, will build our citizen's skills base to succeed in life and business. This is critical to securing greater economic resilience.

The Council will support Life-long Learning and the initiatives of the Regional Skills Forums to match the diverse skills of our people with a choice of employment opportunities.

CE SRA 19

Insert a new paragraph after paragraph 4 on page 201 in Section 6.6.1 People as follows:

The Education and Training Boards (ETBs), and other providers of adult education and training in the County, provide responsive and job specific training over a wide variety of employment sectors. Their role in the business ecosystem, and, in particular, their ability to tailor courses and provide opportunities for reskilling in response to challenges in the economy and employment market is crucial to the economic resilience of the County.

CE SRA 20

Insert a new objective- on page 202 in Section 6.6.1 People as follows:

To engage and invest in capacity building, including bidding capacity, at County and regional level to ensure economic resilience and responsiveness to emerging challenges and potential future economic shocks.

CE SRA 21

Insert a new objective on page 202 in Section 6.6.1 People as follows:

To support the development a Learning Region as envisaged in the RSES and further strengthen our higher and further education and training sector, research, development and innovation capacity.

CE SRA 22

Insert a new objective on page 202 in Section 6.6.1 People as follows:

To support and facilitate the development of adult education in the County, including the Education and Training Boards, and to work with providers to facilitate development which will serve the needs of existing employers, attract new employers and provide up-skilling opportunities for the existing workforce.

CE SRA 23

Amend Objective ED16 on page 203 in Section 6.6.1 People as follows:

To seek to address the skills shortages challenges though improvements in lifelong learning rates in the county and explore the attraction and absorption of incoming talent, with

emphasis on accommodation, education and integration ~~(in the event that when local skills shortages arise and skills development at local level is not possible in the short run)~~. The Council will support the initiatives of the Regional Skills Forums to match the diverse skills of our people with existing and potential employment opportunities in the region.

CE SRA 24

Insert a new paragraph after paragraph 1 on page 204 in Section 6.6.2 Profile as follows:

Smart Specialism is a developing EU, national and regional approach which brings together key stakeholders to identify the competitive advantages of the area with the view to developing economic opportunities. It focuses on measures to improve the attractiveness of a location for national and foreign investment and increasing entrepreneurial activity. It has significant potential to raise the profile of the County as a place to operate a business and a place to do business with. The Council is committed to working with local communities, national enterprise bodies, higher education institutes and private enterprises to undertake the Entrepreneurial Discovery Process and evaluate how best to utilise these opportunities to raise the profile of the region and develop the identified specialisms.

CE SRA 25

Insert a new objective on page 205 in Section 6.6.2 Profile as follows:

To work with key stakeholders including local communities, national enterprise bodies, higher education institutes and private enterprises to identify the competitive advantages of the area with the view to developing Smart Specialisms and measures to improve attractiveness of the County as a location for national and foreign investment.

CE SRA 26

Insert a new objective on page 205 in Section 6.6.2 Profile as follows:

To identify Smart Specialisms through the Entrepreneurial Discovery Process to evaluate how best to utilise opportunities to raise the profile of the County and region and develop the identified specialisms.

CE SRA 27

Insert text on page 205 after the first paragraph in Section 6.6.3 Pillars as follows:

The retail sector is an important economic sector in the County and it has an important role in maintaining the vitality and vibrancy of the County's towns and villages. To this end a detailed Retail Strategy has been prepared to support its development. The Retail Strategy is included in Volume 8.

CE SRA 28

Amend Objective ED49 on page 214 in Section 6.7.2 Key Towns and Large Towns as follows:

To include an economic development spatial strategy in the Local Area Plans for each town to ensure that:

i. The town fulfils its strategic economic role in accordance with the Regional Economic and Spatial Strategy for the Southern Region.

ii. Economic development is located in the optimal location depending on whether it is people intensive (customer and employee), land or space intensive or tied to a particular resource. People intensive activities, particularly those with large customer numbers, should be located in the most accessible locations where public transport is available.

iii. The sequential approach is utilised in selecting land for economic development purposes to ensure that urban consolidation and brownfield regeneration is encouraged over greenfield development.

The preparation of the spatial strategy shall have regard to the principles of Health Place Audits and the guiding principles for the location of employment development as set out in the RSES.

Chapter 8 Transportation Strategy

CE SRA 29

Amend Strategic Transport Objective TS02 on page 295 as follows:

To minimise the generation of greenhouse gases by the transport sector using the avoid-shift-improve principle and by effectively integrating land use and transport planning through: ~~the Core Strategy and Settlement Strategy of the County Development Plan, the~~

~~implementation of the 10-minute town concept in local area plans, by promoting compact development in the right location and by managing our networks, roads and streets in a manner which will promote and prioritise sustainable modes.~~

- The Core and Settlement Strategy of the Plan;
- Implementation of the 10 Minute Town concept;
- Prioritising the development of lands within or contiguous to the existing urban areas, which are, or will be, most accessible by walking, cycling and public;
- Directing larger scale trip intensive developments, such as offices and retail, into central locations which are highly accessible by sustainable transport modes; and
- Consolidating and intensifying residential and employment development in a manner which renders it serviceable by public transport and ensures that it is highly accessible by walking, cycling and public transport.

CE SRA 30

Amend Strategic Transport Objective TS04 on page 295 as follows:

To seek investment in and secure the development of the TEN-T network to include the extension of the Belfast – Dublin corridor to Rosslare Europort ensuring the integrated development of the Eastern Economic Corridor.

CE SRA 31

Amend Strategic Transport Objective TS05 on page 295 as follows:

To develop and support the development of enhanced multimodal transport infrastructure and services, including rail, on the Eastern Economic Corridor, which runs from Belfast to Rosslare Europort via Dublin, Gorey, Enniscorthy and Wexford Town ~~with~~ and has strong links to the Southern Region and the Atlantic Economic Corridor via New Ross.

CE SRA 32

Amend Strategic Transport Objective TS06 on page 296 as follows:

To support actions which will transition ports, freight and all transport modes towards a low carbon future, including by enhanced rail infrastructure and services.

CE SRA 33

Insert a new Strategic Transport Objective on page 299 as follows:

To ensure that new transport infrastructure developed by the Council incorporates appropriate green infrastructure and functions as a biodiversity corridor and ensure that these elements are integrated into the proposals of other transport network providers.

CE SRA 34

Insert a new objective on page 332 in Section 8.11 Ports as follows:

To support the development of rail freight handling facilities and infrastructure at Rosslare Europort.

Chapter 9 Infrastructure Strategy

CE SRA 35

Insert a new objective on page 391 in Section 9.12 Power Transmission as follows:

To support, subject to the objectives of this section and Volume 10 Energy Strategy, connecting infrastructure for the integration of low carbon and renewable energy generation projects including community scaled projects with power transmission infrastructure.

CE SRA 36

Insert a new objective on page 392 in Section 9.13 Gas Networks as follows:

To promote renewable gas leading to carbon emission reduction in agriculture, industry, heating and transport as well as sustainable local employment opportunities and support the transition of the gas network to a "carbon neutral" gas network by 2050.

Chapter 11 Landscape and Green Infrastructure Strategy

CE SRA 37

Amend the title of Section 11.12 Green Infrastructure and amend the first line of paragraph 1 of this section on page 437 as follows:

11.12 Green and Blue Infrastructure

Green and blue Infrastructure, referred to in this Plan as green infrastructure, can be defined as an interconnected network of natural space that conserves natural ecosystem values and functions and provides associated benefits to human populations.

Chapter 15 Sustainable Communities and Social Infrastructure Strategy

CE SRA 38

Amend the fifth paragraph on page 584 in Section 15.7.2 Education as follows:

The availability of further education and adult education centres are important as a tool to encourage and facilitate adults to re-engage with learning, to learn life skills and new skills to either enter the workforce for the first time or to re-enter the workforce. This is an important part of creating a Learning Region, as envisaged in the RSES, and will assist in providing high quality and timely education and training responses to evolving enterprise and skills needs. This is discussed further in Chapter 6 Economic Development Strategy. There are number of these centres across the county which offer a range of further education and training courses.

CE SRA 39

Insert a new objective on page 587 in Section 15.7.2 Education as follows:

To support the development of a Learning Region as envisaged in the RSES and further strengthen the higher education and further education and training sector, and support the initiatives of the Regional Skills Fora to ensure that knowledge and skills are spread to all citizens to help address skills shortages and lifelong learning challenges.

Section 4 WXF-C3-19 Eastern and Midland Regional Assembly

4.1 Summary of Main Issues Raised

The Eastern and Midland Regional Assembly (EMRA) welcomes the publication of the Draft Plan. It is stated that the submission has been made pursuant to Section 27B of the Planning and Development Act 2000 (as amended) and that a copy of the submission has been sent to the Minister and the Office of the Planning Regulator.

It is stated that, whilst the various themes that are addressed within the Draft Plan are fully noted, the scope of this submission mainly focuses on issues directly linked to the Eastern and Midland Region.

The EMRA Regional Spatial and Economic Strategy (RSES) seeks to protect and enhance strategic connections in the region and highlights the importance of the Eastern Corridor extending south to Rosslare Europort, which is an important economic and transport link, particularly in the post Brexit scenario. EMRA welcomes the recognition given to the Eastern Economic Corridor (EEC) in Chapter 3 Core Strategy, Chapter 6 Economic Development Strategy and Chapter 8 Transportation Strategy.

In terms of the Ten-T network specifically, RPO 8.16 of the EMRA RSES supports the improvement and protection of the network to strengthen access routes to Ireland's ports, including investment in the ongoing development of the N11/M11 to improve connectivity to Rosslare and improvements to the Dublin-Wexford Rail line. EMRA welcome the Draft Plan's policies that aim to support the development of multimodal transport infrastructure and which seek investment in and secure the development of the TEN-T network (Objectives TS04, TS05).

In terms of promoting sustainable transport links the EMRA RSES supports the development of flagship strategic greenways including the development of a wider East Coast Trail from Rosslare to Northern Ireland (EMRA RSES, pg. 109). It is therefore recommended that this approach and potential for a wider greenway network is recognised and supported in the Wexford County Development Plan.

The submission concludes that it is considered that the Draft Plan can achieve consistency with the EMRA RSES by addressing the recommendations and observations set out above.

4.2 Chief Executive's Response

The EMRA submission is welcomed. With regard to the EEC a number of proposed amendments are recommended arising from consideration of WXF-C3-137 Southern Regional Assembly. These include amendments to Objective TS04 to refer to the extension of the Dublin- Belfast Corridor and Objective TS05 to reference improvements to rail connections (See Section 3 of this report). It is recommended that an amendment is made to Objective ED04 in Chapter 6 Economic Development Strategy to reference consultation with stakeholders including the EMRA. The amendments will further strengthen the Council's commitments with regard to the EEC.

With regard to the Rosslare to Belfast greenway it is noted that Objective ROS41 in Chapter 14 Recreation and Open Space Strategy states that the Council will *"support investment in the development of walking and cycling facilities and greenways and to explore the potential to develop greenway corridor linkages between settlements to create interregional greenways."* It is considered that this objective adequately covers this issue. No further amendment is recommended.

4.3 Chief Executive's Recommendations

It is recommended that the following proposed amendment be made to Chapter 6 Economic Development Strategy:

CE EMRA 1

Amend Objective ED04 in Section 6.6 Economic Development Strategy on page 199 as follows:

To develop the extended Eastern Economic Corridor and the towns and settlements on the corridor as a significant driver of economic growth in the Southern Region, linking Rosslare Europort and the Southern Region with Dublin and Belfast. <u>The Council will consult relevant</u>

stakeholders including other local authorities and the Eastern and Midlands Regional Authority in order to plan and optimise economic development.

Section 5 Submissions Relating to Chapter 1 Introduction

Relevant Submissions

- WXF-C3-24 Environmental Protection Agency (EPA)
- WXF-C3-29 Healthy Wexford Committee
- WXF-C3-82 Department of Tourism, Culture, Arts, Gaeltacht, Sports and Media (Dept. TCAGSM)
- WXF-C3-90 O'Shea
- WXF-C3-92 Redmond
- WXF-C3-94 Wexford Environmental Network (WEN)
- WXF-C3-101 Markham
- WXF-C3-142 Health Service Executive (HSE)
- WXF-C3-143 An Taisce
- WXF-C3-151 Keep Ireland Open
- WXF-C3-154 Frances O'Grady
- WXF-C3-156 Dunne

Summary of Main Issues and Chief Executive's Response

Section 1.2 What is a County Development Plan?

WXF-C3-101 (Markham) suggests that the second sentence in the first paragraph be rewritten to place nature first, social second and economic third. It is also requested that the second sentence in second paragraph be rewritten as follows: "The plan seeks to balance the ecological outer ring of the doughnut with the social foundation of the internal ring so we do not overshoot our pressure on Earth's life-supporting systems".

Section 1.2 What is a County Development Plan? Chief Executive's Response

Both suggestions are noted. As the existing wording doesn't prioritise the development of one over the other, it is not considered necessary to re-order or refocus the wording. No amendment proposed.

Section 1.3 Legislative Context

WXF-C3-151 (Keep Ireland Open) states that the Draft Plan fails to take account of Planning and Development Acts, Plans in adjoining counties, DoECLG Guidelines, Heritage Act 1995, National Heritage Plan and Development Plan Guidelines.

WXF-C3-156 (Dunne) notes that the content of the CDP is very much dictated by legislation, the NPF, Minister Guidelines, EU Directive, the RSES, the Planning Regulator and other national policies. This does not always translate to democratic planning policy on the ground. Any useful proposals from the Elected Members in the next stage should be taken into account.

Section 1.3 Legislative Context Chief Executive's Response

Regarding WXF-C3-151 (KIO) these assertions are refuted. The Council is satisfied that the Draft Plan was prepared in accordance with the relevant legislation and had regard to all relevant Section 28 Guidelines and national, regional and local policy guidelines. No amendment proposed.

Regarding WXF-C3-156 (Dunne) the comments are noted.

Section 1.3.3 Appropriate Assessment

WXF-C3-82 (Dept. TCAGSM) recommends that Objectives EM02 and EM04, which relate to Appropriate Assessment (AA) of projects and plans respectively and are currently included in Chapter 10 Environmental Management, should also be included at the beginning of the Draft Plan as part of an overarching policy to ensure that all projects and plans flowing from the Plan are subject to screening for AA and where necessary AA. This submission also recommends the wording is changed to 'compliance with the objectives and requirements of the Habitats Directive, the Birds Directive, Water Framework Directive, all other relevant EU Directives and all relevant transposing legislation'.

Section 1.3.3 Appropriate Assessment Chief Executive's Response

It is recommended that Objectives EM02 and EM04 be restated in this chapter to reaffirm that all plans and programmes will be assessed for compliance with the Habitats Directive. As these two objectives relate specifically to the Habitats Directive, it is not considered appropriate to include references to the other suggested Directives and legislation. There are other objectives in the Draft Plan that will require compliance with those. Such objectives include, but are not limited, to Objective WQ14 (Water Framework Directive), Objective NH04 (Birds Directive and Protected Species), Objective AQ01 (Air Directive), and Objective COMAH01 (Major Accidents Directive).

Having further considered this submission, it is also recommended that Objectives EM01 (EIA) and EM03 (SEA) also be included in this chapter to reaffirm that projects and plans will be subject to EIA and SEA respectively.

Section 1.5 Monitoring and Implementation

WXF-C3-142 (HSE) notes the importance of monitoring and implementation of the Plan.

WXF-C3-143 (An Taisce) outlines the need for robust targets, actions and measures to achieve the tangible implementation of the Plan's objectives and policies. The success or otherwise can only be judged against quantifiable and implementable criteria which are subject to on-going monitoring. This will be fundamental in creating a low carbon, low energy, sustainable, and healthy society.

WXF-C3-94 (WEN) suggests that rather than producing the annual report recommended by the Development Plan Guidelines that quarterly reports, in partnership with the Strategic Policy Committees, be produced to monitor and evaluate the objectives of the Plan and identify any issues concerning implementation.

Section 1.5 Monitoring and Implementation Chief Executive's Response

Noted, and these comments will be taken in consideration when setting up and carrying out the monitoring of the Plan. With regard to the timeframe for reporting, the current Development Plan Guidelines for Planning Authorities recommend the preparation of an

annual monitoring and evaluation report. An updated version of the guidelines is expected to be published later this year, and the Council will have regard to the monitoring and implementation procedures set out therein.

Section 1.6 Underlying Themes

WXF-C3-29 (Healthy Wexford Committee) requests the inclusion of 'Healthy Wexford' as underlying theme of the Plan. The submission outlines that many of the determinants of health are within the remit of the Council. The 'Healthy Wexford' vision can be achieved through the continual improvement of the physical and social environment of the county and by assisting in the development of community resources that enable people to support each other and achieve their potential. The submission notes that the Draft Plan already focuses on many of the areas and identifies the role of the Plan in delivering improved quality of life, and overall wellbeing. This submission requests that 'Healthy Wexford' be supported by a paragraph at the start of each chapter which includes a list of what will be done in that particular chapter to achieve a 'Healthy Wexford'. The Plan should also have regard to the Healthy Wexford County Plan 2020 -2022.

A number of submissions, including WXF-C3-82 (Dept. TCAGSM), WXF-CE-94 (WEN) and WXF-C3-101 (Markham), request that, in light of the biodiversity and climate change emergency, biodiversity should be included as underlying theme of the Plan and included as a preface at the start of each chapter. WXF-C3-82 (Dept. TCAGSM) notes that by embedding biodiversity and the ecosystem services into the Plan, this would be in line with Objective 1 of the National Biodiversity Action Plan 2017 –2023 to 'mainstream biodiversity into decision-making across all sectors' as well as Regional Policy Objective 110 of the Regional Spatial and Economic Strategy (RSES) which states 'it is an objective that an ecosystem services approach will be incorporated into the preparation of statutory land use plans in the region'.

WXF-C3-94 (WEN) also suggests that the environment needs to be at the centre of every element of the Plan and central to every objective, and climate adaptation and mitigations actions need to be central to every objective. The submission suggests that biodiversity should have its own chapter, or at the very least have its own set of objectives and be

central to other objectives including a new Biodiversity Action Plan. The Plan should include an overall vision and strategic goal for Wexford to be a Green Economy model and leader in Ireland. While this is included in Objective ED76, it needs to be embedded in other objectives.

Section 1.6 Underlying Themes Chief Executive's Response

The Wexford Healthy County Plan was launched after the Draft Plan was adopted. However, as the Draft Plan was formulated around UN Sustainable Development Goals (SDG) and, in particular, SDG No. 3 - Good health and Wellbeing and the role of spatial planning in developing sustainable, inclusive and healthy communities, it very much aligns with the goals and actions in the Healthy Wexford Plan.

The Draft Plan includes a strong focus on ensuring the development of high quality living environments (well-designed neighbourhoods, high quality and energy efficient housing), active modes of travel (walking and cycling), recreation and open spaces (community gardens, allotments, green infrastructure corridors, parks, playgrounds, playing pitches, greenways, walking trails, river walks, coastal paths and beaches) that will contribute to the physical and mental wellbeing of the county's residents.

The Draft Plan outlines the role of spatial planning in tacking deprivation by facilitating social and community development including health and education services and facilitating employment and enterprise and training facilities in disadvantaged areas/unemployment blackspots. The role of spatial planning in creating built environments that promote and facilitate social inclusion, in particular, in the areas of housing, transport, employment, public transport, social and community facilities is also embedded in the Draft Plan.

It is recommended that 'Healthy Wexford' be included as an underlying theme which, in turn and alongside UN SDG 3 Good Health and Wellbeing, sets the context for the chapters and strategies in this land use plan. Amendments to incorporate to Healthy Wexford are also included in Chapter 3 Core Strategy, Chapter 14 Recreation and Open Space and Chapter 15 Sustainable Communities and Social Infrastructure Strategy.

While objectives and narrative with regard to the protection of biodiversity and its underpinning conditions are contained in many chapters including Chapters 9, 10, 11, 12, 13, 14 in Volume 1 Written Statement and in Volume 7 Landscape Character Assessment, having considered the various submissions relating to the biodiversity and climate change emergency, the need to mainstream biodiversity into all decision making, and in order to highlight the importance of action at the local level, it is considered valuable to include the protection, conservation and restoration of biodiversity and ecosystems as an underlying theme of the Plan. This will also complement the increased focus on biodiversity that is recommended for other chapters including Chapters 2, 11, 12 and 13 and the new County Biodiversity Action Plan.

The inclusion of additional prefaces for Healthy Wexford and Biodiversity at the start of each chapter is not considered necessary, and in light of the increased and stronger focus on biodiversity throughout the Draft Plan, a separate chapter for biodiversity is not considered necessary either.

The protection of the environment is embedded in the Draft Plan. National Strategic Objective No. 9 in the National Planning Framework (NPF) relates to the sustainable management of water, waste and other environmental resources. This objective has been incorporated into Chapters 2, 3, 6, 9, 10, Volume 12 SEA and Volume 13 NIR, and there is a suite of objectives, which both directly and indirectly, will ensure the protection of the environment.

Section 1.6.1 Sustainable Development

WXF-C3-24 (EPA) refer to SDGs and 13 key actions that should be addressed in the Plan to assist with delivering Ireland's long term sustainable development and environmental protection goals.

WXF-C3-101 (Markham) requests, that for the purposes of the Draft Plan, the Council changes its definition of proper planning and sustainable development to include 'do no harm', place nature first and amend the text to reflect this.

WXF-C3-101 (Markham) and WXF-C3-94 (WEN) suggests that the UN SDG icons are used to indicate which areas are being worked. Each section in the Plan should include the icon(s), indicate alignment and provide a brief description of how it fulfills the SDG.

WXF-C3-94 (WEN) requests that the environmental value/pillar is prioritised and placed first in every planning permission and licensing decision. If not, the risk of this pillar losing its innate value will in turn result in a collapse of both the economic and social pillar. The text should read "prioritising policies relating to the environmental value of the natural world and this comprehensive evaluation should precede all economic and social considerations".

Section 1.6.1 Sustainable Development Chief Executive's Response

The EPA's comments are noted. It is considered that the SDGs and 13 actions have been appropriately dealt with in their respective chapters and volumes in the Plan. No amendment proposed.

The definition of sustainable development used in the Draft Plan is "ensuring a balance is achieved between economic, social, cultural and environmental considerations in the interests of the common good of present and future generations of the county". This definition is informed by the UN's 2030 Agenda for Sustainable Development, which integrates in a balanced manner the three dimensions of sustainable development – economic, social and environmental. It is important to note that the 2030 Agenda and the associated SDGs, are indivisible, that is, it must be implemented as a whole, in an integrated rather than a fragmented manner, recognising that the different goals and targets are closely interlinked. This will ensure that one pillar doesn't take priority over another. No amendment is therefore proposed.

As previously outlined, the protection of the environment is embedded in the Draft Plan.

The tagging of SDG icons is a good idea and this will be done once the Plan is made and will form part of the monitoring and implementation. This does not require at proposed amendment at this stage.

Section 1.6.3 Social Inclusion, Accessibility and Age Friendly

WXF-C3-94 (WEN) requests that 'immigrant communities' are included in the identified target groups.

WXF-C3-101 (Markham) requests clarifications on how the Council is ensuring this section is being acted on in relation to the Draft Plan e.g. digital barriers of access to good quality broadband and digital literacy for navigating websites and creating a submission and addressing living with COVID and the changes that have occurred in our lives during 2020 and into 2021-2026.

WXF-C3-90 (O 'Shea) outlines that any development or planning consultation should be made more accessible to all; an emphasis on broader publicity beyond the local newspaper and library is necessary. It is imperative to include a diversity of voices; in this regard an open and easily accessible submission processes is essential so that a wider local perspective is represented on these issues.

WXF-C3-92 (Redmond) raises concerns about the nature of the public consultation period and the timeframe should have been extended as a result of Level 5 restrictions. Other timeframes, such as the timeframe for submitting appeals to An Bord Pleanála was extended in 2020 due to restrictions. The Draft Plan, which was on display in County Hall, would require more than one trip and this was not desirable for people, including the elderly or vulnerable, who did not want to travel and making it virtually impossible for them to participate. The cost of purchasing the Draft Plan was also prohibitive and would contribute to people being excluded from participating in the process. Under the circumstances, the Council could have extended the 10-week period to enable all interested parties to participate.

Section 1.6.3 Social Inclusion, Accessibility and Age Friendly Chief Executive's Response

It is recommended that immigrant groups be included as suggested.

The comments raised in relation to digital barriers and the nature of the public consultation undertaken are noted. Public consultation on the Draft Plan took place during a rapidly

evolving national response to the Covid-19 situation in the country at that time. It is important to note that, while the Government extended statutory planning timeframes during initial Covid- 19 restrictions for period March-May 2020, this extension was not provided for in subsequent Covid restrictions.

The Draft Plan was on public display from the 28th September to the 9th December 2020, and during this 10-week period, the country progressed through three different levels of Covid-19 restrictions (Level 3 to Level 5 restrictions) with resulting limitations placed on the operation of local authority offices, public libraries, public meetings and interactions at each level. The Draft Plan was available to view in person (by appointment) in County Hall throughout this period and was available to purchase. The Draft Plan was also available to view in public libraries until the Level 3 restrictions came into force. During Level 3, while library services reverted to online and click and collect services only, the Council facilitated people in borrowing the Draft Plan from the public libraries. However, this service had to be suspended in Level 5 restrictions as public libraries reverted to online services only. In order to ensure public engagement in the plan preparation process continued, the Council promoted interaction with the Draft Plan via the new online consultation portal, online stakeholder workshops and social media. The Council not only used newspaper advertisements but also advertised the public display via the Council's website, Twitter page and MapAlerter.

In line with the provisions of the Planning and Development Act, 2000 (as amended), it is considered that the fee to purchase a hard copy of the Draft Plan reflected the reasonable cost of making a copy. Charging for the Plan also reduces the production of unnecessary copies of the Plan and encourages people to view it digitally or at libraries. The 13 Volumes of the plan are 2,576 pages in total. This is considered in line with the Council's paperless strategy which aims to reduce our carbon footprint.

The Office of the Planning Regulator published an updated Communications Toolkit in November 2020 which includes an array of public consultation methods; both traditional and new digital/online methods. While the Council used many of the methods suggested such as the online Consultation Portal, online stakeholder meetings and planners available

by phone, the Council looks forward to working with this toolkit and welcomes suggestions from the public on how to reach all groups and people in our communities.

Others Matters

WXF-C3-154 (O' Grady) outlines support for the following submissions: WXF-C3-24, WXF-C3-35, WXF-C3-43, WXF-C3-48, WXF-C3-62, WXF-C3-75, WXF-C3-79, WXF-C3-94, WXF-C3-101 and WXF-C3-120.

Chief Executive's Response

Noted.

Chief Executive's Recommendation

It is recommended that the following proposed amendments be made to Chapter 1 Introduction:

CE CH1.1

To include Objective EM01 (which is also in Chapter 10 Environmental Management) in Section 1.3.3 on page 14 as follows:

To ensure that proposed projects/developments comply with the requirements of EIA Directive 2014/52/EU of the European Parliament and of the Council of 16 April 2014, amending Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment, and as transposed into Irish law under national legislation, including in Schedule 5 Part 1 and Part 2 of the Planning and Development Regulations 2001 (as amended). In accordance with Article 3 of Directive 2014/52/EU, where EIA is required the environmental impact assessments presented in the Environmental Impact Assessment Report (EIAR) shall identify, describe and assess in an appropriate manner, the direct, ~~and~~ indirect and cumulative significant effects of a project on the following factors: population and human health; biodiversity (with particular attention to species and habitats protected under Directive 92/43/EEC and Directive 2009/147/EC); land, soil, water, air and climate, material assets, cultural heritage, and the landscape, and the interaction between the foregoing factors.

CE CH1.2

To include Objective EM02 (which is also in Chapter 10 Environmental Management) in Section 1.3.3 on page 14 as follows:

To ensure that planning permission will only be granted for a development proposal that, either individually or in combination with existing and/or proposed plans or projects, will not have a significant effect on a European site, or where such a development proposal is likely or might have such a significant effect (either alone or in combination), the planning authority will, as required by law, carry out an appropriate assessment as per requirements of Article 6(3) of the Habitats Directive 92/43/EEC of the 21 May 1992 on the conservation of natural habitats and of wild fauna and flora, as transposed into Irish legislation. Only after having ascertained that the development proposal will not adversely affect the integrity of any European site, will the planning authority agree to the development and impose appropriate mitigation measures in the form of planning conditions. A development proposal which could adversely affect the integrity of a European site may only be permitted in exceptional circumstances, as provided for in Article 6(4) of the Habitats Directive as transposed into Irish legislation.

CE CH1.3

To include Objective EM03 (which is also in Chapter 10 Environmental Management) in Section 1.3.3 on page 14 as follows:

To ensure that proposed plans and programmes comply with the requirements of the SEA Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment, as transposed into Irish law under national legislation.

CE CH1.4

To include Objective EM04 (which is also in Chapter 10 Environmental Management) in Section 1.3.3 on page 14 as follows:

To ensure that plans, including land use plans, will only be adopted, if they either individually or in combination with existing and/or proposed plans or projects, will not have a significant effect on a European site, or where such a plan is likely or might have such a significant effect (either alone or in combination), Wexford County Council will, as required by law, carry out an appropriate assessment as per requirements of Article 6(3) of the Habitats Directive 92/43/EEC of the 21 May 1992 on the conservation of natural habitats and of wild fauna and flora, as transposed into Irish legislation. Only after having ascertained that the plan will not adversely affect the integrity of any European site, will Wexford County Council adopt the plan, incorporating any necessary mitigation measures. A plan which could adversely affect the integrity of a European site may only be adopted in exceptional circumstances, as provided for in Article 6(4) of the Habitats Directive as transposed into Irish legislation.

CE CH 1.5

Amend the last line in Section 1.6.3 Social Inclusion, Accessibility and Age Friendly on page 20 as follows:

The Plan has identified target groups which include children and young people, carers, older people, people with disabilities, ethnic minority groups, ~~and~~ including the Traveller community and immigrant communities.

CE CH1.6

Amend the first paragraph in Section 1.6 Underlying Themes on page 18 as follows:

The Plan addresses a wide range of interrelated economic, social and environmental issues set within an overall framework of achieving sustainable development, climate action, biodiversity and ecosystem protection, social inclusion, ~~and~~ adapting to climate change and a healthy county where everyone can enjoy physical and mental health and wellbeing to their full potential.

CE CH1.7

Insert a new Section 1.6.3 titled Biodiversity and Ecosystems on page 19 as follows:

1.6.3 Biodiversity and Ecosystems

In light of the climate change and biodiversity emergency there is a pressing need to mainstream biodiversity into decision making across all sectors and to raise awareness and appreciation of its value and the benefits it delivers. The protection, conservation, restoration and management of biodiversity and ecosystems forms an underlying theme of the Plan and is reflected in relevant chapters, strategies and objectives.

CE CH1.8

Insert a new Section 1.6.4 titled Healthy Wexford on page 20 as follows:

1.6.4 Healthy Wexford

The chapters and strategies in the plan are aligned with UN SDG No. 3 Good Health and Wellbeing and achieving a healthy county. As set out in Healthy Wexford County Plan 2020-2022, the vision for Wexford is a county where everyone can enjoy physical and mental health and wellbeing to their full potential, where wellbeing is valued and supported at every level of society and is everyone's responsibility.

Healthy Wexford is an underlying theme of the Plan, emphasising the important role that spatial planning has to play in creating built environments that promote good health and wellbeing including mental health and in reducing deprivation and inequalities. The Plan will, amongst other things, facilitate increased physical activity through active travel, well-located and designed green and open spaces, require high quality housing and living environments, promote community participation and social inclusion by requiring well-planned community developments and facilities such as health facilities and improve energy efficiencies in developments and reduce pollutions and emissions.

Section 6 Submissions Relating to Chapter 2 Climate Action

Relevant Submissions

- WXF-C3-3 Branigan
- WXF-C3-10 Geological Survey Ireland (GSI)
- WXF-C3-33 and WXF-C3-65 Department of Transport
- WXF-C3-62 WexBug
- WXF-C3-82 Department of Tourism, Arts, Culture, Gaeltacht, Sport and Media (Dept. TCAGSM)
- WXF-C3-94 Wexford Environmental Network (WEN)
- WXF-C3-96 Gas Networks Ireland (GNI)
- WXF-C3-101 Markham
- WXF-C3-109 3 Counties Energy Agency (3cea)
- WXF-C3-127 South-East on Track
- WXF-C3-142 Health Service Executive (HSE)
- WXF-C3-143 An Taisce

Summary of Main Issues and Chief Executive's Response

Section 2.1 Introduction

WXF-C3-3 (Branigan) outlines that every city, town, and village have a responsibility to reduce their carbon footprint over the next ten years, and beyond. The submission notes that in 2016 15,452 people in the towns of Wexford, Gorey and Enniscorthy travelled to work/school by car/van/lorry compared to only 76 by rail.

WXF-C3-142 (HSE) welcomes the new UN Centre of Excellence in Enniscorthy Town. WXF-C3-101 (Markham) also welcomes the development and looks forward to hearing how it will create a better environment for people living and working in Enniscorthy. Solving air quality in this area is critical for the health of its population.

The submission notes that spatial planning is a critical factor in 'do no harm' and commitment to increasing biodiversity across the county and in managed Council spaces and as such the submission requests the addition of nature and biodiversity in the last few paragraphs in Chapter 2. There should also be a move away from managed verges and grass and into biodiverse and edible foodscapes in urban and mobility spaces including more native trees (plus nut and fruit trees too).

WXF-C3-109 (3cea) notes Wexford County Council joined the European Climate Alliance (September 2020) which among other things commits the Council to reduce CO_2 emissions by 10% every 5 years, equivalent to the halving of per capita emissions by 2030.

Section 2.1 Introduction Chief Executive's Response

As a key component of climate mitigation actions and as detailed in Chapter 8 Transportation Strategy, the Draft Plan is focused on achieving a modal shift to sustainable transport modes, including walking, cycling, public transport and EV vehicles.

As of January 2021, plans are progressing with advancing the establishment of the UN centre in Enniscorthy Town from which the UN will roll-out initiatives and campaigns focusing on energy efficient housing. This will be hugely significant for climate change mitigation and offers many opportunities for the town, the county and the South-East region. The Council is actively working with key stakeholders, which includes the Waterford and Wexford Educational Training Board who is already providing trade specific training in NZEB.

The comments relating to green space are noted. The Draft Plan addresses the importance and role of green spaces and green infrastructure in contributing to good health and wellbeing, high quality living environments, climate action and protecting biodiversity and ecosystem. This is supported by a suite of objectives and development management standards to ensure this forms an integral part of developments in the county, including local authority own development.

Having considered a number of submissions and recognising the importance of, and threats to biodiversity, it is proposed to increase the focus on biodiversity both in this chapter and other chapters in the Draft Plan. This is discussed further under Section 2.3.3.
It is recommended that reference to the Climate Alliance be inserted alongside the Climate Action Charter on page 23. It is also recommended that a new objective be included in the Draft Plan to continue the work of the Council in reducing its CO_2 emissions and improving energy efficiencies and to achieve its target under Climate Alliance.

Section 2.2 Policy Context

WXF-C3-101 (Markham) suggests that the Council create a Climate Action Forum for the county. The work of Meath County Council is highlighted, in particular, the work of their 'Climate Action and SDG Officer and Climate Reality Leader' and Climate Academy. The submission asks whether the Council is considering having this role, is the Council developing staff to be Climate Reality Leaders and do we have young climate champions in Wexford?

WXF-C3-109 (3cea) notes the following:

- The 3cea 'Energy Transition Strategy to 2030', published in January 2020. The vision and focus in on creating a region that produces a surplus of clean energy, supports high-quality green employment, encourages and enables its energy consumers to act responsibly, and reduces and manages the impacts of climate change.
- A 'County Sustainable Energy and Climate Action Plan' could assist the county to achieve and comply ahead of time with its obligations under the Climate Action and Low Carbon Development (Amendment) Bill 2020 as the County Climate Action Plan.
- The role of the Climate Action Regional Offices (CARO) in enabling and supporting local authorities in their climate action work.
- 3cea publish energy use and CO_2 emissions through the South East Regional Energy and Climate Observatory on an annual basis at www.energyhub.ie. Information is readily available for input into the final plan including emissions glidepath, emission breakdown by sector and emission breakdown by fuel type.

Section 2.2 Policy Context Chief Executive's Response

Action No. 3 in the County Wexford Adaptation Strategy 2019-2024 recommends the appointment of a Climate Action Officer. This is ongoing.

A Local Authority Climate Action Training programme has been developed in response to Action 150 of the National Climate Action Plan 2019. The six training pillars are Championing Leadership, Raising Awareness, Building Capacity, Empowering Change, Delivering Action and Actioning Policy. All Local Authority staff will avail of specifically tailored training to increase knowledge and building capacity amongst staff on climate change and climate action, to enable a positive influence through all the services and function provided in serving local communities.

Regarding the establishment of a Climate Community Forum and Young Climate Champions/Youth Academy, the Council will consider where existing structures are or can facilitate climate action initiatives, e.g. the Wexford PPN, the LCDC and the Comhairle N'Og.

The Council would like to thank the 3cea for its on-going work and the sharing of data and information which is used to inform many of the Council's functions, including the Draft Plan e.g. Volume 10 Energy Strategy. The Council looks forward to continuing to work with both the 3cea and the Eastern and Midlands CARO in pursuing our climate mitigation and adaptation measures and raising awareness.

It is recommended to amend the policy section to include a new section on the 3cea Energy Transition Strategy and CARO.

In light of the current Programme for Government and the Draft Climate Action (Amendment) Bill, 2020, the Council's climate action mitigation and adaptation measures will be set out in detail in the new local Climate Action Plan. This Climate Action Plan will outline the measures that the Council intends to adopt and will link that plan to other statutory functions that the Council performs, including development plans and local area plans, and will provide a holistic and co-ordinated approach.

Regarding the climate action role of local authorities, the Department of Housing, Local Government and Heritage (DHLGH) are leading the establishment of pilot Decarbonising Zones in each local authority. This is in response to Action 165 of the National Climate Action Plan. Circular LGSM01-2021 (February 2021) outlines that the concept of decarbonising zones will be analytical test beds for the local government sector to give leadership in both understanding the mechanics of achieving the targets set by EU and national policy on climate, as they relate to specific locations within their functional areas. It outlines that the initial zones will provide practical learnings by which such decarbonisation can be rolled out to the rest of their functional areas with the engagement by all the relevant stakeholders and mechanisms, once they are understood.

It is recommended that a reference to Decarbonising Zones be included in Section 2.2.5 Climate Action Plan 2019 and Section 2.4 Climate Action Spatial Planning Strategy, together with a supporting objective.

Section 2.2.3 National Mitigation Plan

WXF-C3-94 (WEN) and WXF-C3-143 (An Taisce) note that the National Mitigation Plan (NMP) no longer exists, having been struck down by the Supreme Court on 31 July 2020 for non-compliance with the Climate Action and Low Carbon Development Act 2015. All references to the NMP should therefore be removed from the Draft Plan e.g. Objective CA02 and replaced with the Climate Action and Low Carbon Development (Amendment) Bill, 2020. It is also requested that reference be included to the requirements for the local authority under this Bill e.g. to prepare a local Climate Action Plan.

Section 2.2.3 National Mitigation Plan Chief Executive's Response

Noted, and it is recommended that Section 2.2.3 and Objective CA02 be amended to omit references to the NMP. It is recommended that this section be replaced with a new sub-section on the Draft Climate Action Bill. This text will be a general overview as the Bill has yet to be enacted and may therefore be subject to change. It is also recommended that a new objective be included to implement any future Local Climate Action Plan prepared for the county.

Section 2.2.8 Regional Spatial and Economic Strategy for the Southern Region

WXF-C3-94 (WEN) requests that evidence for Compressed Natural Gas (CNG) as a sustainable fuel is presented in order for it to be included as an objective in the Plan.

Section 2.2.8 Regional Spatial and Economic Strategy for the Southern Region Chief Executive's Response

CNG is listed as an alternative fuel in the EU's Alternative Fuels Directive. This Directive defines alternative fuels 'as fuels or power sources which serve, at least partly, as a substitute for fossil oil sources in the energy supply to transport and which have the potential to contribute to its decarbonisation and enhance the environmental performance of the transport sector'. The Directive requires Member States to develop national policy frameworks for the development of alternative fuels and their infrastructure.

The Government's Climate Action Plan 2019 (CAP 2019) refers to the role of CNG in decarbonising the transport sector. Figure 4.5 Suggested Timeline for Technology Adaptation 2030 indicates "to explore renewable CNG expansion and hydrogen as a fuel source for medium and heavy-duty trucks". The CAP 2019 outlines that a strategy for heavy freight designed to progress beyond existing commitments will be pursued, along with the delivery of the 14 public CNG fuelling stations as part of the Gas Network's Ireland Causeway Project with a view to a further expansion of the project and the installation of a connected Central Grid Injection (CGI) facility for renewable gas and a grant scheme to support circa 74 CNH vehicles will be pursued. Action 76 of the Climate Action Plan 2019 seeks to develop the CNG fuelling network to support the uptake of CNG vehicles.

Accordingly, as CNG is reflective of Government policy and it is included as a Regional Policy Objective in the RSES, which has been subject to SEA, it is considered appropriate to retain references to CNG in the Draft Plan, including Objective CA14 and CA15. No amendments are therefore proposed.

Section 2.2.9 County Wexford Climate Adaptation Strategy 2019 – 2024

WXF-C3-62 (WexBug) considers that this strategy has a very narrow scope, with no apparent consideration of the social and economic impacts of climate change, of which there will be

many. There are concerns that the strategy and the County Development Plan will not adequately push transport from the private car and into public transport and active transport modes. The submission requests that the Draft Plan include a description of the steps the Council will take in its part in bringing transport emissions down (e.g. prioritising active transport).

WXF-C3-94 (WEN) requests that the baseline data included be aligned with the current EPA emissions inventories and projections data for 2019 to verify measures are working and respond to current trends.

Section 2.2.9 County Wexford Climate Adaptation Strategy 2019 – 2024

Chief Executive's Response

The comments in relation to the County Wexford Adaptation Strategy are noted, however, changes to this strategy are outside of the remit of the County Development Plan. Chapter 8 Transportation Strategy provides the framework for climate mitigation and model shift to sustainable transport modes, and outlines that this will be developed further in the Local Transport Plan for the four main towns in the county.

The baseline data referenced in this chapter is taken from the County Wexford Adaptation Strategy. It is anticipated that the Local Climate Action Plan (provided for the Draft Climate Action (Amendment) Bill 2020, will provide the holistic approach to mitigation and adaptation that submissions are seeking the County Development Plan to fulfil. It will be the mechanism to identify the Council's pathway for mitigation and adaptation using the most up to data, set definite targets and an implementation and monitoring schedule for same. In the meantime, it is considered worthwhile to include an objective to commit to continuing to reduce the Council's CO_2 emissions and to achieve the targets set by the European Climate Alliance.

Section 2.3 Climate Change in County Wexford

Section 2.3.2 Rivers and Water

WXF-C3-10 (GSI) advises that in January 2020, they established the GWClimate project which will establish a long-term strategic groundwater level monitoring network and

develop modelling and analytical approaches for evaluating the impacts of climate change to Irish groundwater systems.

Section 2.3.2 Rivers and Water Chief Executive's Response

The work of GSI is noted and welcomed. The Council will have regard to this information in its climate action and flood risk management work. See the section of this report relating to Chapter 9 Infrastructure which deals further with this issue.

Section 2.3.3 Coastal Areas and Marine Sector

WXF-C3-94 (WEN) requests the inclusion of the following sentence in this section "Wexford County Council supports the introduction and enforcement of Marine Protected Areas along the coast of Wexford and the adjacent marine area".

Section 2.3.3 Coastal Areas and Marine Sector Chief Executive's Response

In response to this and other submissions, additional text and objectives relating to Marine Protected Areas are proposed for inclusion in Chapter 12 Coastal Zone Management and Marine Spatial Planning and Chapter 13 Heritage. Accordingly, it is not considered necessary to repeat in this section.

Section 2.3.6 Agriculture, Forestry and Biodiversity

WXF-C3-82 (Dept. TCAGSM) recommends that biodiversity should have its own section to highlights its importance.

WXF-C3-94 (WEN) outlines that not all forestry act as carbon sinks, and therefore suggests that the word sustainable forestry be used when talking about the role of forestry in mitigation and acting as carbon sinks.

Section 2.3.6 Agriculture, Forestry and Biodiversity Chief Executive's Response

The suggestions are noted. As previously recommended, a new sub-section will be inserted in this chapter for Biodiversity. It is also considered appropriate to include references to sustainable forestry.

Section 2.4 Climate Action Spatial Planning Strategy

WXF-C3-143 (An Taisce) outlines that the 2020 Programme for Government includes the unprecedented commitment to an average 7% reduction in overall greenhouse gas emissions from 2021-2030, based on a pathway to achieving net-zero emissions no later than 2050. It is submitted that the Draft Plan in its current form is not sufficient for that necessarily high level of ambition and that this target should directly inform all CDP objectives relating to development that generates greenhouse gas emissions as well as to the mitigation of emissions.

WXF-C3-142 (HSE) outlines that the Plan needs to provide measurable targets aimed at reducing carbon footprints, transport emissions, energy demands, flood risks and infrastructure vulnerability in the county.

Section 2.4 Climate Action Spatial Planning Strategy Chief Executive's Response

The Programme is clear that the increased scale and depth of the ambition means new strategies will be needed to sustain a reduction trajectory that will increase over time to meet an average 7% per annum fall in emissions to 2030. These strategies will require consultation, detailed planning, organisation and adequate mechanisms for funding and incentives, as well as the gradual build-up of their impact.

Notwithstanding that the Draft Plan was written before the release of the Programme for Government the objectives in the Draft Plan were formulated having regard to the need to reduce carbon emissions and facilitate a transition to a low carbon economy by 2050 in line with Government's policy. It is considered that the strategies and objectives can be effectively used to deliver the higher targets also. It is important to emphasise that a lot of land uses and associated climate action responses are subject to wider sectoral plans, guidelines and investment programmes, which are outside of the remit and control of the County Development Plan.

The new local Climate Action Plan will be best placed to provide the detailed mitigation and adaptation measures and associated targets that many submissions are requesting the CDP

to provide. The approved Climate Action Plan will then inform statutory land use plans prepared in the county.

Section 2.4.2 Mitigation and Spatial Planning

WXF-C3-33 and WXF-C3-65 (Dept. Transport) outlines that the Department's approach to achieving a greener transport sector is aligned with the Avoid-Shift-Improve principle and there are potential roles for new measures through reducing the frequency and distance of trips, shifting towards more environmentally friendly modes of transport, such as walking, cycling or using public transport and promoting efficient fuel and vehicle technologies.

WXF-C3-125 (South East on Track) suggests that this section should include a reference to Wexford's existing strong rail network.

WXF-C3-62 (WexBug) notes this section does not mention a modal shift towards emissions-free transport options such as walking and cycling in this section. Active transport by walking and cycling for short, medium and long-distance travel is an essential part of any climate adaptation strategy for the county and it must be mentioned as a mandatory criterion for consideration.

WXF-C3-94(WEN) suggests the following amendments:

- Add remote working hubs to the first bullet point on page 33.
- Amend the second bullet point on page 33 as follows "facilitate sustainable <u>and regenerative</u> agriculture such as ~~afforestation~~ <u>sustainable agroforestry</u> which not only acts as a carbon sink but is a source of renewal fuel and biomass.
- Add <u>'with particular support for community owned and locally produced renewable energy generation projects'</u> to the end of the third bullet point on page 33. The submission provides examples of community owed/led projects in Tipperary and objectives in the Tipperary CDP.

WXF-C3-96 (GNI) requests the inclusion of the following to ensure the section is in line with the RSES:

- "support investment in the sustainable development of CNG refueling stations" as outlined in RPO 93 (a) in the RSES; and
- "promote renewable gas and support investment in the sustainable development of an agricultural biogas sector and assist in the integration of renewable gas to the grid network" as outlined in RPO 225.

WXF-C3-142 (HSE) requests the inclusion of an objective to promote sustainable farming practices within the county and implement policies to help reduce greenhouse gas emission from agricultural practices. The HSE also recommends that the Council use measures such as nature restoration and protection measures, rewilding initiatives, the development of carbon sinks and nature-based solutions to control flooding in climate action.

Section 2.4.2 Mitigation and Spatial Planning Chief Executive's Response

The comments of the Dept. of Transport are noted.

Active travel modes (walking and cycling) are dealt with comprehensively in Chapter 8 Transportation Strategy. However, as pointed out, active travel modes are an important component of climate action and accordingly, the first bullet point in this section should be expanded to include the references to walking and cycling. In response to WXF-C3-125, a reference to the county's existing rail network will also be included in this bullet point.

The wording of Objective CA15 is informed by RPO93 and already includes 'support for the investment in the sustainable development of EV charging facilities and CNG refueling stations. No amendment is therefore required.

Regarding renewable gas, Objectives CA14 - CA16 in the Draft Plan address both points made by GNI.

The response to the Covid-19 global pandemic included a significant reliance on remote working, and had many positive benefits including a reduction in commuting and emissions and improvements to quality of life due to less time commuting. Remote working will

become a practical and sustainable option for many employers and the Council will support the development of remote working hubs at appropriate locations in towns and villages in the county, and it is recommended that it be included in this chapter, Chapter 3 Core Strategy, Chapter 6 Economic Development and Chapter 8 Transportation Strategy and Chapter 10 Infrastructure.

The suggestions regarding strengthening the focus on sustainable agriculture and forestry are welcomed and considered appropriate.

The current Programme for Government includes a strong focus on sustainable energy communities and the development of community micro-generation energy projects. Section 7.4 of the County Energy Strategy (Volume 10) relates to micro-generation and the potential role in reducing carbon emissions from dwellings and businesses. Both the Wind and Solar Sections of the Strategy contain objectives with regard to community projects. It is considered important to reflect this role in the climate action chapter as well, and accordingly, it is recommended that bullet point five be amended to include support for sustainable community led energy projects as a means of reducing carbon emissions.

Regarding the HSE's request, Objective ED 90 in Chapter 6 Economic Development is an objective to support the development of sustainable agricultural practices. It requires compliance with best practice guidelines, normal planning and environment criteria and the development management standards in Volume 2. There is also an objective in Chapter 2 Climate Action - CA16 to support the decarbonisation of the agricultural sector. No amendment proposed in this regard. It is also proposed to add objectives relating to nature restoration, rewilding and nature-based solutions in various chapters including Chapter 9 Infrastructure, Chapter 11 Landscape and Green Infrastructure, Chapter 13 Heritage and Conservation and Volume 11 Strategic Flood Risk Assessment.

Section 2.4.3 Adaptation and Spatial Planning

WXF-C3-101 (Markham) notes that the aim of adaptation as set out in this section does not include resilience of its people and their mental health. The submission notes there is a need to be clear about the transition that adaptation will bring and explain what is meant by

the term green growth, ensuring there is significance and accountability behind it, with trackable and traceable metrics. The submission asks if green infrastructure and new development will be scoped for carbon footprint using the Scope 1, 2 and 3 emissions?

WXF-C3-142 (HSE) notes that while energy efficiency during the operation of developments has been covered by the Plan, energy use during construction has not be addressed.

Section 2.4.3 Adaptation and Spatial Planning Chief Executive's Response

The National Climate Action Plan (2019) advocates for a 'just transition' and improving the climate resilience of all communities and society. There is a need for all decision makers to make sure that this focus and the achievement of UN Sustainable Development Goal No. 3 Good Health and Wellbeing is fully integrated in the response to climate change and the pursuit of targets. The Healthy Wexford County Plan will have a very important role to play in this regard, along with the strategies and objectives in the County Development Plan relating to the development of sustainable and resilient communities. It is recommended that the Adaptation aim set out Section 2.4.3 be amended to include the good health and wellbeing of people and achieving just transition.

Chapter 6 Economic Development includes a section on the green economy. Green growth is about fostering economic growth and development while ensuring that natural assets continue to provide the resources and environmental services on which good health and wellbeing relies.

Both submissions raise an important point in relation to scoping the carbon footprint of developments. Objective CA10 requires new developments to mitigate and adapt to the impacts of climate change by ensuring they are appropriately located, sited and designed to accommodate the predicted future climate change impacts. Section 2.2 Place Making and Design in Volume 2 Development Management Manual contains the 12 urban design principles that will be applied to residential and other developments which includes connections and sustainable mobility, efficiency and compact growth and adaptability. It is considered that the development of a scoping and carbon footprint audit/quantification and rating methodology for new development would be an excellent innovation. It is considered

that implementing this through a mechanism similar to the Building Energy Rating (BER) or Building Control Management System (BCMS) would be the appropriate mechanism for this. It is recommended that an objective be included in the Draft Plan to prepare a climate proofing check list/matrix. This mechanism would allow a proposal to demonstrate how it incorporates mitigation and adaptation, as appropriate.

Climate Action Strategic Objectives

As previously discussed, WXF-C3-94 (WEN) request that all references to CNG be removed from the Draft Plan. This would include Objective CA14 and CA15 in this chapter.

WXF-C3-96 (GNI) welcomes the inclusion of initiatives to support the use in transport of Biogas/CNG in Objective CA14. Biogas (when upgraded to biomethane and injected into the gas network) and CNG can help Wexford reduce carbon emissions. The submission also welcomes the provision to support investment in the sustainable development of CNG infrastructure in line with TEN-T corridors as outlined in Objective CA15. The submission supports Objective CA16, and outlines that renewable gas produced by anaerobic digestion is a clean, renewable and carbon neutral fuel that can be used in heat, transport and electricity production.

WXF-C3-125 (South-East on Track) requests that Objective CA01 be amended to include 'encouraging development around existing transport corridors.'

WXF-C3-94 (WEN) also requests the following amendments:

- Amend Objective CA11 to include reference to remote working hubs and the Council's own commitment to climate adaptation measures e.g. EV for its own fleet. The submission requests the Council to clarify its plan, commitment and transition plan to moving its fleet of vehicles to EV or hydrogen.
- Amend Objective CA12 so that instead of supporting the development of sustainable buildings the Council could insist that all Council properties are sustainable as well.
- Objectives CA13 and CA14 should have specific time bound targets for the elements that are in the Council's control.

- Objective CA16 should include clear references to types of mitigation and adaptation programmes and suggests the inclusion of the following 'to promote regenerative farming methods and full conversion to Organic and/or chemical free production'.

- Objective CA17 should be expanded to include 'to seek opportunities to implement nature friendly carbon sequestration options on Council owned or control public lands e.g. community orchards and small re-wilding schemes'.

WXF-C3-142 (HSE) requests the inclusion of an objective relating to an annual Local Authority report on energy usage in all public buildings and the setting of a measurable target for improvement in energy efficiency. This submission also requests that objectives to support the provision of more sustainable energy options including development of piped gas network, 'district heating' or 'district cooling' in the Plan.

Climate Action Strategy Objectives Chief Executive's Response

In relation to CNG, having considered the points raised in various submissions regarding the need to transition to sustainable transport modes e.g. public transport and active travel, it is considered worthwhile to include a reference in this chapter to the objectives in Chapter 8 Transportation Strategy that will facilitate the transition to sustainable transport modes.

As outlined in the response under Section 2.4.2 Mitigation and Spatial Planning, it is recommended that support for remote working hubs be included in this chapter, Chapter 3 Core Strategy, Chapter 6 Economic Development, Chapter 8 Transportation Strategy and Chapter 9 Infrastructure Strategy.

The Council is making progress in the roll out of electric vehicles within its fleet of 245 vehicles and plant. As of March 2021, the Council has 7 100% electric vehicles; 4 of these are vans used for various collections and deliveries and 3 are forklifts that are used in the 3 Civic Amenity Sites. The Council is also rolling out EV charging infrastructure at a number of public locations. The Council has a working group dedicated to this issue that meets regularly to monitor progress.

With regard to the agricultural sector, while the County Development Plan is limited in its mitigation and adaptation remit and in its role in the regulation of farming programmes and funding, it is considered appropriate to encourage and support both approaches and it is therefore recommended that Objective CA16 be amended to include examples such as regenerative farming methods and chemical free production.

It is recommended that Objective CA11 be amended to include reference to provision of nature friendly sequestration options in Council own developments and on public land.

The comments relating to Objective CA12 are noted. All new buildings must now meet NZEB standards which will ensure that buildings are sustainable from a construction and energy perspective. In the interests of clarity, the last sentence should be amended to promote and encourage developments to achieve certification under those systems. The House Performance Index is Ireland's first national voluntary certification scheme for high quality and sustainable residential development and the certification covers environment, economic, health and wellbeing, quality assurance and sustainable location. Leadership in Energy and Environmental Design (LEED) is a voluntary rating system to certify sustainable buildings and neighbourhoods. The Council's Energy Committee is also monitoring the energy usage of the Council's key energy users and is taking measures to reduce consumption across all areas.

The request to include specific time bound targets for the elements under the Council's control in Objective CA13 and CA14 is noted. It is considered that the Local Climate Action Plan will be the appropriate mechanism for doing this. It is difficult to prescribe targets to the County Development Plan as so much is dependent on the level of development activity in the plan period. In line with the European Energy Performance of Buildings Directive Recast, all new buildings must now meet nearly-zero energy building standards (NZEB). This means that the 6,427 new houses identified for the plan period will all be NZEB. The County Energy Strategy (Volume 10) sets a target of 100% of electricity consumption in the county to be from renewable energy sources by 2026. Chapter 8 Transportation Strategy sets a modal shift target for the plan period, which will be further expanded upon in the Local Transport Plans that will be prepared for the four mains towns in the county. The Draft Plan

also includes minimum standards for EV parking and associated infrastructure and minimum bicycle parking standards in new developments, along with the introduction of maximum car parking standards in town centres.

Regarding the HSE's request for an annual report on Local Authority energy usage, the Council's Energy Committee along with 3cea monitor energy usage in the Council's largest energy consumers and are making significant progress in reducing their energy consumption. This will also be addressed in the new Local Climate Action Plan. No amendment required.

The HSE's request for additional objectives to support sustainable energy options is noted. District heating is covered in Volume 10 Energy Strategy and gas is addressed in Chapter 9 Infrastructure. While the Plan does not specifically reference district cooling systems, such systems would be supported by Objective CA12 and CA13. No amendment proposed.

Chief Executive's Recommendations

It is recommended that the following proposed amendments be made to Chapter 2 Climate Action:

CE CH2.1

Add the following sentence to the end of the second paragraph in Section 2.1 Introduction on page 23 as follows:

The Council also joined the European Climate Alliance in September 2020. This is the world's largest network of cities dedicated to climate action and which pairs local action with global responsibilities. Amongst other things, it commits the Council to reduce CO_2 emissions by 10% every five years, equivalent to the halving of per capita emissions by 2030 (from a 1990 baseline).

CE CH2.2

Delete Section 2.2.3 National Mitigation Plan on page 25-26 and replace with a new sub-section entitled Section 2.2.3 Draft Climate Action and the Low Carbon Development (Amendment) Bill 2020

~~**Section 2.2.3 National Mitigation Plan**~~

~~Published in 2017, the National Mitigation Plan (NMP) outlines that spatial planning can make a significant contribution to addressing climate change mitigation and adaptation challenges, as well as helping to promote the transition required in the country's energy system. This can be achieved by helping to shape new and existing developments in ways that reduce greenhouse gas emissions, increase resilience to the impacts of climate change and enable renewable energy obligations to be met.~~

~~The NMP outlines that settlement patterns play a fundamental role in influencing how people travel, both the distances undertaken and the modal choice. Effectively meeting travel demand in a manner that avoids congestion and limits transport emissions requires effective spatial policies to be implemented at local and national levels. It notes that the spatial relationship between where a person lives, works, goes to school, shops and socialises forms the basis for demand. The provision of sustainable transport options is only realistic when people live close to employment centres and complementary services such as education, retail and leisure.~~

~~Walking and cycling, in particular, also become more viable as transport options when the distance between such uses is reduced. It is clear that land use policy is a key determinant of transport investment decisions so it is vital that land use planning and transport planning are fully aligned.~~

Section 2.2.3 Draft Climate Action and Low Carbon Development (Amendment) Bill, 2020

This Bill, when enacted, will commit Ireland in law to move to a climate resilient and climate neutral economy by 2050. The current programme for Government (2020) commits to a 7% average yearly reduction in overall greenhouse gas emissions from 2021-2030, and to achieving net zero emissions by 2050. The Bill includes the following key elements:

- Establishes a 2050 emissions target;

- Introduces a system of successive five-year, economy wide carbon budgets starting in 2021;
- Strengthens the role of the Climate Change Advisory Council in proposing carbon budgets;
- Introduces a requirement to annually revise the National Climate Action Plan and prepare a National Long-Term Climate Action Strategy at least every decade;
- Introduces a requirement for all Local Authorities to prepare individual Climate Action Plans which will include both mitigation and adaptation measures; and
- Gives a stronger oversight role for the Oireachtas through an Oireachtas Committee.

The Local Authority Climate Action Plan, which must be reviewed every five years, will specify the mitigation and adaptation measures that the Local Authority intends to adopt and to link the plan to other relevant statutory functions that they perform. Adjoining local authorities will be required to consult and co-operate with each other and to co-ordinate measures, where appropriate. The Local Authority will also be required to have regard to the Climate Action Plan when preparing its development plan and local area plans.

CE CH.3

Amend Section 2.2.5 Climate Action Plan 2019 on page 26 as follows:

The Climate Action Plan 2019 to Tackle Climate Breakdown contains 183 actions which will be implemented by 13 Government Departments and 40 agencies under the remit of those Departments. Actions relating to local authorities include signing up to the Climate Action Charter, the development of the Electric Vehicle (EV) charging network, the preparation of local adaptation strategies and the implementation of objectives for compact growth, in particular NPF NPO 3a, 3b and 3c with regard to targets for development within the existing building footprint of settlements.

Action 165 of the Plan outlines that each local authority will identify and develop plans for one Decarbonising Zone (DZ) in their functional area. Circular Letter LGSM01-2021 from the Department Housing, Local Government and Heritage defines a DZ as “a spatial area identified by the local authority, in which a range of climate mitigation, adaptation and

biodiversity measures and action owners are identified to address local low carbon energy, greenhouse gas emissions and climate needs to contribute to national climate action targets". The DZ should either cover (i) urban areas and agglomerations with a population not less than 5000 persons, or (ii) rural areas with an area of not less than 4km2.

The range of projects proposed for the Decarbonising Zone should be specific to the energy and climate characteristics of the spatial area covered by the DZ and identify appropriate project sponsors and embrace a range of technologies. Plans for the identified DZ should also consider the economic and social benefits of decarbonizing including just transition and health. A DZ should also address the wider co-benefits of air quality, improved health, biodiversity, embodied carbon, agricultural practices and sustainable land.

CE CH2.4

Insert a new section 2.2.10 titled 3 Counties Energy Agency – Energy Transition Strategy 2020-2030 on page 29 as follows:

The 3 Counties Energy Agency (3cea) was established to provide independent sustainable energy information, support, and services to the people of Carlow, Kilkenny and Wexford, to local businesses and community groups and to their local authorities. In January 2020, 3cea launched the 3 Counties Energy Transition Strategy to 2030. The vision is to be a leader in efficient use of locally produced energy, delivering low carbon homes, jobs and enterprise. By 2030 the region will:

- Be energy efficient;
- Use clean energy and produce surplus local clean energy supply;
- Empower citizens to act and participate in the energy transition with rewards for their investment, and
- Be sustainable – an attractive place to live, work, play and invest.

The Strategy also sets energy consumption targets and CO_2 emissions by sector for 2030.

CE CH2.5

Insert a new section 2.2.11 titled Climate Action Regional Office on page 29 as follows:

In January 2018, the Government established four Climate Action Regional Offices (CAROs) in recognition of the commitment by local government to develop and implement its own climate action measures, as well as the need to build capacity within the sector to respond and adapt to climate change. Each CARO focuses on the predominant risks in each geographical area. Through these offices local authorities can play a crucial role in driving practical policy and behavioural changes within their communities to encourage both businesses and citizens to embrace the need for climate action. The offices also played a key role in coordinating the development of the local authority adaptation strategies and ensuring their alignment with sectoral adaptation plans.

County Wexford, along with 16 other local authorities, form the Eastern and Midlands CARO. The office is operated by Kildare County Council and Kilkenny County Council. The predominated risks for this CARO include fluvial flooding, rural pluvial flooding and groundwater flooding.

CE CH2.6

Amend text in Section 2.3.6 Agriculture, Forestry and Biodiversity on page 31-32 as follows:

Section 2.3.6 Agriculture and Forestry ~~and Biodiversity~~

Agriculture and forestry are important sectors in our local economy. The changing climate, in particular temperature, rainfall, soil quality and extreme weather events will affect crop, food and tree production. Sustainable ~~F~~forestry will play an important role in mitigation as trees act as carbon sinks helping to reduce greenhouse gas emissions~~. Biodiversity is vulnerable to climate change, however, it offers opportunities for both mitigation and adaptation. In particular, coastal features such as wetlands and dunes perform flood attenuation and protection for erosion. Similarly, wetlands and floodplains of rivers provide natural attenuation from fluvial flooding and vegetated riverbanks provide protection from erosion and filtration of floodwaters. The protection and enhancement of the county's green infrastructure and biodiversity will therefore be a very important component of any climate change strategy.~~

CE CH2.7

Insert a new section 2.3.7 titled Biodiversity on page 32 as follows:

Climate change is likely to be a significant driver of biodiversity loss. Increases in temperature will change the timing of life cycle events and the distribution of species. The physical impact of more intense storms and increased winter/spring rainfall will accelerate the degradation of habitats that are already compromised by unsustainable practices. There is therefore a need to protect biodiversity from the impacts of climate change and to conserve, restore and manage ecosystems to deliver services that increase the adaptive capacity of people and biodiversity. This, together with the expansion of the county's green infrastructure and recognition by all sectors of the importance of biodiversity, are key components of any climate action strategy.

CE CH2.8

Amend the first bullet point in Section 2.4.2 Mitigation and Spatial Planning on page 32 as follows:

- Facilitate a modal shift towards sustainable transport options as set out in Chapter 8 Transportation Strategy, ~~encouraging~~ encourage the use of electric vehicles by ensuring EV infrastructure is in place, ~~and to~~ work with transport providers to develop public transport options across the county including rail and bus, both in urban and rural areas, and encourage and facilitate a significant increase in the active travel modes of walking and cycling and associated infrastructure.

CE CH2.9

Amend the third bullet point in Section 2.4.2 Mitigation and Spatial Planning on page 33 as follows:

- Increase employment opportunities within the county and promote the development of remote working hubs in towns and villages ~~so as~~ in order to reduce the amount of unsustainable commuting out of the county for work, much of which is car-based commuting.

CE CH2.10

Amend the fourth bullet point in Section 2.4.2 Mitigation and Spatial Planning on page 33 as follows:

- Facilitate sustainable and regenerative agriculture such as ~~afforestation~~ sustainable agroforestry which not only acts as a carbon sink but is a source of renewable fuel and biomass.

CE CH2.11

Amend the fifth bullet point in Section 2.4.2 Mitigation and Spatial Planning on page 33 as follows:

- Facilitate the transition to a low carbon economy which is focused on clean, low carbon technologies and promotes the development of sustainable renewable energy sources such as wind, tidal and solar energy as a means of reducing dependencies on fossil fuels, in particular, community owned and locally produced energy generation projects.

CH CH2.12

Add a new bullet point to Section 2.4.2 Mitigation and Spatial Planning on page 33 as follows:

- To use the Decarbonising Zone identified for county to implement a range of climate mitigation, adaptation and biodiversity measures to address local low carbon energy, greenhouse gas emissions and climate needs to contribute to national climate action targets, and to use this learning experience to inform the roll out of further zones in the county.

CE CH2.13

Amend the first paragraph of Section 2.4.3 Adaptation and Spatial Planning on page 33 as follows:

The aim of adaptation is to reduce the vulnerability of our county, people, economy and environment to climate change, to ensure a 'Just Transition' so that nobody is left behind and to increase resilience to ensure good health and wellbeing. Adaptation brings many ~~opportunity~~ opportunities through green growth, innovation, jobs and ecosystem

enhancement as well as improvements in areas such as water and air quality. In this regard, the CDP includes objectives to:

CE CH2.14

Amend the third bullet point in Section 2.4.3 Adaptation and Spatial Planning on page 34 as follows:

- Protect, conserve and take actions to restore ~~and expand the county's~~ biodiversity, ~~and~~ expand the county's green infrastructure network and encourage nature-based approaches and green infrastructure solutions. These measures will ~~as it~~ provide many benefits including the regulation of temperature, reduction in storm flows and provides clean water and air.

CE CH2.15

Amend Objective CA01 on page 34 as follows:

To ensure that the spatial planning of County Wexford provides for a county that is resilient to climate change, encourages development around existing transport corridors, enables the decarbonisation of the county's economy and reduces the county's carbon footprint in support of national targets for climate mitigation and adaptation objectives as well as targets for greenhouse gas emissions reductions.

CE CH2.16

Amend Objective CA02 on page 35 as follows:

To implement the ~~National Mitigation Plan and~~ National Adaptation Framework through the strategies and objectives of the County Development Plan and in future local area plans.

CE CH2.17

Amend Objective CA03 on page 35 as follows:

To implement the County Wexford Adaptation Strategy 2019 – 2024 and any Wexford County Council Local Climate Action Plan in future local area plans and the assessment of planning applications.

CE CH2.18

Insert a new Climate Action Strategy Objective on page 35 as follows:

To continue to work with the Eastern and Midland Climate Action Regional Office and the 3 Counties Energy Agency to achieve the implementation of national climate policies and targets at the local level.

CE CH2.19

Insert a new Climate Action Strategic Objective on page 35 as follows:

To continue to reduce energy related CO_2 emissions of Wexford County Council, to improve energy efficiencies and to achieve the commitment under the European Climate Alliance to reduce greenhouse gas emissions by 10% every five years.

CE CH2.20

Amend Objective CA11 on page 36 as follows:

To carry out climate adaptation measures such as developing NZEB social housing and retrofitting local authority housing, ensuring new public buildings are NZEB and retrofitting existing public buildings, promoting jobs and innovation in the green economy through the Local Enterprise Office and Economic Development Section, transitioning the Council's own fleet to electric vehicles and facilitating ~~EV~~ electric vehicle infrastructure in public car parks, ensuring flood risk management in conjunction with Irish Water, incorporating biodiversity and green infrastructure planning into local authority own developments including residential schemes, public parks, open spaces, walking trails and greenways and seeking opportunities to implement nature friendly carbon sequestration options on Council owned or controlled public lands e.g. community orchards and rewilding schemes.

CE CH2.21

Amend Objective CA12 on page 37 as follows:

To support the decarbonisation of the energy sector by supporting the implementation of the National Energy Efficient Action Plan and investment in initiatives to improve energy efficiency and future proof the county's residential, commercial, industrial, agricultural and public building stock, including retrofitting in urban and rural areas and reduction in fuel poverty. The Council will ~~also support the development of sustainable buildings~~ encourage

developments to ~~that~~ achieve certification under systems such as the Home Performance Index and Leadership in Energy and Environmental Design.

CE CH2.22

Amend Objective CA16 on page 38 as follows:

To support the decarbonisation of the agricultural sector by facilitating initiatives that advance an approach to achieve carbon neutrality for agriculture and land use that does not compromise sustainable food production through programmes such as the Green Low Carbon Agri-environment Scheme (GLAS) and other relevant mitigation and adaptation programmes and initiatives by the Department of Agriculture, Food and the Marine and the Department of ~~Communications, Climate Action and the Environment~~ the Environment, Climate Action and Communications.

CE CH2.23

Add a new Climate Action Objective on page 38 as follows:

To prepare a Climate Proofing Matrix to be submitted with planning applications to allow the proposed development to demonstrate how it incorporates climate mitigation and adaptation, where relevant.

CE CH2.24

Add a new Climate Action Objective on page 38 as follows:

To ensure that spatial planning is fully embedded in and contributes to achieving the targets set for the Decarbonising Zone in the county by facilitating sustainable transport, energy efficient buildings, appropriate renewable energy developments, waste management developments that promote the circular economy, measures to improve air quality, and restoration and enhancement of biodiversity and green infrastructure in the Decarbonising Zone.

Section 7 Submissions Relating to Chapter 3 Core Strategy

Relevant Submissions

- WXF-C3-6 Devereux
- WXF-C3-11 Quinn
- WXF-C3-25 An Post
- WXF-C3-34 Transport Infrastructure Ireland (TII)
- WXF-C3-48 Courtown Community Council
- WXF-C3-64 Construction Industry Federation (CIF)
- WXF-C3-69 Camolin Town Team
- WXF-C3-70 Re-Imagining Enniscorthy
- WXF-C3-80 Mythen
- WXF-C3-82 Department of Tourism, Arts, Culture, the Gaeltacht, Sports and Media (Dept. TCAGSM)
- WXF-C3-85 Wexford PPN
- WXF-C3-90 O'Shea
- WXF-C3-92 Redmond
- WXF-C3-94 Wexford Environmental Network (WEN)
- WXF-C3-97 Kehoe
- WXF-C3-100 Bigwood Properties Ltd
- WXF-C3-125 Coant Entertainments Ltd
- WXF-C3-127 South East on Track
- WXF-C3-131 Tom and Pat Redmond
- WXF-C3-145 Iarnród Éireann
- WXF-C3-156 Dunne
- WXF-C3-163 Molloy

Land Use Zoning Submissions (other than those relating to Bunclody Town and Rosslare Harbour and Kilrane which are summarised and responded to under Volume 3 Settlement Plans).

- WXF-C3-2 O'Connor
- WXF-C3-5 Gregg
- WXF-C3-13 Fleming
- WXF-C3-49 Cleary and Fleming
- WXF-C3-56 Murphy
- WXF-C3-89 Gregg
- WXF-C3-139 QR Properties

Summary of Mains Issues and Chief Executive's Response

Section 3.1 Core Strategy Vision – County Wexford 2027

WXF-C3-85 (Wexford PPN) welcomes the Core Strategy Vision which closely aligns with their Vision for Community Wellbeing.

WXF-C3-29 (Healthy Wexford Committee) requests the Core Strategy Vision to include a reference to Healthy Wexford. The planned developments set out in the Draft Plan show that health and wellbeing are being considered and Section 3.1 should reflect this.

WXF-C3-94 (WEN) requests that biodiversity forms part of the Core Strategy and be incorporated into the Vision as 'a county in which biodiversity is restored and flourishes'.

WXF-CE-127 (South East on Track) requests that 'transport infrastructure' be added to third bullet point of the Vision.

Section 3.1 Core Strategy Vision – County Wexford 2027 Chief Executive's Response

The suggestions to include biodiversity and a healthy county will strengthen the Vision. As the term physical infrastructure includes transport infrastructure, it is not considered necessary to include a specific reference to transport infrastructure at this point.

Section 3.4 Core Strategy Guiding Principles

WXF-C3-29 (Healthy Wexford Committee) suggests that references to achieving a Healthy Wexford be included in the guiding principles, in particular, E - Compact Growth & Liveable

Sustainable Settlements, F - Regeneration, I - Smart Growth of Settlements and J -Vibrant Rural Areas.

WXF-C3-94 (WEN) suggests that the provision of a network of remote working hubs be included where the 'creation of live-work towns' is referenced in Guiding Principle A – Climate Action. Guiding Principles E and F should also provide for the enhancement of biodiversity and access to green open spaces.

With regard to Guiding Principle B – The development of 'Centres of Scale' to drive regional growth, WXF-C3-92 (Redmond) outlines that Gorey Town has already seen huge growth over the past twenty years. This submission is discussed further under Section 3.6.1 Level 1 Key Towns – Gorey Town. With regard to Guiding Principle E, the submission also queries how higher density increases the attractiveness of settlements. Ireland has always had low rise cities and towns with a small population density.

WXF-C3-127 (South East on Track) requests the following sentence to be included under Guiding Principle D – Utilise the Proximity to the Waterford MASP – 'Reopening the Rosslare and Wexford to Waterford Rail Line can further enhance regional accessibility by offering a low carbon transport link.

With regard to Guiding Principle E – Compact growth and liveable sustainable settlements, while WXF-C3-64 (CIF) supports the principle of compact growth and urban focused development, it emphasises the need for policy objectives in the Plan to support the financial viability of future development, which is dependent on the adequate supply of affordable, developable land and the market demand for residential units. The submission outlines that CIF is concerned that the national and regional focus on compact growth and, in particular on brownfield sites, will have negative consequences on the capacity of the construction industry to deliver affordable housing. Any downzoning, 'de-zoning' or land prioritization/time restrictions of previously identified residential lands will undermine the fragile development market which relies on investor confidence. A stable planning process and consistent outcomes are critical to securing the finance required to delivery new housing at the scale envisaged by the NPF.

WXF-C3-143 (An Taisce) outlines that in order to achieve compact and sustainable settlement, combat rising transport emissions, and improve the quality of life for citizens, the new CDP:

- Must achieve the shift away from dispersed, car-orientated development patterns to walkable, cycleable, transit-orientated and consolidated urban forms will require investment in public transport, walking and cycling to offer communities viable alternatives to private cars.
- Prioritise the future development in Wexford's towns towards efficient, compact, and serviced locations in accordance with the sequential approach and existing infrastructural capacity.
- Be guided by the existing essential social and physical infrastructure, including realistic prospects for addressing capacity constraints.
- Ensure that where services are not available, there should be a reasonable expectation of their provision within the plan period. Land should not be zoned if there is no reliable prospect of providing key physical infrastructure within the plan period or a within reasonable time period thereafter.
- Ensure that the Council engages with the providers of essential physical and social infrastructure and ensure that the town-specific policies are based on realistic assessments regarding the funding and timing of such infrastructure, recognising that some levels of strategic infrastructure may take a number of cycles to provide.

The submission therefore welcomes the commitments throughout the Draft Plan to promote compact development, locate new development in close proximity to public transport, walking and cycling routes and existing services and amenities, promote the 10-minute city concept, direct new rural development to existing settlements, provide serviced sites and ensure the provision of physical and social infrastructure prior to or in tandem with new residential development.

The submission also recommends that the Council make the seven location test standards for new housing outlined in the now replaced National Spatial Strategy 2002 a mandatory CDP requirement for new housing development. The seven test standards are: Asset,

Carrying Capacity, Transport, Economic Development, Character, Community and Integration.

With regard to Guiding Principle H – Connected Settlement and Networks, WXF-C3-33/65 (Department of Transport) supports the recognition throughout the Draft Plan of the importance of aligning land use and transport policies.

WXF-C3-145 (Iarnród Éireann) outlines their proposals to improve inter-county and outer commuter services. The development of these services will contribute to many of the Guiding Principles including compact growth and economic growth, the development of the Eastern Economic Corridor and will be beneficial to the towns of Wexford and Gorey and Enniscorthy.

Section 3.4 Core Strategy Guiding Principles Chief Executive's Response

The comments of the Department of Transport and Iarnród Éireann are noted.

The positive suggestions and comments by An Taisce are noted. Having considered the points, the Council is satisfied that the Draft Plan incorporates the referenced policy approaches needed to achieve compact and sustainable settlement, combat rising transport emissions, and improve the quality of life for citizens. While the submission requests that the 'seven location test standards' form a mandatory requirement for new housing development, the Council will, as set out in Section 2 of Volume 2 Development Management Manual, be applying the 12 urban design criteria from the Sustainable Residential Development in Urban Area Design Manual to new housing developments which will address many of the issues raised by the seven test standards.

In order to reflect the Vision and the focus on good health and wellbeing, which is embedded in the plan being at the heart of proper planning and development, it is recommended that references to a healthy county be included in Guiding Principles E, F, I and J.

The development of remote working hubs is now proposed in other chapters (and as an amendment to Objective CS09 in this chapter) and it is not considered necessary to specifically mention such hubs in Guiding Principle A – Climate Action having regard to the plethora of developments, methods and policy tools that this Guiding Principle covers. It is recognised that biodiversity and open spaces have an important role to play in improving the attractiveness of settlements and it is recommended that Guiding Principle F should reflect this.

The concerns expressed about the development of 'Centres of Scale' and the location and nature of development required to achieve compact growth are noted, and it is fair to say and acknowledge that this concern is shared by many. As these approaches now lie at the heart of spatial planning in Ireland, the Council is required to ensure that compact growth and the efficient use of land (which is a finite resource) is incorporated into land use plans and achieved by proposed developments. While this will mean prioritising brownfield, infill, and under-utilised sites and achieving higher densities, the Council will work with designers and developers to secure design solutions that deliver high quality living environments and attractive places to visit and work in.

As the re-opening of the Rosslare –Waterford Rail Line could further enhance regional accessibility while offering a sustainable transport option, it is considered appropriate to include reference to this rail line under Guiding Principle D –Utilise the Proximity to the Waterford MASP. The Council have been planning the development of a greenway on this route. The greenway would not physically prevent the re-opening of the line at a later stage. The Government recently announced that the Wexford-Waterford rail link will be included in the upcoming all-island Strategic Rail Review and the Council has suspended the development project pending the outcome of this review. The optimal solution, which would achieve the aims of sustainable travel and tourism/economic development and amenity and health would be for a development which would allow for the development of the greenway alongside the existing track. The Council would support such an approach subject to funding being made available by central government.

Section 3.5 Core Strategy Settlement Hierarchy

WXF-C3-94 (WEN) requests the word 'environmental' to be included in the last sentence in the first paragraph to read as follows "All settlements, regardless of their level, have an important role and contribution to make to the environmental, economic and social life of the county".

WXF-C3-6 (Devereux) highlights the absence of Killinick from Table 3.2 County Wexford Settlement Hierarchy and Section 3.6 and recommends that it should be included as either a village or a rural node.

WXF-C3-11 (Quinn) and WXF-C3-127 (South East on Track) request the inclusion of the out of service Rosslare – Waterford rail line on the Figure 3-1 Core Strategy Map. This rail line is regionally strategic important and will play an important role in improving inter-regional connectivity and economic growth in line with objectives in the RSES including RPO 30, RPO 42 and RSES MASP Policy Objective 2 and 7 for the Waterford MASP.

WXF-C3-56 (Murphy) requests that the position of Duncannon as a Level 4 Large Village be reconsidered in light of the potential of the settlement to support additional population growth and economic activity in the areas of tourism and agricultural (both direct and indirect) and the planned wastewater facilities.

WXF-C3-82 (Dept. TCAGSM) consider that Natura 2000 sites and any key green infrastructure resources which lie within or adjacent to settlements should be explicitly acknowledged in the Core Strategy.

WXF-C3-163 (Molloy) requests text to be included in the Plan that acknowledges that some lands in village centres form part of working farms that will continue to be farmed for generations, and as such will not come forward for development. In these cases, the Planning Authority will need to recognise that lands outside those centrally located lands may have to develop first with potential infill development in the future.

This submission also requests that where the boundary of a settlement is not identified either by a land use zoning map or a settlement framework, the following rules on the settlement area should apply: A radius of 200m from any of the following amenities shall be considered for residential or other development and shall be considered to be within the settlement:

- The local GAA or community playing fields or Park
- The local Church(es) or graveyard
- The public house or shop
- The school
- The village crossroads.

Favour shall be given to the greater radius and rural linkage criteria do not apply within the settlements or nodes. All other development and engineering criteria should apply

Section 3.5 Core Strategy Settlement Hierarchy Chief Executive's Response

It is recommended that the word 'environmental' be included in the first paragraph as suggested by WXF-C3-94 (WEN).

The omission of Killinick from Settlement Hierarchy has been noted, and it is now recommended that it be included as a Level 5, Category 2 settlement. Following review of this submission, it was established that the following should also be included in the Settlement Hierarchy:

- Carne, Carrowreagh and Courtnacuddy as Level 5 Small Villages, Category 2, and
- Ballythomas and Mayglass as Rural Nodes

It is recommended that the Rosslare – Waterford railway line be identified on Figure 3-1 Core Strategy Map as a greenway and disused railway to recognise its future potential as a strategic transport corridor to the Waterford MASP, the Atlantic Corridor and the Eastern Economic Corridor. See response to Section 3.4 above.

The designation of Duncannon as a Level 4 - Large Village is considered appropriate having regard to its location, population size and service function.

The request by Dept. TCAGSM that the Core Strategy explicitly acknowledge Natura 2000 sites and any key green infrastructure resources which lie within or adjacent to settlements is noted but this would be a lengthy and detailed exercise given the quantum of settlements in the county, and as such it is not possible at this junction in the plan preparation process. The Council will consider this during the preparation of future local area plans for the Level 1 and 2 settlements, the settlement plans for Level 3(a) settlements, when preparing the boundaries and objectives for Level 3(b) settlements and the boundaries for Level 4 and 5 settlements.

The points raised in WXF-C3-163 (Molloy) are noted. The presence of working farms in the centre of settlements is a valid concern, however it is almost never the case that this would prevent sequential development in all directions. No amendment is recommended.

As discussed under WXF-C3-164 OPR, the Council intends to identify boundaries for all Level 3, 4 and 5 settlements. The requirement to comply with local needs criteria only applies to Level 7 – Open Countryside.

Section 3.6 Core Strategy Development Approach

WXF-C3-85 (Wexford PPN) request that their following vision elements be specifically considered in the Development Approach:

- Supports for recognition, protection and celebration of the county's natural and built heritage. The natural environment is an important asset for the county, both for sustainable living and economic development.
- The local authority and all statutory agencies should work with local communities to ensure well-designed, planned and safe environments that are fully accessible and serviced to meet the diverse needs of residents.
- A good provision of community facilities is needed to support services and activities of different groups and the mixing of these groups and for good health and wellbeing.

- Recreational amenities and activities are well-developed and accessible both in the built and natural environments, making use of land and water resources for the benefit of all.
- Carefully plan the provision of social infrastructure and services that support businesses, workers and the community and offer alternative work alternatives and support community cohesion.
- Encourage and support innovative enterprise models and support small scale and community initiatives critical for the vibrant communities.
- The county should adopt best practices and technologies to minimise its carbon footprint.
- There is a need to provide infrastructure that facilities sustainable transport systems.
- Good provision of local, accessible facilities that accommodate community activities.
- There is support of volunteering activity and the wide range of community-based groups and organisations that provide vital services and opportunities within communities.
- People live in well-planned communities with good infrastructure and a mix of housing to meet different community needs.
- Promote active participation in shaping and working for our communities.
- Local government is open, transparent, listens to all citizens and feeds back regularly. Communications must be regular, up-to-date and in understandable and accessible formats.
- People are consulted about issues that affect them, using a variety of methods that ensure opportunities are available for everyone to engage and influence outcomes and decisions.

WXF-C3-94 (WEN) suggests that the development of high quality public realm and civic spaces should include biodiversity with lots of planting. The submission notes that the Development Approaches for Level 1, 2 and 3 settlements should not just be about building. There should be more references to remote working hubs, connecting public realms and green spaces with cycle lanes and pedestrian walkways, prioritising pedestrians and cyclists in the town centres, development of infill and brownfield sites should include community

allotments, community gardens/orchards and rewilded areas or spaces for nature. WEN also welcomes the principle that priority is given to pedestrians in the Draft Plan but states that it is not clear whether this includes accessibility for those with limited mobility and/or wheelchair users.

Section 3.6 Core Strategy Development Approach - Chief Executive's Response

WXF-C3-85 (Wexford PPN), the Draft Plan already incorporates those elements that lie within the remit of a land use plan. These are addressed in either this chapter or other chapters such as Chapter 4 Sustainable Housing, Chapter 6 Economic Development, Chapter 10 Environmental Management, Chapter 13 Heritage, Chapter 14 Recreation and Open Space and Chapter 15 Sustainable Communities. The Council use a variety of mediums to communicate and consult via including print media, online including website and online consultation portal, social media and via stakeholder channels like the PPN. No amendment is proposed.

The suggestions in WXF-C3-94 (WEN) are noted. While Chapter 3 sets the development approach for each level in the settlement hierarchy (which includes the protection and enhancement of amenities, heritage, green infrastructure and biodiversity), it is considered that the implementation of Chapter 5 Design and Place Making in Towns and Villages, along with Chapter 8 Transportation, Chapter 11 Landscape and Green Infrastructure, Chapter 13 Heritage and Chapter 14 Recreation and Open Space will ensure the holistic development of towns and villages. Accordingly, no amendment to this section is proposed.

In general, where the Council uses the phrase pedestrians it is intended to refer to footpath users to distinguish from users who do not use footpaths such as cyclists and motorised modes. The term pedestrian includes all potential users, persons with a disability, including mobility aid and wheelchair users. It is recommended that this be amended at the first reference to pedestrians in the plan, which is in paragraph three on page 60 and it shall apply to every reference to pedestrians in the plan thereafter.

Section 3.6.1 Level 1 Key Towns – Wexford Town

WXF-C3-89 (Gregg) requests the provision of wastewater infrastructure on Glenville Road to serve both existing residential properties and the planned future population growth and development in this area, including residential developments.

WXF-C3-94 (WEN) asks have the plans for Trinity Wharf been tested against sea level rise scenarios up to 2 degrees of warming. They question whether the Trinity Wharf, Monck Street and Crescent Quay climate resilient against sea level rise and flooding from extreme weather events.

WXF-C3-127 (South East on Track) requests the following to be added to the Wexford Town Development Approach:

- Transport corridor development to Point No. 4.
- Rail services to Waterford as part of the Local Transport Plan under Point No. 9.
- The reopening of the rail link from Rosslare and Wexford Town to Waterford under Point 12.

WXF-C3-125 (Coant Entertainments Ltd) relates to a site located on Commercial Quay in Wexford Town. It is submitted that this is a significant brownfield regeneration site in the town centre, and it is requested that the Draft Plan include additional policies and objectives to support the development of the site for tourism, culture, commerce and the regeneration of this prominent under-utilised site. The following is requested:

- Add the following text to the end of the third paragraph on page 53: 'The planned and permitted mixed use developments for the Commercial Quay redevelopment area will provide the platform to significantly enhance the town's profile as an attractive location for tourists, business visitors, conferences and employees of international companies seeking to locate in Wexford'.
- Add the following text to the end of the second paragraph on page 54 "and also the redevelopment of the Commercial Quay redevelopment area in the centre of the town".

- Add the following text to the end of the third paragraph on page 54: “Monck Street and the area surrounding the Commercial Quay redevelopment area”.

The submission also requests that the Development Approach for Wexford Town on page 55-56 be amended as follows:

- Add the following as a new bullet point: Focus on the redevelopment of the Commercial Quay redevelopment area as a Strategic Tourism and public realm improvement location.
- Amend Point No. 6 to include achieving ‘commercial redevelopment’
- Amend Point No. 7 include ‘the Commercial Quay redevelopment area’.

Section 3.6.1 Level 1 Key Towns – Wexford Town Chief Executive’s Response

The provision of waste water infrastructure in the town is covered by Point No. 12 in the Development Approach and in Objective WT08. This will be considered in more detail in the Wexford Town Local Area Plan. No amendment proposed.

The planning application for the Trinity Wharf project included a Stage 3 - Detailed Flood Risk Assessment prepared in accordance with the OPW’s requirements set out in The Planning System and Flood Risk Management Guidelines for Planning Authorities and the Climate Change Sectoral Adaptation Plan - Flood Risk Management 2019-2024. The design of the project allows for the site to be protected up to the 1 in 1000-year coastal flood event and satisfies the requirements of the relevant planning guidance document and statutory plans.

The Monck Street and Crescent Quay projects are/were constrained by existing ground/building floor levels and will be dependent on the Wexford Flood Relief Scheme for flood protection.

Regarding WXF-C3-127, it is considered appropriate to add transport links to Point 4 which relates to a focus on development in the town that supports the function and expansion of Rosslare Europort. Retention and expansion of the town’s rail services are already referred

to in Point No. 9 (Local Transport Plan) and it is not considered necessary to expand this to specify the Rosslare - Waterford rail line. Point 12 relates to infrastructural requirements which would benefit the key town role and it is considered appropriate to amend this point to include investment in rail services.

Regarding WXF-C3-125, it is proposed to include amendments to refer to the regeneration of Commercial Quay and Monck Street.

Section 3.6.1 Level 1 Key Towns – Gorey Town

WXF-C3-92 (Redmond) raises concerns about the huge population growth that has already occurred in Gorey Town over the last 20 years. This, together with development in settlements such Courtown and Riverchapel and further southwards towards Ballygarrett, has placed increased demands on services in Gorey resulting in overcrowded schools, traffic problems, a large commuter population due to a lack of employment opportunities, an increase in anti-social behaviour, crime, homelessness and high house prices that locals cannot afford. It is submitted that the latter is compounded by the lack of social housing built by Wexford County Council, who instead are investing in privately rented houses which has the effect of supporting investor landlords and further driving up house prices for locals. The people of Gorey have not been asked if they want population growth, and it is submitted that many will not due to the deterioration of many aspects of life in the town due to this population increase.

WXF-C3-116 (Coillte) outlines that their estate includes lands which are within close proximity to town and village centres, including lands in Gorey Town. It is considered that these lands could also provide for and accommodate some alternative uses which would positively contribute to the sustainable development of the county, supporting and enabling national, regional and local planning policy objectives, providing for the consolidated growth of Gorey Town. It is requested that the Council has regard to these lands in any future review of the Gorey Town and Environs Local Area Plan, 2017-2023. In this regard, the Council is requested to consider the provision of planning polices / land use zoning objectives, to support the provision of development on Coillte lands where suitable; to

provide, for example, tourism, commercial, residential, community and/or other uses which would support and enable national and regional objectives.

WXF-C3-131 (Tom and Pat Redmond) welcomes the inclusion of Gorey Town at Level 1 in the County Settlement Hierarchy, noting that this placement reflects the growth that has taken place in the town during the period of current CDP, the town's strategic location and potential that remains for additional housing and employment expansion. The submission outlines that there are many opportunities for the town to become more self-sustaining, particularly having regard to its location on the Eastern Economic Corridor and proximity to Wexford Town and Rosslare Europort.

The submission notes in detail that Gorey Town has outperformed all other settlements in the county and in order for the county to continue to grow and prosper, the Development Plan must be flexible enough to recognise this emerging trend and not to restrict Gorey's growth on the basis that Wexford Town is the county town. While Gorey Town is allocated an increase of 35% of its population, with 60% of that growth frontloaded to 2027, the submission suggests that the population allocation to 2021 (10,853) may already have been exceeded due to the number of housing units commenced since 2016. The submission indicates that from January 2016 to 8th December 2020 665 units were commenced in Gorey Town compared to 75 units in Wexford Town. Redmond Construction accounted for 174 units/26% of the units in Gorey Town.

The submission cautions that the rigid 'planning by numbers' regimes implemented by the NPF and the RSES and overseen by the OPR leaves very little scope for planning authorities to be imaginative and proactive in the forward planning of their county. It requests that, in order to address the static population and housing allocations over the 6 year lifetime of the Plan, the an objective is added which would allow a change in the % allocations of population and housing at more reasonable 2 year intervals in tandem with the initial 2 year review and the 4 years after its adoption:

Section 3.6.2 Level 1 Key Towns – Gorey Town Chief Executive's Response

As outlined in the response to Submission No. 164 OPR, Gorey Town is targeted for population growth given its Key Town status in the RSES, its strategic location, assets and infrastructure. It is fair to say that there was rapid population growth in the town; however, it is considered that this growth took place in a planned manner. The town is thriving and is a much sought after area to live in and visit. There has and continues to be a lot of investment in the town including new schools, orbital link roads, upgrading of Gorey Town Park, public realm enhancements and the development of the M11 Business Campus. Housing activity also remains strong in the town.

The public consultations on the Gorey Town Local Area Plan and the County Development Plan offer the local community the opportunity to comment on strategic proposals for the town including population and housing growth.

The comments are of Coillte are noted. This is considered outside of the remit of the County Development Plan, and a matter for the future review of the Gorey Town and Environs Local Area Plan. No amendment proposed.

The Council is bound by the NPF Implementation Road Map and the recently published Housing Supply Targets which have been allocated to the various levels in the Settlement Hierarchy in Table 3.4 Core Strategy Allocation and Housing Land. While the concerns expressed in Submission No. 131 (Tom and Pat Redmond) are noted and the suggested objective, the Council cannot give a commitment to reallocate population and housing allocations between settlements during the plan period. Furthermore, it is considered that the forthcoming Guidelines and Toolkit for HDNA which are due for release will ensure constant review and live monitoring of housing supply delivery. No amendment is considered necessary.

Section 3.6.2 Level 2 Large Towns – Enniscorthy Town

Submission No. 70 (Re-Imagining Enniscorthy) is a comprehensive submission and includes many suggestions and proposals to support the future development of Enniscorthy. The submission requests amendments to the following objectives:

Objective ET01: The UN Centre should be referenced, the Old Dublin Road should be renamed as the 'North Enniscorthy Business District', and to capture the benefits of remote working, an objective should be included to develop at least one, Grade A remote working space in the town.

Objective ET02: Additional objectives are needed such as - to achieve Fáilte Ireland Destination Town status by 2024, to enhance tourism and information and signage, and to strengthen tourism experiences in the town and surrounding area e.g. possible greenway route on the former Macmine Junction to New Ross railway, walking trails, cycle trails, Blueway from Bunclody to Edermine (rather than Enniscorthy) and strengthen the role of food tourism and festivals. This would include the delivery of a Food Incubation Centre, support to grow the local Farmer's Market and other food innovation and food tourism related activity, make Enniscorthy the food capital of the South-East.

Objective ET03: This needs to be supported by specific actions on how the Smart concept will be used to make Enniscorthy more attractive and how different technologies will be used.

Objective ET04: This objective needs to be more specific in terms of supporting the growth of training and pathway to employment initiatives in Enniscorthy and targeted measures are needed to attract business into the town that play to current local strengths

Objective ET05: More detail is required on the plan to promote the Blueway, develop other water sports and tourism infrastructure.

Objective ET06: This objective needs to be strengthened and supported by objectives and actions to deliver the urban realm improvement recommendations set out in the

Enniscorthy Town Health Check, ensure consistency in the strategic vision, coherence and design of the Tourism Plan, Flood Defence Scheme and Templeshannon Regeneration Project, facilitate pop-up shops in the town centre, an effective plan to deal with vacant and derelict buildings, pilot funding to convert derelict sites/planning flexibility to convert empty shops to living accommodation, specific plans need to re-imagine Abbey Square as it becomes a pedestrian zone once the Flood Relief Scheme is completed and more visible policing of the town.

Objective ET07: The delivery of increased water capacity for the town need to be prioritised along with enhanced broadband capability particularly in the Templeshannon area. There is also a need to provide and enhance amenities for all age groups.

Objective ET08: This objective needs to be strengthened. The development of a least one additional secondary school is recommended by the Department of Education and Skills. This should be referenced and prioritised.

Objective ED13: More detail required on the UN Centre of Excellence and what specifically it will do and how it can be transformative for Enniscorthy and the county. The town could be designated as an exemplar Sustainability Town to cover areas such as energy use, improved air quality, sustainable construction, reduced household emissions, green public spaces, sustainable transport, sustainable food, the circular economy and others.

The submission also highlights that the Plan should

- As a priority, address the air pollution levels in the town which were 10 times over the EU limit in 2019.
- Address transport and movement around the town, improve pedestrian flows and support safe walking and cycling from surrounding areas into the town should and
- Include references to the need to support better communications of Enniscorthy town.

WXF-C3-90 (O' Shea) raises issues in relation to the need to improve the public realm and attractiveness of Enniscorthy Town. In particular;

- There needs to be a specific emphasis on young people.
- The Plan should focus on specific actions and objectives which will address the high levels of town centre vacancy and dereliction.
- There should be support for better use of existing car parks and their links to retail and amenities e.g. the Abbey Square car park.
- There should be a greater focus on the pedestrianisation of core town centre areas; Rafter St is a key example.
- Prioritise the enhancement and maintenance of playgrounds and recreational areas.
- Improve signage which is currently unclear and cluttered.
- The Promenade walk, which is one of the most used assets in the town, should be extended. The Plan should place a greater focus on improving walking trails around the town.

WXF-C3-82 (Dept. TCAGSM) welcomes the Council's intention to make a significant effort to abate and reverse the degradation of the River Slaney at Clohamon Bridge (point 16, page 63) and it is suggested that this could be included as an objective of the Plan. The submission also notes the references in Chapter 7 Tourism Development that feasibility studies are being carried out on a Slaney blueway from Enniscorthy to Wexford Town and that this blueway could also be extended to Bunclody where possible.

Section 3.6.2 Level 2 Large Towns – Enniscorthy Town Chief Executive's Response

The submissions relating to Enniscorthy Town are comprehensive and contain many excellent ideas and suggestions to progress the development of the town and improve the quality of life for the existing and future population. Many of the ideas and actions lie outside of the remit of the County Development Plan and will need to be progressed through other Council's departments, the Enniscorthy Municipal District team and external stakeholders e.g. the UN Centre of Excellence, the rebranding of the Old Dublin Road, tourism strategy and specific projects, the development of the Smart Town concept, education and training initiatives and public realm projects.

The County Development Plan provides the strategic development framework for the town which will be used to support development proposals that arise during the lifetime of the plan and will inform the direction and detail of the new Enniscorthy Town Local Area Plan. The Council's many plans and projects for Enniscorthy Town, together with the proposals contained in the submissions will be reviewed in detail and in a holistic manner to provide an integrated and co-ordinated spatial planning framework for the town. This review and assessment of the suggested proposals with regard to such issues transport and movement, economic, tourism, linkages, biodiversity, green infrastructure, public realm improvements, community facilities, addressing the legacy of deprivation and unemployment in the town (in so far as land use plan can) will be addressed and planned for in more detail in the Local Area Plan. It is also important to note that this is not a stand-alone section and the development of the town is supported throughout the County Development Plan with many objectives which will have positive influences on the town and wider area.

With regard to the request to secure Fáilte Ireland Destination Town Status for the town by 2024, the Fáilte Ireland Development Guidelines for Tourism Destination Towns offer a practical insight into what is requried for a town to develop and operate as a tourism destination town, and this would be a valuable reference at this juncture in the development of a tourism strategy for the town and wider area. As outlined in Setion 3.6.2, the Council will work with all stakeholders to develop the tourism offering and potential in the town and wider area, and will seek to avail of all funding streams. It is recommended that the wording of Objective ET02 be amended to further reflect this comitment.

It is also recommended that the following objectives be amended:

- Objective ET01 to include reference to the UN Centre of Excellence.
- Amend ET03 to include improvements to broadband infrastructure in all areas of the town.
- Amend ET08 to include the provision of at least one additional post primary school.

Regarding Submission No. 82 (Dept. TCAGSM), given that there is a suite of objectives to protect designated sites and water quality in the Draft Plan, it not considered necessary to include specific objective to the River Slaney at Clohamon Bridge.

The Dept. TACGSM also noted that feasibility studies are being carried out on a Slaney blueway from Enniscorthy Town to Wexford Town, and that this blueway could also be extended to Bunclody where possible. Objective ET05 in this chapter supports the development of a blueway in Enniscorthy Town. There is also a reference in Point 16 on page 63 that the Council will focus on developing a Blueway between Bunclody and Enniscorthy. There is no reference to feasibility in either Point 16 or Objective ET05. Accordingly, in the interests of clarity and given the potential environmental sensitivities and considerations, it is recommended that subject to feasibility assessment and environmental assessments be included in Point 16 and Objective ET05. It is also proposed to amend the paragraph on page 265 in Section 7.7.1 Activity and Adventure Tourism that refers to blueways (see the section of this report relating to Chapter 7 for further details of that proposed amendment).

Section 3.6.3 Level 3 Service Settlements

WXF-C3-127 (South East on Track) requests that this section includes the following 'to support the reopening of the Rosslare-Waterford rail link to provide services to Campile, Bridgetown, and Wellingtonbridge'.

Section 3.6.3 Level 3 Service Settlements Chief Executive's Response

The suggestion is noted and it is recommended that this be included in this section.

Section 3.6.4 Large Villages

WXF-C3-69 (Camolin Town Team) notes that the designation of Gorey Town as a key town alongside Wexford Town presents opportunities for neighbouring towns and villages to mitigate pressures on housing, especially social and affordable housing. The designation of Camolin Village as a Level 4 settlement needs to be reflected in subsequent local development plans. The continued failure to upgrade the village wastewater treatment plant is hindering the regeneration and development of Camolin. Significant housing stock could be brought back into beneficial use in the village which would support the objectives to 'concentrate new residential growth within the existing footprint of the villages' and avoid "leap frogging" at the same time. There needs to be a focus on refurbishing available

housing stock on serviced sites within in the existing footprint of the village. The submission notes that while Irish Country Meats is identified in the plan as one of the largest employers in the county, very few of the workers actually reside in Camolin.

Section 3.6.4 Large Villages Chief Executive's Response

The issues raised in this submission are noted. As outlined in Chapter 4 Sustainable Housing, the Council will support and encourage proposals to bring existing housing stock back into use. Chapter 5 contains the Council's policies with regard to compact growth which are consistent with the request in this submission. The Chief Executive acknowledges that the lack of wastewater capacity to accommodate new development is frustrating development. It is dependent on investment by Irish Water, and Camolin is not included in their current Capital Investment Programme. The Council will continue to advocate for this issue to be addressed along with other settlements in the county. No amendment required.

Section 3.6.7 Open Countryside

WXF-C3-94 (WEN) requests that where trees or hedgerows are removed for safety or access reasons, planning conditions should include mitigation measures such as tree planting elsewhere on the development site and/or to reinstate the hedgerow once construction works have ceased.

Section 3.6.7 Open Countryside Chief Executive Response

Section 2.9.1 Roadside Boundaries in Rural Areas and Section 3.1.2 in Volume 2 Development Management Manual already address the issues raised. The Draft Plan has also introduced requirements to provide for biodiversity as part of one-off rural housing sites. No amendment necessary.

Section 3.7.3 Core Strategy Population Allocations

A number of submissions (WXF-C3-80 Mythen, WXF-C3-97 Kehoe, WXF-C3-100 Bigwood Properties and WXF-C3-156 Dunne) raise concerns that the identified quantum of residential zoned land for Rosslare Harbour and Kilrane is too little, particularly in light of the enhanced status and potential for the settlement post-Brexit.

WXF-C3-64 (CIF) is concerned that the extent of land allocated for residential development in the county is wholly insufficient to meet unrealised demand to date and future demand over the plan period. Future Local Area Plans will be bound by the allocations of Table 3.3 of the Draft County Plan in terms of the extent of population they can cater for and the associated quantum of land zoned for development. The ambitions of the Plan in terms of economic development, employment and growth will not be facilitated through overly restrictive land use zoning policies and the associated extensive de-zoning of lands for development in "key" settlements. Demand specific to unit type is an important consideration in this regard, as is clearly justified density specific zoning policies.

This submission also highlights that the identification of an appropriate quantum of zoned land will be critical to ensuring that no shortage of supply occurs during the lifetime of the plan and subsequent future Town & Environs Plans. A shortage in land supply will have a direct impact on land prices and a corresponding impact on the viability of development and house prices. There is a need to ensure that adequate serviced land is zoned to accommodate future demand and demand which has yet to be realised as a legacy of the recession.

Section 3.7.3 Core Strategy Population Allocations Chief Executive's Response

The points raised in relation to housing land supply are noted. However, as previously outlined the Council is bound by the NPF Implementation Road Map and the recently published Housing Supply Targets. These population and housing targets, together with requirements to achieve higher density developments, result in a smaller quantum of required residential zoned land.

As outlined in response to WXF-C3-164 OPR, it is proposed to increase the population allocation and housing allocation for Rosslare Harbour and Kilrane. This increases the zoned land requirements from 3.4ha in the Draft Plan to 6.8ha. The revised Table 3.4 Core Strategy and Housing Land is set out under the Chief Executive's Recommendations in Section 2 and the revised land use zoning proposals for Rosslare Harbour and Kilrane are set out in the section of this report relating to Volume 3 Settlement Plans and Specific Objectives.

Section 3.8.4 Residential Zoned Land and Housing Land Requirements

WXF-C3-64 (CIF) outlines that the implementation of minimum standards in development plans in terms of design is leading to an inability to respond to individual site characteristics and context while promoting uniformity which is counter intuitive to the requirements of the Urban Design Manual. (Minimum separation distances, garden sizes, distances between gable ends, open space requirements, height restrictions, provision of specific boundary treatments, specification of materials and finishes). The submission outlines:

- In some instances, development plans are overly prescriptive stating where secondary and tertiary roads should be located, where street frontages should be located, the orientation of buildings in addition to heights, widths of structures, where open space should be located etc. without consideration of landownership patterns, market demands or the expertise of stakeholders in the private sector.
- Prescriptive development zoning policy can limit the development potential of land and in some instances can burden one landowner with all of the open space provision while another with all of the infrastructural requirements. Zoning policy needs to be flexible and respectful of ownership patterns. The County Development Plan should avoid encouraging Local Area Plans and Town & Environs Plans from being overly prescriptive in these regards allowing appropriate tailored design responses on a site by site basis.
- The preparation of Master Plans by developers (multiple landowners) in partnership with the Planning Authority are far more constructive than overly prescriptive zoning policies and afford the market the flexibility required to deliver development. Such an approach encourages partnership with CIF members utilising their knowledge and experience as opposed to dictating to them in terms of how they develop their own land.

Section 3.4.8 Residential Zoned Land and Housing Land Requirements Chief Executive's Response

The points raised are noted. The Council is required to translate the development guidance and standards in Section 28 Guidelines to the local level. Such guidance includes the Local Area Plan Guidelines, Sustainable Residential Development in Urban Areas and Best Practice Manual, Design Standards for Apartments and the Urban Development and Building Heights

Guidelines. The Design Manual for Urban Roads and Streets must also be incorporated in land use planning.

The Local Area Plan Guidelines require planning authorities to promote high-quality urban design in their local area plan policies, objectives and standards. The guidelines outline that clearly defined policies create more certainty for potential developers and their design teams, and provide a basis for developing a shared, collaborative approach to pre-application consultations with the planning authority. The Guidelines note that local area plans have a key role in translating overarching development plan urban design policies and objectives at the local level, and should:

- Define key elements of local character;
- Identify relevant development plan urban design principles and policies which respond to the local context;
- Provide detailed guidance regarding layout, density, massing, height, materials etc and indicate minimum/maximum densities; and
- include indicative layouts to guide the shape and form of future development, leaving individual building and open space design to expert designers. The effective integration of green spaces/parks into the overall planning and design process will contribute significantly to achieving high-quality places.

It is further noted that the Draft Plan does provide flexibility on standards with an emphasis on qualitative rather than quantitative e.g. as set out in Chapter 14 Recreation and Open Space and Section 2.6 Amenity and Section 3.12 Multi-Unit Residential Schemes in Volume 2 Development Management Manual. Furthermore, Objective TV30 and Objective TV35 in Chapter 5 Design and Place-making in Towns and Villages also give a commitment to applying a more flexible approach to development management standards such as separation distances, open space provision and parking subject to the achievement of performance criteria and design quality being achieved.

The public consultation stages of the LAP process will allow the public, infrastructure providers, landowners and developers to engage and discuss how future development and

infrastructure provision, such as local transport, schools, amenities and water services, be effectively phased and integrated. This will ensure local area plans are based on more realistic assessments of the likelihood of the provision of the infrastructure, including, agreements with relevant agencies and interests.

No amendment proposed to the Draft Plan.

Core Strategy and Settlement Strategy Objectives

WXF-C3-127 (South East on Track) requests that 'support the reopening of the Rosslare-Waterford Rail Link' be included in Objective CS07. The submission also requests that Objective WT05 be amended to including the Rosslare –Waterford Rail Line.

WXF-C3-34 (TII) recommends that the Core Strategy Objectives include:

- To maintain the strategic funding, capacity and safety of the national roads network, and
- To ensure that the existing extensive transport networks, which have been greatly enhanced over the last 2 decades, are maintained to a high level to ensure quality levels of services, safety, accessibility and connectivity to transport.

WXF-C3-48 (Courtown Community Council) requests that Objective CS08 be amended include a greenway/cycle path from Courtown and Riverchapel to Gorey.

WXF-C3-125 (Coant Entertainments Ltd) request amendments to the following Core Strategy and Wexford Town objectives:

- Amend Objective CS18 to include 'redeveloping under-used sites'.
- Amend Objective WT03 to include **'**to promote and support the redevelopment of the Commercial Quay redevelopment area as a Strategic Tourism Employment Location'.
- Amend Objective WT06 to include 'the Commercial Quay Redevelopment Area'.
- Amend Objective WT09 to include public realm works in the Commercial Quay redevelopment area.

WXF-C3-94 (WEN) outlines that in light of the climate emergency any proposal to install new natural gas infrastructure needs to be reversed and removed from the Plan e.g. Objectives GT07, ET07 and NR08.

WXF-C3-94 (WEN) also requests the following amendments:

- Include a remote working strategy for the county identifying key locations for remote working hubs in towns and villages to Objective CS16 and the marketing of the four main towns as remote working centres of excellence, to reduce the requirement for some of the community between north Wexford and Dublin.
- Objective CS04: the development of infill and brownfield/regeneration sites or underutilised lands could include community allotments, community gardens/orchards and rewilded areas or spaces for nature.
- Objective CS14: the preparation of new local area plans should be prepared in accordance with updated environmental guidelines.
- Objective CS23: should include restoration of biodiversity and retaining as much as possible the existing biodiverse/landscape features such as existing hedgerows and trees.
- Objectives WT06 and WT09 should include biodiversity restoration actions.

WXF-C3-25 (An Post) outlines that due the age of some of An Post's facilities, as well as the requirement to efficiently modernise postal facilities as a result of recent trends in the postal services markets e.g. ecommerce parcels/online shopping, the company will be seeking to enhance facilities at existing and new locations. In light of this and the planned population projections for the county, An Post requests that the Council include a supporting policy framework for the future provision of postal infrastructure. Objective CS15 is noted and the following new objectives would be welcomed:

- To support An Post in the provision of new postal facilities and the enhancement of existing facilities, including operational requirements in the county.
- To facilitate the provision of postal infrastructure at suitable locations in the county.
- To promote the integration of appropriate post office facilities within new and existing communities that are appropriate to the size and scale of each settlement.

An Post requests and would welcome engagement with WCC in relation to the following:

- Any proposals to amend delivery times in town centres;
- The preparation of public realm and/or movement strategies to ensure that access and loading bay spaces are protected;
- The preparation of the local area plans for the Wexford Town, New Ross Town and Enniscorthy Town. The use of flexible land use zoning objectives is requested along with consideration of the specific operational requirements of An Post; and
- The future growth and development of Key Towns in the county like Gorey Town.

Core Strategy and Settlement Strategy Objectives Chief Executive's Response

Objective CS07 relates to investment in existing rail infrastructure in the county and seeking investment for improved infrastructure and services. This could include the Rosslare – Waterford Rail Link as it is existing rail infrastructure. Objective WT05 supports the development of additional capacity at Rosslare Europort and the provision of rail freight services and facilities to support sustainable increases in port operations. As the Rosslare - Waterford rail line and rail freight are considered in more detail in Chapter 8 Transportation Strategy, it is not considered necessary to include a specific reference in this objective. No amendment proposed.

The recommendations of the TII are noted. It is considered that Objective TS50 in Chapter 8 Transportation Strategy 'to work with Transport Infrastructure Ireland to protect and improve the safety, capacity and efficiency of the existing national roads network in County Wexford', together Objective TS58 and Objective TS59, provide this policy context. No amendment is proposed.

Objective CS08 refers to local transport plans for the Key Towns (which includes Gorey Town). The suggestion to develop a greenway/cycle path from Courtown and Riverchapel to Gorey Town is noted and it is considered in more detail in the responses to Chapter 7 and 8. No amendments to the Core Strategy objectives are considered necessary.

The request to include objectives with regard to the redevelopment of brownfield and under-utilised sites in pursuit of the achievement of compact growth and regeneration is noted, however it is considered that this is adequately covered by Objective CS04 and Section 5.9 Compact Growth which relate to all towns. With the regard to the other requested amendments, the following is noted:

- Objective WT03 promotes and supports the development of the Trinity Wharf lands as a Strategic Employment Location (SEL). An amendment is proposed to include the redevelopment of the Commercial Quay area as a Strategic Tourism Employment Location.
- Objective WT06 also supports the development of tourism projects in the town including the town's new Maritime brand such as the planned marina at Trinity Wharf and the proposed Wexford to Rosslare Greenway. An amendment is proposed to include the redevelopment of the Commercial Quay area.
- Objective WT09 relates to improving public realm and attractiveness of the town through the regeneration and revitalisation of key locations such as the Trinity Wharf lands, the Crescent Quay public realm project and the public realm works on Monck Street. An amendment is proposed to include the public realm works in the Commercial Quay area.

With regard to WEN's comments in relation to natural gas in Objectives GT07, ET07 and NR07. The policies to the support gas infrastructure are reflective of the need to step down from fuels which are more intensive in terms of carbon generation in the short term with a view to a complete transition to carbon neutral fuels over the medium term. This is in line with Government Policy. No amendment proposed.

The Council supports the development of remote working hubs and it is recommended that Objective CS09 be amended to include reference to the development of same. It is not considered necessary to incorporate this into Objective CS16 as the focus of this objective is the development of smart technologies and revitalising town and village centres.

The focus of Objective CS04 is to achieve the National Strategic Objective for Compact Growth. Amongst other things, compact growth focuses on the development of brownfield,

infill and under-utilised lands in town and village centres for a mix of uses including housing. The wording of Objective CS04 does not preclude features such as community gardens, allotments and rewilded areas being incorporated into compact growth projects. This can also be given further consideration in the preparation of the new local area plans. No amendment proposed.

The requested change to Objective CS14 is noted. The purpose of this objective is ensure that future local area plans are prepared in accordance with all relevant Section 28 Guidelines published by the Minister including the Local Area Plan (2012). All land use plans are subject to SEA and AA. The Council will also ensure that these plans will comply with other environmental legislations, where relevant. No amendment proposed.
The suggestions relating to the incorporation of biodiversity restoration into a number of objectives are noted (Objective CS23, WT06 and WT09. There are biodiversity objectives in other chapters that all new developments will have to comply with e.g. Chapter 11 and Chapter 13. However, it would be beneficial to include a new, overarching biodiversity and green infrastructure objective in the Core Strategy to highlight the importance of both.

The comments of An Post are noted. With regard to the additional objectives sought by their submission, Objective CS15 "to strengthen the viability of our rural towns and villages and to support the retention of essential rural services such as post offices, shops and medical facilities, is taken from the RSES and its purpose is to focus on the retention of services to support and retain rural populations. The requests for specific objectives with regard to the location or servicing arrangements within towns will be best addressed as part of local area plans for these towns. The request for consultations is noted and the Council will continue to consult all stakeholders where possible/appropriate.

Land Use Zoning Submissions

WXF-C3-2 Eamonn O'Connor

This submission relates to New Ross Town and suggests that all shipping, port and storage activities should be relocated downriver to Raheen, Marshmeadows and Stokestown.

Stafford's town centre docks should be re-designated and rezoned for tourism/ leisure to take full advantage of upcoming developments in the town.

WXF-C3-2 Eamonn O'Connor Chief Executive's Response

The suggestions are noted. Land use zoning will be given detailed consideration during the preparation of the proposed New Ross Town Local Area Plan.

WXF-C3-5 Gregg

This submission requests the rezoning of lands in Zone 9 Coolcots and Knockcumshin in the Wexford Town and Environs Development Plan 2009-2015 (as extended) from Open Space and Amenity to Medium Residential.

WXF-C3-5 Gregg Chief Executive's Response

The rezoning request is noted. Land use zoning will be given detailed consideration during the preparation of the proposed Wexford Town Local Area Plan.

WXF-C3-13 Sarah Fleming

This submission requests the rezoning of c. 5 acres of lands at Glen Richards, Ardamine. Under the current Courtown and Riverchapel Local Area Plan 2015-2021 (as extended) the subject lands are zoned Natural Amenity. It is requested that the lands be zoned Residential with a view to facilitating the development of a care home, retired housing scheme or sheltered accommodation on the lands.

WXF-C3-13 Sarah Fleming Chief Executive's Response

The rezoning request is noted. Land use zoning will be given detailed consideration when the Courtown and Riverchapel Local Area Plan 2015-2021 (as extended) is being reviewed.

WXF-C3-49 Cleary and Fleming

This submission relates to lands located at Middleton, Ardamine which are currently zoned Leisure and Amenity in the current Courtown and Riverchapel Local Area Plan 2015-2021 (as extended). It is requested that the lands be rezoned to Mixed Use to provide retail and other services to serve the needs of the existing and future population.

WXF-C3-49 Cleary and Fleming Chief Executive's Response

The rezoning request is noted. Land use zoning will be given detailed consideration when the Courtown and Riverchapel Local Area Plan 2015-2021 (as extended) is being reviewed.

WXF-C3-56 Murphy

The submission notes that smaller settlements such as Duncannon are unzoned and have no defined settlement boundary. The submission requests the designation of a c.1 ha parcel of land on Clonsharragh Road for a low density residential scheme (c. 12 permanent houses). The submission outlines that land is considered to be located on the edge of the village, located 50m from existing residential development, close to the playground and within walking distance of all local services. It is considered a natural extension of the settlement, and it would assist in the delivering the aim of the NPF to develop villages and to provide low density sites in villages to offer an alternative to one-off unserviced sites in rural areas. It is submitted that the subject site will be serviceable when the wastewater treatment works are complete.

WXF-C3-56 Murphy Chief Executive's Response

The points raised in the submission are noted. As set out in the response to Submission No. 164 OPR, settlement boundaries will be designated for Level 4 settlements at a later juncture. This will be done through a Variation of the County Development Plan during which submissions and observations on the proposed settlement boundaries can be made to the Planning Authority. No amendment proposed.

WXF-C3-89 Gregg

This submission requests the Council to rezone open space and amenity lands to residential. While there is no accompanying map to identify the subject lands, the submission outlines that the lands are located on Glenville Road and are located in Zone – Coolcotts & Knockcumshin' of the current Wexford Town and Environs Development Plan 2009 – 2015 (as extended). The submission requests the Council to engage with the landowner when drawing up the new draft Wexford Town & Environs Development Plan due in 2021.

WXF-C3-89 Gregg Chief Executive's Response

The rezoning request is noted. However, it is a matter for the new Wexford Town Local Area Plan. There will be an opportunity for the landowner to make a submission during the public consultation stages on the new Local Area Plan.

WXF-C3-139 QR Properties

This submission relates to 22ha parcel of land located at Ballynagree, Wexford Town. The subject lands are not identified on an accompanying map but are described as being located less than 2km south west of the centre of Wexford Town and 1km east of the N25 Wexford ring road. The subject lands are bounded to the north by the Duncannon Road (R733), one of the main thoroughfares to the town centre, and is south of Wexford Retail Park and Clonard Village that also access the Duncannon Road. It is located in Zone 20 in the current Wexford Town plan. It is noted that there a new Local Area Plan will be prepared for Wexford Town and it is the intention of the developer to make a submission to that LAP to retain and progress the development potential of the lands. The maintenance of the underlying land use development objectives for the landholding are of paramount importance in the review as they continue to deliver on established housing, commercial, retail, amenity and educational land use development policy for the main county settlement.

The submission states that they intend to deliver housing and retail over the next plan period. In this regard, the Retail Strategy (Vol. 8) is noted and the primacy of Wexford Town in the settlement and retail hierarchies of the Draft Plan is supported in this submission.

WXF-C3-139 QR Properties Chief Executive's Response

The submission is noted. The County Development Plan sets the strategic development framework and objectives for the spatial planning of Wexford Town, the specifics of which will be translated to the local level during the preparation of the new Wexford Town Local Area Plan. No amendment necessary.

Chief Executive's Recommendations

It is recommended that the following proposed amendments be made to Chapter 3 Core Strategy:

CE CH3.1

Amend the Core Strategy Vision – County Wexford 20207 on page 41 as follows:

By 2027 County Wexford will:

- Be a self-sustaining, low carbon, climate resilient and healthy county where people want to live, work and play.
- Offer high quality sustainable employment opportunities and high quality residential developments.
- Have sustainable urban and rural environments supported by excellent physical and social infrastructure.
- Continue to value its unique natural environment, built and cultural heritage, be a county where biodiversity is restored and flourishes and which offers a range of high quality experiences to both residents and visitors.

CE CH3.2

Amend the second sentence in Core Strategy Guiding Principle D – Utilising the proximity to the Waterford MASP on page 47 as follows:

The improved transport links, via the recently opened N25 New Ross Bypass and the possible future development of a sustainable transport corridor comprised of the re-opening of the Rosslare –Waterford Rail Line and in tandem development of a greenway, will increase access to job opportunities and access to services including education and health care.

CE CH3.3

Amend the last sentence of Core Strategy Guiding Principle E – Compact growth and liveable sustainable settlements on page 48 as follows:

It will help all of our settlements to enhance their attractiveness, viability and vibrancy, in particular, our smaller towns, villages and rural areas, while at the same time encouraging

economic development and job creation, ~~and~~ improving liveability and contributing to a healthy county.

CE CH3.4

Amend the third sentence in Core Strategy Guiding Principle F – Regeneration on page 48 as follows:

This approach will improve visual amenities, design quality and place making, restore and enhance biodiversity, green infrastructure and provide access to quality open spaces, and will facilitate increased residential population and employment activity, making attractive places to live, work and visit and contributing to a healthy county for all.

CE CH3.5

Amend the last sentence in Core Strategy Guiding Principle I – Smart Growth of Settlements on page 49 as follows:

This approach also focuses on the role of digital connectivity in improving access to a range of services including public administration, transport services, education and health, and improving the wellbeing and quality of life of our residents including our ageing population and people with disabilities and will contribute to a healthy county for all.

CE CH3.6

Amend the wording of Core Strategy Guiding Principle J – Vibrant Rural Areas on page 49 as follows:

In line with the Rural Action Plan, the Core Strategy Development Approach has a strong focus on supporting sustainable and vibrant rural communities, supporting and regenerating villages that are struggling or in decline, in particular, villages that have lost services in recent years, supporting enterprise and employment and improving rural infrastructure and connectivity as a means of sustaining rural populations, ~~and~~ improving quality of life and good health and wellbeing in rural areas.

CE CH3.7

Amend Figure 3-1 Core Strategy Map to include the Rosslare – Waterford rail line and potential greenway.

CE CH3.8

Amend the first paragraph in Section 3.5 Core Strategy Settlement Hierarchy on page 51 as follows:

The Settlement Hierarchy is developed around ~~7~~ seven levels. While each level serves a different strategic role, together they will achieve a balanced, spatial planning settlement framework which supports our urban and rural areas. All settlements, regardless of their level, have an important role and contribution to make to the environmental, economic and social life of the county.

CE CH3.9

Amend Table 3-2 County Wexford Settlement Hierarchy on page 52 as follows:

- Include Carne, Carrowreagh, Courtnacuddy and Killinick as Level 5, Category 2 Small Villages.
- Include Ballythomas and Mayglass as Level 6 Rural Nodes.

CE CH3.10

Amend the third paragraph under Wexford Town in Section 3.6.1 Level 1 Key Towns on page 53 as follows:

Wexford Town is a significant regional centre for education, health, public services and retail. The town is also a major employment centre for the finance, life sciences and technology sectors. The planned Trinity Wharf mixed use development will provide the platform to significantly enhance the town's profile as an attractive environment for international companies seeking to locate in the county, or for existing companies looking to expand. The regeneration of Commercial Quay and Monck Street will also attract tourists, business visitors, conferences and employees of international companies seeking to locate in Wexford

CE CH3.11

Amend the fifth and sixth paragraphs under Wexford Town in Section 3.6.1 Level 1 Key Towns on page 54 as follows:

Tourism also offers potential to add to the regional economic driver role. The Council's Tourism Development Strategy proposes to develop Wexford town's profile as a unique and

vibrant Maritime town. This will be centred on the town's Viking heritage, its long and rich seafaring history, unique maritime environment, water sports, festival and food offering and, in time, the Trinity Wharf Development which includes a marina, and the redevelopment of the Commercial Quay area in the centre of the town.

There are also public realm projects which will enhance the attractiveness of the town including the Crescent Quay Enhancement work and the public realm elements of the Trinity Wharf scheme which will develop a new urban quarter with a high quality public realm, civic spaces, a new boardwalk and an urban greenway, and Monck Street and the area surrounding the Commercial Quay area.

CE CH3.12

Insert new bullet point under Development Approach for Wexford Town in Section 3.6.1 Level 1 Key Towns on page 55 as follows:

- Focus on the redevelopment of the Commercial Quay area as a Strategic Tourism and public realm improvement location.

CE CH3.13

Amend the following points in the Wexford Town Development Approach on page 55 as follows:

6. Prioritise the development of brownfield and infill sites in the town centre and close to public transport corridors, and ensure the efficient use of those central sites, achieving compact growth, commercial redevelopment and higher residential densities, while also ensuring attractive and high quality living environments.
7. Improve the public realm and attractiveness of the town centre as a place to live, work and visit through the development of key urban regeneration projects such as Trinity Wharf and public realm schemes including Crescent Quay, Monck Street and the Commercial Quay area.

CE CH3.14

Amend the following points in the Wexford Town Development Approach on page 55 as follows:

4. Focus on development in the town that supports the function and expansion of Rosslare Europort~~,~~ including improvements to transport links, industrial development, commercial and residential development.

12. Support the delivery of the infrastructural requirements which would benefit the key town role including improving road infrastructure to ~~improve~~ enhance links from Rosslare and Wexford to include the M11/M25 Oilgate to Rosslare Harbour Scheme, the N30 and N80, improvements to rail infrastructure and services, upgrading and development of water supply and additional investment in wastewater infrastructure to support the economic development and anticipated growth of the town.

CE CH3.15

Insert the following footnote after the word 'pedestrian' in the third paragraph on page 60:

* Throughout the Plan the term 'pedestrian' is intended to refer to footpath users and to distinguish from users who do not use footpaths such as cyclists and motorised modes. 'Pedestrian' incorporates all potential users, persons with a disability, including mobility aid and wheelchair users.

CE CH3.16

Amend Point 16 on page 63 in Section 3.6.2 Large Towns – Enniscorthy Town

The Council acknowledges the environmental, tourism and economic importance of the River Slaney and will seek to develop these. The Council will also focus on developing a Blueway between Bunclody and Enniscorthy to include adjacent cycleway and walking trail~~.~~ subject to feasibility assessment and environmental assessments. The Council will make a significant effort to abate and reverse the degradation of the River Slaney at Clohamon bridge and its environs. Any proposals will be subject to Appropriate Assessment in accordance with the requirement of the EU Habitats Directive to ensure the protection and preservation of the Slaney River Valley SAC.

CE CH3.17

Amend the first paragraph in Section 3.6.5 Small Villages Category 2 on page 70 (and anywhere where the settlement hierarchy is repeated) as follows:

There are ~~18~~ 21 settlements in this category: Ballinaboola, Ballygarrett, Ballyhack, Ballymitty, Ballymoney, Boolavogue, Carne, Carrowreagh, Castledockrell, Cleriestown, Courtnacuddy, Crossabeg, Curracloe, ~~Duncormick,~~ Foulkesmills, Gusserane, Holyfort, Killinick, Monamolin, Monaseed, Rathdangan and Tomhaggard.

CE CH3.18

Amend the first paragraph in Section 3.6.6 Rural Nodes on page 71 (and anywhere where the settlement hierarchy is repeated) as follows:

There are ~~34~~ 35 rural nodes: Ballycarney, Ballycogley, Ballyduff, Ballyedmond, Ballyellis, Ballyfad, Ballyoughter, Ballyroebuck, Ballythomas, Balwinstown, Cahore, Cassagh, Castletown, ~~Cleariestown,~~ Clologue, Clohamon, Cullenstown, Cushinstown, Donard, Galbally, Horeswood, Killann, Killenagh, Killurin, Mayglass, Poulpeasty, Raheen, Rathgarogue, Saltmills, Tara Hill, Tellarought, Templeshambo, The Harrow, The Rock, Tombrack and Watchhouse Village.

CE CH3.19

Amend the second and third paragraphs under Development Approach in Section 3.6.6 Rural Nodes on pages 71-72 as follows:

~~Appropriately designed residential cluster type developments~~ Individual houses will be considered at these locations provided that the layout respects the form and structure of the village and subject to complying with all planning, traffic safety and environmental criteria. ~~A cluster development is defined as small residential development comprising of between two and five dwelling houses served by a communal vehicular entrance point and access road from the public road. Local need or the requirement to enter an occupancy agreement will not apply to the occupiers of single dwellings or cluster developments within the boundary of these rural nodes.~~ A permanent residence condition shall be attached to any permission.

In general, the guiding principle is that development must be commensurate to the scale of the node and no more than 5~~-10~~ houses will be permitted in a smaller rural node and no more than 5-8 houses will be permitted in a larger node during the period of this Plan. An exception to this may be considered where it is demonstrated that an additional dwelling(s) can be accommodated without detracting from the rural character of the node.

CE CH3.20

Amend Objective CS09 on page 85 as follows:

To adopt a presumption in favour of development that can generate more jobs and activities within existing towns and villages in order to reduce the distances that people have to commute from home to work such as remote working hubs and subject to development complying with appropriate planning standards and achieving targeted growth.

CE CH3.21

Add a new Core Strategy and Settlement Strategy Objective on page 88 as follows:

To promote the protection, restoration and enhancement of biodiversity and green infrastructure in all settlements and in the open countryside.

CE CH3.22

Amend Objective WT03 in Wexford Town Strategic Objectives on page 88 as follows:

To promote and support the development of the Trinity Wharf lands as a Strategic Employment Location and the redevelopment of the Commercial Quay redevelopment area as a Strategic Tourism Employment Location.

CE CH3.23

Amend Objective WT06 in Wexford Town Strategic Objectives on page 89 as follows:

To support the development of tourism projects in the town including those associated with the town's new Maritime brand such as the planned marina at Trinity Wharf, the Commercial Quay Redevelopment Area and the ~~proposed~~ potential Wexford to Rosslare Greenway, subject to compliance with the Habitats Directive and the proper planning and sustainable development of the town.

CE CH3.24

Amend Objective WT07 in Wexford Town Strategic Objectives on page 89 as follows:

To support the delivery of the infrastructural requirements which would benefit the key town role including improve road infrastructure such as the M11/M25 Oilgate to Rosslare Harbour Scheme and upgrading of the N30 and N80, enhanced rail infrastructure and services, improved digital connectivity, upgrading and development of water supply and additional investment in wastewater infrastructure to support the economic development and anticipated growth of the town.

CE CH3.25

Amend Objective WT09 in Wexford Town Strategic Objectives on page 89 as follows:

To improve the public realm and attractiveness of the town through the regeneration and revitalisation of key locations such as the Trinity Wharf lands, the Crescent Quay Public Realm Enhancement project and public realm works on Monck Street and the Commercial Quay redevelopment area.

CE CH3.26

Amend Objective ET01 in Enniscorthy Town Strategic Objectives on pages 91- 92 as follows:

To strengthen the role of Enniscorthy Town as a Large Town with a large economic hinterland and leverage ~~ing~~ its strategic location and accessibility to Rosslare Europort and the Eastern Economic Corridor (port, rail and road), and build on its inherent strengths including digital connectivity, innovation and enterprise, tourism~~,~~ and culture, to facilitate economic and employment growth in the town, and, in particular, promote Enniscorthy Business and Technology Park, the UN Centre of Excellence and the NZEB Training Centre as key economic drivers for the town and to support the development and improvement of the business/industrial centre ~~at Kilcannon and~~ located on the R772 and the Old Dublin Road into a modern Business ~~p~~ Park capable of attracting international companies as a key economic driver for the County.

CE CH3.27

Amend Objective ET02 in Enniscorthy Town Strategic Objectives on page 92 as follows:

To develop ~~Enniscorthy Town and its surrounding area as Tourism Destination~~ and facilitate new tourism related developments, both direct and indirect, that will ~~facilitate and~~ expand the tourism offering and potential of the town and its surrounding area, and to work with key stakeholders to develop the Enniscorthy as a vibrant visitor hub and tourism destination town in the county.

CE CH3.28

Amend Objective ET03 in Enniscorthy Town Strategic Objectives on page 92 as follows:

To pursue Smart Town status for the town, to facilitate enhanced broadband capabilities and digital connectivity in all areas of the town as a key enabler, and to maximise the opportunities offered by that status for all aspects of life in the town.

CE CH3.29

Amend Objective ET05 in Enniscorthy Town Strategic Objectives on page 92 as follows:

To promote the development of a Blueway along the River Slaney in the town subject to feasibility assessments, compliance with the Habitats Directive and normal planning and environmental criteria.

CE CH3.30

Amend Objective ET08 in Enniscorthy Town Strategic Objectives on page 93 as follows:

To support the delivery of infrastructural requirements to allow Enniscorthy to keep pace with the planned population growth~~.~~to include ~~These requirements include~~ the provision of ~~additional educational facilities including~~ at least one additional post primary school and additional educational facilities ~~places~~ to address existing and future demand and additional social, cultural and amenity facilities.

Section 8 Submissions Relating to Chapter 4 Sustainable Housing

Relevant Submissions

- WXF-C3-34 Transport Infrastructure Ireland (TII)
- WXF-C3-40 Balfe
- WXF-C3-41 Ó'Conail
- WXF-C3-64 Construction Industry Federation (CIF)
- WXF-C3-80 Mythen
- WXF-C3-85 Wexford PPN
- WXF-C3-87 Ewing
- WXF-C3-94 Wexford Environmental Network (WEN)
- WXF-C3-97 Kehoe
- WXF-C3-98 O'Brien
- WXF-C3-100 Bigwood Properties Ltd
- WXF-C3-101 Markham
- WXF-C3-142 Health Service Executive (HSE)
- WXF-C3-146 Wexford Greens
- WXF-C3-158 Molloy
- WXF-C3-159 Molloy
- WXF-C3-160 Molloy
- WXF-C3-161 Molloy
- WXF-C3-162 Molloy
- WXF-C3-170 O'Hagan

Summary of Main Issues and Chief Executive's Response

Section 4.3 Policy Context

WXF-C3-94 (WEN) suggest swapping the position of Pillars 3 and 5 to make it clear that 'Utilise Existing Housing' will be prioritised over 'Build More Homes'.

Section 4.3 Policy Context Chief Executive's Response

Noted, and while this is considered a good idea, this represents the order of the pillars as presented in the Government's Rebuilding Ireland policy framework. No amendment proposed.

Section 4.4 Sustainable Housing Strategy

WXF-C3-85 (Wexford PPN) welcomes the overall housing goal and outlines the elements of the PPN Vision for Community Wellbeing that relate to sustainable housing.

Regarding Objective SH02, WXF-C3-94 (WEN) requests that additional text be inserted to cover local connections to green open spaces and nature. Provision should also be made for planned pedestrian linkages and cycle lanes that will connect new developments to existing services, town centres, nearby schools, etc.

Section 4.4 Sustainable Housing Strategy Chief Executive's Response

The points raised in the Wexford PPN submission are noted and welcomed. It is considered that the Draft Plan is well aligned with the PPN vision and the issues are suitably addressed in both in this chapter and other chapters such as Chapter 5 Design and Place Making in Towns and Villages and Chapter 15 Sustainable Communities. No amendment proposed.

The suggestions relating to Objective SH02 are noted and it is recommended that the objective be amended to incorporate the additional references.

Section 4.5.2 Housing Need

Submissions WXF-C3-64 (CIF), WXF-C3-80 (Mythen), WXF-C3-97 (Kehoe) and WXF-C3-100 (Bigwood Properties) raise concerns that that the Housing Strategy is flawed and that the number of housing units required during the plan period has been underestimated due to assumptions made in relation to vacant houses in the Core Strategy and Housing Strategy.

Section 4.5.2 Housing Need Chief Executive's Response

The issues raised in relation to the Housing Strategy are discussed in detail in the section of this report relating to Volume 9 Housing Strategy.

As detailed in the response to WXF-C3-164 (OPR) the Council is now bound by the housing supply targets set out in the new Section 28 Guidelines. The Guidelines and the accompanying methodology outlines that these targets take account of existing unmet need, and while the targets can be adjusted to take account of new house completions no adjustment is made for vacant units. These targets have been incorporated into the Core Strategy and Housing Land allocations in Chapter 3 and addressed in Volume 9 Housing Strategy. It is also necessary to amend this section and the associated Table 4-1, Table 4-2, Table 4-3 and Table 4-4 to reflect the incorporation of the targets in the Draft Plan.

Section 4.6 Locations for Future Housing

WXF-C3-94 (WEN) asks if waste reduction and management infrastructure can be included as a specific item in the infrastructure providers list for rural settlements? Can this also be added to the fourth bullet point on page 111?

WXF-C3-64 (CIF) refers to Section 3.4.2 of the Draft Housing Strategy which identifies that 4.3% of the population of the county lived in apartments in 2016. The submission outlines that while apartments have a role to play in terms of meeting future housing need, proper consideration should be given to their siting and location. Apartments should be located within walking distance of town centres and associated services and amenities close to public transport. They should not be located on peripheral sites or utilised as a simple means of increasing density on development by development basis.

Section 4.6 Locations for Future Housing Chief Executive's Response

The suggestions made by WEN are noted. The provision of waste management infrastructure forms part of the development management standards for developments, including residential schemes. No amendment proposed.

The concerns relating to apartments are noted. Section 4.6 Locations for Housing outlines that apartment developments will generally be acceptable in town centres, at appropriate scales. Small apartment schemes may be considered in village centres and the scale will depend on the characteristics and size of the village. However, in the Small Villages (Level 5 Settlement Hierarchy), the provision of apartments will be restricted to the conversion of an

existing building e.g. the use of the first floor over a shop or hairdressers for an apartment. An amendment is proposed to include reference to The Sustainable Urban Housing - Apartment Guidelines (2020) and Chapter 6 of the Sustainable Residential Development in Urban Areas Guidelines in Villages and Towns with regard to the location of apartment developments in towns and villages with a population of 400 to 5000.

Section 4.7 Future Housing Delivery

WXF-C3-41 (Ó'Conail) outlines that self-builders have frequently been the ones to pioneer environmentally conscious and sustainable modes of building, and notes that Cork has led the way with its own county plan, incorporating sustainable self-building, to the social and environmental good. As there is no mention of self-builders, there is concern that the Council will effectively exclude sustainable self-builders using methods and materials that are not typically used by commercial builders.

WXF-C3-101 (Markham) requests the Council to clarify and address a multidimensional urban sustainability balance with higher densities and more compact urban growth with provision of the SDGS, Scope 1 and negative carbon. The Council should also consider the following:

- Good agricultural land not being lost to urbanisation
- A Wexford ceiling for land through promoting the use of existing buildings and preserving open spaces, to boost local attractivity and manage economic activity.
- Construction projects are energy and resource intensive.

Section 4.7 Future Housing Delivery Chief Executive's Response

Regarding the promotion of self-builders, the points are noted. The Council supports and promotes all types of building entities, and it is not considered necessary to specify this in the Plan. No amendment proposed.

In line with current Government policy, the strategy for housing development in the county is very much focused on utilising existing stock, achieving compact growth and the more efficient use of land and prioritising brownfield and infill lands over greenfield lands (which

in some cases could be agricultural lands). It is not considered possible to place a ceiling/cap on land usage in the county. No amendment proposed.

Section 4.7.3 Utilise Existing Stock

WXF-C3-142 (HSE) welcomes the policy regarding encouraging utilisation of existing housing stock under the Vacant Homes Strategy and Action Plan and the repurposing of suitable vacant commercial properties for housing supply.

WXF-C3-101 (Markham) suggests that in order to make vacancies available again to the general public, strong elements of the common good can be (re)-introduced such as high taxes on empty second houses, increasing the municipal stocks of social housing or social expropriation of empty housing from private investors. The Council's plan is to be commended for outlining specific actions for increased housing stock.

Section 4.7 Utilise Existing Stock Chief Executive's Response

The comments in both submissions are noted. The use of higher taxes on empty second houses and the social expropriation of empty housing from private investors lies outside the remit of the County Development Plan. However, the Council does place levies on vacant and derelict sites. The Council continues to increase its own social housing building stock as funding allows, work with Approved Housing Bodies to increase social housing supply in the county and work with private developers to secure social housing under Part V of the Planning and Development Act, 2000 (as amended). No amendment proposed.

Section 4.7.2.1 Density of Residential Developments and Section 4.7.5 House Types

WXF-C3-64 (CIF) outlines that that there is an established market resistance to higher density developments, and particularly apartment developments in locations outside of core urban centres. CIF consider that the density objectives set out for settlements will not be achievable and will have a significant negative impact on the deliverability of housing units in these settlements.

The submission outlines that an overall higher density can be achieved within a plan area while still catering for all sectors of the market. High density can be targeted at public

transport nodes, along main arterial routes, around neighbourhood centres and can be offset with defined pockets of lower density development to achieve an overall increase in density across a plan area while accommodating market demand.

Diversity of housing provision which is reflective of and responsive to the needs of the population is equally important as density and should be acknowledged as such by the policies of the CDP.

The CIF submission also notes that policies need to be realistic and should ensure that the total cumulative cost of meeting the requirements set down by those policies does not undermine the deliverability of new housing. The submission notes that the price gap between new and second-hand properties has been over 40% since 2018, reflecting in the main enhanced standards and a better-quality product.

WXF-C3-162 (Molloy) requests that an objective is added as follows:

- To facilitate low to medium density residential development at appropriate levels (6-12 units per application in all settlements depending on position in the hierarchy. Any grant of permission must be commenced within one year of the final grant of permission, and if not commenced within a year then the Council would accept an application for another 6-12 units on different lands for a different applicant. Avoiding land banking in villages and encouraging faster housing delivery. For Village nodes, the same policy should apply at 4-6 units per application. Low to medium density is desirable but if a centre of a village or node is identified or can be identified then set back streetscapes should be allowed with slightly higher build up, giving a community a centre, identity and a central realm.

It is submitted that this policy recognises that houses will only be built if the market demands. The development of villages will create local construction employment, ease pressure for one-off rural housing, offer a cheaper alternative to the main towns and revive the villages. Sales of serviced sites to people can design and plan their own dwelling on small village sites will further ease the pressure on their own dwelling on small village sites will further east the pressure on the one-off rural applications will also be considered.

Section 4.7.2.1 Density of Residential Developments and Section 4.7.5 House Types Chief Executive's Response

The concerns expressed in relation to density are noted, and it is fair to say that this concern is shared by many. However, the Council is required to ensure the Plan complies with the NPF, the RSES and relevant Section 28 Guidelines at the local level. The densities set out in Table 4-5 are informed by the Section 28 Sustainable Residential Development in Urban Areas (2009). In response to the recommendation of the OPR, it is now proposed to amend density provisions in the Plan. See response to Recommendation 5 of the submission from the OPR.

As a planning authority, the Council's mandate is to ensure the proper planning and sustainable development of the county. The commercial viability of projects lies outside of the remit of the County Development Plan.

The suggestions outlined in WXF-C3-162 (Molloy) are noted. However, as previously outlined residential schemes must comply with the Section 28 Guidelines in this regard, and the densities are set out in Table 4-5 and the associated text in this section have been duly informed by those guidelines. No amendment proposed.

The point raised in relation to land banking is noted, and it is very relevant given the restricted nature of Core Strategy allocations and housing supply targets. A planning permission has a lifetime of five years and it is not considered appropriate or reasonable to limit commencement to the first year of the permission. Furthermore, it is considered that the application of the sequential approach must be followed in the interests of the proper planning and sustainable development of these settlements. No amendment proposed.

Regarding house mix, the HNDA carried out as part of the Housing Strategy identifies the need for a mix of house types to reflect the diverse housing needs of the existing and future population. The need for one-bedroom and two-bedroom properties is particularly evident. The Draft Plan specifies the desired house type mix for schemes proposing houses and notes that deviations from this mix will be considered where local requirements and/or market evidence suggest that a different housing mix is required. The apartment types and ratios

must comply with the relevant the Specific Planning Policy Requirements set out in the Apartment Guidelines.

The Minister for Housing, Local Government and Heritage published an updated version of the Section 28 Apartment Guidelines in December 2020. The purpose of the update was to amend the section relating to Shared Accommodation/Co-Living. The Guidelines now include a Specific Planning Policy Requirement which states that there shall be a presumption against the granting planning permission for shared accommodation/co-living developments unless the proposed development is required to meet specific demand identified by a planning authority further to a Housing Need and Demand Assessment (HNDA) process or there is a valid planning application under consideration by the Planning Authority/An Bord Pleanála. The HNDA that forms part of the Housing Strategy did not identify a need for this type of development in the county. It is recommended that references to the Share Accommodation/Co-Living and the Guidelines in the Draft Plan be amended accordingly.

Section 4.7.2.2 Ready-to-go Land

A number of submissions WXF-C3-64 (CIF), WXF-C3-80 (Mythen), WXF-C3-97 (Kehoe) and WXF-C3-100 (Bigwood Properties) and WXF-C3-156 (Dunne) raise concerns about the application of the Tiered Approach to land use zoning and residential development in the Draft Plan.

These concerns include that Tier 1 sites will be afforded preferential status for the first three years of the plan with other tiered sites only being considered after a three-year period and only if development proposals have not been pursued on the preferred (Tier 1) sites. This is considered anti-competitive; it may prohibit the delivery of these houses as the Tier 1 landowner(s) have until year 3 to apply for permission and then would have another 5 years to build the permission which is beyond the lifetime of the plan. It is submitted that the Plan is unclear as to how and when capacity is reserved in the context of a grant of permission. Affording a three-year head start over other sites simply because they are easier to service is not representative of proper planning and development. It is submitted that all lands within a plan area should be considered for development and considered on their merits

without time restrictions. It is also submitted that all lands within a settlement plan should be open for development.

WXF-C3-64 (CIF) requests that a balance is required between promoting brownfield sites and releasing the development potential of outer suburban greenfield sites located within the urban footprint. The submission requests:

- Planning authorities to take an active role to address issues outside of the applicants control and land ownership which often form the basis for the refusal of permissions such as "leapfrogging" as a result of a lack of public lighting provision, services, or connectivity via provisions of footpaths and cycle lanes.
- The Plan should include a clear presumption in favour of developing all zoned lands including a commitment from the Planning Authority to provide the necessary services, footpaths, lighting etc. It should not be assumed that all infrastructure required to render land developable can be delivered in a developer-led scenario.

Section 4.7.2.2 Ready-to-go Land Chief Executive's Response

The points raised are noted. As outlined in this section, it is important to ensure that Core Strategy lands are 'not tied' to lands that will not be developed for reasons such as infrastructural constraints or land ownership. It is outlined that the phased development of land is important in achieving the timely and efficient delivery of housing and this will be linked to the tiered approach to residential land use zoning. It is also an objective of the Plan as set out in Objective SH10 to ensure the development of land is carried out on a phased basis and to identify the priority of land for development in the relevant local area plans and in accordance with the methodology for the Prioritisation of Development Lands in the NPF, the Section 28 Development Plan Guidelines and Local Area Plan Guidelines and any updated version of these guidelines.

The approach used in the Bunclody Town and Rosslare Harbour and Kilrane Settlement Plans prioritised the development of Tier 1 lands first as they were deemed available, ready-to-go, were located within the existing footprint of the settlement, contiguous to existing development and sequentially the most suitable sites. Tier 2 lands, which had identified infrastructural constraints but were deemed serviceable within the lifetime of the plan,

were prioritised for development next. The Tier 1 (Phase 1) lands were given a three-year period to come forward for development, and if they were not forthcoming, the Tier 2 (Phase 2) lands would come into play, in a sequential manner. This three-year period is halfway during the lifetime of those settlement plans. This was a reasonable and considered approach, it ensures well-located, serviced lands are prioritised and it provides clarity around timelines. It is considered that the small quantum of residential zoned lands involved in both Settlement Plans compounded the perceived severity of the tiered/phased approach.

While Tier 2 lands may address their servicing requirements and be ready-to-go at an early juncture in the plan period, this is not the only consideration in prioritising land for development. In this regard, as outlined in the foregoing, the residential lands chosen in both Bunclody Town and Rosslare Harbour and Kilrane were not selected for these reasons alone but also for other reasons such as sequential development and the development of brownfield lands.

However, in order that these considerations are explicit in the plan it is recommended that the text in Section 4.7.2.2 be amended to clearly set out the differences between the tiered approach to zoning land and prioritising development lands (phasing). The allocation of lands to each phase will be based on factors including the planned levels of growth in the settlement, the achievement of compact growth, the application of the sequential approach, the location of the lands, suitability for the type of development envisaged, availability of and proximity to amenities, schools, shops or employment, accessibility to transport services etc and the availability of infrastructure (serviced land or serviceable land).

It is not proposed to allocate a specific number of residential units to each phase. The Planning Authority will monitor the number of residential units granted planning permission, the number of commenced residential units and the number of completed residential permissions. It is therefore important to note that it cannot be assumed that all residential planning applications (during any phase) will be granted, particularly where the

Core Strategy and housing supply targets for a settlement have already been met or are underway to being meet by commenced or completed permissions.

The points raised in relation to the servicing of lands outside of an applicant's control/ownership are noted. In line with the tiered approach to development, the NPF is clear that lands must be serviced or serviceable for development to be considered as Tier 1 and Tier 2 and Objective SH20 states that required physical and/or social infrastructure is provided either prior to or in tandem with new residential developments in the interests of the proper planning and sustainable development of the area. The application of the tiered and sequential approaches will allow the Council, developers and key stakeholders such as Irish Water to work together to provide a focused and co-ordinated approach to the provision of infrastructure. No amendment proposed.

Section 4.7.2.4 Land Development Agency

WXF-C3-94 (WEN) suggest that the Council, in conjunction with the Land Development Agency, should promote the housing cooperative model such as Co-housing and Ecovillages run by social and community groups rather than just working with public and private sector landowners (developers).

Section 4.7.2.4 Land Development Agency Chief Executive's Response

Noted. The Council will work with all relevant bodies to secure the development of social and affordable housing solutions. While not directly related to this submission, it is recommended that the wording in this section be amended to refer to the Land Development Agency Bill 2021.

Future Housing Delivery Objectives

Regarding Objective SH21, WXF-C3-94 (WEN) suggests that these amenities could include providing allotments, community gardens, community orchards, space for nature etc.

Future Housing Delivery Objectives Chief Executive's Response

The suggestions regarding the nature of amenities in Objective SH21 are noted. As this is a general objective, it is not recommended to provide specific detail on the type of amenities. No amendment proposed.

Section 4.8.1 Housing for the Homeless

Regarding Objective SH30, WXF-C3-94 (WEN) asks if the Council are familiar with the Housing First Service, and could it work with organisation likes the Peter McVerry Trust to roll out this service in the county.

WXF-C3-142 (HSE) outlines that despite the focus on social housing there is still a national and local problem regarding homelessness. The situation may well now be exacerbated by job losses and pay reductions in the current economic climate. The provision of Women's Refuge places is deficient nationally and locally in line with the Istanbul Convention. The HSE would welcome more focused solutions to the need for emergency accommodation. HAP caps appear to be posing a supply problem in larger towns like Wexford and Gorey along with private rental shortages, thereby resulting in greater demand for emergency accommodation.

There are also local news reports of people being offered emergency accommodation at the opposite end of the county. It is acknowledged that the long-term solution is to increase the supply of homes however in the interim adequate provision of temporary/emergency accommodation is required which is distributed throughout the county. It is felt that there should be a time limit set in policy regarding the length of time people can spend in emergency accommodation before suitable accommodation is provided.

Section 4.8.1 Housing for the Homeless Chief Executive's Response

The points raised are noted. The provision of emergency accommodation lies outside of the remit of the County Development Plan, but it can be confirmed that the Council are working with Focus Ireland to implement the Housing First National Implementation Plan 2018 – 2021. The Housing Strategy did explore the issue of rental affordability in the county and it

determined that 2,149 of the 6,427 additional households will not meet the affordability criteria for private rental during the plan period which will place significant demands on housing supports in the county.

Section 4.8.2 Housing for Older People

WXF-CE-94 (WEN) notes that planned pedestrian (and accessible) linkages (and cycle lanes) should be for all settlements/housing units not just for those catering for the elderly.

Section 4.8.2 Housing for Older People Chief Executive's Response

Noted, and it is the intention of the Council that this will be achieved for all new residential developments. This is reaffirmed by the proposed amendment to Objective SH02 on page 102.

Section 4.8.3 Housing for People with Disabilities

WXF-CE-142 (HSE) comments that objectives in the Plan should focus on meeting the housing and accommodation needs of people with disabilities. A local re-housing plan should be prepared and jointly co-ordinated with the HSE, in collaboration with service providers. It is also recommended that objectives be included to support people with disabilities to access employment and education opportunities and mainstream community services.

Section 4.8.3 Housing for People with Disabilities – Chief Executive's Response

This section outlines the Council's objectives for the provision of accommodation for people with disabilities. A local re-housing plan is considered outside of the remit of the County Development Plan. Section 15.6 Social Inclusion in Chapter 15 Sustainable Communities and Social Infrastructure Strategy outlines that the Council has a significant role to play in facilitating social inclusion, in particular, in the areas of housing, employment, public transport, tourism and social and community facilities. No amendment proposed.

Section 4.9.1 Single (One-Off) Rural Housing Policy Context

WXF-C3-94 (Wexford WEN) request that the inclusion of biodiversity alongside natural heritage in the second paragraph on page 129.

WXF-C3-34 (TII) would welcome the inclusion in this section of an appropriate cross reference with the national roads policy included in Chapter 8 Transportation Strategy. This will provide clarity and will provide early assistance to applicants in the preparation of any subsequent planning application where there may be implications for the strategic national road network in the area.

Two submissions (WXF-C3-40 Balfe and WXF-C3-98 O'Brien) consider the rural housing policy too strict.

- WXF-C3-40 (Balfe) submits that the policy will contribute to the decline of rural Ireland, it will raise the price of previously owned houses making it out of the reach of people who do not want to live in urban estates or who have already settled in a village in order to get on the property ladder. It will impact on builders and trade people. It will also increase demand for sites in villages making it more difficult to build there.
- WXF-C3-98 O'Brien raises concerns about the coastal zone policy. The Draft Plan policy proposes that people must be from within the coastal zone to be considered. In their particular case, while they own land in the coastal zone, they do not live in the coastal zone. This means their children will not be able to build on family land in the coastal zone. Furthermore, the location of their land means that hardly anyone will qualify to build on it. The requirement to have lived in a certain area for 10 years means that only people who were born in the area will be able to build as realistically people could not afford to rent for 10 years and then build. The policy is also anti those who are not first-time buyers especially 'person B'.

Other submissions (WXF-C3-87 Ewing, WXF-C3-146 Wexford Greens and WXF-C3-170) raise concerns that the proposed rural housing policy is too lenient, and the implementation of the policy needs tighter implementation.

- WXF-C3-146 (Wexford Greens) considers that the Category A criteria is far too lenient, unsustainable, discriminatory, and appears to still contravene EU rules. The Plan should require that any new one-off house must be built in a village or rural settlement. The proposed plan is not fit for purpose in the current age. Category A should be removed from the criteria for one-off housing, leaving category B for farmers/agricultural workers.
- WXF-C3-170 (O'Hagan) submits that the increased radius distance for applicants applying for rural one-off dwellings houses will allow a greater number of people to comply with the local need criteria which may not be within their immediate place of birth or where they have resided long term. This will potentially put greater pressure in sought after areas within the county and could lead to inflated site costs out of the reach of applicants within the local area. These areas may also lose their ability to cater for future needs of that local area for generations to come as all potential available sites within area will be used to up facilitate a greater number of applicants from the wider rural area. The existing radius distances in the 2013 Plan should be retained. There is a facility in the Draft Plan under Category B to cater for applicants from the wider rural area who have a definitive need e.g. employment.
- WXF-C3-87 (Ewing) submits that the neither the previous planning policy or the draft policy appears to have a long term strategy for protecting the character of rural and coastal landscapes from inappropriate and impactful new build, and it is submitted that the protection of the countryside should be more important than peoples' desire to build in particular parts of it. The submission outlines that the development of rural houses erodes the quality of landscapes, especially sensitive landscapes such as Bannow Bay. When new houses genuinely need to be built in the open countryside, they should be built on sites that are as unobtrusive as possible, the house design should show some resemblance to, or be a modern take on traditional rural house design and use local materials when available. should be used. The planning policy should be applied equally to the children of landowners as well as to those demonstrating genuine social or economic need. This submission also questions whether a policy which allows someone to live in the area but travel outside of the area for work is local need or rather a desire to live in that area. There are existing houses for sale within the countryside which can be utilised.

WXF-C3-159 (Molloy) requests the following changes to the policy for houses for older people who are downsizing their rural house. It is submitted that older people need to be given the space to live and have family stay, and the ability to sell the property in the future also need to be considered. It is requested that the:

- The maximum floor area should be increased from 125m2 to 150m2;
- The number of bedrooms allowable should increase from 2 to 3 bedrooms; and
- People should be allowed to avail of exempted development provisions relating to the construction of an extension to the dwelling (Class 1).

WXF-C3-163 (Molloy) requests that where the boundary of a settlement is not identified either by a land use zoning map or a settlement framework, that distances should be incorporated into the Plan to define a settlement area. The submission also proposes that rural linkage criteria does not apply within the settlements or nodes.

Section 4.9.1 Single (One-Off) Rural Housing Policy Context Chief Executive's Response
Regarding the request of WXF-C3-94 (Wexford WEN), it is recommended that biodiversity be included alongside nature heritage on page 129 as one of the criteria for assessment of one-off rural housing planning applications.

It is considered that the TII's request is already sufficiently addressed in this chapter. Table 4-6 is accompanied by a list of definition and notes. Point 7 reads as follows: "In accordance with Objective TS59 in Chapter 8 Transportation and regardless of compliance with Category A or B, no individual rural housing proposing either (a) new direct access to the national road network or (b) the generation of increase traffic from an existing access onto the national road network in a zone where the speed limit is greater than 60 kph will be permitted – see Section 8.7.1 National Roads (Chapter 8 Transportation)". No amendment proposed.

The various issues and viewpoints raised in WXF-C3-40, WXF-C3-87, WXF-C3-98, WXF-C3-146 and WXF-C3-170 are noted and have been considered. As outlined in the response to WXF-C3-137 (SRA) and WXF-C3-164 (OPR), the Sustainable Rural Housing Guidelines for

Planning Authorities (2005) are the prevailing guidelines relating to housing in the open countryside.

These guidelines provide that planning authorities must tailor policies that respond to the differing housing requirements of urban and rural communities; and the varying characteristics of rural areas. It is stated that those distinctions are necessary to ensure first and foremost the housing requirements of persons with roots or links in rural areas are facilitated. The guidelines further note that persons who are intrinsic part of the rural community will normally have spent substantial periods of their life living in rural areas as members of the established rural community. Accordingly, and in line with the Guidelines, while the concerns of WXF-C3-146 (Wexford Greens) are noted the Plan provides for Category A Social functional rural housing need.

Regarding the concerns expressed in WXF-C3-170 (O'Hagan) it is agreed that this will result in increased pressure for sites and significantly reduce the opportunities for people with a genuine need in live in particular rural areas. As outlined in the Chief Executive's response to WXF-C3-137 (SRA), it is recommended that the distances used to define a person's local rural area are reduced

The concerns relating to the coastal zone policy are noted. A set out under the prevailing Section 28 Rural Housing Guidelines certain sensitive scenic areas are limited in the capacity to carry very substantial levels of development and that such capacity as exists should be carefully managed. The coastal zone is under significant pressure from rural housing development and therefore requires a stricter policy response to control this pressure for development. It is necessary to ensure that any remaining capacity is reserved for those with a demonstrable social or economic functional need to live in the coastal zone. No amendment proposed.

Regarding the visual amenity and design concerns expressed, there are objectives in the Draft Plan to ensure that the rural housing developments does not detract from the visual amenity or scenic quality of the area e.g. Objectives SH43. L04, L05, L08, L12 and L15. No amendment proposed.

Regarding WXF-CE-159 (Molloy), the spirit of the policy related to downsizing, contained in Table 4-6 Definition and Notes Point 4(d), is is to allow older people the option of downsizing from their original larger rural house to a smaller rural house which is easier to maintain, while alllowing them to remain in their local community. This is considered a reasonable policy approach. People can chose to remain in their original, larger homes should they wish to have a large home. No amendment proposed.

Regarding WXF-C3-163 (Molloy), the issue of settlement boundaries is discussed under Chapter 3 Core Strategy. The Draft Plan provided that local need, occupancy or permanent residency conditions would not be applied within settlements or Rural Nodes. The Rural Node policy also allowed between 5 and 10 dwellings to be constructed within a Rural Node during the lifetime of the plan. The aim of this policy position was to offer an alternative to one-off rural generated rural housing. However, having reviewed the nature of these settlements in response to this submission it is considered that:

- It could give rise to unsustainable patterns of community and increased carbon generation;
- Result in additional pressure in Rural Nodes in sensitive areas; and
- Be a lost opportunity for the regeneration of our rural towns.

Accordingly, it is recommended that no more than 5 dwellings may be permitted in thesmaller Rural Nodes and no more than 5-8 dwellings may be permitted in the larger Rural Nodes during the lifetime of the plan and a permanent residence condition shall be attached to planning permissions.

Table 4-7 Refurbishment and Replacement of Dwelling Houses

Two submissions (WXF-CE-160 Molloy and WXF-C3-161 Molloy) relate to Table 4.7 and vernacular houses.

WXF-C3-160 (Molloy) requests that the following be incorporated into the criteria as it is not always affordale to the owner to restore a vernacular house to provide a family home:

- If a vernacular dwelling is deemed to be economically unsuitable for renovations or structurally irretrievable, then a replacement dwelling shall be considered by the Planning Authority within the same architectural style or form. The applicant should provide proof by way of a report from a suitably qualified conservation engineer or architect as to why the dwelling is not considered of any merit in terms of historical building stock and why it is unsuitable for renovation. Similar to refurbishing such dwellings the rural linkage criteria shall not apply to such replacements.

WXF-C3-161 (Molloy) relates to the replacement of non-vernacular 'substantially intact' dwelling houses. It is requested that the applicant should not have to comply with the local needs policy and the permission should not be subject to an occupancy condition or permanent place of residence condition. It is submitted that the owners of such houses (built in the 1970s/80s/90s) should be allowed to do what they wish with properties, either replace or refurbish, given there is no architectural value associated with the property.

Table 4-7 Refurbishment and Replacement of Dwelling Houses Chief Executive Response

With regard to the refurbishment and replacement of existing dwellings houses, the policy in the Draft Plan currently provides for the following:

- The restoration of a habitable, substantially intact or derelict vernacular dwelling. These applications will not be required to comply with local needs criteria in order to encourage the reuse and restoration of the county's verncular houses.
- The replacement of a habitable vernacular dwelling will not be allowed in order to protect the county's vernacular houses.
- The replacement of a sustantially intact non-verncular dwelling (generally post 1970s of little architectural merit) will be considered. However, these will be treated as a greenfield site and compliance with local needs criteria will be applied.

It is noted that there is no stated guiding principles or criteria in relation to the replacement of a habitable non-vernacular dwellings or any policy relating to the replacement of derelict dwellings (either vernacular or non-vernacular) in the guiding principles column.

It is considered that the amendments proposed under WXF-C3-160 (Molloy), which request that the current policy be amended to allow the replacement of vernacular houses in stated circumstances, would not be appropriate as it would result in the loss of this important part of our architectural heritage.

WXF-C3-161 (Molloy) also suggests that the replacement of a substantially intact non-vernacular dwelling house should not have to comply with the rural housing policy. Having reviewed this, it is considered that the owner of either a habitable or 'substantially intact' dwelling house should be allowed to replace the dwelling without having to comply with the rural housing policy. The premise for this proposed revised policy position is that these categories of dwellings are already either habitable or could easily be made habitable and that any new house is likely to be more energy efficient and have a better waste water treatment system. It is recommended to amend the text in Table 4.7 accordingly and to provide that while such applications will not have to comply with local needs criteria, occupancy or permanent residence conditions, compliance with all other normal planning and environmental criteria will be required.

In the interests of clarity, it is recommended that text be included in Table 4.7 to confirm that (a) the replacement of a habitable, susbstantially intact or derelict vernacular dwelling will not be considered and (b) the replacement of a derelict non-vernacular dwelling will be considered and will be treated as a greenfield site. The development will therefore have to comply with the rural housing policy for the area and all normal planning and environmental criteria.

Section 4.9.2 Unfinished Single Houses in the Open Countryside

WXF-C3-158 (Molloy) provides suggested text that should be included in the Plan to provide for the completion of unfinished cluster housing developments (between 2 and 5 units). The proposal would allow the completion of dwellings that have been constructed to ground level stage, no rural linkage criteria to apply and an appropriate bond would be set by the planning authority for the completion of such developments, along with maintenance conditions.

Section 4.9.2 Unfinished Single Houses in the Open Countryside Chief Executive's Response

The points raised in this submission are noted. Cluster developments are no longer considered acceptable by the Council as they have been a problematic type of development in the past due to issues with shared areas, infrasturcture and maintenance etc. With regard to unfinished cluster developments it is considered more appropriate to deal with these on a case-by-case basis. There may be issues with structural integrity with some structures and these structures may need to be dealt with under derelict sites legislation.

Chief Executive's Recommendations

It is recommended that the following proposed amendments be made to Chapter 4 Sustainable Housing:

CE CH4.1

Amend the last paragraph in Section 4.3 Policy Context on page 98:

The plan seeks to improve the rental sector by striving to make rent more affordable and creating an attractive, viable, and sustainable private rented sector. As part of this strategy 'Build to Rent' and 'Shared Accommodation' ~~have~~ emerged. The latter has been the subject of a recent review by the Minister for Housing, Local Government and Heritage (See the Section 28 Apartment Guidelines 2020 for further details).

- ~~'Build to Rent developments are large scale developments that have potential to deliever residential accommodation at a pace and scale significantly greater than that of the more traditional developments.~~
- ~~Shared accommodation or 'Co-Living' consists of professionally managed rental accommodation where individual rooms are rented within an overall development that includes access to shared or communcal facilities and amenities.~~

CE CH4.2

Amend the Section 28 Guidelines paragraph in Section 4.3 Policy Context on page 100 as follows:

Recent Section 28 Guidelines have also been provided to assist with increasing housing output. The 'Urban Development and Building Height Guidelines for Planning Authorities' published in 2018 builds on the strategic policy framework set out in the NPF which supports higher densities and more compact growth. The 'Design Standards for New Apartment Guidelines for Planning Authorities' were updated in 2018 and December 2020. ~~and the~~ The Guidelines ~~amendments~~ aim to enable a mix of apartment types, make better provision for building refurbishment and infill schemes and address the ~~emerging 'build~~ Build to ~~rent'~~ Rent' and '~~shared~~ the suitablity of the Shared Accommodation/Co-Living' sectors.

The Housing Supply Targets Methodology for Development Planning Guidelines were published in December 2020. The purpose of the Guidelines (hereon referrred to as the HST Guidelines) is ensure a consistent and coherent approach is taken by planning authorities in incorporating national and regional population and housing projections into their statutory functions such as the county development plan, the preparation of the Housing Strategy, informed by the Housing Need and Demand Assessment (HNDA) process.

CH CH4.3

Amend Strategic Housing Objective SH02 on page 102 as follows:

To ensure that all new residential developments provide a high quality living environment with attractive and efficient buildings which are located in a high quality public realm, ~~and~~ are serviced ~~by~~ and linked with pedestrian and cycle lanes to well-designed and located open spaces and nature and to the town or village centre and existing and planned services.

CE CH4.4

Insert a new paragraph after paragraph one on page 104 in Section 4.5.2 Housing Needs as follows:

The Housing Supply Target Guidelines (HST) have been incorporated into the Core Strategy and the Housing Strategy. Table 22 in Appendix 1 sets out the housing demand figure for

County Wexford between 2020 and 2031. It is 6,931 additional households/578 households per annum. This figure was adjusted to reflect the plan period (Q3 2021 to Q3, 2027). The figure was further adjusted, in line with the parameters set out in the HST guidelines to ensure that the households and population targets for the county follow a course to converge with the NPF and the NPF Implementation Roadmap by the end of 2026. The adjusted housing supply target for the plan period is 6,427 units/1,071 units per annum.

CE CH4.5

Amend paragraph 3 on page 104 in Section 4.5.2 Housing Needs as follows:

Based on the traditional Department of Environment and Local Government Model Housing Strategy[10] annuity formula, the Housing Strategy identified that ~~537~~ 376 of the ~~6,488~~ 6,427 additional households during the plan period will not meet the affordability criteria for home ownership throughout the plan period which is equivalent to ~~8.3%~~ 5.8% of the total of additional households in County Wexford.

CE CH4.6

Amend Table 4-1 on page 104 in Section 4.5.2 Housing Needs as follows:

Table 4-1 Summary of Social (and Affordable) Housing Requirements 2021-2027

	2021	2022	2023	2024	2025	2026	2027	Total
Additional Anticipated Households	~~918~~ 268	~~928~~ 1,071	~~938~~ 1,071	~~943~~ 1,071	~~956~~ 1,071	~~967~~ 1,071	~~838~~ 803	~~6,488~~ 6,427
Social (and Affordable) Housing Requirements	~~48~~ 4	~~56~~ 26	~~64~~ 37	~~75~~ 61	~~90~~ 76	~~104~~ 91	~~100~~ 81	~~537~~ 376
% (as a Total of Additional Anticipated Households)	~~5.26%~~ 1.4%	~~5.99%~~ 2.4%	~~6.77%~~ 3.5%	~~7.93%~~ 5.7%	~~9.45%~~ 7.1%	~~10.76%~~ 8.5%	~~11.96%~~ 10.0%	~~8.3%~~ 5.8%

[10] Part V of the Planning and Development Act, 2000, Housing Supply: A Model Housing Strategy and Step-by-Step Guide from 2000.

CE CH4.7

Amend the text and Table 4-2 on page 105 in Section 4.5.2 Housing Needs as follows:

This analysis determined that ~~2,476~~ 2,403 of the ~~6,488~~ 6,427 additional anticipated households will not qualify for a mortgage during the plan period owing to the Central Bank Rules (refer to see Section 4.4.1 in the Housing Strategy for further detail). It was also determined that ~~2,141~~ 2,149 of the ~~6,488~~ 6,427 additional households will not meet the affordability criteria for private rental during the plan period.

Table 4-2 Overview of Mortgage Qualification and Private Rental Affordability for Additional Anticipated Households in County Wexford[11]

	2021	2022	2023	2024	2025	2026	2027	Total
Anticipated Households that Do Not Qualify for a Mortgage to Purchase the Cheapest Property	~~283~~ 83	~~286~~ 331	~~332~~ 331	~~373~~ 442	~~395~~ 442	~~399~~ 442	~~406~~ 332	~~2,476~~ 2,403
Anticipated Households Not Able to Afford Private Rental (based on RTB Demand allocation by Unit Type)	~~243~~ 70	~~293~~ 337	~~296~~ 337	~~298~~ 337	~~336~~ 382	~~345~~ 382	~~329~~ 306	~~2,141~~ 2,149

Having regard to the difference in numbers between the traditional model and the new HNDA calculations, it is considered that the application of at least 10% Part V contribution is justified. The Council will work to influence Government policy to increase the amount allowed to be charged to reflect that identified in the HNDA (circa. ~~38~~ 37.4%).

The HNDA also provides important information with regard to the household sizes which is set out in Table 4-3.

[11] It should be noted that mortgage qualification and private rental have been considered in isolation and should therefore not be aggregated. Totals may not sum due to rounding

CE CH4.8

Amend Table 4-3 and Table 4-4 on page 106 in Section 4.5.2 Housing Needs as follows:

Table 4-3 Forecasts for Household Size of the Additional Anticipated Households in County Wexford 2021-2027[12]

	2021	2022	2023	2024	2025	2026	2027	Total
1 person household	~~90~~ 25	~~92~~ 102	~~94~~ 103	~~96~~ 105	~~98~~ 106	~~100~~ 108	~~80~~ 82	~~651~~ 630
2 person household	~~202~~ 60	~~205~~ 242	~~207~~ 244	~~209~~ 246	~~212~~ 249	~~215~~ 251	~~183~~ 170	~~1,433~~ 1,481
3 person household	~~176~~ 52	~~177~~ 208	~~178~~ 209	~~179~~ 210	~~181~~ 211	~~182~~ 212	~~153~~ 159	~~1,226~~ 1,260
4 person household	~~230~~ 67	~~233~~ 271	~~237~~ 272	~~239~~ 274	~~244~~ 275	~~248~~ 276	~~214~~ 208	~~1,645~~ 1,643
5+ person household	~~221~~ 64	~~221~~ 249	~~221~~ 243	~~220~~ 237	~~221~~ 231	~~222~~ 225	~~206~~ 164	~~1,532~~ 1,143

The HNDA also provides forecasts for dwelling type during the plan period. This is set out in Table 4-4. Section 4.7.5 provides further details of the breakdown of house types that will be pursued in new residential developments in the county.

Table 4-4 Forecasts for Dwelling Type of Additional Anticipated Households in County Wexford 2021-2027[13]

	2021	2022	2023	2024	2025	2026	2027	Total
1 Bed	~~70~~ 24	~~71~~ 97	~~71~~ 97	~~71~~ 97	~~72~~ 97	~~73~~ 97	~~54~~ 73	~~483~~ 583
2 Bed	~~290~~ 97	~~293~~ 387	~~296~~ 387	~~296~~ 387	~~300~~ 387	~~303~~ 387	~~238~~ 291	~~2,016~~ 2,325
3 Bed	~~395~~	~~400~~	~~405~~	~~407~~	~~413~~	~~418~~	~~378~~	~~2,817~~

[12] Totals may not sum due to rounding
[13] Totals may not sum due to rounding

	2021	2022	2023	2024	2025	2026	2027	Total
	108	433	433	433	433	433	324	2,596
4+ Bed	~~162~~ 38	~~164~~ 154	~~166~~ 154	~~168~~ 154	~~171~~ 154	~~173~~ 154	~~168~~ 115	~~1,172~~ 924
Total	~~917~~ 267	~~928~~ 1,071	~~938~~ 1,071	~~942~~ 1,071	~~956~~ 1,071	~~967~~ 1,071	~~838~~ 803	~~6,488~~ 6,427

CE CH4.9

Amend the fourth paragraph in Section 4.56 Locations for Future Housing on page 107 as follows:

With regard to apartments, this type of development will generally be acceptable in town centres, at appropriate scales. Small apartment schemes may be considered in village centres and the scale will depend on the characteristics and size of the village. Location for apartments will be assessed in accordance with The Sustainable Urban Housing - Apartment Guidelines (2020) and Chapter 6 of the Sustainable Residential Development in Urban Areas Guidelines in Villages and Towns with a population of 400 to 5000. However, in the Small Villages (Level 5 Settlement Hierarchy), the provision of apartments will be restricted to the conversion of an existing building e.g. the use of the first floor over a shop or hairdressers for an apartment.

CE CH4.10

Amend text under Level 6 Rural Nodes in Section 4.7 Future Housing Delivery on page 111 as follows:

In general, the guiding principle is that development must be commensurate to the scale of the node and no more than 5 houses will be permitted in a smaller rural node and no more than 5-8 houses will be permitted in a larger rural node during the period of this Plan. The houses should prefereably be located on individual sites and respect the form and structure of the village with care taken to avoid any ribbon development. An exception to this may be considered where it is demonstrated that an additional dwelling(s) can be accommodated without detracting from the rural character of the node. A permanent residence condition shall be attached to planning permissions.

CE CH4.11

Amend text on pages 111 and 112 in Section 4.7.2.2 Ready-to-go land as follows:

The availability of a good supply of ready-to-go development land is an important component in the housing supply chain as it helps to deliver housing units. The purpose of zoning land for residential development is to secure the production of that housing~~. The~~ , and the quantum of required residential zoned land in the county is set by the Core Strategy. With the building of new homes a key pillar of 'Rebuilding Ireland', it is important that all residential zoned land be developed, rather than some of the Core Strategy quantum being 'tied to' lands that will not be developed for reasons including land ownership or infrastrutural constraints. The Council will apply the following NPF approaches to ensure that (a) sufficient land is zoned for residential development, (b) this land is available, serviced and ready-to-go, and (c) the **building of more houses is secured.**

~~In this regard, the NPF sets out a new three-tiered approach to land zoning:~~

- ~~Tier 1 land is ready for development;~~
- ~~Tier 2 lands can be serviced within the six year life of the plan but are currently constrained due the need to deliver some infrastructure; and~~
- ~~Tier 3 lands are unlikely to be or can't be serviced during the life of the plan.~~

~~The preparation of local area plans will critically examine all existing residential zoned lands, in particular, historically zoned lands that remain undeveloped, to determine whether similar well-located and ready-to-go but unzoned lands are available.~~

~~The Council will apply the NPF approach to ensure that (a) sufficient land is zoned for residential development, (b) this land is available, serviced and ready-to-go, and (c) the~~ ~~**building of more houses will be secured.**~~

~~The phased development of land is also important in achieving the timely and efficient delivery of housing and this will be linked to the tiered approach to residential land use zoning in accordance with the methodology set out in the NPF.~~

Tiered Approach to Zoning Land

The NPF outlines that effective implementation will require substantially better linkages between the zoning of land and the availability of infrastructure. NPO72a requires planning

authorities to apply a standardised, tiered approach to differentiate beteen (i) zoned land that is serviced and (ii) zoned land that is serviceable within the lifetime of the plan:

Appendix 3 of the NPF sets out the methodology for this tiered approach to land zoning:

- Tier I: Serviced Zoned Land
  This zoning comprises lands that are able to connect to existing development services, for which there is service capacity available and can therefore accommodate new development. These lands will generally be positioned within the existing built-up footprint of the settlement or contiguous to existing developed lands. Inclusion in Tier 1 will require the lands to be within the footprint of or spatially sequential within the settlement.
- Tier 2: Serviceable Zoned Land
  This zoning comprises lands that are not currently sufficiently serviced to support new development but have the potential to become fully serviced within the lifetime of the plan. These lands may be positioned within the existing built-up footprint of a settlement, or contiguous to existing developed lands or to Tier 1 lands, where required to fulfil the spatially sequential approach to the location of new development within the settlement.

NPO 72c also outlines that when considering the zoning of land for development purposes that cannot be serviced within the lifetime of the plan, such lands should not be zoned for development.

Prioritising Development Lands

As outlined in the NPF there are many other planning considerations relevant to land use zoning beyond the provision of basic enabling infrastructure including the overall planned levels of growth, location, suitability for the type of development envisaged, availability of and proximity to amenities, schools, shops or employment, accessibility to transport services etc. The Planning Authority will weigh up all of the relevant factors, together with the availability of infrastructure, to determine the order of priority to deliver planned growth and development in a settlement.

CE CH4.12

Amend Section 4.7.2.4 Land Development Agency on page 112 as follows:

~~The Land Development Agency has been established to coordinate and develop key state owned lands for regeneration and development, and to drive strategic land assembly working with public and private sector land owners to promote the delivery of housing and other development. It is envisaged the agency will have Compulsory Purchase Order (CPO) and other legislative powers to allow a more proactive land management role. The Council will work with the Agency to activate key sites and lands that will assist with the delivery of housing.~~

The Land Development Agency (LDA) is a commercial, State-sponsored body that has been created to co-ordinate land within State control for more optimal uses where appropriate, with a focus on the provision of housing. The LDA will work with State bodies and local authorities to make more effective use of State lands, providing a stable, sustainable supply of land for housing.

The new Land Development Agency Bill, 2021, when enacted, will put the LDA on a statutory footing and set out its core objectives and powers. Amongst other things;

- The LDA will be deemed a designated development agency under the Planning and Development Acts 2000 (as amended).
- A "Register of Relevant Public Land" will be established by the LDA to identify lands owned by relevant public bodies in areas with a population greater than 10,000 that can be made available for housing. It is intended that the LDA will have the power to acquire relevant public land at market value, by means of being offered first refusal on a proposed sale by the land-owning public body.
- The Agency will have CPO powers where it is required to provide access to or infrastructure for relevant public land or land owned by the LDA and where it is has failed to acquire the land via agreement.
- There will be a requirement that a proportion of any housing provided on relevant public land be made available for affordable housing by the LDA or any other party which acquires such land.

CE CH4.13

Amend Section 4.7.5 House Types on page 116 as follows:

Shared Accommodation/'Co-Living'

This is a new format of residential accommodation which comprises professionally managed rental accommodation, where individual rooms are rented within an overall development that includes access to shared or communal facilities and amenities. ~~Due to the distinct nature and features of the Shared Accommodation type development, it is only appopriate where responding to an identified urban housing need at particular locations e.g. short term employee accommdoation needs and accommodation for students. This type of accommodation is not suitable for familites. The Council will given consideration to this housing model in the central areas of Key and Large towns, at an appropriate scale.~~ The amended Apartment Guidelines for Planning Authorities published in December 2020 introduced Specific Planning Policy Requirement 9 which states the following:

There shall be a presumption against granting planning permission for shared accommodation/co-living development unless the proposed development is either:

i. Required to meet specific demand identified by a local planning authority further to a Housing Need and Demand Assessment (HNDA) process; or
ii. On the date of publication of these updated Guidelines, a valid planning applicationn to a planning authority, appeal to An Bord Pleanála, or strategic housing development (SHD) planning application to An Bord Pleanála, in which case the applciation or appeal may be determined on its merits.

The HNDA that forms part of the Housing Strategy (Volume 9) did not identify the need for this type of accommodation in the county.

CE CH4.14

Amend Objective SH14 on page 119 as follows:

To require new apartment developments to comply with the Specific Planning Policy Requirements and Standards set out in the Apartment Guidelines for Planning Authorities (Department of Housing, Environment and Local Government, ~~2018~~2020), where relevant. Proposals for apartment block developments in excess of 50 units will also be assesed having regard to the nature of existing developments in the area, existing and planned social

facilities and the need to ensure that apartment developments contribute to the development of sustainable communities into the future.

CE CH4.15

In Section 4.9.1 Single (One-Off) Rural Housing Policy Contect, amend the second paragraph on page 129 as follows:

As outlined in Section 3.3 single rural housing will be considered in the open countryside only where it is for those with a demonstrable economic or social functional need to live there. Notwithstanding the demonstration of this need, the planning application will be determined based on the proper planning and sustainable development of the area, in accordance with all relevant development plan objectives and development management standards including traffic safety, public health, the protection of natural heritage and biodiversity, landscape and siting and design. The demonstration of a local rural housing need will not outweigh the need to comply with all other relevant planning and environmental criteria and standards.

CE CH4.16

Amend the Guiding Principles relating to the Replacement of 'habitable' and 'substantially intact' dwellings in Table 4-7 Refurbishment and Replacement of Dwelling Houses on page 138-139 as follows:

Table 4.7 Refurbishment and Replacement of Dwelling Houses

Category of Development	Guiding Principles	Criteria
Restoration of a habitable or, 'substantially intact' or derelict vernacular dwelling.	The Planning Authority will protect the vernacular dwelling building stock in the county's rural areas and will encourage the sensitive restoration of a 'habitable', or 'substantially intact' or derelict vernacular dwelling as an alternative to the construction of a single rural house elsewhere in the countryside.	(i) The vernacular dwelling must be capable of being suitably restored to habitable accommodation in keeping with its original character and without the necessity to demolish or significantly alter it. (ii) The remaining character and original historic fabric of the structure must be retained using appropriate traditional construction methods and materials. (iii) The applicant will not be required to comply with the local need criteria relevant to the rural area in which the structure is located and occupancy and

Category of Development	Guiding Principles	Criteria
		permanent residency conditions shall not apply. (iv) Any proposed extension of the structure must be proportionate in scale and be visually subservient while allowing sufficient accommodation to function as a modern dwelling. (v) Normal environment criteria will apply to the treatment of wastewater, safe access and water supply. (vi) Minimum site sizes do not apply apart from required distances for wells and wastewater treatment systems.
Replacement of 'habitable' and 'substantially intact' dwellings	The Planning Authority will protect the vernacular dwelling building stock in the county's rural areas and as such will not consider the replacement of habitable or substantially intact vernacular dwellings.	N/A
	~~However,~~ Consideration will be given to the replacement of ~~non-vernacular~~ habitable or substantially intact non-vernacular dwellings (generally post 1970 buildings of little architectural merit). While ~~S~~such cases will ~~be~~ not have to comply with the ~~assessed as a greenfield sites and the~~ rural housing policy for new single houses in that rural area, the development must comply with ~~will be applied as will all other~~ all other normal planning and environmental criteria.	(i) The applicant will not be required to ~~shall~~ comply with the local need criteria relating to the rural area that the dwelling is located in and ~~the applicant will be required to accept the~~ occupancy ~~condition~~ and permanent residence conditions shall not apply. (ii) The design of the replacement dwelling must be of a high standard and its scale and character appropriate to the site and its rural setting. (iii) The dwelling shall generally be on the same footprint as the existing dwelling or such other footprint as would have lesser associated impacts. The development must comply with all normal planning and environmental criteria. (iv) Normal environmental criteria will apply to treatment of wastewater, safe access and water supply. (v) Minimum site sizes will apply.

Category of Development	Guiding Principles	Criteria
Replacement of a Derelict Dwelling	The Planning Authority will protect the vernacular dwelling building stock in the county's rural areas and as such will not consider the replacement of a derelict vernacular dwelling.	N/A
	Consideration will be given to the replacement of a derelict non-vernacular dwelling. Such cases will be assessed as a greenfield site and the rural housing policy for new single houses in that rural area will be applied as will all other normal planning and environmental criteria.	(i) The applicant shall comply with the local need criteria relating to the rural area that the dwelling is located in and the applicant will be required to accept the occupancy condition and permanent residence condition. (ii) The design of the replacement dwelling must be of a high standard and its scale and character appropriate to the site and its rural setting. (iii) The dwelling shall generally be on the same footprint as the existing dwelling or such other footprint as would have lesser associated impacts. The development must comply with all normal planning and environmental criteria. (iv) Normal environmental criteria will apply to treatment of wastewater, safe access and water supply. (v) Minimum site sizes will apply.

Section 9 Submissions Relating to Chapter 5 Design and Place-making in Towns and Villages

Relevant Submissions

- WXF-C3-26 Clonattin Residents
- WXF-C3-34 Transport Infrastructure Ireland (TII)
- WXF-C3-59 Stephen O'Brien
- WXF-C3-64 Construction Industry Federation (CIF)
- WXF-C3-82 Department of Tourism, Culture, Arts, Gaeltacht, Sports and Media (Dept. TCAGSM)
- WXF-C3-85 Wexford PPN
- WXF-C3-88 William Dunbar
- WXF-C3-92 Paula Redmond
- WXF-C3-94 Wexford Environmental Network (WEN)
- WXF-C3-102 Trish Crowe
- WXF-C3-106 Sinéad Dowling
- WXF-C3-107 P Flood and Sylvia Flood)
- WXF-C3-111 (Claire Langrell)
- WXF-C3-118 Carol Carr and Colin Conroy)
- WXF-C3-119 (Martina Byrne)
- WXF-C3-126 (Ambrose Dowling)
- WXF-C3-138 (Ferns Development Association)
- WXF-C3-142 Health Service Executive (HSE)
- WXF-C3-162 (Molloy Architecture and Design Studio)
- WXF-C3-165 (Ciarán Breen)

Summary of Main Issues and Chief Executive Response

Section 5.5 Strategy

WXF-C3-94 (WEN) states that there should be an emphasis on trees, enhancing biodiversity and incorporating green infrastructure which will encourage 'place making.' They request

the inclusion of additional objectives to ensure our towns have easy access to biodiversity rich green spaces for physical and mental health, to prioritise access to nature in any new development and for the restoration and protection of biodiversity in towns and villages. They suggest that biodiversity could be added as a design principle in its own right, which would include things like areas for biodiversity in parks, low impact street lighting in towns and green enhancements to buildings or hard structures like bus stops (e.g. bee friendly bus shelters).

WXF-C3-85 Wexford PPN) highlight the importance of community engagement in design and place-making.

WXF-C3-82 (Dept. TCAGSM) highlights the importance of the historic urban centres and the opportunity that exists for safeguarding vacant town centre buildings and the reuse of under-utilised buildings, particularly in response to the impacts of Brexit, climate change and COVID 19 pandemic. The Department requests that enhanced policies are included for heritage-led urban regeneration based on an understanding of their cultural layering/transmission of cultural significance/high quality adaptation, reuse and renewal of historic fabric and remaking of historic places.

The Dept. TCAGSM requests that a policy is included to consider a *Town first* approach to the revitalisation of historic urban centres which focuses on the repair and upgrade of existing historic buildings and their adaptation to new uses with regard to their architectural character and significance. It also requests that policies are included to promote the development of heritage-led regeneration, to plan for the reuse and conservation of core built heritage and archaeological sites within urban centres as an integral part of the evolution of the historic place and its significance, and to support the development of sustainable infill to the town back lands that is appropriate in scale and character to that of the historic centre, that transitions and accommodates surviving structures and retains the historic streetscape form particularly within sensitive areas of built and archaeological importance.

WXF-C3-142 (HSE) state that they would welcome the inclusion of support for the objectives of public health policy including Healthy Ireland and the National Physical Activity Plan in the Design and Placemaking Section.

WXF-C3-165 (Ciarán Breen) suggests that housing master plans could be developed by the local authority to guide future development in village settlements, which would bridge the gap between the high-level development plan and the current practice of individual developments that do not add up to a coherent vision at the settlement level. He suggests that the masterplans could be achieved by way of architectural competition or local authority architect's office.

WXF-C3-162 (Molloy Architecture and Design Studio) requests that an objective is added to this Chapter to require that where permission is granted for residential units in a village that if it is not commenced within a year then the Council would accept an application for another 6-12 units on different lands for a different applicant.

WXF-C3-92 (Paula Redmond) asks the Council to clarify the term 'diverse' in Objective TV01 and states that Objective TV06 regarding the 10 Minute Town concept is too late, as towns like Gorey were allowed to spread outwards with estates being located some distance from the town centre, holiday homes in Courtown/Riverchapel were allowed to be used as permanent residences and large estates were built in Courtown/Riverchapel without infrastructure such as suitable shopping and educational facilities.

Section 5.5 Strategy Chief Executive's Response

Biodiversity in open space and the provision of open spaces in new developments is addressed in Chapter 14 Recreation and Open Space Strategy, Chapter 13 Heritage and Conservation, Chapter 11 Landscape and Green Infrastructure and Volume 2 Development Management Manual (Sections 2.2 Design Statements, 3.12.4 Public Open Space and 7.4 Landscape and Biodiversity). The Plan is cognisant of the need to promote, protect and restore biodiversity. It is also recognised that high quality open space and amenity provision is paramount in developing more compact urban forms, as stated in Section 14.5.2 of the Draft Plan. It is recommended that biodiversity in open spaces is also incorporated into this

Chapter in the context of design and place-making and it is recommended that an additional key aim is added to the Strategy and that associated narrative and objectives are included. Other biodiversity measures will be considered as part of the preparation of a new County Biodiversity Action Plan proposed under Chapter 13 Heritage and Conservation.

The comment from Wexford PPN is noted.

The comments from the Dept. DCAGSM are noted and it is also recommended that natural, built and cultural heritage is incorporated into the additional key aim, narrative and objectives referred to in the previous paragraph.

It is noted that Objective TV37 states that it is an objective of the Council *"to encourage and participate in heritage led regeneration, including consideration of the potential to participate in the Heritage Council's Historic Towns Initiative."* It is recommended that this objective be amended to also support a *Town first* approach to the revitalisation of historic urban centres which focuses on the repair and upgrade of existing historic buildings and their adaptation to new uses with regard to their architectural character and significance. A further amendment is recommended to an objective in Chapter 13 Heritage and Conservation to promote the development of heritage-led regeneration in towns and villages.

With regard to the comments of the HSE on Healthy Ireland and the National Physical Activity Plan it is noted that objectives relating to these plans are included in Chapter 1 Introduction, Chapter 3 Core Strategy, Chapter 8 Transportation Strategy, Chapter 14 Recreation and Open Space Strategy and Chapter 15 Sustainable Communities and Social Infrastructure Strategy. It is not considered necessary to include specific reference to them in Chapter 5 as they relate to all areas urban and rural.

The Council will give consideration to the development of masterplans areas when preparing local area plans. The Gorey Town and Environs LAP 2017-2023 contains Neighbourhood Framework Plans which set out detailed urban design objectives and key components for each area. It is also noted that the Draft Plan includes an objective (TV14) to

require a Design Statement for specified significant developments in towns and on a case by case basis in villages where the sensitivity to change is higher due to considerations of scale and context. Objective TV18 states that the Council will support proposals from local communities and community organisations to prepare a Village Design Statement for villages through a process involving community participation, the Heritage Council and the Council's Planning Department subject to availability of resources. The Settlement Plans for Bunclody and Rosslare Harbour also contain route concept drawings which indicate proposed linkages and locations where strong frontages will be required.

In relation to the submission from Molloy Architecture and Design Studio this issue has been responded to in Section 4.7.2.1 (See Section 9).

The comments from Ms. Redmond are noted. The "10 Minute Town" concept will be applied in the preparation of future Urban Design Frameworks and will inform future Local Area Plans in line with the RSES. In addition, the Core Strategy in Chapter 3 sets out objectives to support the delivery of infrastructural requirements to keep pace with the planned population growth for settlements.

Section 5.7 Design Quality

WXF-C3-94 (WEN) requests additional wording to Objective TV17 to enhance the biodiversity of towns/villages and would also like to see mentioned in Public Realm places such as areas for organic/chemical free/regenerative food production (orchards, allotments, communal green houses and so on) to help in supporting a circular economy which tends to guarantee a stable access to whole food in communities.

Section 5.7 Design Quality Chief Executive's Response

WEN's point in relation to Objective TV17 is noted and it is recommended to make a minor amendment to this objective to enhance the biodiversity of towns/villages. Community gardens/orchards and allotments are addressed in Chapter 14 Recreation and Open Space Strategy.

Section 5.8 Connected Places and Design of Streets

WEN welcomes the principle that priority is given to pedestrians but states that it is not clear whether this includes accessibility for those with limited mobility and/or wheelchair users. They would like to see this made clearer in the objectives TV19 to TV26.

WEN states that connectedness for biodiversity should be included in objectives TV19 to TV26. Including small green features such as street trees, flower boxes or green privacy strips provides connectedness for pollinators and garden birds. Urban trees improve air quality and offset urban heat in periods of high temperature. Establishing green infrastructure such as rain gardens, swales and green roofs can also provide biodiversity connectedness or ecological networks.

A number of submissions (WXF-C3-26 Clonattin Residents, WXF-C3-102 Trish Crowe, WXF-C3-106 Sinéad Dowling, WXF-C3-107 P Flood and Sylvia Flood, WXF-C3-111 Claire Langrell, WXF-C3-118 Carol Carr and Colin Conroy, WXF-C3-119 Martina Byrne and WXF-C3-126 Ambrose Dowling) state that the policy around permeability ignores the rights of people living in small estates and will fracture communities by dividing them up using roads and lanes. They state that there should be consultation and input from local people from the initial stages of the Plan right through to its completion (and not just to amend this Draft Plan) and that the Plan should include a statement committing to consult with local people before its implementation. They also suggest that the development on Esmonde Street, which is supported by the Plan, should not go ahead as it will impede traffic in Gorey Town Centre.

WXF-C3-92 (Redmond) states that the making of retrospective links to existing developments should be carefully considered as it could result in the loss of privacy for some homeowners and could attract anti-social behaviour.

WXF-C3-59 (Stephen O'Brien) objects to the provision of a new cycle/pedestrian route through Clonattin estate which he states would run counter to the statement in the "Route Hierarchy" section of the "Towns and Villages Strategic Objectives" that "Movement function is much less important, place function is paramount."

William Dunbar (WXF-C3-88) highlights the significant increase in housing units in the Greenville/Moyne area of Ennsicorthy and requests that new footpaths and roadways be provided to link the area to the Vocational School and the Main Dublin Road.

TII requests that the Council consider incorporating reference to TII Standard 'The Treatment of Transition Zones to Towns and Villages on National Roads' in this section in association with reference to DMURS in instances where national roads continue to pass through town and village locations. The TII Standard describes the requirements that shall be implemented on National Roads on the approaches to towns and villages in terms of the provision of traffic calming measures and pedestrian crossings.

Section 5.8 Connected Places and Design of Streets Chief Executive's Response

Universal Access and Design is addressed in Section 15.6.2 of the Draft Plan. Objective TS11 in Chapter 8 Transportation Strategy also addresses universal accessibility in the design of streets and roads: *"To ensure that streets and roads, public transport facilities and interfaces are designed to be universally accessible. The design of streets and roads, transport facilities and networks shall ensure that accessibility is considered 'end to end', that is, from the door of an accessible dwelling through to parking, street, public realm and the destination building."* In general, where the Council uses the phrase pedestrians it is intended to refer to footpath users to distinguish from users who do not use footpaths such as cyclists and motorised modes. The term pedestrian includes all potential users, persons with a disability, including mobility aid and wheelchair users. It is recommended that this be amended at the first reference to pedestrians in the plan and it shall apply to every reference to pedestrians in the plan thereafter.

Biodiversity, ecological networks and green infrastructure are addressed in Chapter 13 Heritage and Conservation and Chapter 11 Green Infrastructure. This Section refers to connections and the movement of people however the Council accepts that reference could be made to green linkages and biodiversity within the design section of this Chapter. This is addressed under Section 5.5 Strategy above.

On the issue of enhancing permeability and connectivity through the development of open networks and formation of linkages, it is considered that the benefits of such, particularly in respect of making walking and cycling more convenient and safe, outweigh the perceived adverse impacts. Walking and cycling networks and permeability issues generally in the four main towns will be considered in detail in the Local Transport Plans. This is discussed further in Chapter 8 Transportation Strategy.

Public consultation on the Plan took place at the pre-draft and draft stages of the Plan in accordance with the requirements of the Planning and Development Act 2000 (as amended) and further public consultation will take place at the proposed amendments stage. Specific projects supported by the Plan may also be subject to further consultation at the project level through the planning application or Part 8 processes. The proposed development of Esmonde Street has been subject to a Part 8 application which has been granted and was subject to a public consultation process.

There is no specific objective in the Draft Plan for a cycle/pedestrian route through Clonattin estate.

Linkages within Enniscorthy Town will be considered in detail as part of the preparation of the Enniscorthy Town and Environs Local Area Plan.

The comments from TII are noted and it is recommended to include reference to their document 'The Treatment of Transition Zones to Towns and Villages on National Roads' in this section.

Section 5.9 Compact Growth and Regeneration

WXF-C3-64 (CIF) considers that the NPF is fostering an unrealistic approach to land allocation by redirecting development to urban infill/brownfield sites which are inherently more difficult to deliver. Releasing the development potential of Brownfield sites is extremely challenging as many are in multiple ownership, often contaminated, require demolition works, involve complex construction management, can be poorly serviced and are often located in areas which require significant regeneration. In the absence of active

land management measures and national incentive schemes or initiatives, few infill/brownfield sites will be commercially viable. Within this context, the CIF submission requests that the following options should be explored:

- A Viability Assessment of all key Brownfield and Infill sites included in Town and Environs Local Area Plans
- Site assembly and clearance being progressed by LAs via CPO
- Reduced development contributions for complex infill/brownfield sites.

WXF-C3-92 (Redmond) states that, in relation to Objectives TV30, TV32 and TV34, the Council should clarify/provide more detail as to when and what type of scenarios it intends to use CPOs.

In relation to Objective TV35 regarding the presumption in favour of the development of infill and brownfield sites, Ms. Redmond questions if priority will be given to development even if adjoining land/property owners will have their privacy, light and amenity negatively affected.

WEN states that the concept of redevelopment, renewal and regeneration of areas for infill, brownfield, derelict sites and institutional lands should also encompass developing these areas for community gardens, community orchards, allotments and spaces for nature (wilding areas). There is also the possibility of transforming these areas into continuous productive urban landscapes (CPULs), also referred to as urban farms and this could be linked to the design of the public realm where the existing and planned squares in towns and villages become 'market squares' at the weekend for local farmers and food growers.

Ferns Development Association (WXF-C3-138) states that derelict and vacant buildings have a negative impact, particularly commercial premises left vacant for lengthy periods in key town/village locations. They ask that the Local Authority put in place a specific team with ring fenced resources, to set out an action plan, implementation plan and a delivery strategy. Levies accrued from current derelict commercial premises could be used to assist this process.

WXF-C3-142 (HSE) state that other ideas for the regeneration of towns could include providing connectivity and internet access, promoting active travel links with other towns, improvement to marketing, promoting 'destination' shopping and implementing measures to adapt to cultural diversity. They also recommend the carrying out of social and amenity audits.

In relation to Objective TV39 which promotes residential uses on upper floors of appropriate buildings located in town and village centres, Ms. Redmond states that this will attract single people of a transient nature and does not assist in building a sense of community and residents will suffer noise, traffic and light pollution.

In relation to Objectives TV43 and TV44 Ms. Redmond states that increased building heights will detract from the appearance of the areas in question and adjoining property owners will suffer many negative effects such as loss of light and privacy.

Section 5.9 Compact Growth and Regeneration Chief Executive's Response

Objective TV32 states that it is an objective of the Council *"to engage in active land management to facilitate the development of sites which would achieve the aims of compact growth and regeneration where such sites have not come to the market or where they have complex patterns of ownership or consent regimes."* Section 5.9.2 of the Draft Plan also states that the Council is committed to targeted intervention and will consider interventions such as site assembly using CPO (Objective TV30), demolition and clearance or decontamination and the provision of facilitating infrastructure. Further detail in relation to active land management and the use of CPO's are outlined in the response to Observation 2 and 3 in submission WXF-C3-164 OPR.

The current Development Contributions Scheme 2018 includes an exemption for development charges where the development consists of refurbishment works to a site or structure which, in the opinion of the Local Authority, is a Derelict Site or is listed in the Derelict Sites Register and a reduction of 50% in contributions will be provided for development of properties within town centres that have been vacant for a 12 month period or greater. This issue could be considered in future Development Contribution Schemes.

In response to Ms. Redmond's concerns regarding the impact of infill and brownfield development on adjoining land/property owners it should be noted that all developments will be subject to the development management standards contained in Volume 2 of the Draft Plan, including the Section 2.6 Amenity. Individual planning applications will be assessed on their merits.

WEN's point in relation to the consideration of community gardens, orchards and allotments on infill, brownfield, derelict sites and institutional lands is noted and in this regard Objective ROS14 in Chapter 14 Recreation and Open Space Strategy states that the Planning Authority will identify land for use as allotments and community gardens in larger towns and villages during the preparation of local area plans.

The comments from Ferns Development Association are noted and in this regard the Council is very proactive in the area of derelict sites. The Draft Plan includes objectives (TV40 and TV41) to use powers under the Urban Regeneration and Housing Act 2015 to address issues of vacancy and underutilisation of lands in town and village centres and to implement the provisions of the Derelict Sites Act to encourage and facilitate the redevelopment of derelict sites. Further objectives are recommended to underline the Council's commitment in this regard.

With regard to the comments of the HSE on connectivity and internet access, travel links with other towns, improvement to marketing, 'destination' shopping and implementing measures to adapt to cultural diversity it is noted that objectives are included in the various chapters of the plan to cover these issues. With regard to the carrying out of social and amenity audits, the Council will consider this issue when preparing Local Area Plans.

Ms. Redmond's comments on residential use on upper floors are noted. No amendment is proposed.

In relation to building heights appropriate objectives are included to ensure that development complies with the criteria set out in the Urban Development and Building Heights Guidelines (TV44), does not adversely impact on the streetscape, local amenity or

views (TV45), and to require all development proposals to include an analysis of the impact of the building on adjoining structures (TV46). Each planning application will be assessed on its merits.

Section 5.10 Vibrant, Inclusive, Resilient and Adaptable

With regard to Objective TV47, WEN highlights the opportunity for the provision of a flexible open space/public realm that can function as a market square at the weekend and as a place for festivities during the holiday period. This could mean reinstating the old market square (often used as a car park) back to its original purpose.

Regarding Objective TV47, WXF-C3-92 (Redmond) questions why the population of our towns and villages needs to be increased as it would bring negative implications for residents and increasing opening hours can severely impact on residents living near commercial buildings.

With regard to Objective TV48, to ensure that our towns are inclusive and welcoming to all, Ms. Redmond states that this objective needs to be either removed or its meaning clarified and then reverted to the public for their opinion.

Section 5.10 Vibrant, Inclusive, Resilient and Adaptable Chief Executive's Response

The comments from WEN in relation to a flexible open space/public realm/market square are noted and it is considered that this could be pursued through Objectives TV06 (to prepare Urban Design Frameworks), TV07, TV08, TV16 and also through the preparation of future Local Area Plans and Settlement Plans.

Ms. Redmond's comments are noted. The growth allocated to Gorey is considered proportionate to the existing population and the capacity of the settlement to accommodate growth. A capacity assessment was carried out prior to the establishment of the settlement hierarchy and allocation of growth and it was considered that Gorey could accommodate the additional growth. The capacity assessment is included in the OPR submission response.

An amendment is proposed to Objective TV47 to clarify that extending opening hours will be subject to residential amenity and other planning criteria.

With regard to Ms. Redmond's comments on Objective TV48, this is considered an appropriate objective. Inclusivity is an underlying theme of the Plan and the Council is welcoming to everybody.

Chief Executive's Recommendations

It is recommended that the following proposed amendments be made to Chapter 5 Design and Place-making in Towns and Villages.

CE CH5.1

Amend Section 5.5 Strategy on page 149 as follows:

The Council's strategy is to create attractive, healthy, safe and efficient places through its own interventions and ensuring that all future developments achieve the highest standards in design and layout. Having regard to this, the key aims of the strategy are:

- **Design Quality** - To ensure that our towns and villages are attractive places to live and visit and that the design of development and the public realm is of exceptional quality.
- **Place Based Design** - To ensure that all new development is designed to respect, enhance and respond to its natural, built, cultural and social context
- **Connected Places** - To ensure that future development has a coherent urban structure, is permeable and places people at the heart of the public realm.
- **Compact and Rejuvenated** - To ensure that development results in the efficient use of land, encourages walking and cycling and rejuvenates the area within which it is located.
- **Vibrant, Inclusive, Resilient and Adaptable** -To ensure our towns and villages are self-sustaining places which are vital and vibrant, with appropriate services, jobs, amenities and community facilities which are inclusive, accessible to all and are resilient to challenges such as climate change and economic instability.

CE CH5.2

Insert a new section 5.8 titled Place Based Design-Context on page 156 as follows:

Place Based Design-Context

An understanding of 'place' context and appreciation of character is at the core of good design. New development should be designed to respect, enhance and respond to its natural, built, cultural and social context. This should not be seen as a constraint but as a resource to create interesting, attractive and distinctive places.

New development should be designed to respect and complement heritage assets and character. Cues can be taken from the existing built form, scale, massing, plot widths and urban grain. Building lines and building heights should be observed and the response should demonstrate how these factors have been taken into account while at the same time achieving compact and efficient growth. The intention is not to replicate scale and form but to respond appropriately and use opportunities presented by landform or adjacent urban development to create more intensive development patterns while avoiding abrupt changes in scale in historic environments.

Contextual development in our smaller towns and villages warrants special attention given the number of villages scattered throughout Wexford's countryside, their unique character and appeal and their smaller scale and thus sensitivity to change. The expansion of villages is appropriate and necessary to prevent the decline of rural areas, provide rural employment as an alternative to commuting and to provide an alternative to one off rural housing.

New development must respond to the natural landscape and make optimum use of the opportunities presented by the natural features of the site. Features such as watercourses, hedgerows, wetlands and tree stands must be identified and incorporated in the site. Care must be taken to ensure that features such as rivers and streams are left open and that buildings and spaces appropriately address them. As well as adding to the character and value of the place these features act as natural measures to absorb surface water, absorb carbon and allow for the enhancement and dispersal of plant and animal diversity in our town and villages. It is important to identify how these natural features will be connected to

each other and to those outside the site, as continuity is imperative for both surface water and biodiversity.

Place Based Design Objectives

It is the objective of the Council:

Objective

To ensure that all new development is designed to respect, enhance and respond to its natural, built, cultural and social context and add to character and sense of place.

Objective

To ensure that new development has regard to the scale of the settlement and the ability of the settlement to absorb further development. In deciding whether any given development exceeds the absorption capacity of the settlement, as well as the absolute quantum of development, the Planning Authority will also have regard to scale, bulk and massing of the individual buildings and groups of buildings.

Objective

To ensure that new development responds to the natural features of the site and wider settlement. To ensure that features are identified in planning applications and preserved. The Design Statement required for the site (or site layout where a Design Statement is not required) should identify the features to be retained and design measures to enhance the biodiversity of the settlement such as linking green of blue features within and outside the site.

CE CH5.3

Amend Objective TV37 on page 178 as follows and move to Section 5.8 Place Based Design:

To encourage and participate in heritage led regeneration, including consideration of the potential to participate in the Heritage Council's Historic Towns Initiative, and to adopt a *Town first* approach to the revitalisation of historic urban centres which focuses on the repair and upgrade of existing historic buildings and their adaptation to new uses with regard to their architectural character and significance.

CE CH5.4

Amend Objective TV17 on page 156 as follows:

To require that new developments, streets, public spaces and other areas of public realm including parks are designed to reflect the design principles of Connectivity, Enclosure, Active Edge and Pedestrian Facilities/Activity[14] and enhance the biodiversity of the town/village in which they are situated.

CE CH5.5

Insert new text after paragraph 3 in Section 5.8.4 Streets-Detailed Design and Safety on page 165 as follows:

Where national roads pass through settlements, where the speed limit on that road is between 50km/h and 60 km/h, regard shall also be paid to the Transport Infrastructure Document 'The Treatment of Transition Zones to Towns and Villages on National Roads', which describes the requirements that shall be implemented on national roads in terms of the provision of traffic calming measures and pedestrian crossings.

CE CH5.6

Amend Objective TV47 in Section 5.10 Vacant, Inclusive, resilient and Adaptable on page 181 as follows:

To support development which will add to the vitality and vibrancy of our towns and villages including development which will increase population, result in additional services and extend opening hours, subject to normal planning criteria including residential amenity.

[14] See Section 5.8.3 below.

Section 10 Submissions Relating to Chapter 6 Economic Development Strategy

Relevant Submissions

WXF-C2-1/21 Kloss

WXF-C3-19 Eastern and Midland Regional Assembly (EMRA)

WXF-C3-32 O'Leary International

WXF-C3-70 Re-Imagining Enniscorthy

WXF-C3-82 Department of Tourism, Culture, Arts, Gaeltacht, Sports and Media (Dept. TCAGSM)

WXF-C3-85 Wexford PPN

WXF-C3-94 Wexford Environmental Network (WEN)

WXF-C3-99 Roadstone Ltd

WXF-C3-114 Byrne

WXF-C3-125 CoAnt

WXF-C3-137 Southern Regional Assembly (SRA)

WXF-C3-138 Ferns Development Association

WXF-C3-142 Health Service Executive (HSE)

WXF-C3-143 An Taisce

WXF-C3-146 Wexford Greens

WXF-C3-156 Dunne

WXF-C3-164 Office of the Planning Regulator (OPR)

WXF-C3-166 Fáilte Ireland

Summary of Main Issues and Chief Executive's Response

Section 6.6 Economic Development Strategy

Submissions from the OPR (WXF-C3-164), SRA (WXF-C3-137) and EMRA (WXF-C3-19) are addressed in Sections 2-4 of this Report, as required by the Planning and Development Act 2000 (as amended).

WXF-C3-85 (Wexford PPN) set out their broad concurrence with the content of the Chapter and state that the PPN Vision for Community Wellbeing suggests a need for a diversity of employment opportunities at all stages of life, that alternative enterprise models should be included, and that we should maximise the County's natural environment and focus on sustainability as key assets in economic development.

WXF-C3-94 (WEN), WXF-C3-146 (Wexford Greens), WXF-C3-142 (HSE), Kloss (WXF-C3-1/21 Kloss) and Dunne (WXF-C3-156) comment on home and remote working during the Covid situation and state that it is likely to become more common.

WXF-C3-142 (HSE) comments that unemployment and social deprivation have adverse impacts on people's health.

WXF-C3-120 (Markham) comments that the circular economy is weakly articulated in the overall document. This is an emerging concept in Ireland. The Council and planning strategy may be the first place Wexford businesses and communities discover this term. It should be articulated more clearly beyond waste and waste management and separated from bio-economy and social enterprise as this may negate the overall impact a systemic change requires. Circular principles seek to recover and preserve the embedded value in materials, components and products. Implementing innovative circular strategies and business models – which keep materials, components and products in use in the economy – creates significant macro-economic, environmental, social and business benefits**.** Planning is well placed to seed circularity as an economic and social lever to create a climate and pandemic resilient economy.

The submission states that there are several opportunities to hold people and businesses accountable to their use and impact on nature and its resources through planning. The submission notes opportunities for education and funding around the circular economy.

Section 6.6 Economic Development Strategy - Chief Executive's Response

The Chief Executive acknowledges the broad welcome to the overall content of Chapter 6 Economic Development Strategy as expressed in the submissions from the OPR and SRA.

With regard to the comments from Wexford PPN it is considered that the Plan addresses the points made in their submission, particularly in respect of balancing protection of the county's natural environmental with encouraging a strong economy. The Council concurs with the comment from the HSE that unemployment and social deprivation have adverse impacts on people's health and the objectives of the Plan are focussed on developing a strong and inclusive economy.

With regard to the comments from Kloss, WEN, HSE, Wexford Greens and Dunne Objective ED10 specifically and Chapter 9 Infrastructure set out the Council's support for the development of IT provision right across the county. This issue is further dealt with under Section 6.6.4 Property below.

With regard to the submission from Markham it is noted that the plan contains references to the circular economy in this section and Section 9.7 Waste Management Infrastructure. It is also proposed to add an objective to Chapter 2 Climate Action. It is acknowledged that the circular economy is wider than these sections and requires systemic change. The ideas put forward are both interesting and valuable and can form part of an important discussion going forward. However, the influence of the land use planning system does not extend to the inputs and outputs of the circular economy (and cannot be readily made so). It is considered that this area is one which will need to be addressed at central government level as it is very worthwhile but covers many disciplines and sectors and, as stated in the submission, requires systemic change.

Section 6.6.1 People

WXF-C3-1/21 (Kloss) comments that third level educational facilities are of great importance. WXF-C3-70 (Re-Imagining Enniscorthy) comment that details of the full range of training agencies should be included and that more details should be included in Objective ED13 relating to the Centre of Excellence for Sustainable Construction in Enniscorthy. WXF-C3-94 (WEN) reference the role of NZEB and Teagasc in the development of the county's green and sustainable economy.

Section 6.6.1 People - Chief Executive's Response

The submissions made are noted. The Draft Plan emphasises the role of education and training in the economic development of the county. Objectives ED11-ED18 support the development of education and training facilities and emphasise the important role it plays in economic development. Chapter 15 Sustainable Communities and Social Infrastructure Strategy also contain detailed objectives for education and training. Individual educational/training developments can be further dealt with in the LAPs for the main towns.

A number of amendments are proposed to this Chapter and Chapter 15 as a result of submission WXF-C3-137 (SRA). See response to Recommendations 17, 19, 20, 21, 37 in Section 3.

Section 6.6.2 Profile

WXF-C3-94 (WEN) comment that the circular and green economy could be referenced in this section.

Section 6.6.2 Profile - Chief Executive's Response

There is reference to the green and circular economy in Section 6.7.5 Green Economy. See also response to WXF-C3-120 (Markham) under Section 6.6 above.

Section 6.6.3 Pillars

WXF-C3-142 (HSE), WXF-C3-70 (Reimagining Enniscorthy) and WXF-C3-94 (WEN) all make references to the development of a future Food Strategy for the county with an emphasis on healthy and sustainable local food production.

Section 6.6.3 Pillars - Chief Executive's Response

The comments made by the HSE, Re-imagining Enniscorthy and WEN are noted. Agri-food is identified as one of the Pillars in the Draft Plan. The development of a possible Food Strategy is outside the remit of the plan but may be an appropriate objective for the LECP.

Section 6.6.4 Property

WXF-C3-1/21 (Kloss), WXF-C3-94 (WEN), WXF-C3-146 (Wexford Greens), WXF-C3-142 (HSE), and WXF-C3-156 (Dunne) comment on home and remote working during the Covid situation and state that it is likely to become more common. In this regard strong IT connections will be of great importance going forward. The development of IT hubs with shared office space in settlements (similar to the Gorey Hatch Lab) are supported. It is noted that home and remote working can significantly reduce the transport, environment and social costs of commuting. WXCFC3-1/21 (Kloss) notes that broadband infrastructure is of vital importance.

Section 6.6.4 Property - Chief Executive's Response

It is considered that additional reference to the development and support of remote working hubs in settlements would strengthen the Plan. It is recommended that a new objective be included in this section supporting their development.

Section 6.6.5 Place

WXF-C3-82 (Dept. TCAGSM), WXF-C3-138 (Ferns Development Association) and WXF-C3-70 (Re-Imagining Enniscorthy) all comment on the role that town and village centre properties of historic value could and should play in economic development and that the Council should work to address high levels of vacancy.

Section 6.6.5 Place - Chief Executive's Response

The comments of Dept. TCAGSM, Ferns Development Association and Reimagining Enniscorthy are noted. Objective ED45 directly addresses the issue of vacancy and under-utilised buildings. The Retail Strategy also identifies actions and detailed policies to rejuvenate central areas and reduce vacancy. Notwithstanding, as a result of these submissions and submissions received related to Chapter 5 Design and Place-making in Towns and Villages changes are recommended to that Chapter to deal with regeneration and contextual development in towns and villages (See Section 9 of this report for further details).

Section 6.7 Specific Locations for Economic development

With regard to Objective ED50, WXF-C3-94 (WEN) comment that there is no reference in the objective to environmental limits or boundaries. WEN also comment that objectives for Gorey and Enniscorthy (ED52, ED53) should reference remote working hubs and that the development of New Ross port should seek to restore and augment habitats rather than just comply with the Habitats Directive (ED54). It is stated that Objective ED61 could also reference the circular economy and restoration and augmentation of habitats.

With regard to Objective ED55 relating to the scale of commercial development in each settlement, WEN comment that smaller, local shops should be prioritised over large supermarkets that can promote unhealthy and/or wasteful lifestyles.

WXF-C3-125 (CoAnt) request that their proposed Commercial Quay redevelopment project in Wexford Town be referenced in Objective ED51.

WXF-C3-70 (Re-Imagining Enniscorthy) comment that the Old Dublin Road industrial estate in Enniscorthy Town should be upgraded to a North Enniscorthy Business District capable of attracting international companies, that a Grade A remote working Hub should be developed to avail of remote working opportunities, broadband connectivity should be improved, public realm improvements (including for pedestrians and car parking) should be carried out and that vacancy and dereliction in the town needs particular attention, possibly as a pilot scheme for the county. The Plan should also give greater reference to the town's Festivals and the implementation of the town's actions contained in the Health Check, in Volume 8 Retail Strategy.

WXF-C3-114 (Byrne) comments gambling and gaming proposals should be restricted in Enniscorthy.

Section 6.7 Specific Locations for Economic Development - Chief Executive's Response

With regard to WEN's comment that there is no reference in the objective to environmental limits in Objective ED50 it should be noted this is an objective to ensure that adequate infrastructure is provided to serve economic development. The provision of infrastructure

and the development it serves will be subject to the comprehensive environmental protection objectives of the plan. With regard to the comments on hubs, it is recommended that an additional objective is included to refer to remote working hubs generally.

The comments with regard to New Ross port are noted and while it is not proposed to amend this objective it is recommended that biodiversity restoration is referred to in a number of sections of the plan (referenced in their individual chapters). See also above response in Section 6.6 and responses in Chapter 9 Infrastructure (see Section 13) and Chapter 10 Environment (see Section 14) which deal with the circular economy.

With regard to WEN's comment on the scale of retail development, it should be noted that retail development is dealt with in Volume 8 Retail Strategy. The Section 28 Retail Planning Guidelines require the Council to ensure a healthy retail environment, and the Council must provide appropriate policies to ensure this.

The request of CoAnt is noted. It is proposed to make an amendment to Objective ED51 to refer to the regeneration of this area.

The submission from Re-Imagining Enniscorthy contains many positive ideas and the Council looks forward to working with this group on the LAP for Enniscorthy Town.

The comments with regard to gambling and gaming proposals are noted. While this matter is primarily dealt with in bye-laws consideration may be given to this issue when LAPs are being prepared for the towns.

Section 6.7.5 Green Economy

WXF-C3-146 (Wexford Greens) comment that more grants and incentives could be used to encourage transition to more sustainable practices in businesses and in farming.

WXF-C3-94 (WEN) comment that Wexford could be a leader in green economic practices which couple economic development with environmental regeneration.

WXF-C3-70 (Re-Imagining Enniscorthy) comment that more detail is needed on the Sustainable Construction campus in Enniscorthy town.

Section 6.7.5 Green Economy - Chief Executive's Response

With regard to the comment from Wexford Greens regarding grants and incentives, such matters lie outside the remit of this Plan.

In response to WEN's submission, this section of the Plan and Objective ED76 sets out the Council's ambition to be a leader in the green economy.

The comments from Re-Imagining Enniscorthy are noted and as outlined above this will be given more detailed consideration in the forthcoming Enniscorthy LAP.

Section 6.7.6 Rural Economy

WXF-C3-94 (WEN) suggests that Objective ED83 relating to seeking leveraged funding for diversification should reference support for best practice schemes in agriculture and aquaculture (chemical free, organic, permaculture, regenerative, riparian etc.) and Objective ED89 should give reference to enhancement and restoration of, rather than just prevention of harm to, the quality of the environment.

Section 6.7.6 Rural Economy - Chief Executive's Response

Objective ED83 relates to a specific funding stream arising out of the National Planning Framework (NPF) and National Development Plan (NDP) and its application covers a wide range of development not linked to agriculture or related sectors. It could, for example, be used to support remote working hubs or cycling infrastructure in rural areas. It is not appropriate to tie it to best agricultural practices. It is considered that the environmental protection objectives of the plan and those relating to sustainable development in the rural economy adequately cover this issue.

With regard to Objective ED89 it is recommended that the objective is amended to reference enhancement and restoration of the quality of the environment and this is dealt with in the OPR submission (See Section 2 of this report).

Section 6.7.6.1 Agricultural Development

WXF-C3-143 (An Taisce) and WXF-C3-94 (WEN) recognise the value of agriculture and quality food production to the economy of Wexford but comment in detail on the adverse impacts that some agricultural practices can have on waters, soils, biodiversity and greenhouse gas emissions, and support and promote transition to more sustainable agricultural practices.

WEN comment that Figure 6.5 (in section 6.5.2 of this chapter) does not include reference to the environmental impacts that agricultural developments can have and state that the plan should seek to improve, not worsen, environmental impacts. WEN comment that Wexford could be a leader in sustainable agricultural practices as well as sustainable building and the Plan should reference regenerative farming and organic and chemical free methods.

With regard to Objective ED94 relating to intensive agricultural units WXF-C3-82 (Dept. TCAGSM) comment that AA screening should be referred to. WXF-C3-94 (WEN) comment that the criteria used to assess such applications should be available to the public as it is unlikely that such developments would not cause animal welfare and environmental issues.

Section 6.7.6.1 Agricultural Development - Chief Executive's Response

The comments of An Taisce and WEN with regard to environmental impacts are noted. Agriculture has and will continue to have a significant role to play in the economy of the county. The environmental protection policies of the Plan are strong and relate to all sectors of the economy including agriculture. The Council has a very limited role in the governance and regulation of farming practices but, where it can, will support farmers and other Government department and agencies in the transition to more sustainable practices.

With regard to Objective ED94 relating to intensive agriculture, Objective EM02 in Chapter 10 Environmental Management relates to the implementation of the Habitats Directive through Appropriate Assessment of planning applications. This will apply to all planning applications including those relating to agricultural development.

With regard to the availability of the details of all agricultural development, it is noted that planning applications are on public display, that members of the public can make submissions and that, at the appropriate time, environment reports and planning authority reports are available for public inspection.

6.7.6.2 Rural Diversification including agri-food

WXF-C3-82 (Dept. TCAGSM) states that the retention of vernacular buildings in diversification enterprises should be encouraged.

WXF-C3-94 (WEN) comment that Objective ED95 should reference Wexford's ambition to be a leader in the green economy and Objective ED96 should reference waste, ambient water quality, biodiversity and soil quality.

6.7.6.2 Rural Diversification including agri-food - Chief Executive's Response

It is recommended that Objective ED95 be amended to reference the green economy. In response to Dept. TCAGSM it is recommended that Objective ED96 is amended to refer to the retention of vernacular buildings in farm diversification enterprises and in response to WEN it is recommended that this objective is further amended to refer to wider environmental impacts.

6.7.6.3 Horticulture

WXF-C3-143 (An Taisce) comment that the use of peat in horticulture should be banned.

6.7.6.3 Horticulture - Chief Executive's Response

The usage of peat in horticulture is not a matter which is under the control of the Council.

6.7.6.4 Forestry

WXF-C3-116 (Coillte) made a detailed submission on their role and the economic and environmental benefits of forestry and sustainable timber production. They state that Government regulation of forestry largely rests with the Department of Agriculture, Food and the Marine. Coillte supports the forestry objectives of the Draft Plan, in particular

Objectives ED103 and ED105. Coillte requests that the Council promote the use of sustainable timber products in the Plan.

WXF-C3-94 (WEN) comment that Objective ED103 should give greater reference to environmental enhancement and restoration.

WXF-C3-82 (Dept. TCAGSM) welcomes Objective ED106 which relates to the protection of existing and planting of further woodlands with native species.

6.7.6.4 Forestry - Chief Executive's Response

The supportive comments from Coillte are welcomed. The use of sustainable timber products is a matter that would more appropriately be dealt with under the Building Control system. No amendment is proposed.

Having considered to the comments of WEN it is recommended that Objective ED103 be amended to reference environmental enhancement and restoration.

6.7.6.5 Aggregate Resources and Extractive Industry

WXF-C3-99 (Roadstone Ltd) generally welcomes and supports the text and objectives within this section, but make the following observations:

- The availability of locally sourced aggregates is vital if other goals in the Plan regarding residential, economic and infrastructure growth are to be achieved. There should be more emphasis in the Plan on the economic value and significance of the extractive industry;
- Extensions of existing quarries which have been responsibly run in compliance with existing planning permissions should be favourably considered, having regard to the need for aggregates in the wider economy and the level of investment required to operate a quarry;
- The development management policy with regard to the use of existing landforms to mitigate for visual impacts is queried, as it is considered impractical and would not sufficiently allow for detailed consideration of mitigation measures provided in local context;

- The Plan should provide for Mineral Safeguarding Areas, where potential future aggregate resources are identified (in conjunction with the GSI, operators and others), with the lands subject to a degree of protection from non-extractive development which could impair possible future extraction;
- Reference is made to the document Essential Aggregates (prepared by the Irish Concrete Federation), which sets out the case for Government policy to acknowledge the need for, and establish policy support for, a strong aggregates industry, a more efficient planning application process, and the identification and protection of future reserves via Mineral safeguarding Areas.

WXF-C3-10 (GSI) comments on the importance of the aggregates industry to the country as a whole and states that the planning authority could consider aggregate potential sterilisation. GSI state that they provide data, maps, interpretations and advice on matters related to minerals, their use and their development including bedrock, groundwater and aggregate potential to assist plan policy making.

WXF-C3-142 (HSE) comment that sensitive receptors adjacent to extractive industry development should be protected from unwanted impacts from dust, fine airborne particulates, noise and vibration. Ground and surface water should be protected. All such environmental impacts should be considered prior to quarrying development taking place and protection measures should be adhered to during the exploitation of such resources.

WXF-C3-143 (An Taisce) request that an additional objective be added relating to the strong enforcement of unauthorised quarrying operations.

6.7.6.5 Aggregate Resources and Extractive Industry - Chief Executive's Response

With regard to the submissions made by Roadstone and GSI the importance of local aggregates supply to development in the county is acknowledged.

With regard to the past record of developers and the mitigation of visual impacts it is noted that applications to extend existing quarries will be considered on their merits, having regard to the objectives of this section and the standards of Section 5.8 relating to the

extraction industry. This section includes consideration of (inter alia) the degree of compliance with previous planning permissions. It also considered that the policy with regard to utilising landforms and avoiding excessive mitigation are appropriate. No amendments are recommended.

It is not recommended that Minerals Safeguarding Areas or sterilisation zones be introduced into the Plan as such areas may result in the prevention of other legitimate types of rural development.

With regard to the comments of the HSE, the objectives of this section and Section 5.8 of the Development Management Manual set out how all environmental impacts will be considered in the assessment of applications for quarrying.

With regard to the comments of An Taisce, unauthorised quarrying development is subject to Council enforcement action and does not fall within the remit of the County Development Plan.

Chief Executive's Recommendations

It is recommended that the following proposed amendments be made to Chapter 6 Economic Development Strategy:

CE CH6.1

Add a new Property Objective on page 209 as follows:

<u>To support the development of remote working hubs in settlements.</u>

CE CH6.2

Amend Objective ED51 in Key Towns and Large Towns Objectives on page 215 as follows:

- Develop the Trinity Wharf lands as a Strategic Employment Location for the town and the county, and to maximise the economic development opportunities that this development will bring forward for the town, both directly and indirectly.

- Maximise the economic development opportunities offered by the strategic location of the town on the Eastern Economic Corridor.
- Further develop and expand the presence of the Financial Services, Life Science and ICT industries in the town.
- Further develop manufacturing industries in the town.
- Maximise the tourism potential of the town through the development of the Wexford Town 'Maritime Town' brand, the planned Greenways and the vibrant Arts and cultural scene in the town.
- Focus on the regeneration of key sites in the town including the regeneration of the Commercial Quay and Monck Street area.

CE CH6.3

Amend Objective ED95 in Section 6.7.5.2 Rural Diversification including Agri-food on page 223 as follows:

To support the continued development of the agri-food industry~~,~~ as a lead sector in the green economy and a key growth sector for the county, through the implementation of Food Wise 2025, by facilitating food production and processing at appropriate locations and subject to the proper planning and sustainable development of the area.

CE CH6.4

Amend Objective ED96 in Section 6.7.5.2 Rural Diversification including Agri-food on page 233 as follows:

To facilitate farm or rural resource related enterprises, including food production and processing on farm holdings, where the key resource is produced on the farm (or other nearby rural resource) or a number of farms in the locality subject to Objectives ED88 to ED89 and normal planning and environment criteria. The scale of the facility should be appropriate to the rural character of the area and will be assessed having regard to a number of factors including source of material, scale of the operation, building size, number of employees and hours of operation , waste generation, traffic movements to and from the

site, water and wastewater requirements, environmental impacts including but not limited to noise and odour, ~~number of employees and hours of operation~~ and impacts on natural and cultural/built heritage and water. The restoration of vernacular farm buildings to facilitate such enterprises will be encouraged.

CE CH6.5

Amend Objective ED103 in Section 6.7.5.4 Forestry on page 235 as follows:

To facilitate the sustainable development of forestry in the county provided that that no significant adverse impacts are caused to natural waters, wildlife habitats and biodiversity and that it does not have a significant adverse visual impact on the local landscape. Forestry developments should include environmental enhancement and restoration where possible.

Section 11 Submissions Relating to Chapter 7 Tourism Development

Relevant Submissions

- WXF-C3-3 Branigan
- WXF-C3-10 Geological Survey Ireland (GSI)
- WXF-C3-24 Environmental Protection Agency (EPA)
- WXF-C3-41 O'Conail
- WXF-C3-48 Courtown Community Council
- WXF-C3-53 Nova Connect
- WXF-C3-70 Re-Imagining Enniscorthy
- WXF-C3-82 Department of Tourism, Culture, Arts the Gaeltacht, Sports and Media (Dept. TCAGSM)
- WXF-C3-85 Wexford PPN
- WXF-C3-94 Wexford Environmental Network (WEN)
- WXF-C3-103 Colbert
- WXF-C3-116 Coillte
- WXF-C3-125 Coant Entertainments Ltd
- WXF-C3-127 South East on Track
- WXF-C3-138 Ferns Development Association
- WXF-C3-142 Health Service Executive (HSE)
- WXF-C3-143 An Taisce
- WXF-C3-147 O'Conail
- WXF-C3-165 Breen
- WXF-C3-166 Fáilte Ireland

Summary of Main Issues and Chief Executive's Response

Section 7.1 Introduction

WXF-C3-166 (Fáilte Ireland) recommends the text be updated to include reference the Wexfordia Project which is a concept to develop a new visitor experiences at three sites

across the county, namely Hook Lighthouse, the Dunbrody Famine Ship and the Irish National Heritage Park in Ferrycarrig.

Section 7.1 Introduction - Chief Executive's Response

Noted, and it is recommended that the text be updated accordingly to refer to the Wexfordia project.

Section 7.2 Climate Action and Tourism

WXF-C3-94 (WEN) outline that as more summer droughts are a potential impact of climate change, assessing the capacity and resilience of water supply for increased summer volumes should be added as a bullet point on page 247.

WXF-C3-127 (South-East on Track) requests that the following text be added to the third bullet point on page 246 "making use of the county's existing railways".

Section 7.2 Climate Action and Tourism - Chief Executive's Response

The issues raised are noted, and it is considered appropriate to include references to water supply capacity and resilience and existing railways in this section.

Section 7.3 Policy Context

WXF-C3-166 (Fáilte Ireland) notes that Point 1 seeking to increase visitor numbers to rural Ireland by 12% by 2019 is now outdated and policy objectives should relate to the most current Government Policy at the time of publication of the final plan. Additionally, it is considered that the Plan acknowledge that figures highlighted in the County Wexford Tourism Strategy 2019-2023 may need to be reconsidered in terms of the impact of Covid 19.

With regard to the County Wexford Tourism Strategy 2019 – 2023 on page 250, WXF-C3-125 (Coant Entertainments Ltd) requests that the Commercial Quay redevelopment area should be added to Wexford's Town profile.

Section 7.3 Policy Context - Chief Executive's Response

This section provides a summary of strategic tourism policy in place at the time of writing the Draft Plan. The tight statutory timeframes at this juncture in the plan preparation process does not afford the time necessary to review new tourism policy documents and figures. An updated target figure does not appear to be available for the Action Plan for Rural Development, and accordingly it is recommended that the target figure for 2019 be omitted.

The suggested updates to the County Wexford Tourism Strategy 2019 -2023 and the request to add the Commercial Quay site to Wexford Town's profile in that strategy would require a change to a separate Wexford County Council policy document which is outside of the remit of this process. No amendments proposed.

Section 7.4 Tourism Product

WXF-C3-125 (Coant Entertainments Ltd) requests the 'cultural centre at the permitted Crown Live venue and hotel conference facilities as part of the Commercial Quay redevelopment area, with associated public realm improvements', to be included as a bullet point on page 253.

WXF-C3-166 (Fáilte Ireland) notes the tourism attraction numbers on page 251 should be replaced by the most recent figures available to the Council i.e. 2018. This submission also requests the inclusion of a specific objective acknowledging and supporting future Destination Experience Development Plans (DEDPs). DEDPs focus on unlocking the growth potential of an area by developing experiences that will motivate potential visitors to firstly visit there and secondly to dwell in the area. It is requested that this objective should support continued collaboration and alignment with Fáilte Ireland and tourism stakeholders to ensure successful implementation and delivery of these DEDPs. This submission also requests the inclusion of the Ireland's Ancient East branding logos to increase brand awareness in the new Development Plan.

Section 7.4 Tourism Product - Chief Executive's Response

This section focuses on strategic county and Council tourism related products, rather than specific projects, and as such it is not considered appropriate to included references to projects such as the Crown Live cultural venue or the proposed hotel conference facilities at Commercial Quay.

Tourism figures for 2018 have been sourced, and it is recommended that this section be updated to incorporate those figures.

The Council would welcome the preparation of a Destination Experience Development Plan for the county (or part thereof) or the wider region and will collaborate with Fáilte Ireland and other key stakeholders in the preparation of same. It is recommended that an objective be included to support the preparation of a DEDP subject to compliance with all relevant requirements including SEA, EIA and Habitats Directives.

The County Development Plan is a statutory land use document. It is not a tourism promotional document and as such the incorporation of brand logos is not considered appropriate.

Section 7.5 Tourism Development Spatial Strategy

WXF-C3-10 (GSI) encourages the Council to continue to support the growing trend of geo-tourism, to make the information in the geological audit easily available to the public and ensure geology is a significant part of any tourism initiative that may be introduced.

WXF-C3-41 (O' Conail) outlines the need for key players to include the diverse private tourist industry. The key groups to be consulted are the innovative groups or persons using new modes of tourist attractions (such as people who use AirBnB in their tourist business).

WXF-C3-70 (Re-Imagining Enniscorthy) outlines that additional objectives are needed to develop the tourism potential of Enniscorthy Town including to achieve Fáilte Ireland Destination Town status by 2024, to enhance tourism and information and signage, and to strengthen tourism experiences in the town and surrounding area e.g. possible greenway

route on the former Macmine Junction to New Ross railway, walking trails, cycle trails, Blueway from Bunclody to Edermine (rather than Enniscorthy) and strengthen the role of food tourism and festivals.

WXF-C3-82 (Dept. TACGSM) requests that Objective TM06 be amended to read 'National Parks and Wildlife Service' and this change should be made elsewhere in the Plan as required.

WXF-C3-85 (Wexford PPN) outlines that within the PPN's vision for Work, Economy and Resources, specific elements including sustainability, a year-round offering of culture, heritage and natural environment for visitors and the promotion of innovative enterprise models, would be mutually beneficial for tourism and citizens. In particular, reducing seasonality and the social enterprise model, could deliver strong local benefit for communities.

WXF-C3-94 (WEN) suggests that eco-tourism (that is sensitive to habitats and species) could be a strategic goal for the Council. In this regard, the 'development of Wexford as a model for ecotourism that prioritises habitat and species protection" should be included as an objective.

WXF-C3-138 (Ferns Development Association) proposes that community tourism be recognised as a sector which delivers services and tourism products and practical supports and representation should be given to this sector.

WXF-C3-143 (An Taisce) outlines it is their objective that future eco-tourism and recreational visitor promotion nationally should be car free. The Programme for Government sets out a range of tourism policies including "Develop Ireland as a long stay tourism destination to spread tourism more evenly across the country. This will help to reduce emissions and maximise economic return". The submission also welcomes Objective TM29 (greenways that do not prejudice the reopening of disused railways).

WXF-C3-147 (O' Conail) welcomes the inclusion of New Ross as a potential lead-tourism town and using the leverage of the cluster of nationally notable tourist and heritage items in the New Ross district is very welcome for the county as a whole. It is suggested that there should be a roadway such as the 'New Line' or 'Duncannon Road' linked to the Hook Head/New Ross area specifically through its name as this would be a conduit also for tourist traffic out of there and into Wexford Town. While focus on Enniscorthy is welcome, specific cultural historical heritage of 1798 (international interest) and 1916 should not be neglected. These specific local elements stand in vibrant contrast to the Normans and Vikings.

WXF-C3-166 (Fáilte Ireland) requests the following:

- The inclusion of a tourism strategy map for the county. This map should illustrate key nodes of tourism activity in the county, existing transport links between nodes and identified routes, strategic tourism centres, sensitive environments, areas of unrealised tourism potential where proactive policies will aim to encourage the development of this sector and relevant tourism branding. This submission also requests:
- The rewording of Objective TM09 to read as follows: To maximise the role of key Wexford towns such as New Ross and Wexford as visitor hubs within the county.

This submission also requests the inclusion new policies in Section 13.1.4 in Chapter 13 Heritage. However, it considered that it would be more appropriately addressed in this chapter.

- Encourage the sensitive redevelopment and/or return to suitable use, of derelict, vacant or redundant buildings, in appropriate locations in order to provide for visitor accommodation and tourism development, while having regard to ecological constraints and architectural heritage requirements.
- Encourage the reuse and refurbishment of vernacular buildings (houses or farm/industrial buildings) in appropriate locations for tourism related facilities, including holiday home accommodation.

Section 7.5 Tourism Development Spatial Strategy - Chief Executive's Response

The suggestions relating to the inclusion of geo-tourism, community tourism and eco-tourism are noted and welcomed, and it is recommended that Objective TM06 be amended to include these niche sectors. It is also recommended (in response to Fáilte Ireland's requested to include a stronger focus on Food tourism in this chapter to include a reference to Food tourism in Objective TM06 as well.

The suggestion relating to new key players in tourism and the need to consult with them is noted and will be considered during the preparation of future tourism strategies for the county.

The comments in WXF-C3-85 (Wexford PPN) are noted and it is considered that the Draft Plan, both in this chapter and other chapters, address the points raised.

As previously outlined, the County Development Plan is a statutory land use plan. It is not a tourism promotional document, and in this regard, it is not considered appropriate to include the tourism strategy map requested by Fáilte Ireland. This could be given further consideration as part of any future update of the County Wexford Tourism Development Strategy 2019-2023.

With regard to Objective TM09, the focus of this objective is to support the towns in the county that have (Wexford Town) or are working towards (New Ross Town) becoming a tourism destination town. The driver for this was the Fáilte Ireland Tourism Destination Town scheme, funded under the Government's Project Ireland 2040. There are opportunities for other towns in the county to work towards this and it is therefore recommended that the objective be reworded to reflect that and to avail of all available tourism funding streams to develop the tourism potential of our towns.

It is considered that the objectives in the Draft Plan allow for the appropriate reuse of existing buildings, both vernacular and non-vernacular, at appropriate locations. No amendment proposed in this regard.

The points raised by WXF-C3-143 (An Taisce) in relation to the integration of sustainable transport modes and tourism are noted. The Council supports this approach; however, it is dependent on significant investment in public transport services within the county and inter-county services. The Draft Plan includes a strong focus on the development of sustainable transport modes and the Council will continue to advocate for the necessary investment to facilitate this shift. The Council will continue to progress its proposed greenways, along with the development of cycling and walking infrastructure and trails. It is also noted that new developments will be required to incorporate EV and bicycle parking infrastructure.

Regarding WXF-C3-70 (Re-Imagining Enniscorthy) and WXF-C3-147(O'Conail), the suggestions relating to Enniscorthy Town and New Ross Town are noted. While some of the suggestions lies outside of the remit of the County Development Plan and are considered under the remit of the Council's Economic Section and the County Tourism Strategy 2019 – 2023, it is recommended to include a reference to the county's wide-ranging history from prehistoric to Celtic, the Vikings, the Normans, the 1798 Rebellion and the 1916 Rising in Section 7.5.1 Goal. The new LAPs for Enniscorthy Town and New Ross Town will also provide more detail and specific objectives relating to the development of tourism in these towns.

The clarifications regarding the title of the National Parks and Wildlife Service are noted, and all references will be amended accordingly.

Section 7.5.4 Making Tourism Accessible for Everyone

WXF-C3-166 (Fáilte Ireland) welcomes the Council's acknowledgement of the importance of Accessible Tourism in this section but suggests that the Plan could be more ambitious in this regard. There is a need for the Council to focus on consumer – focused Accessibility Information by way of 'Destination Accessibility Guides' for its key hubs, local authority owned and managed tourism sites. The submission also requests that the following proposed objectives be inserted in Section 7.5.4:

- To ensure all projects and improvements will adopt the principles of Universal Design.

- To undertake an Accessibility Audit within the lifetime of the Development plan to inform Accessible Tourism priority investments at key tourism hubs.

WXF-C3-142 (HSE) would like to see the Council provide a Changing Place within the lifetime of this plan at one of the county's Blue or Green flag beaches with ancillary facilities such as disabled parking.

Section 7.5.4 Making Tourism Accessible for Everyone - Chief Executive's Response

The Council has and continues to be very proactive in the areas of improving accessibility to and the provision of accessible facilities at key tourism sites in the county. The Council will continue to support this approach. The wording of Objective TM02 is considered sufficient along with the development management standards set out in Volume 2 Development Management Manual. The development of an Accessibility Audit and a Destination Accessibility Guide lies outside the remit of the County Development Plan. No amendment proposed.

Regarding the HSE's suggestion, the Council is proud to be a leading authority in the provision of Changing Place facilities and will continue to roll out these invaluable facilities at appropriate locations across the county.

Section 7.6.1 Tourism in Towns and Villages

WXF-C3-166 (Fáilte Ireland) suggest that this section should refer to Covid-19. As seen during recent months in many parts of the country the popularity of cycling and walking has increased significantly throughout the Covid-19 pandemic. A greater focus on pedestrian, cyclist and public realm facilities should be placed in the new Development Plan. In this regard improvements to public realm spaces should consider the visitor perspective and the ability of these spaces to facilitate and accommodate stimulating new experiences e.g. festivals/performance spaces etc.

Section 7.6.1 Tourism in Towns and Villages - Chief Executive's Response

The Draft Plan contains a strong focus on the development of walking and cycling infrastructure to achieve, inter alia, national policy objectives relating to compact growth, place making, sustainable transport modes, good health and wellbeing and climate action, for examples, Chapters 3, 4, 5, 7, 8, 12, 14 and 15. It is not considered necessary to mention Covid-19. No amendment proposed.

It is considered appropriate to include additional text in Section 7.7.3 Creative Arts, Culture and Food Tourism to require public realm schemes/proposals to consider the visitor perspective and the ability of these spaces to facilitate and accommodate stimulating new experiences e.g. festivals and performance spaces.

Section 7.6.3 Tourism in Coastal Areas

WXF-C3-166 (Fáilte Ireland) welcomes the identification of Coastal Tourism as an important part of Wexford's offering as outlined in Section 7.6.3 however it is suggested that the section could benefit by further identifying that tourism in coastal areas has the potential to enhance the destination offering in Wexford. A new objective to promote at local level the development of the Irish Sea Way as highlighted as a priority in the Programme for Government should be included in the Development Plan. It is also suggested that Objective TM24 be amended to include 'shared facilities.'

Section 7.6.3 Tourism in Coastal Areas - Chief Executive's Response

It is considered that the tourism strategy and associated objectives in this chapter and the policy and objectives in Chapter 12 Coastal Zone Management and Marine Spatial Planning suitably address the tourism potential of the county's coastal areas. The existing wording of Objective TM24 is considered sufficient and it does not preclude the development of shared facilities. No amendment proposed.

The current Programme for Government includes a commitment to initiate a consultation process with communities along the coastline from Carlingford Lough in Louth to Cobh in Cork with a view to creating the 'Irish Sea Way' to boost tourism in these regions. This trail, similar to the Wild Atlantic Way, could have significant economic potential for tourism and

will benefits towns and village along the coast. Accordingly, it is recommended that an objective supporting the Irish Sea Way be included, subject to compliance with the relevant Directives and legislation.

Section 7.7.1 Activity and Adventure Tourism

WXF-C3-24 (EPA) notes the commitments in the Plan to the development of a number of greenways and blueways and welcomes the commitment that these initiatives will be subject to the relevant environmental assessments. There is also merit in the Plan promoting the need to be careful not to remove or degrade existing natural or existing green infrastructure, and potentially negatively impact on designated European or national sites. Development of new greenways and blueways should support rather than replace existing green infrastructure.

WXF-C3-3 (Brannigan) and WXF-C3-165 (Breen) raise concerns that the development of greenways should not come at the expense of a functioning railway line. WXF-C3-143 (An Taisce) welcome Objective TM29 (to ensure that the development of greenways/active travel routes along disused railways safeguards the railways and does not prejudice their reopening for the sustainable movement of freight and/or passenger travel in the future").

WXF-C3-165 (Breen) also raises as an issue that investment in cycling and walking infrastructure should not impede the development of other sustainable infrastructure, namely rail. This submission also suggests that the development of walking and cycling routes as public amenities and for tourism are often closed circuits e.g. on Coillte properties. It would be beneficial to link these networks to each other and to local towns.

WXF-C3-48 (Courtown Community Council) request that consideration be given to the development of a cycle path/greenway at Courtown and Courtown Woods.

WXF-C3-116 (Coillte) outlines that as they are in a strong position to play a key role in supporting the provision of new tourism and recreation uses and support the inclusion of objectives which seek to facilitate the provision of "outdoor activity based tourism facilities, including at suitable rural locations" (Objective TM32).

WXF-C3-166 (Fáilte Ireland) outlines that there is a growing consumer segment that want to get out in nature and have outdoor experiences particularly walking but also cycling and water-based activities. Covid-19 has accelerated this by increasing everyone's appreciation of the outdoors.

WXF-C3-82 (Dept. TACGSM) welcomes the four proposed greenway routes and notes that the Wexford to Curracloe Greenway needs to ensure the adoption of a route that does not cause ecological conflicts with the internationally important North Slobs bird habitat. The submission further notes that feasibility studies are being carried out on a Slaney blueway from Enniscorthy to Wexford Town and that this blueway could also be extended to Bunclody where possible.

The submission also notes that it is desirable that an integrated greenway and cycling network be initiated across the county, and advises that many of the same risks to nature conservation interests and biodiversity associated with the development of all linear developments, such as roads, arise in relation to cycleways and walkways (e.g. impacts from disturbance and lighting).

Submission No.127 (South East on Track) requests the rewording of the text relating to the Rosslare to Waterford Greenway on page 265-266. and requests that the following text be added "explore the extension of the Waterford-New Ross Greenway to Enniscorthy via the old New Ross-Macmine Junction Rail Line".

Submission No. 94 (WEN) requests that 'strong litter control measures will be required as part of any blueway development' as blueways are sensitive to litter, in particular plastics, and Objective TM30 (which relates to complementary facilities along greenways/blueways) should include little control as part of the planning conditions for these facilities and promotion of plastic free business.

Section 7.7 Activity and Adventure Tourism - Chief Executive's Response

The support outlined in these submissions is noted and welcomed.

Regarding the EPA's comments, the Plan ensures that that greenways and blueways will be subject to the relevant environmental assessments. There are also objectives in the Plan to protect and enhance existing green infrastructure which will apply to all developments including greenways and blueways . No amendment proposed.

The concerns expressed about the use of the Rosslare-Waterford rail line as a greenway are noted. This issue is mainly addressed in the Chief Executive's response and the associated proposed amendments in Chapter 3 Core Strategy and Chapter 8 Transportation Strategy. An amendment is also recommended in this chapter to point no 1 under Greenways/Active Travel Routes to include reference to the new combined sustainable transport corridor (which would accommodate a reopened passenger and freight line and a greenway) as outlined in Chapter 3 Core Strategy and Chapter 8 Transportation Strategy.

The requests to extend the New Ross Greenway to Macmine Junction and the development of a Greenway in the north of the county (Courtown) are addressed in Chapter 8 Transportation Strategy.

Regarding WXF-C3-166 (Fáilte Ireland), the growing popularity of outdoor experiences are noted, and it is agreed that Covid-19 has resulted in a new-found appreciation of the outdoor areas in our county. It is considered that the objectives in this chapter, Chapter 8 Transportation Strategy, Chapter 12 Coastal Zone Management and Marine Spatial Planning and Chapter 14 Recreation and Open Space, provide the strategy and objectives to support the appropriate developments of recreational facilities.

The advice from the Dept. TACGSM with regard to the environmental considerations and assessments that must be carried out during the design and planning of greenways/active travel ways are noted. The Council will ensure that all such projects comply with the Habitats Directive, and the relevant objectives include the proviso that they are subject to compliance with the Habitats Directive and other relevant Directives and legislation.

The Dept. TACGSM noted that feasibility studies are being carried out on a Slaney blueway from Enniscorthy Town to Wexford Town, and that this blueway could also be extended to Bunclody where possible. In the interests of clarity and given the potential environmental sensitivities and considerations, it is recommended that subject to feasibility assessment and environmental assessments be included in the paragraph on page 265 in Section 7.7 that refers to blueways. It is also recommended that associated amendments be made to Point 16 and Objective ET05 in Chapter 3 Core Strategy (see Section 7 of this report for those proposed amendments).

The need for strong litter control in blueway development is agreed with, however, this is considered to fall outside the remit of the Plan.

Section 7.7.2 Business Tourism

WXF-C3-125 (CoANT Entertainments Ltd) requests that Objective TM37 be amended to 'To support the addition of a new substantial hotel in Wexford town at the Commercial Quay redevelopment area'.

Section 7.7.2 Business Tourism - Chief Executive's Response

As Objective TM37 is a general objective, it is not considered appropriate to identify sites in specific towns. This can be given further consideration in future local area plans. No amendment proposed.

Section 7.7.3 Creative Arts, Culture and Food Tourism

WXF-C3-166 (Fáilte Ireland) recommends that the Plan would benefit from the inclusion of a dedicated section and policy in respect of Food Tourism. It is considered that the text, currently included in Section 7.7.3, should be supplemented and a new objective added.

Section 7.7.3 Creative Arts, Culture and Food Tourism - Chief Executive's Response

The inclusion of the additional text relating to Food Tourism is considered appropriate as it provides additional context. It is recommended that food tourism be added to Objective TM06 and ObjectiveTM41.

Section 7.7.4 Integrated Reports and Amenities

WXF-C3-94 (WEN) requests a shift towards more sustainable and inclusive recreational options, and only low impact tourist amenities (such as walking trails and trekking courses) should be facilitated.

WXF-C3-43 (Nova Connect) relates to suggested policy objective amendments which would facilitate tourism infrastructure development across rural Wexford, but in particular, relate to the use of landowner's lands at Beak and Nemestown, Kilmore Quay for future tourism infrastructure development. Elements currently under consideration include a hotel and leisure centre, a health and wellness centre or an integrated tourism resort facility.
The submission notes that, while the Draft Plan's strategic tourism policies provide support for the concept of the proposal, the use of general/vague words in specific policies is a concern and does not provide clarity for the development of Kilmore Quay and these lands; for example:

- Objective TM45 refers to 'a limited number';
- Objectives TM03, TM04, TM24, TM37 and ED27 refer to tourism development in 'appropriate locations'. It is requested that at least general locations should be identified and more details on appropriate locations provided. Kilmore Quay should be one as it is a leading light.
- Section 7.7.4 states that 'some forms of tourism development' and integrated resorts may 'require a location outside of an existing settlement'.

While the submission considers the proposal development would fit the criteria set out in the plan for 'integrated resorts', the Council's commitment to the importance of plan led tourism development in rural locations is noted, and as such it is suggested that more assertive steps be taken and clarity be provided to underpin and make a more robust tourism strategy. The submission reminds of the commitments given in the CE's Report at the Issues Paper stage that a Tourism Development Strategy would be prepared which would address the appropriate locations for various tourism land uses including accommodation.

The submission proposes the following text amendments:

Add the following text to Objective TM45

- [and in areas proximate to the "leading lights" of Courtown, Curracloe, Rosslare, Kilmore Quay and the Hook Peninsula]

Add the following text to the Hotels in Rural Areas sub-section on page 274:

- [Integrated Resort Hotels may be accommodated proximate to and not within existing villages and towns where the need for tourism accommodation is justified and would not unduly compromise the character of the village or town in terms of scale.]

WXF-C3-103 (Colbert) relates to a 38ha parcel of land located on the county road that connects Kilmuckridge village with Morriscastle beach. Parts of these lands are already developed - Morriscastle Castle Village (85 houses), Oakfields Holiday Park and a pitch and putt course. The landowner is proposing the development of a sustainable, self-sufficient Eco-village which would be a Demonstration Project for the county and the State. It would be a zero-energy village with c. 33 houses, commerce, training, demonstration and visitor experiences offered.

The submission outlines that while there are many policy statements and objectives throughout the Draft Plan that would support the project, it is considered that a zoning or other appropriate designation with a specific local objective would provide the owner with the certainty required to invest in the further development of concept and proceed to planning. Accordingly, it is requested that the subject lands are zoned or otherwise identified/designated as an Integrated Tourism and Leisure Resort.

Section 7.7.4 Integrated Reports and Amenities - Chief Executive's Response

The comments in Submission No. 94 (WEN) are noted.

The comments of Coillte are also noted. All tourist related development proposals will be assessed in accordance with the objectives in this plan.

Section 7.6 Locations for Tourism clearly outlines that the spatial planning strategy is to direct tourism development to towns and villages. This section further states that while rural based tourism offers significant potential for the county, it is prudent that it is carefully managed to protect these areas which are, in themselves, a tourism product, and accordingly, tourist development in rural areas will be carefully considered in accordance with the objectives and exceptions in Chapter 7 Tourism Development, Chapter 6 Economic Development and Chapter 12 Coastal Zone Management.

The exceptions to this spatial planning approach are clear in Chapter 7 and are set out in Section 7.6.2 Rural Based Tourism, Section 7.7.4 Integrated Resorts and Amenities and Section 7.5 Tourist Accommodation. These sections indicate the policy and criteria that development must comply with. Future planning applications will be considered on their merits under these objectives.

At this juncture, it is also important to note the OPR's concerns with regard to these policies and the request to review and monitor the policies that would allow consideration of tourist accommodation outside our towns and villages on the premise that towns and villages should be the focus of such developments.

Regarding WXF-C3-43 (Nova Connect) and WXF-C3-103 (Colbert) Kilmore Quay and Kilmuckridge are designated settlements. As set out in the response to WXF-C3-164 (OPR) (see Section 2 of this report), it is proposed to identify settlement boundaries for all Level 3(b) settlements which will provide clarity regarding whether a site is within or outside the settlement boundary and applicable tourism development policies. If it is determined that they are outside the settlements, then they will be required to meet the criteria for an integrated tourism facility. It is not appropriate to consider the compliance or otherwise of individual projects under the County Development Plan at this juncture. This would have to be decided by planning applications.

While it is noted that the submissions are seeking comfort by way of a designation/zoning of the land as an Integrated Tourism Resort, the Council does not advocate the approach of piecemeal zoning/designations of this nature.

Section 7.7.4 Integrated Resorts and Amenities indicates that the Council will give consideration to the development of a 'limited number' of integrated tourism/leisure/recreation complexes at 'appropriate locations' and includes detailed guidance on what an integrated resort should include. Concerns are raised in WXF-C3-43 (Nova Connect) around the vagueness of 'limited number' and the vagueness of 'appropriate locations' in this section and other sections and objectives in the chapter.

In response, there is a need to avoid an overprovision of integrated resorts given that they are located outside of settlements and in the interests of sustainable development. It is also not possible for the Plan to identify/prescribe the 'appropriate locations' for these developments as the policy approach is tied to an existing local resource, a unique site characteristic or an overriding need. All proposals will be considered on a case-by-case and in accordance with the policy set out under Section 7.7.4 and Objective TM45. The request to include "in areas proximate to the "leading lights" of Courtown, Curracloe, Rosslare, Kilmore Quay and the Hook Peninsula" is therefore not considered appropriate.

The term 'appropriate locations' is also used in:

- Objective TM03 ***"****To facilitate the development of a sustainable diversified tourism industry at appropriate locations....*" In response, this is a strategic tourism objective, and it is considered that the subsequent sections and objectives in this chapter provide clarity on the locations for different types of tourist development.
- Objective TM24 *"To facilitate development which would improve tourism potential and tourist numbers such as marinas, sea angling, sailing, marine adventure activities, diving and surfing and beach nourishment at appropriate locations….*" In response, as this objective relates to water-based tourism, the appropriate locations will be at the coast, watercourses and lakes in the county.
- Objective TM37 ***"****To support the development of conferencing facilities at appropriate locations in towns and villages…..*" In response, this objective is clear in that it supports conferencing facilities in towns and villages. 'Appropriate locations' was intended to refer to appropriate sites within the town or village, and it recommended that this should be clarified.

It is considered that the Draft Plan is clear that new holiday home developments, both individual and multi-unit, will be required to take place in serviced towns and villages, and will only be allowed in a rural area where the development is ancillary to an Integrated Tourism/Leisure/Recreation complex in accordance with Section 7.7.4. As detailed in Section 7.5 Tourist Accommodation and Objective TM48, ancillary tourist accommodation, including holiday homes, will not be permitted as part of a new hotel facility in a rural area.

With regard to the request in WXF-C3-43 (Nova Connect) to add text to the Hotels in Rural Areas sub-section on page 274 to allow integrated resort hotels to be considered proximate to and not within existing villages and towns, all areas outside of the boundary of a town or village will be considered as open countryside/a rural area and accordingly will be subject to Objective TM48. Again, it is important to note that the submission from the OPR highlights this type of development should be located within towns and villages. No amendment proposed.

Section 7.7.5 Tourist Accommodation

WXF-C3-116 (Coillte) support the provision of tourism infrastructure and visitor services, including the provision of tourism accommodation at appropriate locations in the Coillte estate.

WXF-C3-166 (Fáilte Ireland) recommend that a new objective be included after Objective TM46 to support the provision of new tourism accommodation in including hotels in New Ross and Wexford Town to support the significant tourism investment and opportunity for tourism in these towns. This submission also recommends that Objective TM50 be updated to include the up to date guidelines relating to caravan and camping parks.

WXF-C3-142 (HSE) note that there are issues around the correct disposal incorrect disposal of sewage, pet waste, wastewater and refuse are campervans outside caravan parks.

Section 7.7.5 Tourist Accommodation - Chief Executive's Response

Regarding WXF-C3-116 (Coillte) all future tourism related developments, including tourism accommodation will be assessed in accordance with the objectives in this chapter and other relevant chapters. Given the strategic nature of the CDP, it is not considered appropriate to reference specific landholdings. No amendment proposed.

Objective TM46 already provides support for the provision of proportionate high-quality accessible tourist accommodation in settlements. It is not considered necessary or appropriate to reference particular towns in the county. This could be considered as part of the new local area plans for those towns.

It is recommended that Objective TM50 be updated to incorporate the new guidelines.

The Council will assess waste disposal and servicing arrangements for caravan parks in accordance with the objectives in Chapter 9 Infrastructure and Chapter 10 Environmental Management which apply equally to all forms of development. It is not considered necessary to include a specific objective relating to caravan parks in this regard.

Section 7.7.6 Tourist Infrastructure

WXF-C3-166 (Fáilte Ireland) requests the inclusion of an additional policy encouraging orientation, signage and wayfinding infrastructure in the county. While Objective TM08 encourages such facilities as part of the IAE program, Fáilte Ireland require such facilities to be required more widely in the county in particular at key destination towns.

This submission also requests that Objective TM58 be amended to include electric car and bicycle infrastructure. Submission No. 94 (WEN) also strongly supports the rolling out of EV charging to all tourist destinations in the county.

Section 7.7.6 Tourist Infrastructure Chief Executive's Response

Objective TM59 relates to the development of branded signage plans for tourist attractions and tourist facilities. It is recommended that the wording be amended to include orientation signage and way finding infrastructure.

The suggestion to amend Objective TM58 to include EV and bicycles is welcomed, and it is recommended as a proposed amendment. These works must be achieved without compromising the amenity of tourism sites.

Chief Executive's Recommendations

It is recommended that the following proposed amendments be made to Chapter 7 Tourism Development:

CE CH7.1

Amend the second paragraph in Section 7.1 Introduction on page 246 as follows:

The Council is currently leading a number of proposed projects including greenways, blueways, a marina in Wexford Town, Carrigfoyle Outdoor Activity Centre, ~~and~~ Ireland's Ancient East incorporating the Norman Way, ~~proposed tourism developments at the National Irish Heritage Park and Enniscorthy Town~~ the Wexfordia project which is a concept to develop new visitor experiences at three sites across the county, namely the Hook Lighthouse, the Dunbrody Famine Ship and the Irish National Heritage Park. A tourism development is also planned for Enniscorthy Town.

CE CH7.2

Amend the third bullet point in Section 7.2 Climate Action and Tourism on page 246 as follows:

- Develop, where possible, new tourism related developments along, or in close proximity to public transport routes, making use of existing railways in the county.

CE CH7.3

Include a new bullet point in Section 7.2 Climate Action and Tourism on page 247 as follows:

- Work with relevant State bodies, including Irish Water, to assess the capacity and resilience of water supplies in the county, particular during summer months.

CE CH7.4

Amend Point 1 in Section 7.3 Tourism Policy on page 248 as follows:

1. Increase tourist numbers to rural Ireland. ~~by 12% by 2019.~~

CE CH7.5

Amend the first paragraph in Section 7.4 Tourism Product on page 251 as follows:

County Wexford is a popular tourist destination for both overseas and domestic visitors. ~~In 2017, the county attracted 232,000 overseas visitors which generated approximately €61 million revenue for the county. In the same year, the county attracted 654,000 domestic visitors, generating revenue of approximately €146 million.~~ In 2018 Wexford welcomed 3% (circa 288,000) of the overseas tourists who came to Ireland, spending 2% of the €5,217bn overseas tourism expenditure in Ireland. In the same year, the county attracted 785,000 domestic trips (c. 7% of the 10,918 million domestic trips in 2018), spending €157 million (8% of domestic tourist spend).

CE CH7.6

Amend the first paragraph in Section 7.5.1 Goal on page 255 as follows:

To achieve this, the Council will utilise Wexford's wide-ranging history including the Vikings, the Normans, the 1798 Rebellion and the 1916 Rising, unique natural and built tourism assets and its strategic location to further develop tourism as a key economic driver for the county while ensuring that this takes place in a manner which respects the county's heritage, cultures, its people and environment.

CE CH7.7

Include a new objective in Section 7.5 Strategy on page 255 as follows:

To support the future development of Destination Experience Development Plans which may be developed by Fáilte Ireland during the lifetime of this plan and to ensure continued collaboration and alignment with Fáilte Ireland and tourism stakeholders to ensure successful implementation and delivery of these plans subject to compliance with the Habitats, SEA, EIA and Water Framework Directives and normal planning and environmental criteria.

CE CH7.8

Amend Objective TM06 in Tourism Strategic Objectives on page 256 as follows:

To engage with Fáilte Ireland, Tourism Ireland, the Arts Council, National Parks and Wildlife Service, Wexford Local Economic Office and other key stakeholders to promote and maximise the tourism potential of the county and to support the development of niche tourism sectors such as Geo-tourism, Eco-tourism, Food tourism and community-based tourism, while ensuring the protection of natural, cultural and built heritage for the county.

CE CH7.9

Amend Objective TM09 in Tourism Strategic Objectives on page 256 as follows:

~~To maximise the role of Wexford Town as a designated Fáilte Ireland's Ancient East 'Destination Town' and to works towards securing this designation for New Ross Town.~~

To maximise the potential of the main towns in the county as tourism visitor hubs, and to implement guidelines such as the Fáilte Ireland Development Guidelines for Tourism Destination Towns to inform the development and operation of the towns as tourism destination towns, and to work with all stakeholders to leverage funding streams that will assist with maximising the tourism potential and offering of the towns.

CE CH7.10

Include a new objective in Section 7.6.3 Tourism in Coastal Areas on page 263 as follows:

To support the co-ordinated development of the Irish Sea Way Trail subject to compliance with the Habitats, SEA, EIA and Water Framework Directive and all other planning and environmental criteria and the proper planning and sustainable development of the county.

CE CH7.11

Amend Point 1 under Greenways/Active Travel Routes in Section 7.7.1 Activity and Adventure Tourism on pages 264-265 as follows:

The Rosslare to Waterford Greenway. The Council will examine the feasibility of developing a sustainable transport corridor along the disused Rosslare Europort to Waterford Railway which would accommodate a reopened passenger and freight line and a greenway for active travel and amenity use. This corridor would include ~~This will be~~ an off-road cycle and walking path from Rosslare Harbour to Waterford City alongside the rail line and will take in

the villages of Kilrane, Rosslare, Killinick, Mayglass, Bridgetown and~~,~~ Wellingtonbridge and ~~.~~ ~~It will~~ link in with the New Ross Town Greenway project.

CE CH7.12

Amend the third sentence in the section relating to Blueways on page 265 as follows:

Feasibility studies are being carried out in a Slaney blueway from Enniscorthy Town to Wexford Town. The Council will also support the extension of this ~~is~~ blueway ~~could be extended~~ to Bunclody Town subject to feasibility assessment and environmental assessments. ~~where possible.~~

CE CH7.13

Amend Objective TM37 in Section 7.7.2 Business Tourism on page 268 as follows:

To support the development of conferencing facilities ~~at~~ on appropriate sites ~~locations~~ in towns and villages as a means of attracting business and tourism subject to compliance with normal planning and environmental criteria.

CE CH7.14

Amend the first paragraph in Section 7.7.3 Creative Arts, Culture and Food Tourism on page 268 as follows:

Creative arts and culture is enjoyed by everyone, both residents and visitors, from visual arts, theatre, music and dance to opera and film. Creative arts and culture generates significant economic revenue for the county, both direct and indirect, and it provides a variety of employment opportunities. The development of this sector and associated venues and performance spaces will be encouraged and facilitated, where appropriate. The Council will encourage improvements to public realm spaces to consider the ability of these spaces to facilitate and accommodate stimulating new experiences e.g. festivals/performance spaces.

CE CH7.15

Add a new paragraph to Section 7.7.3 Creative Arts, Culture and Food Tourism on page 270 as follows:

Food and beverage consumption accounts for 35% of all international tourism revenues. The county's food and beverage offering has a significant role to play in developing tourism in the county and delivering great visitor experiences, increasing dwell time around the country and growing spend.

CE CH7.16

Amend Objective TM41 in Section 7.7.3 Creative Arts, Culture and Food Tourism on page 270 as follows:

To support and encourage the growth of Food Tourism in the county, and to consider the development of food tourism related activities such as local farmers markets, artisan food producers, craft breweries and distilleries and to facilitate the development of the Wexford Food Trail in conjunction with other branded trails. These developments will be directed to towns and villages and will only be considered in rural areas where they are tied to an existing premises and a rural based resource and where it is appropriate in scale to the rural location and subject to compliance with normal planning and environmental criteria. Where expansion is proposed to an industrial scale and/or the development is no longer considered appropriate in scale to its rural location, it will be directed to zoned land.

CE CH7.17

Amend Objective TM50 in Section 7.7 Tourism Accommodation on page 277 as follows:

To have regard to Fáilte Ireland's~~Registration and Renewal of Registration for Caravan and Camping Parks, 2009,~~ 'Registration and Renewal of Registration Regulations for Short Term Tourism Accommodation Rental' (Fáilte Ireland, 2018) and any future update of these guidelines, where considering planning applications for this type of development.

CE CH7.18

Amend first sentence in the second paragraph in Section 7.7.6 Tourist Infrastructure on page 280 as follows:

The provision of tourist orientation, signage and wayfinding infrastructure is important as it allows visitors to travel with ease between their destinations and to detour to points of interest along the way which will increase dwell time in the area.

CE CH7.19

Amend Objective TM58 in Section 7.7.6 Tourist Infrastructure on page 281 as follows:

To facilitate improvements to tourism infrastructure including proposals to improve car, bus and bicycle parking, proposals to provide electric car and bicycle charging infrastructure, directional signage/information boards and service/rest facilities designed in accordance with the principles of universal design subject to normal planning and environmental criteria and without detracting from the physical setting, character or visual quality of the tourism asset.

CE CH7.20

Amend Objective TM59 in Section 7.7.6 Tourist Information on page 281 as follows:

To facilitate the development of co-ordinated and branded orientation, signage ~~plans~~ and wayfinding infrastructure for tourist attractions and tourist facilities subject to compliance with normal planning environmental criteria.

Section 12 Submissions Relating to Chapter 8 Transportation Strategy

Relevant Submissions

WXF-C3-2 O'Connor

WXF-C3-3 Brannigan

WXF-C3-11 Quinn

WXF-C3-24 Environmental Protection Agency (EPA)

WXF-C3-25 An Post

WXF-C3-26 Clonattin Residents Association

WXF-C3-29 Wexford Healthy Committee

WXF-C3-33/65 Department of Transport (DoT)

WXF-C3-34 Transport Infrastructure Ireland (TII)

WXF-C3-37 McGuiness

WXF-C3-42 Denner

WXF-C3-48 Courtown Community Development

WXF-C3-55 Greenville Court Residents Group

WXF-C3-58 Redmond

WXF-C3-59 O'Brien

WXF-C3-62 Wexford Bicycle Users Group (WexBUG)

WXF-C3-63 Brannigan

WXF-C3-64 Construction Industry Federation (CIF)

WXF-C3-68 Roche

WXF-C3-70 Re-Imagining Enniscorthy

WXF-C3-71 Bolger

WXF-C3-75/79 Seal Rescue Ireland

WXF-C3-85 Wexford PPN)

WXF-C3-86 Gregg

WXF-C3-88 Dunbarr

WXF-C3-90 O'Shea

WXF-C3-91 Clohamon Development Group

WXF-C3-94 Wexford Environmental Network (WEN)

WXF-C3-96 Gas Networks Ireland (GNI)

WXF-C3-102 Crowe

WXF-C3-104 Slaney Foods

WXF-C3-105 National Transport Authority (NTA)

WXF-C3-106 Dowling

WXF-C3-107 Flood

WXF-C3-108 Carr and O'Connor

WXF-C3-109 3CEA

WXF-C3-111 Langrell

WXF-C3-115 Department of Education (DoE)

WXF-C3-118 Carr and Conroy

WXF-C3-119 Byrne

WXF-C3-121 O Mathúna

WXF-C3-126 Dowling

WXF-C3-127 South East on Track

WXF-C3-135 Electricity Supply Board (ESB)

WXF-C3-137 Southern Regional Authority (SRA)

WXF-C3-141 Tesco Ireland

WXF-C3-142 Health Service Executive (HSE)

WXF-C3-143 An Taisce

WXF-C3-145 Iarnród Eireann

WXF-C3-146 Wexford Greens

WXF-C3-147 Ó Conail

WXF-C3-151 Keep Ireland Open (KIO)

WXF-C3-164 Office of the Planning Regulator (OPR)

WXF-C3-166 Fáilte Ireland

Summary of Main Issues and Chief Executive's Response

Section 8.1 Introduction

A number of submissions expressed broad support for the overall content and aims of the transport chapter of the Draft Plan and its alignment with national and regional policy, including DoT(WXF-C3-33/65), Wexford PPN (WXF-C3-85), SRA (WXF-C3-137), HSE (WXF-C3-142), An Taisce (WXF-C3-143) and OPR (WXF-C3-164). The comments of the OPR and SRA and the associated responses and recommendations are included in Sections 2 and 3 of this report.

WEN (WXF-C3-94) suggest that the chapter be organised on a 'Connecting Wexford' basis rather than on a mode-by-mode basis.

Section 8.1 Introduction - Chief Executive's Response

The comments made are noted. Whilst the Chief Executive understands the rationale for the 'Connecting Wexford' idea, it is considered that the practicalities of implementing policy require a mode by mode layout to this chapter.

Section 8.2 Climate Change and Transportation

Reference is made in a number of submissions to the role that transport plays in greenhouse gas generation and how transport policy, particularly through the promotion of sustainable transport, can reduce such emissions (EPA WXF-C3-24, DTTS, WEN, South East on Track WXF-C3-127, and An Taisce WXF-C3-143).

The EPA and DoT refer to the 'Avoid-Shift-Improve' principle being applied in policy development, that is avoiding the extent of travel, shifting to sustainable means where possible and improving on emissions generation through new technologies. WexBUG (WXF-C3-62) comment that planning for active transport will enable people to cope better with the extreme weather incidents likely through climate change.

3CEA (WXF-C3-109) note that the Council's energy efficient street lighting programme is now nearing completion.

Section 8.2 Climate Change and Transportation - Chief Executive's Response

Chapter 2 Climate Action and Section 8.2 of this chapter includes reference to transport and climate change, including greenhouse gas generation and therefore it is considered that the Plan adequately addresses the issues raised.

In relation to the comments from the EPA and DoT, it is recommended that Objective TS02 be amended to refer to the 'Avoid-Shift-Improve' principle in climate action. Please see response to SRA Recommendation 29 Integration of Land Use and Transportation which deals with this issue and the associated proposed amendments (see Section 3 of this report).

The comments from 3CEA are noted.

8.3 Policy Context

In respect of emerging policy, DoT refer to an upcoming review of Government Departmental Investment priorities (an exercise formerly entitled as the Planning and Land Use Transportation Outlook) and comment that public consultation on a revised set of priorities to guide transport investment will commence shortly. DoT also comment that the Smarter Travel and National Cycle Policy Framework programme will be replaced by new sustainable mobility policies being developed currently. The 2020 Programme for Government, with its extensive commitments to sustainable transport, is referred to in submissions from WexBUG, An Taisce and Iarnród Eireann (WXF-C3-145).

8.3 Policy Context - Chief Executive's Response

It is recommended that Objective TS01 be amended having regard to the comments of DoT with regard to emerging policy and that reference is also made in Section 8.3.1 to the 2020 Programme for Government.

8.4 Sustainable Transport Strategy

The importance of the integration of planning and transport in national and regional policy is referred to in submissions from the EPA, DoT, NTA and An Taisce. NTA suggests that existing objectives in the Draft Plan in this regard be strengthened by reference to:

- The role of higher densities of development;
- Sequential development of residential lands prioritising sites accessible by sustainable transport, including infill and brownfield sites;
- Locating trip intensive development such as offices and retail in central locations accessible by sustainable transport;
- New employment and residential development be highly accessible and serviceable by sustainable transport;
- Optimisation of public transport potential in smaller rural towns;
- Maximum parking standards for non-residential development;
- Area wide caps on parking where the highest density of development occurs; and
- Maximising populations living within walking and cycling distances of shops, schools and services

A number of submissions refer positively to the Eastern Economic Corridor (EEC) concept and the role that sustainable transport, particularly rail, can play in its development (EMRA WXF-C3-19, SRA, Iarnród Eireann). TII (WXF-C3-34) request consultation on EEC strategy development with national roads implications.

The objective to prepare Local Transport Plans (LTP) is welcomed in a number of submissions (TII, NTA, and HSE) with TII and NTA requesting consultation on the preparation of such. WexBUG request that broader analysis of transport in the county outside of the main settlements be undertaken, that village growth should not be car dependent and that the LTPs for the main settlements give full consideration to the sustainable transport issues related to the hinterlands to the settlements.

The need for improvements in accessibility to sustainable transport for people with disabilities and older people is referred to by DoT, Wexford PPN, WEN and HSE. The importance of access to transport for all people including rural populations is referred to by DoT, Wexford PPN and NTA.

On the issue of permeability and connectivity in settlements (generally Objectives TS13, TS14, TS15, TS22 and TS23) WexBUG and the HSE refer positively to the concept and request that quality audits be undertaken. A number of submissions express concern that retrofitting links from established residential estates can give rise to security and place making concerns (Clonattin Residents Association (WXF-C3-26), O'Brien (WXF-C3-59), Crowe (WXF-C3-102), Dowling (WXF-C3-106), Flood (WXF-C3-107), Carr and O Connor (WXF-C3-108), Langrell (WXF-C3-111), Carr and Conroy (WXF-C3-118), Byrne (WXF-C3-119) and Dowling (WXF-C3-126).

Submissions from DoT, WEN and Wexford Greens refer to the growth of remote working and the impact of such on transport. WEN support the development of more remote working hubs in settlements to reduce demand for commuting. Re-Imagining Enniscorthy (WXF-C3-70) comment that such a hub should be established in the town.

The role that active transport can play in improving the health of communities is referred by Wexford Healthy Committee (WXF-C3-29), HSE, An Taisce and Wexford Greens (WXF-C3-146). The health benefits of facilitating and promoting access to existing and future employment locations by active transport (with related issues such as the provision of workplace showers and cycle parking) is referred to by the HSE.

HSE and Fáilte Ireland (WXF-C3-166) reference the important role that sustainable transport (public transport, active travel) can play in the development of the tourist economy of the county.

The role that all sustainable transport networks can play in the development of green infrastructure networks and creating opportunities for biodiversity is mentioned by the HSE and WEN.

A number of submissions query the lack of detail on sustainable transport infrastructure in the Draft Plan compared with the level of detail on the national roads proposals (WEN, An Taisce and Wexford Greens). Brannigan questions the allocation of funds to greenways in comparison with the cost of a Wexford-Castlebridge cycleway, and the cost of national road

schemes compared with that of improved rail infrastructure. The need for greater expenditure in sustainable transport is mentioned by HSE. Comments are made with regard to the economic, social and environmental benefits of walking and cycling (WexBUG and Wexford Greens).

WEN suggest that the Council should establish a Sustainable Transport Forum, with representation from stakeholders and lobby groups, to advise and guide policy, similar to that which has recently been established in Limerick.

Greenville Court Residents Association (WXF-C3-55) and An Taisce refer to the need for sustainable transport infrastructure (e.g. paths, cycleways, bus stops) to be constructed at an early stage in new developments.

On the modal share targets included in Section 8.4.4 with supporting Objective TS09 of the Draft Plan, NTA suggest that broader county-wide transport profiling should be undertaken to enable greater understanding of travel patterns and to inform future policy. The need for effective detailed on-going monitoring to assess on-going trends is referred to by NTA, HSE and An Taisce. A number of submissions (including WexBUG, Brannigan (WXF-C3-63), HSE and An Taisce) refer to the current high levels of car dependency and low numbers currently using active transport, particularly cycling, and suggest that the target modal share figures in the Plan are unambitious. WexBUG suggest cycling specific targets and SE on Track (WXF-C3-127) comment that the rail network has the potential to cater for a greater modal share if enhancements to infrastructure and services are made.

8.4 Sustainable Transport Strategy - Chief Executive's Response

With regard to the comments of NTA on the integration of planning and transport, the vast majority of the issues highlighted in their submission are already included in the relevant section of the Draft Plan (including this chapter, Chapter 5 Design and Placemaking in Towns and Villages and Chapter 6 Economic Development Strategy) but, as requested, it is recommended that Objective TS02 is amended to include reference to the key principles. Please see response to SRA Recommendation 29 Integration of Land Use and Transportation

in Section 3 of this report which deals with this issue and the associated proposed amendments.

Regarding the comments made on the EEC, it is recommended that Objectives TS04 and TS06 are amended to give greater reference to the role of rail in the development of the corridor and to refer to the corridor in the context of the Ten-T network. Please see response to SRA Recommendation 26 TEN-T Network and SRA Recommendation 27 Rail, in Section 3 of this report which deal with these issues and the associated proposed amendments.

Regarding the submissions made on Local Transport Plans (Section 8.4.3), it is not proposed to prepare LTPs for areas outside of the four main settlements however, it is agreed that LTPs should consider sustainable transport links with 'hinterland' settlements and amenities close to the main towns. It is recommended that Objectives TS08 and TS21 be amended to refer. Relevant stakeholders, including the NTA and TII, will be consulted on the preparation of LTPs as requested.

The comments made by DoT and HSE with regard to access to sustainable transport for all people in the county, including those living in rural areas, and for people with disabilities and older people are noted. Objectives TS11 and TS12 currently reference universal accessibility and the provision of sustainable transport in rural areas and no amendments are recommended to these objectives. Objective TS36 (as recommended to be amended) also references accessible bus shelters.

On the issue of enhancing permeability and connectivity through the development of open networks and formation of linkages, it is considered that the benefits of such, particularly in respect of making walking and cycling more convenient and safer, outweigh the perceived adverse impacts. Walking and cycling networks and permeability issues in the four main towns will be considered in detail in the LTPs.

Regarding the issue of remote working and transport, objectives within Chapter 9 Infrastructure Strategy support the development of effective ICT right across the county. A

new objective is recommended in Chapter 6 Economic Development Strategy supporting the development of remote working hubs in settlements and objectives in Chapter 3 Core Strategy (CS09) and Chapter 9 Infrastructure Strategy (TC04) are also proposed to be amended to refer.

The role of sustainable transport in tourism is already referenced in Objective TS30 in this chapter and also in Chapter 7 Tourism Development.

Green infrastructure issues are addressed in Chapter 11 Landscape and Green Infrastructure. A new objective with regard to biodiversity and roads schemes is recommended in the Roads section of this chapter.

Regarding the comparative costs of transport infrastructure and the level of detail for such in the Plan, it is noted that the Programme for Government proposes increases in spending on sustainable transport modes.

The suggestion of WEN that a Sustainable Transport Forum be established will be referred to the Strategic Policy Committee for consideration.

On the matter of the timing of construction of sustainable transport infrastructure, Section 3.1.2 of the Development Management Manual includes references to phasing.

Regarding modal share baseline figures please refer to the response to OPR Recommendation 8 - Sustainable Transport and Accessibility in Section 3 of this report which deals with this issue and the associated proposed amendments.

8.5 Walking and Cycling

WexBUG suggest that walking and cycling are distinct modes and that combining active transport modes in policy reduces the significance of both, and request that transport and leisure cycling be distinguished.

KIO (WXF-C3-151) and An Taisce comment that the Council should appoint Cycling and Walking officers.

On the issue of active travel networks and infrastructure for active travel, a range of comments have been made in submissions from WexBUG, Brannigan, Ó Mathúna (WXF-C3-121), An Taisce, HSE, Wexford Greens, Ó Conail (WXF-C3-147), NTA and Roche (WXF-C3-68) which are summarised below:

- Current infrastructure is inadequate;
- Full and early Rothar roads scoping, including network analysis/ design, should be undertaken;
- Cycling infrastructure should be included in the design upgrade of all streets and roads, with a design hierarchy which favours cycling and walking;
- Segregation of cycling infrastructure is necessary to achieve wider cycling take up, line painting on roads is not sufficient;
- Cycling and walking infrastructure should provide links between settlements, and link to greenways and walking routes;
- The Council should work with NTA and source the expertise necessary to develop the right infrastructure, including solutions to awkward issues;
- Shared walking/cycling infrastructure is not ideal when there are likely to be large numbers of pedestrians;
- Trialling infrastructure can enable assessment of its effectiveness;
- A segregated Castlebridge – Wexford cycle route is necessary and is achievable
- The Programme for Government gives significant commitments for cycling and walking infrastructure spend (10% walking 10% cycling);
- Flood defence infrastructure could be used for active travel use; and
- Cycle parking should be effectively accommodated into the public realm and should be provided outside all public buildings. The Dun Laoghaire-Rathdown Standards for Cycle Parking is referenced as good practice.

Ó Conail comments on the need for improved pedestrian links in all areas, including employment areas and that the use of more crosswalks should be considered. Re-Imagining

Enniscorthy, O Shea (WXF-C3-90) and Dunbarr (WXF-C3-88) make a number of detailed points regarding the pedestrian and cycling experience in Enniscorthy with the former suggesting better cycling and walking linkages to areas and amenities outside of the town.

Courtown Community Development (WXF-C3-48) comment that a Courtown-Gorey cycleway/greenway would be of great benefit to the residents of both settlements. Brannigan (WXF-C3-3), SE on Track and Re-Imagining Enniscorthy express support for a greenway on the disused New Ross – Macmine line.

WexBUG, An Taisce and Wexford Greens comment that more effort is necessary to encourage more cycling to school and that community supporting cycling initiatives should be encouraged.

NTA comment that Travel plans should be required for all schools and employment developments. Wexford Greens suggest that Mobility Plans are prepared for all employment uses.

8.5 Walking and Cycling - Chief Executive's Response

This section of the Draft Plan (and other chapters including Chapter 7 Tourism Development and Recreation and Chapter 14 Recreation and Open Space Strategy) currently sets out how the Council intends to promote and facilitate cycling and walking in the county as 'everyday' transport modes and as leisure/tourist pursuits. The Draft Plan includes objectives to develop cycling and walking infrastructure during the life of this Plan, subject to available funding support from Government. It is not considered that cycling and walking issues are diminished by their shared inclusion in this section and many of the overall issues affecting both active travel modes are similar.

With regard to the appointment of walking and cycling officers, this is outside the remit of the County Development Plan.

The detailed submissions made with regard to walking and cycling infrastructure are noted and Objectives TS21 – TS26 currently address many of the issues raised. Notwithstanding

this, it is recommended that Objectives TS21, TS22, TS24, TS25 and TS26 are amended to give greater reference to:

- Segregation of cycling infrastructure, where possible;
- Possible future walking and cycling infrastructure in rural areas to link settlements and link settlements to tourism amenities and other trip generators;
- The potential for using flood defence infrastructure for walking and cycling;
- Trials of infrastructure;
- Prioritising walkers and cyclists in works to existing roads and streets.

The LTPs for the LAPs will seek to provide for improvements to walking and cycling infrastructure, including cycle parking, in the main towns. Section 6.4 of Volume2 Development Management Manual relates to cycling infrastructure including bicycle parking.

In relation to improved pedestrian links to employment lands, crosswalks and the specific recommendations regarding Enniscorthy these matters will be considered during the preparation of the LAPs.

Whilst there are no current proposals for such, Objective TS26 (as recommended to be amended) would allow for future consideration of a Courtown-Gorey cycleway/greenway. Objective TS21 (as proposed to be amended) will also require Local Transport Plans to consider walking and cycling networks in the four main towns with linkages to the towns from their surrounding hinterlands.

Similarly, the development of a greenway on the old New Ross – Macmine rail line would not be precluded by the objectives in the Plan. In addition to Objectives TS26 and TS21 in this chapter, Objective ROS41 in Chapter 14 Recreation and Open Space Strategy states that the Council will “support investment in the development of walking and cycling facilities and greenways and to explore the potential to develop greenway corridor linkages between settlements to create interregional greenways.”

In response the submissions from WexBUG, An Taisce and Wexford Greens it is recommended that a new objective be included relating to cycling and walking initiatives led by schools and community groups.

Objectives TS25 (as proposed to be amended) and Section 6.2.4 of Volume 2 Development Management Manual address requirements for school and workplace travel plans.

Section 8.6 Public Transport

The HSE comment that improving the customer experience is important in encouraging sustainable transport choices and this could include initiatives such as integrated ticketing, quality bus corridors, real time travel information and bike rental at public transport stops and tourist destinations areas.

The need for improved public transport in Enniscorthy is highlighted by the HSE, Re-Imagining Enniscorthy and O'Shea (WXF-C3-90).

Iarnród Eireann (IE) comment that the Plan represents an opportunity to develop a sustainable transport system for the county. IE note that the EEC concept and development of Rosslare Europort are key elements of the RSES. Improvements to rail services will support the settlement strategy and the development of the EEC.

The IE plan for the Rosslare to Dublin line is to increase services towards a two-hourly all-day pattern, subject to demand levels. This will be dependent on the implementation of the DART+ programme and the facilitation of an efficient interchange with DART services at Greystones station. Commuter services from Gorey Town will benefit from the increased number of Intercity services planned on the Dublin-Rosslare route and IE plan to increase outer commuter services from Gorey to Dublin to every 20 minutes in peak periods and half hourly at off-peak times, subject to demand levels, via the Greystones interchange.

IE comment that coastal erosion is having and will continue to have significant impacts on the future of the Dublin- Rosslare line. At current rates of erosion, it is estimated that the Rosslare Line could be severed at certain locations within the next five years. IE have

prepared an alleviation programme which is currently under detailed Government Cost Benefit Analysis. IE welcome the continued engagement of Wexford County Council in the implementation of a long term strategy to address coastal erosion between Rosslare Strand and Rosslare Europort.

IE seek continued delineation measures to the railway line along the Wexford quays.
IE comment that while it is engaged with the Council in facilitating studies to assess the possibility of the use of the Rosslare Strand to Waterford [Belview Port] railway as a greenway, this is still subject to the approval of the Boards of IE and CIÉ.

With regard to the proposed Wexford Town to Rosslare Greenway via the South Slobs, IE comment that it must not utilise any level crossings and that any crossing of the railway by a Greenway must be by means of a bridge and that the development of this Greenway can only take place with the consent of the landowners in the South Slobs. The Commissioners for the South Slobs (of which IE is a constituent part) have legal obligations to protect the South Slobs and must be consulted on any plans for a greenway in this area. Any development of a greenway parallel to the Rosslare Strand to Rosslare Europort rail line shall not interfere with railway services.

Support for more investment in rail transport is expressed in submissions from Brannigan (WXF-C3-3), Quinn (WXF-C3-11), SE on Track, HSE, An Taisce and Ó Conail.

With regard to the Dublin – Rosslare Europort line submissions from Brannigan and SE on Track refer to:

- The sustainable transport potential on the line for commuters and students;
- How journey and departure times influence usage;
- The need to avoid the need to transfer at Greystones;
- The need to engage with IE and NTA to improve services and how better rolling stock, passing loops and crossing closures in the Dublin area could significantly enhance journey times;

- The potential advantages to Wexford of an extended Luas service between Sandyford and Bray; and
- The possibility of a train stop to serve the Trinity Wharf development;

With regard to the disused Rosslare – Waterford line, a number of submissions (Quinn, Brannigan, South East on Track, An Taisce, Wexford Greens, Ó'Conail) refer to the benefits of reintroducing rail services on this line, notwithstanding the current proposal for a greenway. A number of submissions note that there is RSES support for this. SE on Track comment that the scheme could be redesigned to allow an operable rail line and greenway to exist concurrently, and the line has the potential to link the Europort to the rest of the southern region, particularly with the Waterford city region which is proposed for growth. Wexford Greens comment that the Barrow Bridge could be shared between sustainable transport modes. It is also commented by SE on Track that re-use of the Killinick loop could facilitate rail services between Wexford and Waterford on this line.

HSE and SE on Track mention the potential for rail freight on the Dublin – Rosslare Europort and Rosslare – Waterford lines, with the latter linking to Limerick.

NTA and DoT refer to the potential of bus services to provide sustainable transport for the county, having regard to its large rural population, and request that greater prominence be given to the development of the Local Link service. The importance of access to bus services for people with disabilities and the National Disability Inclusion Strategy is referred to by DoT.

WEN suggest that pollinator friendly bus shelters could be used.

8.6 Public Transport Chief Executive's Response

With regard to the comments of the HSE on the customer experience of public transport it is considered that Objective TS30 currently sets out the Council's support for such and no amendments are recommended.

Public transport within Enniscorthy Town will be examined through the forthcoming LTP.

With regard to the Dublin- Rosslare Europort line the comments of IE are noted and welcomed, particularly with regard to aspirations to improve the Dublin-Rosslare Harbour service. These aspirations are included within the recently published Iarnród Eireann Strategy 2027, but it is noted however that no timescales are given for service enhancements. Regarding passenger transfers to/from the Dart service at Greystones, the comments of SE On Track and Brannigan are also noted. It is the case currently however, that the intercity services significantly reduce in speed between Dublin city centre and Greystones and this adds significantly to overall journeys times. Transfers to improved Dart services at Greystones may be justified for reductions in overall journey times and a greater frequency of service from the County, particularly if such transfers are timely and convenient but in the longer term an efficient service from the Europort to Dublin over connect the EEC would be appropriate. An extension of the Luas services to Greystones from Sandyford would also be welcomed.

On the issue of coastal erosion, the Council will continue to work with IE on works to address possible damage to the railway. Objective TS34 currently refers to this.

The comments made with regard to the possibility of reintroduced rail services on the Rosslare – Waterford line are noted. The Council have been planning the development of a greenway on this route. The greenway would not physically prevent the re-opening of the line at a later stage. The Government recently announced that the Wexford-Waterford rail link will be included in the upcoming all-island Strategic Rail Review and the Council has suspended the development project pending the outcome of this review. The optimal solution, which would achieve the aims of sustainable travel and tourism/economic development and amenity and health would be for a development which would allow for the development of the greenway alongside the existing track. The Council would support such an approach subject to funding being made available by central government. It is therefore recommended that a new objective be included to explicitly state this and to seek the necessary funding. It is also recommended that Figure 8-1 Strategic Transport Network is amended to show the disused railway line and potential greenway.

On the issue of a possible new train stop at Trinity Wharf, while this is not currently part of the proposal for the site, Objective TS30 of the Draft Plan would support the creation of new train stops and the Wexford Town LTP can address the matter in more detail. With regard to the delineation of the line at Wexford Quays, the Council will continue to work with IE on matters of public safety and enhancement to the public realm.

The comments with regard to rail freight are noted and it is recommended that Objective TS35 be amended and a new Ports objective included to give greater reference to rail freight facilities at Rosslare Europort. Please see response to SRA Recommendation 30 Rail Freight in Section 3 of this report which deals with this issue and the associated proposed amendments.

With to regard to rural bus services, particularly those provided through the Local Link service, the comments of NTA and DoT are noted. Section 8.6.2 and Objective TS32 in this chapter currently reference this.

It is recommended that Objective TS36 be amended to require bus shelters to be fully accessible and to support pollinator friendly designs.

Section 8.7 Roads

On the issue of car parking, NTA suggest that in locations with a high density of development, area wide parking caps should be applied. Support for traffic free zones is expressed by Wexford Greens. Landscaping of car parks to better manage surface water is suggested by HSE.

ESB (WXF-C3-135) comment that they are rolling out high power charging hubs around the national roads network across the country and that in order to meet Government targets for EV roll out and infrastructure, higher targets for EV provision in car parks than the 20% proposed in Objective TS44 should be considered. WEN comments that EV infrastructure should be provided at tourism destinations.

3CEA (WXF-C3-109) comment that greater reference should be made to energy sources other than EV.

GNI (WXF-C3-96) welcome references to CNG and requests that greater reference is made to the advantages of CNG, particularly for haulage. They request that a new objective be added which specifically adopts a presumption in favour of applications for CNG refuelling infrastructure, provided planning and environmental criteria are satisfied. WEN comment that CNG, being fossil-derived, should not be considered as a sustainable fuel source. The role that locally sourced biodiesel could play in reducing emissions is referred to by O'Conail.

WEN and Ó Conail comment that the Council's vehicle fleet should use low emission fuel sources including electricity and locally sourced biofuel. Redmond (WXF-C3-58) refers to the need for regular hedge trimming to improve safety for all users of the roads network, including cyclists.

Tesco Ireland (WXF-C3-141) comment that retail layouts should facilitate single deliveries by larger vehicles rather than requiring multiple deliveries by smaller vehicles. An Post (WXF-C3-25) comment that flexibility is need for parking and delivery requirement at their premises due to the nature of their business.

Seal Rescue Ireland (WXF-C3-75/79), WEN and HSE suggest that the roads network, including national roads, has potential to be used as green infrastructure corridors and that all new road projects include for wildlife connections (wildlife tunnels, wildlife bridges).

DoE (WXF-C3-115) comment that an inner orbital route objective in the Wexford Town and Environs Development Plan 2009 may not be compatible with the development of new schools on lands at Clonard Little and Gregg (WXF-C3-86) also expresses concern over the route.

McGuiness (WXF-C3-37) refers to the need for a lower speed limit in Oulart village and submissions from Denner (WXF-C3-42) and Bolger (WXF-C3-71) refer to the poor condition of roads at Ballymaclane/Tomhaggard and Marshalstown respectively.

Section 8.7 Roads Chief Executive's Response

The use of area wide parking caps as suggested by NTA and traffic free zones as supported by Wexford Greens can be explored through the LTPs for the main settlements and also may be considered through the recently announced Decarbonisation Zones project. Objective TS40 of the Draft Plan currently refers to these issues and no amendments are recommended. Surface water management as raised by HSE is addressed in the Infrastructure chapter.

Regarding the comments of ESB with regard to EV infrastructure in car parks, no amendments are recommended to Objective TS44, as the objective requires that the necessary infrastructure be constructed to facilitate more than 20% of spaces with EV charge points. In response to the comment of WEN, it is recommended that Objective TS43 be amended to refer to the provision of EV infrastructure at tourism sites. An amendment is also proposed to Objective TM58 in Chapter 7 Tourism Development Strategy in this regard.

With regard to the future use of CNG, the Council is aware of the need to step down from fossil fuel use, with the view in the long to term replace its use and will have regard to current and future Government policy on such. Further detail in this regard in included in the submission responses under Chapter 2 Climate Action and Chapter 9 Infrastructure Strategy. It is recommended that Objective TS45 be amended slightly to refer to a wider range of fuels.

The submissions made with regard to the Council's own vehicle fleet are addressed in Chapter 2 Climate action. The use of pesticides is addressed in Chapter 13 Heritage and Conservation.

The comments of Tesco and An Post are noted. No changes are proposed to Objective TS42 which allows for the balance of issues to be considered in the assessment of servicing and delivery proposals on a site- and use-specific basis.

Regarding biodiversity and the roads network, it is recommended that a new objective be included in this section referring to such.

Issues relating to the Wexford town orbital road will be addressed in the forthcoming LTP and LAP for the town.

The area specific comments on the roads network are not considered to be strategic issues which this Plan can address.

Section 8.7.1 National Roads

TII comment that safeguarding the strategic function of the national road network will be a critical component to any EEC strategy and the TII would welcome consultation on the preparation of future EEC strategy. The TII would also welcome consultation on the preparation of future LTPs and LAPs.

TII comment on issues including:

- The requirement to maintain the strategic function, capacity and safety of the existing national roads network;
- Development and land use zonings at national road interchanges and junctions
- Cross referencing specific types of development with national roads objectives; and
- The requirement for changes to Objective TS59 with regard to the exceptional circumstances under which accesses are allowed onto national roads.

In relation to National Road Schemes, the TII is collaborating with the Council in progressing the N11/N25 Oilgate to Rosslare and the N25 Rosslare Europort Access Road in accordance with National Development Plan investment commitments. The TII welcomes reference to the schemes in the chapter and Objectives TS52 and TS55. TII state that the Council will be

aware that the implementation of all national road schemes is subject to budgetary constraints and is subject to prioritisation and adequacy of the funding resource available to the Authority. In these circumstances and taking account of the Exchequer financial position and levels of funding available to the Authority, the relative priority or timeframe for national road schemes may be subject to alteration. On such basis, Objective TS57, which sets out the requirement to safeguard routes and schemes during the design and planning process is welcomed.

TII priorities also include the maintenance of the existing national road network, including junctions, and safeguarding the Exchequer investment in national roads to date. Any additional improvements relating to national roads identified at a local level should be done so in consultation with and subject to the agreement of TII and the Council will note that the TII may not be responsible for the funding of any such schemes or improvements. While proposals should be developed complementary to safeguarding the strategic function of the national road network, proposals impacting on the national road network (including those proposals in the Bunclody and Rosslare Harbour and Kilrane Settlement Plans) should be developed in consultation with and subject to the agreement of TII.

TII would welcome a new objective which safeguards the capacity and efficiency of the national road network drainage regimes.

With regard to Grid connection infrastructure, TII would welcome a new objective which states that it should be demonstrated that an assessment of all alternative grid connection routing options have been undertaken prior to any proposals being brought forward for grid connection routing utilising the national road network, having regard to the technical road safety issues such as differential settlement and increased costs of general maintenance and safety works which can arise from such works.

TII would welcome incorporation of references to 'The Treatment of Transition Zones to Towns and Villages on National Roads' document where relevant throughout the Plan, in order that it be considered as well as DMURS in instances where national roads continue to pass through town and village locations.

TII welcome Objective TS49 with regard to noise mitigation and comment that noise mitigation proposals should be included in planning applications for noise sensitive use in proximity to existing or proposed national roads. They also state that the costs of mitigation measures which may be sought further to Objectives TS49, TS74 and TS75 with regard to noise and safety should be funded by the developer/applicant.

An Taisce comment that expenditure on the proposed national road schemes could be reduced if a less expensive scheme was proposed. Wexford Greens comment that making all national roads dual-carriageways is not necessary.

Clohamon Development Group (WXF-C3-91) and Slaney Foods (WXF-C3-104) comment that safety at the N80 /Clohamon junction would be improved with street lighting and a reduced speed limit.

Section 8.7.1 National Roads Chief Executive's Response

The detailed submission from TII is noted and welcomed. The Council will consult with the TII in the preparation of future EEC strategy and LAPs and LTPs.

In response to the comments made by TII regarding: the inclusion of an objective to safeguard National Roads in the Core Strategy; to cross reference National Roads Objectives with objectives in Chapters 4 Sustainable Housing, Chapter 6 Economic Development and Chapter 7 Tourism Development, to amend Objective TS59 Categories 1 and 4; and to include an objective to protect national road junctions, please see response to OPR Recommendation No. 9 in Section 2 of this report which deals with these issues and the associated proposed amendments.

The Chief Executive notes the TII's support for Objectives TS52, TS55 and TS57 and no changes to these objectives are recommended. It is recommended that Section 8.7.1.1 is updated to refer to the current status of the N25 Rosslare Harbour access road scheme. In this regard, following the completion of Phase 2 (Option Selection), the Council and TII have confirmed the preferred scheme option for the route. The Preferred Scheme Option will now proceed to the next phase of the project, which is Design and Environmental

Evaluation, during which it will be further developed to refine the design of the road alignment, junctions, accesses and structures. The environmental evaluation of the scheme will be progressed in tandem with design development, with both elements of the process influencing each other. It is recommended that the text of Section 8.7.1.1 is amended to reflect this with Figure 8.2 replaced by a new map showing the Preferred Scheme Option.

New objectives are recommended with regard to safeguarding national road network drainage regimes and in relation to grid connection and other infrastructure beside all roads.

Regarding TII document 'The Treatment of Transition Zones to Towns and Villages on National Roads' Objective TS60 in this chapter currently references this document. It is also proposed to reference this document in Chapter 5 Design and Place Making in Towns and Villages.

In relation to noise and safety mitigation it is recommended that Objectives TS74 and TS75 are amended to refer to the cost being borne by the applicant/developer. It is not recommended that objective TS49 be amended as noise mitigation measures are provided by developers.

The comments of An Taisce and Wexford Greens on the design and costs of funding for the national roads are noted. The design of the N11/N25 schemes will be subject to a detailed planning and environmental assessment process and decisions on funding for the scheme will be made having regard all the appropriate alternative scenarios.

The comments made by Slaney Meats and Clohamon Development Group regarding the N80 junction at Clohamon cannot be addressed in this Plan but the comments will be forwarded to the Roads Department.

Section 8.6.1 Regional Roads

While not arising out of a submission it is recommended that the wording of Section 8.7.2 including Table 8-5 and Objectives TS65 and TS66 (and Section 6.2.6 Development

Management Manual) are amended so as they are aligned with changes to sightlines in Volume 2 Development Management Manual made by Council Members at Draft Plan stage (decision to retain the sightline distances from the 2013-2019 Plan). In this regard, it is recommended that roads are categorised as Class 1 and Class 2 (and not by traffic volume and speed) to align with the sightline classes. It is further recommended that the R714 Mountgarrett Bridge to Corcoran's Cross Roads is moved from Class 2 to Class 1 as it is a former national road and should have been in the category.

Section 8.11 Ports

IE state that Rosslare Europort's role is likely to become increasingly important to the Irish economy. IE have prepared a Masterplan to steer investment at the Port to expand the current key areas of RORO freight and passenger transport and to facilitate new border inspection requirements. The Masterplan, together with initiatives under the strategic plan for the port, will see over €30 million invested by IE in Rosslare Europort over the next five years. IE note the other investments taking place including the N25 Rosslare Europort Access Road and development of the Rosslare Europort Business Park.

IE welcome the Plan's commitments to support the further development of Rosslare Europort to increase capacity including measures to extend existing berths and to provide additional berths and support industrial development that requires the bulk transfer of materials or finished products adjacent to or within the environs of the county's ports.

IE welcome objectives which encourage the development of associated infrastructure including access, wastewater treatment, communications and power to ensure the growth of the county's ports and fishing ports; safeguard access to Rosslare Europort, harbours and navigation channels in the coastal zone and maritime area; and safeguard ports and harbours from inappropriate development that would compromise current activities or the future expansion.

IE welcome the inclusion of both the N25 Rosslare Europort Access Road and the N11/N25 Oilgate to Rosslare Harbour national Road Schemes, along with related objectives and

comment that these road schemes are essential for the future development of the port and the region.

In relation to the Offshore Wind Sector, IE welcome the Plan's objectives to support the development of Ireland's offshore renewable energy potential. Development proposals are currently being prepared by IE to allow Rosslare Europort to serve this industry in the coming years.

IE welcomes the inclusion of the Rosslare Harbour and Kilrane Settlement Plan, and in particular reference Objectives RHK29-RHK31, RHK33-RHK36, RHK38-RHK46 and RHK48-RHK53 which are supportive of the proposed developments included in the Port Masterplan.

IE notes the Council's support for the provision of rail freight services and facilities at Rosslare Europort to support sustainable increases in port operations. The installation of rail freight infrastructure at Rosslare Europort to support rail freight services is not an immediate objective of IE, but the consideration of sustainable rail freight capability at the port could form a longer-term objective if economically viable.

The HSE support rail freight at ports and comment that linkages to other ports around Ireland will be important.

CIF (WXF-C3-64) support Tier 1 status for the port.

Ó Conail welcomes the support in the Plan for New Ross port. O'Connor (WXF-C3-2) suggests that current port related activities should be further directed downstream and that Stafford's docks should be repurposed for tourism/leisure uses.

Section 8.11 Ports Chief Executive's Response

With regard to Rosslare Europort the comments made are noted. Planning permission was granted in August 2020 for significant internal access and other development at the port. The Plan and the RSES support the upgrade of the port to Tier 1 status.

Please see SRA Recommendation No. 30 in Section 3 of this report which deals with the issue of rail freight and the associated proposed amendments.

The comments made by Ó Conail and O'Connor with regard to New Ross port are noted and can be addressed in the future New Ross Town LAP.

Section 8.12 Aviation

An Taisce comment that aviation growth is not compatible with current European climate commitments.

Section 8.12 Aviation Chief Executive's Response

The comments of An Taisce are noted. The RSES contains objectives (RPO139, RPO150, Waterford MASP Objective 16) which relate to the Waterford airport and lower carbon generating growth is supported.

Chief Executive's Recommendations

CE CH8.1

Insert a new paragraph into 8.3.1 National Transport Policy and Guidelines after the 2nd paragraph on page 287 as follows:

The Programme for Government 2020 contains extensive commitments in support of sustainable transport.

CE CH8.2

Amend Figure 8-1 Strategic Transport Network on page 290 to show the disused railway line and potential greenway.

CE CH8.3

Amend Objective TS01 in Strategic Transport Objectives on page 295 as follows:

To implement the principles and objectives of Smarter Travel – A Sustainable Transport Future: A New Transport Policy for Ireland 2009-2020 (Department of Transport, 2009)The

Design Manual for Urban Roads and Street (Department of Transport, Tourism and Sport, Department of the Environment Community and Local Government, 2013 and 2019), Spatial Planning and National Roads, Guidelines for Planning Authorities (Department of Environment, Community and Local Government, 2012) and emerging Government Sustainable Mobility Policy and the other guidance listed in Section 8.3 above and any updated version of these documents.

CE CH8.4

Amend Objective TS08 in Strategic Transport Objectives on page 296 as follows:

To prepare Local Transport Plans in accordance with the Area Based Transport Assessment Guidelines (~~TII~~ Transport Infrastructure Ireland, 2018) for Wexford, Gorey, Enniscorthy and New Ross towns and their hinterlands.

CE CH8.5

Amend Objective TS16 in Strategic Transport Objectives on page 298 as follows:

To ensure that all urban roads and streets in our towns and villages, including residential streets and housing estates, are designed in accordance with the principles, approaches and standards set out in the 'Design Manual for Urban Roads and Streets' (2013/2019) and any updated version of the Manual, and the TII document 'Treatment of Transition Zones to Towns and Villages on National Roads' where relevant in order to:

- provide safe and convenient infrastructure for walking and cycling.
- ensure that all streets and route networks are designed to balance the needs of place and movement.
- ensure that roads and streets, including their landscaping, street furniture and lighting, function as attractive, fully accessible and safe places,
- passively calm traffic through the creation of self-regulating street environments, particularly in sensitive areas and where vulnerable users are present and to impose speed limits which are reflective of the context and function of the road.
- create roads and street networks which are easily permeable by active travel modes and to support appropriately designed and safe measures which improve the permeability of existing street layouts.

- facilitate accessible, convenient, attractive and user friendly public transport infrastructure in appropriate locations.
- ensure that roads and streets and cycling and walking networks can adapt to climate change and as appropriate can accommodate green infrastructure and biodiversity networks.

Where possible retrofitting modifications of existing roads and streets shall be undertaken to achieve the goals of this objective.

CE CH8.6

Amend Objective TS21 in Section 8.5 Walking and Cycling on page 301 as follows:

To implement the Core and Settlement strategies of this Plan to encourage population growth in towns and villages where people can more easily undertake journeys on foot or by cycle. Within towns and villages, residential and other developments will be encouraged at appropriate locations and at the appropriate density to facilitate walking and cycling. Local transport plans will inform decision making on land use zoning, walking and cycling networks and the provision of walking and cycling infrastructure in the four main towns and linkages to the towns from their hinterlands.

CE CH8.7

Amend Objective TS22 in Section 8.5 Walking and Cycling on page 301 as follows:

The design of new developments, streets and street networks shall be in accordance with DMURS~~,~~ and the TII document 'Treatment of Transition Zones to Towns and Villages on National Roads' where relevant and shall recognise the importance of assigning higher priority to pedestrians and cyclists and ensure that they are fully permeable by pedestrians and cyclists. Where practical, new developments should integrate fully with existing roads and streets to facilitate permeability. Proposed modifications to existing roads and streets shall also have regard to these guidance documents. ~~They~~ Scheme designs shall also have regard to the Permeability Best Practice Guides (NTA, 2015), other Government guidance and advice as may be updated, Chapter 5 of this Plan and the development management guidance in Volume 2.

CE CH8.8

Amend Objective TS24 in Section 8.5 Walking and Cycling on page 302 as follows:

To maintain, improve and provide appropriately designed and universally accessible infrastructure for walking and cycling in urban and rural areas of the county as resources allow (including footpaths, cycle paths, pedestrian crossings, dropped kerbs, road surfaces, cycle parking, junction designs, and street lighting. Cycleways shall be segregated where possible. (and as a As far as reasonably possible, the design of future roundabouts will be 'Dutch style' roundabouts with priority cycle lanes and pedestrian ways). In undertaking and to undertake traffic management schemes the Council will ensure that they which facilitate convenient, pleasant and safe cycling and walking in towns, villages and rural areas. Trials may be undertaken to establish the practicalities of new infrastructure and modifications to roads and streets.

CE CH8.9

Amend Objective TS25 in Section 8.5 Walking and Cycling on page 302 as follows:

To require Travel Plans for workplaces and schools in accordance with Section 6.2.4 of Volume 2 Development Management Manual new employment uses, which will result in significant trip generation, to provide a plan to promote and facilitate safe and convenient access by walking and cycling and to work and engage with existing employers who are significant trip generators to the same end.

CE CH8.10

Amend Objective TS26 in Section 8.5 Walking and Cycling on page 302 as follows:

To provide amenity and tourism related cycling and walking routes as resources allow within and between settlements, and between settlements and rural trip generators (including places of employment, sports facilities, tourism assets including greenways and other amenities). The Council will provide a cycle way between County Wicklow, Gorey, Camolin, Ferns and Enniscorthy, with a view to extending this cycleway towards Rosslare Europort and New Ross, including a strategic cycle way between County Wicklow, Gorey, Camolin, Ferns and Enniscorthy with a view to extending this cycle way to Rosslare Europort and New Ross and walking trails to key tourism assets and amenities as resources allow, The provision of such cycling and walking routes shall be subject to the protection of habitats,

environment, amenity and heritage~~. Any such proposal will be subject to~~ and Appropriate Assessment in accordance with the requirement of the EU Habitats Directive to ensure the protection and preservation of all designated SACs and SPAs. Green infrastructure and sustainable drainage shall be designed into such routes where possible.

CE CH8.11

Insert a new Walking and Cycling Objective on page 302 as follows:

To support the work of schools and community groups in the development of initiatives which facilitate and encourage walking and cycling.

CE CH8.12

Amend Objective TS36 in Public Transport Objectives on page 308 as follows:

To promote and facilitate the provision of bus passenger waiting facilities including the provision of accessible and age-friendly bus shelters. The use of pollinator-friendly bus shelters will be encouraged.

CE CH8.13

Insert a new Public Transport Objective on page 308 as follows:

To examine the feasibility of reopening the disused Rosslare Europort to Waterford Railway as a sustainable transport corridor which would accommodate a reopened passenger and freight line and a greenway for active travel and amenity use. The Council will seek appropriate funding to facilitate the development of this important corridor between Rosslare Europort and Belview and Waterford MASP.

CE CH8.14

Amend Objective TS43 in General Roads Objectives on page 311 as follows:

To require the provision of electricity charging infrastructure for electric vehicles in new developments and on existing streets and to facilitate charging infrastructure on existing roads and streets, buildings, ~~and~~ car-parks and at tourism sites in positions which give due consideration to other users of pavements and roads.

CE CH8.15

Amend Objective TS45 in General Roads Objectives on page 312 as follows:

To facilitate the development of infrastructure for the full range of sustainable alternative fuels at existing service stations and other locations subject to fire safety standards and normal planning and environmental considerations.

CE CH8.16

Insert a new General Roads Objective on page 313 as follows:

To encourage the use of road corridors, including national road corridors as green infrastructure networks and to encourage roads infrastructure design which maximises opportunities for biodiversity.

CE CH8.17

Insert a new General Roads Objective on page 313 as follows:

To allow the use of road networks, including national roads, for grid connection and other non-roads related infrastructure only when it has been demonstrated that the infrastructure would not adversely impact upon the structures, maintenance and safety of the road.

CE CH8.18

Amend second paragraph under N25 Rosslare Europort Access Road on page 314 as follows:

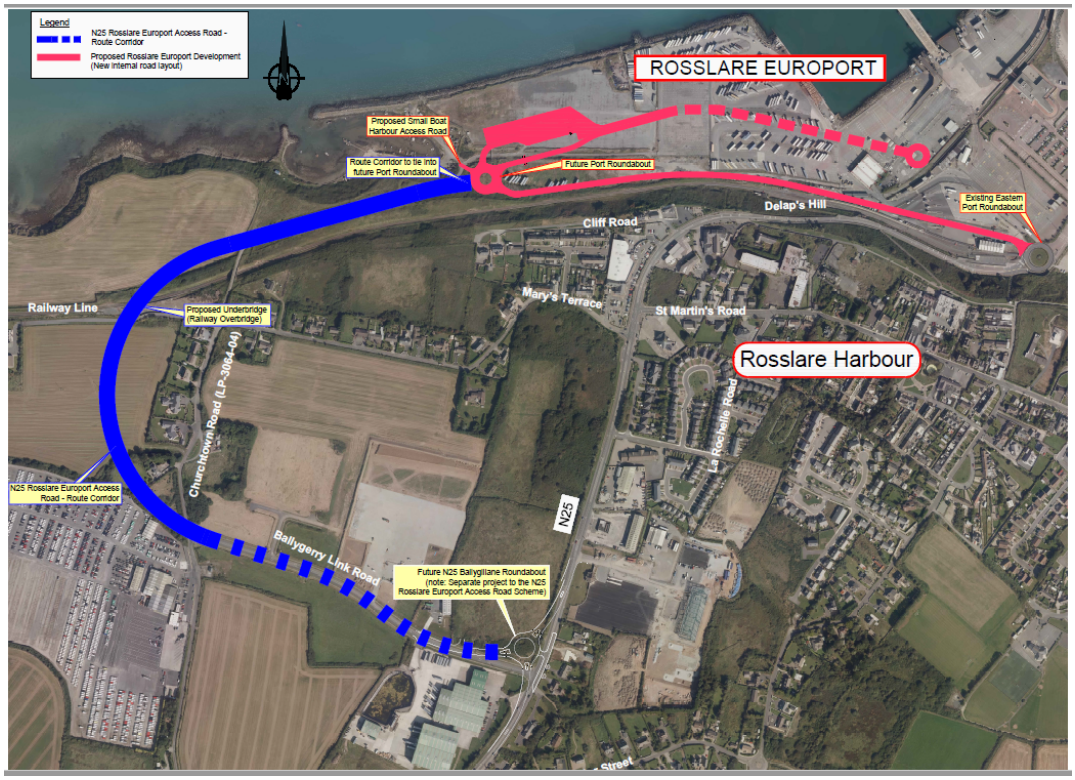
~~This element is currently progressing through Phase 2 (Option Selection see map 8.4) which entails the identification and examination of scheme options to determine the best option for its development~~. Following the completion of Phase 2 (Option Selection), the Council and TII have confirmed the preferred scheme option for the route. The chosen option is the construction of a new offline access road to the port and is shown in Figure 8.2. The design and environmental assessment of the proposed scheme will proceed next, and it is anticipated that the project could proceed through the statutory planning processes by 2022. Separately, the 'N25 Ballygillane Roundabout' scheme received Part 8 Planning approval in January 2020. That project will provide a roundabout on the N25 at its junction

with the L7021 Link Road. The N25 Rosslare Europort Access Road project will be developed to fully integrate with the approved N25 Ballygillane Roundabout scheme.

CE CH8.19

Replace Figure 8.2 on page 315 with the following map:

Figure 8.2 Preferred Scheme Option



CE CH8.20

Insert a new National Roads Objective on page 322 as follows:

<u>The Council will safeguard the capacity and efficiency of national road network drainage schemes.</u>

CE CH8.21

Amend paragraph 4 of Section 8.7.2 Regional Roads on page 322 as follows:

The assessment of planning applications for new or materially intensified access points to regional roads with speed limits of greater than 60 kph will have regard to the speed limit in place on that road and the volume of traffic which that road carries. ~~Regional roads generally have maximum speed limits of 80 kph, with some sections notably on the former~~

~~regional roads as by-passed by new national roads retaining a speed limit of 100 kmh. The regional roads in the county also have greater and lower traffic levels.~~

CE CH8.22

Insert a new paragraph after paragraph 1 and before Table 8-5 on page 323 as follows:

Table 8-5 identifies and categorises the regional roads and Objectives TS65 and TS66 set out the criteria to be addressed for each category. These objectives implement a stricter control over the formation of new and the intensification of existing access points on certain regional roads. Objective TS67 and Development Management Manual Policy 6.6 sets out the other criteria to be addressed in the assessment of applications, including the provision of sightlines.

CE CH8.23

Amend Table 8.5 on page 323 as follows:

Table 8-5 Regional Roads

Class 1 ~~**Regional roads with higher traffic levels/100km speed limits**~~	**Class 2** ~~**Regional roads with lower traffic levels/80km speed limits**~~
R725 Gorey – Carnew	R700 New Ross ~~– N30~~ R714
R733/R770 Wexford - Arthurstown – Ballyhack	R702 Enniscorthy – Kiltealy
R739 N25 junction - Kilmore Quay	~~R704 Rosbercon~~
R741 Wexford – Gorey	R729 New Ross-Poulmounty
R772 (former N11) Oilgate – Wexford/Wicklow border	R730 Wexford – Kiltealy
R723 Ballymacar roundabout - New Ross	R731Ballynabanogue – Killanne
R714 Mountgarret Bridge to Corcoran's Cross	R733 Arthurstown – New Ross
	R734 Ballinteskin – Hook Head
	R735 Gussurane – Clonroche
	R736 Rosslare –Ballynaboola

	R737 Haggard –Duncannon
	R738 Barntown – Baldwinstown
	R740 N25-Rosslare
	R742 Wexford – Kilmuckridge – Courtown – Gorey
	R744 Enniscorthy – Blackwater
	R745 Ferns – Ballindaggan
	R746 Wheelagower – Bunclody
	~~R714 Corcoran's Cross Roads – Mount Elliot~~
~~**Roads with Higher Traffic but lower speeds 50/60km**~~	
~~R890 within Enniscorthy~~	

CE CH8.24

Amend Regional Roads Objective TS65 on page 324 as follows:

To prevent new, or the material intensification of existing, access points to Class 1 regional roads ~~which have higher traffic levels and/or 100 kmh speed limit (refer Table 8-5) and~~ where a speed limit of more than 60kmh applies (see Table 8-5). This objective will not apply in the following locations and circumstances:

- For farmers, and their sons or daughters, proposing to build a dwelling house for their own permanent private use, provided that a need for that dwelling has been clearly established and where there is no suitable alternative access/egress possible from the family landholding onto a local road.
- For replacement dwellings.
- The intensification of use of an existing entrance to accommodate the sub-division of the site of an existing authorised dwelling house site to provide a dwelling for the use of a son or daughter of the original site owner, where a need for that dwelling has been clearly established and where there is no suitable alternative access point possible from the family landholding onto a local road. Proposals for granny flat type developments at such properties will be considered on their merits having regard to

the characteristics of the site and the anticipated level of intensification of use of existing access/egress point.

- For developments of a commercial nature, where a clear need for the development is established, which could not be met in other locations, and where there is no suitable alternative access to a local road possible or appropriate.

Planning applications for these types of development shall also be assessed having regard to Objective TS67. This objective also applies where access to the regional road is proposed via an existing private lane.

CE CH8.25

Amend Regional Roads Objective TS66 on page 325 as follows:

To prevent new, or the material intensification of, existing access points to Class 2 regional roads ~~with lower traffic levels/80 kmh (refer to Table 8-5)~~ where a speed limit of greater than 60 kmh applies (see Table 8.5), except where a need for the development at that location has been clearly established and there is no suitable alternative access possible from a local road.

These planning applications shall also be assessed having regard to Objective TS67.

This objective also applies where access to the regional road is proposed via an existing private lane.

CE CH8.26

Amend Objective TS74 in Section 8.10 Traffic and Transport Assessments, Road Safety Audits and Road Safety Impact Assessments on page 330 as follows:

To require that a Road Safety Audit (RSA) is undertaken in accordance with Section 6.2.2 of Volume 2 Development Management Manual for development which requires a new entrance, or intensified use of an existing entrance, or significant changes to an existing entrance, or alterations to the carriageway or road layout adjoining a national road, or for development on local or regional roads as appropriate. The RSA shall be prepared in accordance with Road Safety Audit GE-STY-01024 (TII, March 2015). The costs of mitigation measures shall be borne by the developer.

CE CH8.27

To amend Objective TS75 in Section 8.10 Traffic and Transport Assessments, Road Safety Audits and Road Safety Impact Assessments on page 331 as follows:

To require that Road Safety Impact Assessments are carried out where appropriate in accordance with the standards set out in Section 6.2.3 of Volume 2 Development Management Manual. The costs of mitigation measures shall be borne by the developer.

Proposed Figure 8-1 Strategic Transportation Network (see CE CH8.2 on page 348)

Section 13 Submissions Relating to Chapter 9 Infrastructure Strategy

Relevant Submissions

WXF-CE-1/21 Naomi Kloss

WXF-C3-10 Geological Survey of Ireland (GSI)

WXF-C3-34 Transport Infrastructure Ireland (TII)

WXF-C3-61 Kieran Dunne

WXF-C3-69 Camolin Town Team

WXF-C3-70 Re-Imagining Enniscorthy Town

WXF-C3-72 Office of Public Works (OPW)

WXF-C3-82 Department of Tourism, Culture, Arts, Gaeltacht, Sports and Media (DTCAGSM)

WXF-C3-85 Wexford PPN

WXF-C3-94 Wexford Environmental Network (WEN)

WXF-C3-96 Gas Networks Ireland (GNI)

WXF-C3-120 Markham

WXF-C3-134 Irish Water(IW)

WXF-C3-135 ESB

WXF-CE-138 Ferns Development Association

WXF-C3-142 Health Service Executive (HSE)

WXF-CE-143 An Taisce

WXF-CE-148 Ballymoney Community Group

WXF-CE-162 Molloy

WXF-C3-167 Eirgrid

Summary of Main Issues and Chief Executive's Response

Section 9.2 Climate Action and Infrastructure Planning.

WCF-C3-143 (An Taisce) suggest that infrastructure development should contribute to the mitigation of greenhouse gas emissions.

Section 9.2 Climate Action and Infrastructure Planning - Chief Executives Response

The Council's approach to climate change issues is set out in Chapter 2 Climate Action. The submission from Irish Water states that they are preparing a new climate change strategy which will address mitigation issues. Action 181 of the current Climate Action Plan aims to build sectoral resilience to the impacts of climate change through the delivery of sectoral plans under the National Adaptation Framework. These cover a number of infrastructure providers including transport infrastructure, electricity and gas networks, communications networks, flood risk management, water quality and water services infrastructure and health. These policies and actions in these sectoral plans will inform the future planning and delivery of infrastructure. Furthermore, the new Climate Action and Low Carbon Development (Amendment) Bill will also require that actions for each sector will be detailed in the Climate Action Plan, Government Ministers will be responsible for achieving the legally-binding targets for their own sectoral areas and public bodies will be obliged to perform their functions in a manner consistent with national climate plans and strategies, and furthering the achievement of the national climate objective.

Section 9.3 Policy context

WXF-C3-134 (IW) state that they are finalising their Draft Investment Plan 2020-2024, which has received approval from the Commission for Regulation of Utilities. IW is preparing a strategy to respond to emerging climate change adaption and mitigation.

Section 9.3 Policy Context - Chief Executive's Response

The comments of IW with regard to its Draft Investment Plan and new climate change strategy are noted.

Section 9.4 Infrastructure Strategy

WXF-C3-94 (WEN) comment that the Infrastructure Strategy should be amended to refer to best practice in protecting water supplies, minimising waste of water, water recycling and leakage reduction.

IW state that they encourage sequential development to maximise the use of water services infrastructure.

Section 9.4 Infrastructure Strategy - Chief Executive's Response

With regard to the comment of WEN, Section 9.5 Water Supply of this chapter addresses issues of water supplies, waste minimisation, recycling and leakage reduction.

Sequential development is supported in objectives Chapter 3 Core Strategy. Chapter 5 Design and Place-making in Towns and Villages and Chapter 6 Economic Development Strategy.

Section 9.5 Water Supply

WXF-C3-134 (IW) comment that a National Water Resources Plan is in preparation, with a stakeholder consultation exercise underway in Q1 2021, including options assessment consultation with the Council.

IW have prepared revised capacity information on the Water Resources Zones and is examining interim solutions to address supply issues in the Enniscorthy and Clonroche water resource zone.

IW state that they are preparing Drinking Water Protection Plans. IW state that they work with the Council on an on-going basis in leakage reduction, mains rehabilitation works and maintenance works. The also provide a list of generic water supply related objectives.

WXF-C3-70 (Re-Imagining Enniscorthy) comment that specific objectives should be set to increase water capacity of Enniscorthy town as a matter of priority for the town's future economic development.

WXF-C3-94 (WEN) comment hazardous chemicals should be kept out of water supplies. Greater reference to water conservation and rainwater harvesting should be made in Objectives WS07 and WS13 and mandatory rainwater harvesting should be incorporated into development construction. Objective WS05 should be amended to refer to other areas as well as Clonroche which may need water supply issues to be addressed. Greater opportunity should be given to the public to raise water-related issues.

WXF-C3-138 (Ferns Development Association) comment that the supply of public water for Ferns is identified in the Draft Development Plan as having no capacity available. They ask that targeted and deliverable measures are taken to improve capacity in the lifetime of this Plan.

WXF-C3-142 (HSE) request the Council to have regard to the National Biodiversity Plan 2017-2021 in its protection of water sources, in its water treatment plants and facilities under its control. The restoration of freshwater ecosystems should be considered as part of water source protection.

HSE also comment that public drinking water points could be provided.

Section 9.5 Water Supply - Chief Executive's Response

Subsequent to the submission from IW the Council received a revised water capacity update from IW and it is recommended that Section 9.5.1 and Table 9.1 be amended to reflect the information received. It is also recommended that this table is amended to reflect the proposed amended Settlement Hierarchy.

While most of IW's suggested water supply objectives are already included within the Draft Plan it is recommended that the wording of Objective WS01 be amended to refer to reductions in levels of water treatment, the National Water Resources Plan and Drinking Water Protection Plans. It is also recommended that Objective WS10 be amended to refer to buffer zones around public water supply infrastructure.

With regard to water conservation and rainwater harvesting, as raised by IW and WEN, objective WS12 and WS13 and Development Management Policy 8.2.3 currently address the issue, and no amendments to objectives in this chapter are recommended.

In response to the submission from WEN, will continue to work with Irish Water and others to ensure a supply of safe water. The Council is an active participant with other parties in Water Framework Directive (WFD) related activities, which include initiatives which stimulate public participation in water body protection. Objective WS05 provides that the

Council will work with EPA on possible water supply issues in other locations besides Clonroche.

The comments of Ferns Development Association and Reimagining Enniscorthy are noted, the IW submission notes that investigations are underway to address supply issues.

In response to the HSE request that the Council have regard to the National Biodiversity Plan 2017-2021 in its protection of water sources, it is recommended that Objective WS01 is amended to reflect this.

The Council would support the idea of suitably located and managed public water drinking taps in settlements and other locations and it is recommended that a new objective is recommended.

Whilst not raised in a submission, the Irish Water: Code of Practice for Water Infrastructure was updated in 2020 and it is recommended that Objective WS11 be amended to reflect this.

Section 9.6 Wastewater

WXF-C3-134 (IW) comments that:

- The upgrade of the Enniscorthy WWTP has been completed. The next stages of surveying and modelling the network and identifying the upgrades needed will be completed by 2021;
- The Kilmore Quay WWTP project is progressing, with completion anticipated in Q1 2024;
- The Duncannon WWTP (including Arthurstown and Ballyhack) project is progressing, with completion anticipated in January 2023;
- The Ferns South project has been deferred due to budget constraints and is to be reassessed in the next investment planning cycle (2025-2029);
- The Fethard WWTP upgrade has been deferred due to budget constraints and is to be reassessed in next investment planning cycle (2025-2029);

- The Wexford Town Drainage Area Plan is being progressed with Stage 2 model build and verification currently underway with completion anticipated in Q1 2022; and
- The preparation of a Drainage Area Plan for Gorey is to commence in 2021.

IW comment that consultation with local authorities is underway for the New Homes in Small Towns and Villages Growth Programme to identify projects in each area with final decisions to be made in Q1 2021. IW state that they would support local authorities who wish to seek funding for unsewered villages through the Rural Regeneration and Development Fund of the National Development Plan.

IW provide a list of generic wastewater objectives, including one which requires that developments connect to public wastewater infrastructure where available.

WXF-C3-1/21 (Kloss) and WXF-C3-69 (Camolin Town Team) note that 47% of houses in County Wexford use the public wastewater network, behind the national average of 65.9%, and that more should be done to increase connections to the public wastewater system.

Camolin Town Team note that the extent to which Camolin can contribute towards the aims and objectives of the Plan is dependent upon successful engagement with IW for investment in both water and wastewater infrastructure. The current capacity of the Camolin waste water treatment infrastructure is currently only enough to service 20% of the population.

WXF-C3-143 (An Taisce) highlights that the ongoing proliferation of private wastewater treatment systems will present significant challenges for the achievement of Ireland's binding water quality targets.

WXF-C3-94 (WEN) comments that delays in the construction of wastewater infrastructure leads to non-compliance with EU legislation on the discharge of wastewater. Several projects have been deferred and it is stated that this is not acceptable. It is stated that raw sewage continues to be pumped into the Suir Estuary from the seaside towns of

Duncannon, Arthurstown and Ballyhack and that fixed commitments from should be sought from IW to remedy this.

WXF-C3-138 (Ferns Development Association) comment that the WWTP for Ferns is non-compliant and has limited headroom. The improvement of the Ferns WWTP has been negatively reprioritised repeatedly over the years and it is requested that it be reprioritised positively, in the lifetime of this Plan.

WXF-C3-148 (Ballymoney Community Group) comment that planting should be encouraged around private waste water treatment plants, to catch run-off before it enters streams.

WXF-C3-162 (Molloy Architecture) comment that waiting for IW to expand and supply wastewater services in rural villages and towns is not acceptable and request that private communal wastewater treatment plants are permitted subject to appropriate conditions.

Section 9.6 Wastewater - Chief Executive's Response

It is recommended that Table 9.5 Irish Water Investment Plan Public Waste Water Projects 2024 -2024 be amended to reflect the submission of IW with regard to the anticipated timescales for completion listed wastewater treatment projects. It is also recommended that new objectives be included relating to protection of the sites of existing and proposed wastewater infrastructure.

With regard to the comments from WXF-C3-1/21 (Kloss) and WXF-C3-69 (Camolin Town Team) on connection to public wastewater treatment systems Objective WW08 requires that developments connect to public services where available. No further amendment is necessary.

The Council regrets that more villages, including Fethard, Ferns and Camolin, are not currently scheduled for wastewater treatment upgrades. The Council shall continue to work with IW water to ensure that appropriate upgrades are carried out and to explore all options, including the Rural Regeneration and Development Fund.

The comments of An Taisce with regard the numbers of private treatment systems and the provision of serviced sites in villages are addressed under Water Quality in Chapter 10 Environmental Management.

With regard to the suggestion from Ballymoney Community Group regarding planting around wastewater treatment systems it is noted that there can be issues with root systems damaging piping, so no changes to objectives are recommended.

On the issue of private communal wastewater systems raised in submission WXF-C3-162, as raised by Molloy, it is considered that such infrastructure is not appropriate due to problems with ownership and maintenance. No amendment is recommended.

Although not specifically linked to a submission, a number of updates to the Draft Plan are recommended as a result of updated information and guidelines. It is recommended that:

- Table 9.6, which lists the candidate villages for the New Homes in Small Towns and Villages Growth Programme, is updated to reflect the revised list of villages submitted to IW by the Council.
- Table 9.4 is amended to show that Enniscorthy is no longer on the EPA list of Areas of Concern.
- Objective WW09 be amended to reflect the latest, 2020, Irish Water Code of Practice.
- Section 9.6.4 Individual Private Wastewater Facilities in Rural Area and related objective WW11 be amended to refer to the 2021 update of the Code of Practice for Domestic Wastewater Treatment Systems (Population Equivalent ≤ 10) which will come into effect on 7th June 2021.

Section 9.7 Waste Management Infrastructure

With regard to sludge management WXF-C3-134 (IW) comment that the National Sludge Management Plan is scheduled for review in for 2021. IW state that the plan regional Sludge Hub and that Wexford Town WWTP is identified as one of four Sludge Hubs in the south east region.

Wexford PPN (WXF-C3-85) generally support the content of this section of the chapter and comment that their strategy document promotes minimal waste generation, optimal re-use and recycling activity, and responsible waste disposal with corresponding enforcement and regulations.

WEN would like to see the promotion of a circular economy for all developments to save energy and reduce waste, to set objectives and targets for achieving zero waste and to set conditions and incentives for reduction in plastic use, with the Council taking the lead through the continued elimination/minimisation of plastic when conducting all its services.

WEN state that there should be a condition attached to planning permissions for commercial developments and grants should be offered to help businesses minimise waste, and state that special attention needs to be paid to reuse and recycling infrastructure in coastal areas to reduce plastic maritime pollution. WEN also suggest that community reuse networks, repair cafes and upcycling services could be added to the types of Waste Management facilities listed in table 9.7.

GNI (WXF-C3-96) welcome the support for anaerobic digestion as a means of minimising waste and contributing to the circular economy with the production of renewable gas and digestate/bio-fertiliser.

Markham (WXF-C3-120) makes detailed comments regarding the benefits of the circular economy.

An Taisce (WXF-C3-143) welcome the provision of Objective WM07 to provide for the development of bioenergy through anaerobic digestion but only where the sustainability of this resource is justified. In order for bioenergy to be deemed renewable and to contribute to overall emissions reduction, the feedstock sources and the supply chain of these feedstocks must be assessed to be sustainable. The use of existing waste streams for energy provision are often a more sustainable option as they do not promote an increase in production of crops, which can increase N02 soil emissions and impact on water quality (through higher requirements of fertiliser).

Section 9.7 Waste Management Infrastructure - Chief Executive's Response

The submissions made are noted. Many of the points made are covered already in the text and objectives of this chapter and Chapter 10 Environmental Management including the issues of sludge management, waste recycling, and the circular economy.

Objectives are included to support the achievement of a circular economy in line with national and regional policy (Objectives IS06, WM01, WM02). Chapter 6 Economic Development Strategy also contains objectives to promote a circular economy (Objectives ED78 and ED79). See the response to this issue in Section 10 of this report which relates to that chapter)

The Southern Regional Waste Management Plan 2015-2021 includes a target to reduce to 0% the direct disposal of unprocessed residual municipal waste to landfill from 2016 onwards in favour of higher value pre-treatment processes and indigenous recovery practices. This is supported by Objective WM02 in the Draft Plan "to implement the provisions of the Southern Region Waste Management Plan 2015-2021, and any updated version published during the lifetime of the Plan..."

Incentives for reducing plastic are outside the remit of the development plan, however the Council will continue to reduce or eliminate its plastic use.

With regard to WEN's suggestion to include reference to community reuse networks, repair cafes and upcycling services it is recommended that Objective WM03 be amended to refer to community recycling initiatives.

The comments from An Taisce with regard to the source of material for bio-waste proposals are noted but the expansion of the livestock herd is outside of the remit of this Plan. The Objectives of this chapter are supportive of the anaerobic treatment of waste streams.

Section 9.9 Graveyards and Crematoria

WXF-C3-94 (WEN) comment that native planting and further opportunities for biodiversity could be encouraged in graveyards, and that multi-denominational, non-denominational

burial grounds should be encouraged as part of an inclusive and integrated society. Natural burial grounds and woodland and green burial sites should be encouraged.

9.9 Graveyards and Crematoria - Chief Executive's Response

The Council Burial Ground Strategy 2017 states that all new burial grounds in the county must be available to the public and be non-denominational or multi-denominational. It is recommended that Objective GC01 be amended to refer to natural, woodland and green burial sites and a new objective be included to refer to support for the creation of opportunities for biodiversity in graveyards.

Section 9.10 Telecommunications and ICT Strategy

WXF-C3-61 (Dunne) expresses concern that monopoles should not be allowed in urban or communal areas.

Re-imagining Enniscorthy (WXF-C3-70) comment that broadband should be enhanced in Enniscorthy, particularly commercial broadband in the east of Enniscorthy.

WXF-C3-1/21(Kloss), WXF-C3-94 (WEN), WXF-C3-142 (HSE), WXF-C3-146 (Wexford Greens) and WXF-C3-156 (Dunne) comment on home working during the Covid situation and state that it is likely to become much common. It is stated that strong IT connections will be of great importance and that the development of IT hubs with shared office space in settlements is supported.

WXF-C3- 135 (ESB) generally support the content of this section and note that expansion of the ICT network will be important to attract investment and widen connectivity.

WXF-C3-138 (Ferns Development Association) comment that reliable high-quality broadband brings many benefits, particularly to rural communities. It enables businesses, employees, residents and visitors to conduct their business, provide services and allows social connections.

Keep Ireland Open (WXF-C3-151) comment that telecoms masts should not be located near walking routes.

Section 9.10 Telecommunications and ICT - Chief Executive's Response

The Council will continue to work with National Broadband Ireland in the implementation of the National Broadband Plan in the county and with all other service providers and stakeholders.

The development of remote working hubs is supported by the Council and objectives have been recommended for inclusion in Chapter 3 Core Strategy and Chapter 6 Economic Development Strategy. It is recommended that a new objective is added to support the development of remote working hubs.

On the issue of the location of masts and antenna (including monopoles) it is considered that existing objectives in this section (e.g. Objective TC11) and Section 8.1 of Volume 2 Development Management Manual are sufficient to ensure that the requirement for ICT equipment is balanced with protection of residential amenity and heritage.

It is recommended that an additional objective be included stating that the Council will support the relocation or replacement of existing telecommunications infrastructure where the proposed location or form will be more suited in terms of visual amenity, residential amenity and built or natural heritage.

Section 9.11 Flood Risk and Surface Water Management

WXF-C3-10 (GSI) advises that they have established the GWClimate project which will establish a long-term strategic groundwater level monitoring network and develop modelling for evaluating the impacts of climate change on Irish groundwater systems.

WXF-C3-72 (OPW) recommends that the SFRA provide guidance on the likely applicability of different SuDS techniques for managing surface water run-off at key development sites. The submission also notes that the Guidelines recommend that the SFRA identifies where

integrated and area-based provision of SuDS and green infrastructure are appropriate in order to avoid reliance on individual site by site solutions.

WXF-C3-82 (DTCAGSM) comment that natural water retention measures should be incorporated into Flood Risk Management and SUDS. FRM16 should refer to restoration of floodplains and FRM19 should state that culverting should be avoided unless absolutely necessary and unavoidable and that box culverts and clear span bridging structures are always the preferred option to piped culverts. A development proposal requiring culverting should also document stream habitat loss and provide compensatory habitat where possible. Realignment of water courses should incorporate stream enhancement measures.

WXF-C3-94(WEN) comment that soil sealing exacerbates flood risk and therefore brownfield development should be prioritised over greenfield. Natural water control features such as wetlands should be protected. Nature based SUDS have many advantages and large developments should only be permitted where this is incorporated. 'Source control' methods such as rainwater harvesting and green roofs decrease flow rates and other natural techniques such as pre-treatment, retention systems and infiltration also reduce the volume of, and pollutants in, discharge waters.

WXF-C3-148 (Ballymoney Community Group) comment that impervious driveways cause surface water run-off and more use should be made of porous materials such as gravel which could be encouraged by property tax.

Section 9.11 Flood Risk and Surface Water Management - Chief Executive's Response
The work of GSI is noted and welcomed. The Council will have regard to this information in its climate action and flood risk management functions. Furthermore, while Objective FRM08 requires all sources of flood risk, including groundwater flooding, to be assessed as part of site-specific flood risk assessments, it is recommended that additional text be included in Section 9.11.3 to refer to groundwater as a source of flood risk. It is also recommended that references to relevant GSI projects and associated mapping be included in Section 9.11.5 Flood Mapping.

While not arising from a submission, it is recommended that Section 9.5.11 Flood Mapping also be updated to include the National Indicative Flood Mapping. The OPW released this mapping on the 1st February 2021. While it is too late to incorporate this dataset into the plan preparation process and SFRA, the Council will have regard to this mapping when screening for flood risk during the preparation of local area plans and when assessing development proposals.

The OPW's comments are noted, and while these are directed to the SFRA, it is considered relevant to this section as well as it sets out the policy context and objectives for surface water management in the county. Given the strategic nature of Plan and the strategic nature and the number of settlements contained in the SFRA (83 settlements), the provision of guidance on the likely applicability of different SuDS techniques at key development sites is considered too specific. This will be given further consideration in the preparation of future local area plans. The use of SuDS and nature-based solutions on an area based rather than site by site solutions will also be explored and considered as part of the preparation of those plans. Chapter 11 Landscape and Green Infrastructure already commits to incorporating a review of existing and proposed green infrastructure in these plans and planning applications.

It is recommended that this section be amended to include support for the use of nature-based solutions and green infrastructure and an area-based approach to SuDS, where possible to avoid a reliance on individual site by site solutions. It is recommended that objectives FRM14 and SWM01 be amended to refer. An additional objective in Section 9.11.11 to consider an integrated approach in future local area plans is also recommended. It is also recommended that the references to the 'Planning for Watercourses in the Environment' guidelines be updated in Section 9.11.9 Riparian Zones and Flood Risk Management and Objective FRM18.

In response to the comments of DTCAGSM it is recommended that objective FRM16 be amended to refer to the restoration of floodplains. Objective FRM19 currently states that culverting will only be considered where absolutely necessary and no amendments are recommended.

With regard to the comments of WEN, the Plan does support brownfield development and promotes the use of natural surface water management and SUDS.

The comments of Ballymoney Community Group re porous materials on driveways etc. are noted. Objective SWM07 (WXF-C3-148) seeks to discourage the use of non-porous surfaces in rural housing sites.

Section 9.12 Power Transmission

TII (WXF-C3-34) comment that the use of the national road network for electricity grid connection infrastructure can raise maintenance issues and that full consideration of alternative routes should be undertaken.

WEN (WXF-C3-94) request that an objective with regard to community power generation in housing and industrial areas be included.

ESB (WXF-C3-135) express general support for the content of the section.

Keep Ireland Open (WXF-C3-151) supports the undergrounding of cables particularly where transmission infrastructure affects the amenities of walking routes.

Eirgrid (WXF-C3-167) comment that Objective PT03 is too vague where it refers to substations not having a negative impact on nearby residents and therefore should be omitted. It is stated that Objective PT04, referring to undergrounding of overhead powerlines in urban areas is too restrictive and does not reflect the technical, environmental and landowner considerations which inform such decisions and should therefore be omitted.

Section 9.13 Power Transmission - Chief Executive's Response

The submissions made are noted. Issues regarding Energy generation are addressed within Volume 10 Energy Strategy of this Plan

In response to the submission from TII, a new objective has been added to Chapter 8 Transportation Strategy to state that the Council will facilitate works only when it has been demonstrated that the infrastructure would not adversely impact upon the structures, maintenance and safety of the road. (See Section 12 of this report for that proposed amendment).

In response to the comment from Keep Ireland Open, Objective PT01 appropriately addresses considerations relating to new and improved cabling proposals. In response to the comments from Eirgrid, no changes are recommended to Objectives PT03 and PT04 which are considered to be necessary and in the interests of proper planning and development.

Section 9.13 Gas Network

WXF-C3-94 WEN comment that use of gas generates greenhouses gasses and therefore support for the gas network should be removed and replaced with reference to alternative energy sources.

WXF-C3-143 An Taisce comment that there is no capacity for further expansion of the fossil gas network under national, EU and international climate policy and suggest that Objective GN01 be omitted and replaced with an objective expansion of renewables.

Section 9.13 Gas Network - Chief Executive's Response

With regard to WEN's comments in relation to natural gas the policies to the support gas infrastructure are reflective of the need to step down from fuels which are more intensive in terms of carbon generation in the short term with a view to a complete transition to carbon neutral fuels over the medium term. This is in line with Government Policy. No amendment is proposed.

Chief Executive's Recommendation

It is recommended that the following proposed amendments be made to Chapter 9 Infrastructure Strategy:

CE CH9.1

Amend paragraph 2 of Section 9.5.1 on page 342 as follows:

~~Table 9-1 lists the settlements in Levels 1-4 in the Settlement Hierarchy that have Irish Water public water assets and the capacities.~~

- ~~Level 1 Key Towns -issues with Wexford Town~~
- ~~Level 2 Large Towns - issues with Enniscorthy Town.~~
- ~~Of the 14 Level 3 Service settlements, there is no capacity in Ferns and there is no Irish Water scheme in Wellingtonbridge.~~
- ~~Of the 21 settlements at Level 4 Large Villages, only ten have Irish Water public water schemes, all of which have capacity of varying levels. The remaining 11 Level 4 settlements may be served by a Group Water Scheme or other small public water schemes associated with the local authority.~~

Table 9.1 lists Irish Water Public Water Supplies and Categories based on information received in Q1 2021. The table includes reference to the settlements where supply issues have been identified.

CE CH9.2

Replace Table 9.1 on page 342 from the Draft Plan with the following table:

Table 9-1 Irish Water Public Water Supplies and Capacities Source Irish Water Q1 2021

Settlement Hierarchy	Settlement	Water Resource Zone	Capacity of source/treatment*
Level 1 Key town	Wexford Town	South East Wexford	Capacity available. Network upgrades/extensions may be needed in the future to cater for high levels of growth.
	Gorey	Gorey	Capacity available.
Level 2 Large Towns	Enniscorthy Town	Enniscorthy	Currently there is limited capacity. Solutions for improving capacity are being assessed through the full options assessment stage of the NWRP, due to be completed in mid-2021. In addition, interim solutions are being reviewed to relieve constraints. Funding has been approved for additional mains rehab in 2021.
	New Ross Town	New Ross	Capacity available.
Level 3a Service Settlements	Bunclody Town	Bunclody	Limited capacity available – further assessment needed.
	Castlebridge	South East Wexford	Capacity available.
	Courtown and Riverchapel	Gorey Rural	Capacity available.
	Ferns	Ferns Regional	Limited capacity, options being investigated.
	Rosslare Harbour and Kilrane	South East Wexford	Capacity available.
	Rosslare Strand	South East Wexford	Capacity available.

Level 3b Strategic Settlements	Bridgetown	South East Wexford	Capacity available
	Campile	South East Wexford	Capacity available
	Clonroche	Clonroche	Currently limited capacity. Solutions for improving capacity are being assessed through the full options assessment stage of the NWRP, due to be completed in mid-2021. In addition, the solutions will address treatment issues.
	Coolgreany	Coolgreany	Capacity available
	Kilmore Quay	South East Wexford	Capacity available
	Kilmuckridge	Gorey	Capacity available
	Taghmon	South East Wexford	Capacity available
	Wellingtonbridge	South East Wexford	Capacity available
Level 4 Large Villages	Adamstown	Adamstown	Capacity available
	Ballaghkeen	South East Wexford	Capacity available
	Ballindaggin	Ballindaggin	Limited capacity available
	Ballycanew	Gorey	Capacity available
	Ballycullane	South East Wexford	Capacity Available
	Ballyhogue	Ballyhogue	Capacity available
	Ballymurn	South East Wexford	Capacity available
	Barntown	South East Wexford	Capacity available
	Blackwater	Sow	Capacity available
	Bree	Bree	Capacity available
	Camolin	Camolin	Capacity available
	Carrig-on-Bannow	South East Wexford	Capacity available

	Clongeen	South East Wexford	Capacity available
	Duncannon	South East Wexford	Capacity available
	Fethard-on-Sea	South East Wexford	Capacity available
	Murntown	South East Wexford	Capacity available
	Oilgate	South East Wexford	Capacity available
	Oulart	Sow	Capacity available
	Piercetown	South East Wexford	Capacity available
	Ramsgrange	South East Wexford	Capacity available
	Tagoat	South East Wexford	Capacity available

CE CH9.3

Amend Objective WS01 on page 346 as follows:

To work with all stakeholders to protect existing and potential water resources for the county and to reduce the level of treatment required in the production of drinking water, in accordance with the EU Water Framework Directive (2000/60/EC), the National River Basin Management Plan for Ireland 2018-2021 and any updated version, the Pollution Reduction Programmes for designated shellfish waters, the National Biodiversity Plan 2017-2021, the provisions of the County Groundwater Protection Scheme and any other protection plans including the National Water Resources Plan and Drinking Water Protection Plans, for water supply resources.

CE CH9.4

Amend Objective WS10 on page 347 as follows:

To protect existing way leaves and areas, including buffer zones, around public water services infrastructure through appropriate zoning and to facilitate the provision of appropriate sites for public water infrastructure, as required.

CE CH9.5

Amend Objective WS11 on page 348 as follows:

To ensure that development proposals comply with the standards and requirements of the Irish Water: Code of Practice for Water Infrastructure (~~December 2016~~ July 2020), and any updated version of this document during the lifetime of the plan.

CE CH9.6

To include a new objective on page 348 as follows:

To support the provision of appropriately designed and located available tap water refill points in settlements and other locations in the county.

CE CH9.7

Amend Table 9-4 on page 352 as follows:

Table 9-4 EPA Urban Wastewater Areas of Concern~~, 2018~~

Settlement	Reason
~~Enniscorthy Town~~	~~Failing to meet the Urban Waste Water Directive. This plant has been upgraded to a capacity of 26,000 PE and all results to date since the upgrade, which was completed in March 2019, have been acceptable.~~
Arthurstown, Ballyhack, Duncannon and Kilmore Quay	Discharging untreated wastewater to the environment.
Ballycanew, Clonroche and Coolgreany.	Putting pressures on inland and/or coastal waters.

Source: Urban Wastewater Report EPA, Wexford County Council Water Services Section

CE CH9.8

Amend Table 9-5 on page 352 as follows:

Table 9-5 Irish Water Investment Plan Public Wastewater Projects 2020-2024

Project	Project Description
Kilmore Quay Village and Environs Waste Water Outfall	Provision for the Wastewater Treatment Plant (WWTP) to protect environment and quality of receiving waters, increase capacity and facilitate future growth. ~~It is expected that contracts will be awarded in Spring 2021 with construction to take 15 months.~~ Completion expected Q1 2024
Duncannon WWTP (to include Arthurstown and Ballyhack)	Provision for the WWTP to protect environment and quality of receiving waters, increase capacity and facilitate future growth. ~~It is expected that contracts will be awarded in Spring 2021 with construction to take 15 months.~~ Completion expected Q1 2023
Enniscorthy WWTP	Upgrade of WWTP to protect environment and quality of receiving waters and facilitate growth. Construction completed and WWTP upgrade is commissioned and operational
Enniscorthy Main Drainage	Upgrade of the foul collection network in the town of Enniscorthy, Co Wexford.
Wexford Town Distillery Road PS Upgrade - WW Network	Provision of infrastructure to facilitate growth and address existing capacity issues by increasing the capacity of the wastewater network entering the existing WWTP.

CE CH9.9

Amend Table 9-6 on page 354 as follows:

Table 9-6 Candidate Settlements for the New Homes in Small Towns and Villages Growth Programme

~~Settlement~~	~~Settlement Level~~
~~Wellingtonbridge~~	~~3~~
~~Bree~~	~~4~~
~~Adamstown~~	~~4~~
~~Oilgate~~	~~4~~

Settlement	Settlement Level
Wellingtonbridge	3b
Tagoat	4
Adamstown	4
Campile	3b
Ballindaggin	4
Ballycanew	4
Camolin	4
The Ballagh	4
Oilgate	4
Davidstown	5(1)
Clongeen	4
Killinerin	4
Davidstown	5(1)

CE CH9.10

Amend text of 3rd paragraph of Section 9.6.4 Individual Private Water Systems in Rural Area on page 355 as follows:

For new development where it is proposed to serve a dwelling house with a domestic wastewater treatment system, it must be demonstrated that the proposed onsite system can safely and adequately dispose of the effluent in accordance with the Code of Practice: Wastewater Treatment and Disposal Systems Serving Single Houses (EPA 2021, ~~2009~~) and complies with the Water Framework Directive and the provisions of the relevant River Basin Management Plan.

CE CH9.11

Amend Objective WW09 on page 357 as follows:

To ensure that development proposals comply with the standards and requirements of the Irish Water: Code of Practice for Wastewater Infrastructure, (~~December 2016~~ 2020), and any updated version of this document during the lifetime of the Plan.

CE CH9.12

Amend Objective WW11 on page 358 as follows:

To consider the development of single dwelling houses only where it is demonstrated to the satisfaction of the Planning Authority that the proposed wastewater treatment system is in accordance with the *'Code of Practice Wastewater Treatment and Disposal System Serving Single Houses, EPA 2021 ~~2009~~'* and any updated version of this document during the lifetime of the Plan, and maintained in accordance with approved manufacturer's specifications and subject to compliance with the Water Framework Directive, the National River Basin Management Plan 2018-2021, the Habitats and Shellfish Waters Directives and relevant Pollution Reduction Programmes.

CE CH9.13

To insert a new wastewater objective on page 358 as follows:

To protect existing wastewater infrastructure, including way leaves and buffer zones, from inappropriate development and zoning.

CE CH9.14

To insert a new wastewater objective on page 358 as follows:

To facilitate the provision of appropriate sites for public water infrastructure, as required and to protect those sites and associated wayleaves and buffer zones, from inappropriate development and zoning.

CE CH9.15

Amend Objective WM03 on page 365 as follows:

To support the development of appropriately sited waste recycling and recovery facilities, such as bring centres, civic amenity centres, waste transfer stations, material recovery facilities, community recycling facilities and waste recovery facilities and authorised treatment facilities for end-of-life vehicles as a means of facilitating a reduction in the quantity of waste that goes to landfill disposal sites subject to compliance with the locational requirements for waste management facilities contained in Section 9.7.3 and subject to compliance with Objectives WM05 or WM06, normal planning and environmental criteria and the relevant development management standards set out in Volume 2.

CE CH9.16

Amend Objective GC01 on page 371 as follows:

To facilitate the provision of burial grounds or extensions to existing burial grounds, including natural, woodland and green burial grounds in cooperation with local communities, at appropriate locations throughout the county subject to complying with normal planning and environmental criteria and the development management standards contained in Volume 2.

CE CH9.17

Insert a new Graveyards and Crematoria Objective on page 371 as follows:

To ensure that biodiversity of existing burial grounds is protected and that actions are taken to increase biodiversity value in existing and proposed burial grounds in the county.

CE CH9.18

Insert new Objective on page 374 as follows:

To support the provision the appropriate infrastructure to facilitate the development of remote working hubs in settlements.

CE CH9.19

Insert a new Objective on page 376 as follows:

To support the relocation of replacement of, existing telecommunications infrastructure where the proposed location or form will be more suited in terms of visual amenity, residential amenity, the environment, biodiversity and built or natural heritage.

CE CH9.20

To include the following text in Section 9.11.3 on page 380:

Groundwater

Groundwater flooding occurs when the level of water stored in the ground rises as a result of prolonged rainfall, to meet the ground surface and flows out over it, i.e. when the capacity of this underground reservoir is exceeded. Groundwater flooding tends to be very local and results from the interaction of site-specific factors such as local geology and tidal variations. While water level may rise slowly, groundwater flooding can last for extended

periods of time, and as such flooding may often result in significant damage to property and disruption.

CE CH9.21

Amend Section 9.11.5 Flood Mapping on page 381 as follows:

The Council will use all available sources of information when screening for flood risk during the preparation of local area plans and when assessing development proposals. These sources include:

- The CFRAM flood zone mapping.
- The OPW National Indicative Flood Mapping.
- Fluvial flood maps prepared by JBA for the county.
- Flood zone maps prepared for flood relief schemes e.g. Enniscorthy Town.

The SFRA contains a set of flood maps for the county which incorporate some of ~~the above~~. The OPW National Indicative Flood Mapping do not form part of the SFRA.

Other flood mapping resources include the OPW benefitting land maps, mineral alluvial soil mapping and the Ordnance Survey 'lands liable to floods' mapping, Geological Survey of Ireland flood mapping and climate research projects such as the GWFlood project and the GWClimate project, flood studies and reports and working knowledge from local authority engineers.

CE CH9.22

Amend the third sentence in Section 9.11.9 Riparian Zones and Flood Risk Management on page 383 as follows:

The Planning Authority will have regard to the guidelines set out in the document 'Planning for Watercourses in the Urban Environment'~~, Shannon Regional~~ (Inland Fisheries ~~Board~~ Ireland when considering development proposals in the vicinity of rivers and streams.

CE CH9.23

Amend Objective FRM14 on page 387 as follows:

To require the use of sustainable drainage systems (SuDS) and nature-based solutions to minimise and limit the extent of hard surfacing and paving and require the use of sustainable drainage and nature-based techniques where appropriate for new development or for extensions to existing developments in order to reduce the potential impact of existing and predicted flooding risk, to improve water quality, enhance biodiversity and green infrastructure and contribute to climate mitigation and adaptation

CE CH9.24

Amend Objective FRM16 on page 387 as follows:

To protect and enhance and restore the county's floodplains, wetlands and coastal areas as 'green infrastructure' which provides space for the storage and conveyance of floodwater, enabling flood risk to be more effectively managed and reducing the need to provide flood defences in the future, subject to normal planning and environmental criteria and the objectives contained in Chapter 11 Landscape and Green Infrastructure.

CE CH9.25

Amend Objective FRM18 on page 388 as follows:

To ensure riparian buffer zones, a minimum of 10 metres in width (in some cases buffer zones of up to 50 metres may be appropriate), are created between all watercourses and any future development. In considering the appropriate width, the Council will have regard to 'Planning for Watercourses in the Urban ~~Area~~ Environment' (Inland Fisheries Ireland ~~Shannon Regional Fisheries Board~~)

CE CH9.26

Amend the text of paragraphs 3 and 4 in 9.11.11 Surface Water Management on page 388 and 389 as follows:

Sustainable Drainage Systems, commonly known as SuDS, is an approach that seeks to manage ~~the~~ surface water as close as possible to its origin by various nature based or engineering solutions that replicate natural drainage processes before it enters the watercourse. Nature based solutions can be equally or more effective, better for

biodiversity, the environment and in terms of visual amenity. ~~The incorporation of SuDS techniques allows surface water to be either infiltrated or conveyed more slowly to water courses using porous surface treatments, ponds, swales, filter drains or other installations.~~

SuDS and nature-based solutions provide an integrated approach which ~~addresses and~~ provides ~~four main~~ many benefits including:

- Water quantity by controlling the quantity of run-off to support the management of flood risk, and maintain and protect the natural water cycle;
- Improving water quality by managing the quality of the runoff to prevent pollution;
- Amenity by creating and sustaining better places for people; ~~and~~
- Biodiversity by creating and sustaining better places for nature; and
- Climate adaptation and mitigation such as building resilience, micro-cooling and carbon sequestration.

The application of SuDS techniques and nature-based solutions allows surface water to be either infiltrated or conveyed more slowly to water courses using porous surface treatments such as bioretention areas, ponds, swales, basins, rain gardens, wetlands, filter drain, green roofs or other installations. This approach is often less expensive to construct and easier to maintain than underground solutions, whilst providing the multiple additional benefits previously outlined.

The Council will require the application of SuDS and nature-based solutions in new development proposals and proposals to extend an existing development. ~~for example through reducing the extent of hard surfacing, and using permeable pavements. All developments will be required to incorporate SUDS~~ While traditionally the application of SuDS techniques ~~will be~~ is site-specific and ~~will~~ depends on the site's characteristics, ~~and will be required to demonstrate that climate change considerations have been incorporated into the design~~ the Council will work with designers and developers to deliver an integrated and area-based approach where possible so that the approach works like a mini-catchment.

Applicants will also be required to demonstrate that climate change considerations have been incorporated into the design and the role of green infrastructure in providing nature-based solutions must also be demonstrated. All applications should include a commensurate drainage assessment which outlines the drainage design considerations/strategy in line with the flood risk, surface water management and climate change requirements and objectives in the CDP.

CE CH9.27

Amend Objective SWM01 on page 389 as follows:

To require the application of SuDS in accordance with the CIRIA SuDS Manual 2015 and future update of this guidance, or other best practice guidance as may be specified or required by the Council. The application of SuDS should prioritise the use of appropriate nature-based solutions where possible. All proposals should include a commensurate drainage assessment used to design the surface water management system and this assessment should outlined the drainage design considerations/strategy in line with the flood risk, surface water management and climate change requirements and objectives of the County Development Plan and the County Strategic Flood Risk Assessment in Volume 11.

CE CH9.28

Insert a new Surface Water Management Objective on page 390 as follows:

To incorporate an integrated area based approach to SuDS and nature-based solutions and green infrastructure in the preparation of future local area plans.

Section 14 Submissions Relating to Chapter 10 Environmental Management

Relevant Submissions

WXF-C3-10 Geological Survey Ireland (GSI)

WXF-C3-24 Environmental Protection Agency (EPA)

WXF-C3-34 Transport Infrastructure Ireland (TII)

WXF-C3-68 Matthew Roche

WXF-C3-70 Re-Imagining Enniscorthy Town

WXF-C3-82 Department of Tourism, Culture, Arts, Gaeltacht, Sports and Media (Dept. TCAGSM)

WXF-C3-85 Wexford PPN

WXF-C3-92 Paula Redmond

WXF-C3-94 Wexford Environmental Network (WEN)

WXF-C3-96 Gas Networks Ireland (GNI)

WXF-C3-142 Health Service Executive (HSE)

WXF-C3-143 An Taisce

WXF-C3-146 Wexford Greens

Summary of Main Issues and Chief Executive's Response

Section 10.1 Introduction

WXF-C3-85 (Wexford PPN) is glad to see the alignment within the document to their own Environment and Sustainability Vision.

WXF-C3-94 (WEN) notes that environmental sustainability needs to be prioritised over economic and social and highlights the socio-economic value of healthy and resilient soils, rivers, marine areas and climate.

WXF-C3-10 (GSI) comment that they maintain detailed information on groundwaters, including aquifer vulnerability and recharge, groundwater flood mapping, and monitoring of impacts of climate change on groundwaters.

Section 10.1 Introduction - Chief Executive's Response

The comments from Wexford PPN and WEN are noted. No amendment is necessary.

The submission from GSI is noted and the relevant datasets will be included in the Environmental Report in Volume 12 where appropriate.

Section 10.2 Climate Action and the Environment

WXF-C3-94 (WEN) states that a stronger statement is needed for reducing pollution from agricultural sources and the Plan should include support for farmers to increase habitat and riparian vegetation on their land (with the overhaul of current agricultural subsidies).

Section 10.2 Climate Action and the Environment - Chief Executive's Response

Agricultural subsidies are outside the remit of the development plan but reducing pollution from agricultural sources is supported by the objectives in the Draft Plan. This Section states that the Council will require new agricultural developments to comply with the Nitrates Directives and facilitate development that will contribute to achieving the objectives of the Green, Low Carbon Agri-Environment Scheme (GLAS). Objectives WM10 and WM13 in Chapter 9 Infrastructure Strategy state that the Council will require the disposal of agricultural waste and the treatment and management of sludge waste to be carried out in a safe, efficient and sustainable manner having regard to the protection of the environment and public health and in compliance with the Nitrates Directive and other waste legislation.

Section 10.4 Environmental Management Strategy

WXF-C3-24 (EPA) refers to their 'State of the Environment Report - An Assessment 2020' (EPA, 2020) which identifies thirteen key messages for Ireland which align with many of the UN Sustainable Development Goals (SDGs). The EPA states that a concerted effort is needed by government departments to address these key actions to deliver Ireland's long-term sustainable development and environmental protection goals.

WXF-C3-143 (An Taisce) requests that Objective EM01 be amended to refer to the "direct, indirect and cumulative significant effects of a project" to ensure full compliance with the EIA Directive.

WXF-C3-94 (WEN) states that the Strategy should include an objective to prioritise urgent action to transition to a carbon free, sustainable society where nature is enhanced and protected. A new objective should also be added to objectives EM01 to EM05 to recognise that Ireland is in a Climate and Biodiversity Emergency and to prohibit development that contributes to this twin emergency.

Section 10.4 Environmental Management Strategy - Chief Executive's Response

The comments from the EPA are noted. The key actions in the State of the Environment report require measures/policy action at a national level. However, many of the actions are supported at a local level in the Plan, e.g. improving the water environment and tackling water pollution quality, reducing human induced pressures on the marine environment, moving to clean energy systems, drinking water and wastewater infrastructure that meets the needs of our society and moving to a less wasteful and circular economy where the priority is waste prevention, reuse, repair and recycle.

Objective EM01 seeks to implement Article 3 of Directive 2014/52/EU and Section 171A(b) of the Planning and Development Act 2000 (as amended). Annex IV of the Directive (as transposed under Schedule 6 of the Planning and Development Regulations 2001 (as amended)) sets out further information to be included in the EIAR which includes a description of the cumulative effects with other existing or approved developments. It is therefore appropriate to amend Objective EM01 to include cumulative effects.

Climate Action and a transition to a low carbon economy are addressed across all chapters of the Draft Plan. The Biodiversity crisis is discussed in Chapter 13 Heritage and Conservation (as proposed to be amended).

Section 10.5 Water Quality

WXF-C3-143 (An Taisce) welcomes the commitment to consider compliance with the provisions of the Water Framework Directive (WFD) and the River Basin Management Plan (RBMP) in the granting of planning permissions but highlights that the ongoing proliferation of private wastewater treatment systems will present significant challenges for the achievement of Ireland's binding water quality targets under the WFD. It states that the Plan

should ensure the adequate provision of serviced sites within close proximity to established water/ wastewater infrastructure.

WXF-C3-146 (Wexford Greens) note the findings of previous (2017) EPA reports on river biological quality and the elevated nitrate levels within, and also the Nitrates Derogation Review 2019 which states that higher nitrogen losses are correlated with freely draining soils and intensive agriculture in the South and South-East of the country. They request that the Council regularly publishes the results of its drinking water quality monitoring in a form that is easily accessible by the public, and that this includes the public supply and any data they can issue on private supplies, to allay fears about poor quality water, instil confidence in the system and enable well informed representations to be made when needed.

The HSE (WXF-C3-142) has concerns for the Aquaculture industry in Wexford Harbour to Rosslare, Bannow Bay and the Nore Barrow Suir Estuary and would like to see these shellfish waters named and mapped in the plan and an emphasis placed on the importance of protecting and improving them for aquaculture purposes due to their importance as a human food source. The potential impact of development adjacent to waterbodies on downstream aquaculture areas is highlighted. The HSE also expresses concern over the lack of sewage treatment in the Nore Barrow Suir estuary which leads to microbial and viral pollution and the spread of antimicrobially resistant bacteria strains thus threatening the viability of antibiotics for medical use in the future.

WXF-C3-142 (HSE) expresses concern over bathing water quality at some beaches which has resulted in public notices prohibiting bathing due to pollution each year. While some may be the result of natural weather events others are the result of inadequate sewage treatment from villages. The HSE has concerns re microbial and viral pollution and the presence of antibiotic resistant microbes in the environment. This is especially so in the Nore Barrow Suir Estuary and Kilmore Quay where discharges are in close proximity to Kilmore Quay Harbour and Marina, amenity waters and the Ballyteigue Burrow Nature Reserve. The HSE adds that another source of pollution on beaches is streams running across the beach into the sea and these need to be tested during the bathing season and adequate signage erected to prevent parents allowing small children to play in polluted waters.

WXF-C3-94 (WEN) states that it would be useful to include the main causes of moderate, poor or bad water quality status in Wexford: the top three pressures being agriculture, wastewater and hydromorphology pressures. They also state that reference should be made water supply, waste management, flood risk management and surface water management objectives contained in Chapter 9 Infrastructure.

Section 10.5 Water Quality - Chief Executive's Response

An Taisce's comments in relation to a proliferation of private wastewater treatment systems and the achievement of water quality targets is noted. In this regard Chapter 9 Infrastructure Strategy recognises the high proportion of individual treatment plants in the County and the significant pressure it places on water quality. Section 9.6.4 states that the provision of on-site wastewater treatment systems to serve new one-off rural housing will only be considered where it is demonstrated that the proposed onsite system can safely and adequately dispose of the effluent in accordance with the Code of Practice: Wastewater Treatment and Disposal Systems serving Single Houses (EPA, 2009) and complies with the WFD and the provisions of the relevant RBMP. This is embedded in Objective WW11.

Section 9.6.3 of the Draft Plan refers to the NPF's 'New Homes in Small Towns and Villages' Programme which will provide appropriate infrastructure to attract people to build their own home and live in small towns and villages and offer an alternative to one-off rural housing. Table 9-6 (as proposed to be amended) identifies 13 candidate settlements for this programme. Objective WW07 states that the Council will work with Irish Water, other public infrastructure agencies and local communities to develop this programme. Chapter 3 Core Strategy also contains an objective (CS21) to work with public infrastructure providers and local communities to provide serviced sites in the designated Large Villages and Small Villages.

The comments from Wexford Greens are noted however the publication of drinking water quality monitoring results is outside the remit of this Plan.

With regard to the HSE's comments on the Aquaculture industry, the Designated Shellfish Areas are named and mapped in Chapter 13 Heritage and Conservation and a number of

objectives are included in the Draft Plan to ensure their protection (including Objective WQ01 in this Chapter, Objectives WS01, WW01, WW10, WW11 in Chapter 9 Infrastructure Strategy, Objective CZM43 in Chapter 12 Coastal Zone Management and Objective NH01 in Chapter 13 Heritage and Conservation). Further objectives to support the development of the aquaculture industry are included in Chapter 6 Economic Development Strategy (ED72, ED82) and Chapter 12 Coastal Zone Management (CZM45, CZM51, CZM81).

With regard to sewage treatment in the Nore Barrow Suir estuary, Section 9.6.2 (Table 9-5) sets out the planned public wastewater projects for the period 2020-2024 which includes the Duncannon WWTP (to include Arthurstown and Ballyhack).

In relation to the HSE's comments on bathing water, the Duncannon WWTP and the Kilmore Quay Village and Environs Wastewater Outfall are due to be developed over the period 2020-2024, as outlined in Table 9-5 in Chapter 9 Infrastructure Strategy. This will improve the quality of the receiving waters. Section 10.5.7 in the Draft Plan sets out the Council's objectives for bathing water and includes objectives for their protection (WQ01, WQ18). Specific reference is made to the 'Duncannon Blue Flag Farming and Communities Scheme' which is led by the Council and is designed to improve the bacterial quality of the two coastal streams that flow onto Duncannon beach by reducing pollution from agricultural and domestic sources. This should contribute to the recovery and long term retention of the Blue Flag status at Duncannon beach. Further objectives for the protection of bathing waters are included in Chapter 12 Coastal Zone Management (CZM71, CZM72). The testing of bathing waters is outside the remit of this Plan.

In response to WEN's comments it is acknowledged that there is an intrinsic link between this chapter and Chapter 9 Infrastructure Strategy in relation to water supply, waste management, flood risk management and surface water management. However, having regard to the OPR's submission to reduce the amount of text in the Draft Plan, it is not considered appropriate to repeat the objectives in this Section and the chapters should be read concurrently.

The main threats to surface waters coming from agricultural, forestry, outfalls from municipal wastewater treatment works, on-site wastewater treatment systems and licences and unlicenced discharges and storm water un-off is referenced in Section 10.5 (page 401). Further information in relation to water quality is included in the SEA Environmental Report contained in Volume 12 of the Draft Plan.

Although not specifically related to a submission received on the Draft Plan, as a result of updated information in relation to the RBMP, it is proposed to insert additional text and maps under Section 10.5.2 River Basin Management Plan 2018-2021 and Section 10.5.6 Blue Dot Catchment Programme.

Section 10.6 Air Quality

WXF-C3-94 (WEN) asks that the Plan include reference to the poor air quality in our urban centres, particularly during winter months and a statement that the main drivers of poor air quality in Wexford are the burning of solid fuels and transport and that the Council supports a call for a ban on the sale and burning of smoky coal.

Two submissions (WXF-C3-142 HSE and WXF-C3-70 Re-Imagining Enniscorthy Town) highlight the recent exceedances of air quality standards in Enniscorthy Town. The HSE suggests that a commitment to further enforcement of policies to combat air pollution along with public awareness campaigns would be beneficial, while Re-Imagining Enniscorthy Town states that a ban on other pollutants and other initiatives are needed to further improve air quality. Re-Imagining Enniscorthy Town also states that there should be a specific objective in the Plan to designate Enniscorthy as an exemplar Sustainability Town which focuses on addressing air quality, building retrofitting, sustainable transport, green public spaces, circular economy, etc.

WXF-C3-96 (GNI) outlines the opportunities to improve air quality by switching home heating to natural gas, switching to gas powered generation and CNG, which replaces diesel and improves air quality with 99% less particulate matter, 70% less Nitrogen Oxide, and 80% less Sulphur Dioxide. It also states that the introduction of renewable gas to the network will, over time, decarbonise home heating.

WXF-C3-92 (Paula Redmond) notes with regard to Objective AQ05 that there are problems with electric vehicles in terms of the mileage they can do before needing to be charged and that although better, more frequent and more reliable public transport should be promoted, citizens need to maintain their right to independent modes of transport. The lack of bus routes to colleges and schools is noted, as is the evident traffic congestion at schools which has a severe negative effect on residents in those areas. Ms Redmond states that the objective should be more specific in what areas the reduction in private car use is being sought (e.g. travel to work or school), as a blanket reduction on private car use would have severe implications for citizens' freedom of movement, especially following the severe restrictions of 2020.

With regard to Objective AQ06 Ms. Redmond notes that an explanation of the acronym 'NZEB' and a general note on what its aims are should be given so that this can be easily understood by all citizens especially as this will impact the design of houses and must be taken into consideration by private individuals and developers alike.

Section 10.6 Air Quality - Chief Executive's Response

The Smoky Coal Ban was extended last September to cover towns with a population of over 10,000 persons including Wexford/Ardcavan/Castlebridge and Enniscorthy. The smoky coal ban (and air quality enforcement generally) is implemented and enforced under the relevant regulations and is outside the remit of this Plan. Further information on the baseline of air quality across County Wexford is contained in the SEA Environmental Report in Volume 12.

Section 10.6 of the Draft Plan outlines the policy approach of the Council to integrate land use planning and transportation and to promote renewable energy and energy efficiency to reduce greenhouse gases and emissions from vehicles. In addition to the objectives contained in this section (AQ01-AQ06) a range of objectives have been incorporated across the various Chapters in the Draft Plan to improve air quality, including to support public transport, walking and cycling as more favourable modes of transport to the private car, the promotion of energy efficient buildings and homes, green infrastructure planning and innovative design.

With regard to Re-Imagining Enniscorthy Town's recommendation to include an objective in the Plan to designate Enniscorthy as an exemplar Sustainability Town, Chapter 3 Core Strategy outlines the development approach for Enniscorthy Town which includes an acknowledgement of the town's strategic importance as a UN centre of excellence on energy efficiency in High Performance Buildings and states that Wexford County Council will specifically pursue a focused Smart Town/Smart Environment Strategy which marries the Smart Town Strategy with environmental sustainability aims. This will be given further consideration in the preparation of the Enniscorthy Town and Environs Local Area Plan.

In response to GNI regarding the benefits of switching to natural gas, Section 9.13 of the Draft Plan states that expansion of the gas network to the three main towns (Gorey, Enniscorthy and New Ross) would be considered positively by the Council particularly when serving industrial uses with high energy demands. Objective GN01 supports the extension of the gas network throughout the county. Chapter 3 Core Strategy also includes objectives to support the delivery of natural gas to Gorey, Enniscorthy and New Ross Towns (GT07, ET07, NT08), while Chapter 2 Climate Action includes an objective (CA14) to support decarbonisation in the transport sector including consideration of electric, hydrogen, Compressed Natural Gas (CNG)/biogas.

Ms. Redmond's comments are also noted and in this regard the Transportation Strategy in Chapter 8 sets out a range of objectives for all modes of transport. Targets for a modal shift from private car usage to public transport/walking/cycling for work and school over the period of the Plan (see Section 8.4.4 Modal Shift) are set in that chapter. Bus routes and times are outside the remit of this Plan but the improvement of bus services will be supported by the Council to increase the viability of these services and in this regard the Draft Plan includes objectives for the provision of associated infrastructure such as interchanges, bus shelters, bus parking etc.

Ms. Redmond's point in relation to Objective AQ06 and the need for an explanation of the acronym 'NZEB' and a general note on what its aims are is acknowledged and a minor amendment is proposed in this regard.

Section 10.7 Noise

WXF-C3-142 (HSE) recommends that the Council apply WHO/Europe's Night Noise Guidelines when assessing planning applications with potential noise implications, with the average night exposure not exceeding 40 decibels (dB), corresponding to the sound from a quiet street in a residential area. The HSE notes that persons exposed to higher levels over a period of time can suffer health effects.

WXF-C3-92 (Paula Redmond) states that the Council should require high building standards for soundproofing to ensure that people can live peacefully in their own homes and that these issues, along with adherence to other building regulations, should be checked by the Council (and not rely on paperwork supplied by the developer or their agents to confirm adherence). In addition, more regulation around construction noise needs to be implemented and planning conditions should state allowable times for building to ensure that residents in the adjoining areas do not suffer sleep loss and a reduction in the enjoyment of their properties. Ms. Redmond also states that local authorities should be responsible for investigating and assisting with noise issues of a domestic nature, i.e., people being affected by excessive noise from neighbours, building work etc, similar to the process in the UK.

Section 10.7 Noise - Chief Executive's Response

The HSE's recommendation to apply WHO/Europe's Night Noise Guidelines when assessing planning applications with potential noise implications, with the average night exposure not exceeding 40 decibels (dB) is noted. The Draft Plan includes objectives to have regard to national legislation on noise when assessing planning applications and to ensure that planning applications comply with the Wexford County Council Noise Action Plan 2019-2023 (N01-N05 and TS49 in Chapter 8 Transportation Strategy).

The Draft Plan also includes objectives to ensure that new development does not cause an unacceptable increase in noise levels affecting noise sensitive properties (N06), to ensure that future developments are designed and constructed to minimise noise disturbance (N07, N12), to require mitigation measures and monitors to be installed for developments likely to give rise to excessive noise (N08), to minimise noise from traffic by promoting

development patterns that combine walking, cycling and public transport (N09), to carry out traffic management measures and promote the use of electric vehicles (N10) and to require a sound impact assessment and mitigation measures for developments proposed near major roads (N11).

Section 2.6 of Volume 2 Development Management Manual sets out development management standards for noise and states that *"noise emanating from any proposed development shall not cause to be measured at the facing elevation (outside) of any dwelling in the area, during the hours 0700 – 2100 a noise level of 55 dB(A) (Laeq 1 hour) and during the hours 2100 – 0700 and Sundays and Bank Holidays a noise level of 42 dB(A) (Laeq 1 hour). The noise shall not be impulsive in nature or have any tonal element which is 4 dB(A) above the adjacent frequencies."*

The Energy Strategy contained in Volume 10 sets out development management standards for wind farms which includes more stringent noise limits (consistent with World Health Organisation noise standards) in accordance with the Draft Revised Wind Energy Development Guidelines (Department of Housing, Planning and Local Government, 2019).

In relation to Ms. Redmond's comments, the implementation of the building regulations is outside the remit of this Plan however Objective N12 states that it is an objective of the Council *"to ensure that future developments are designed and constructed in accordance with best practice to minimise noise disturbances through good acoustic design."* In relation to construction noise Objective N06 states that *"proposals for new development with the potential to create excessive noise will be required to submit a construction and/or operation management plan to control such emissions*" and this will be addressed at the individual project level. Similarly, hours of operation and construction will be assessed on a case-by-case basis at the project level. The investigation of noise issues of a domestic nature is outside the remit of this Plan.

Section 10.8 External Lighting

WXF-C3-82 (Dept. TCAGSM) states that in relation to Objectives EL01, EL02 and EL03 regard should be had to the Institute of Lighting Professionals (ILP) publication Guidance Note 1 for the reduction of obtrusive light 2020, particularly Table 2 which outlines Environmental Zones in relation to light pollution, the concept being that its impacts are worse in dark zones which should be subject to special light pollution control measures. It also notes that the RSES encourages measures to support and establish 'Dark Sky' parks and reserves, where appropriate (RPO 132) which could be considered in the plan.

WXF-C3-94 (WEN) also ask if the Council can change public lighting from blue and white toned LEDS to amber toned lighting as the blue and white tones are hugely contributing to a collapse in night pollinators and states that the Council should research the best wildlife friendly lighting for street lighting.

Section 10.8 External Lighting Chief Executive's Response

The current standard for external public lighting is 4,000 kelvin (4,100 to 4,150 Kelvin equates to moonlight) and at this point in time it is not possible to achieve safe lighting levels with the lower 2,400 to 2,500 kelvin. However, Wexford County Council will continue to endeavour to reduce the colour temperature of external public lighting while at the same time achieving minimum lighting level requirements.

The objectives in the Draft Plan and the Development Management Standards in Section 8.5 of Volume 2 are considered appropriate for the purposes of assessing planning applications and each development will be assessed on a case-by-case basis. A minor amendment is proposed to Section 8.5 of Volume 2 to include reference to any updated version of Wexford County Council's Public Lighting Specification document (2017) which may address the points raised in the submissions.

In relation to Dark Sky parks and reserves, there are areas in the County where this could be explored, and it is considered appropriate to include an objective in line with the RSES.

Section 10.9 Major Accidents Directive

While not arising out of a submission it is recommended that this section is updated to take account of the HSA's Consultation Draft Guidance on Technical Land-use Planning Advice for Planning Authorities and operators of COMAH establishments (2020).

Chief Executive's Recommendations

It is recommended that the following proposed amendments be made to Chapter 10 Environmental Management.

CE CH10.1

Amend Objective EM01 in Section 10.4.2 Strategy on page 399 as follows:

To ensure that proposed projects/developments comply with the requirements of EIA Directive 2014/52/EU of the European Parliament and of the Council of 16 April 2014, amending Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment, and as transposed into Irish law under national legislation, including in Schedule 5 Part 1 and Part 2 of the Planning and Development Regulations 2001 (as amended). In accordance with Article 3 of Directive 2014/52/EU, where EIA is required the environmental impact assessments presented in the Environmental Impact Assessment Report (EIAR) shall identify, describe and assess in an appropriate manner, the direct, ~~and~~ indirect and cumulative significant effects of a project on the following factors: population and human health; biodiversity (with particular attention to species and habitats protected under Directive 92/43/EEC and Directive 2009/147/EC); land, soil, water, air and climate, material assets, cultural heritage, and the landscape, and the interaction between the foregoing factors.

CE CH10.2

Amend second paragraph in Section 10.5.2 River Basin Management Plan 2018-2021 on page 403 as follows:

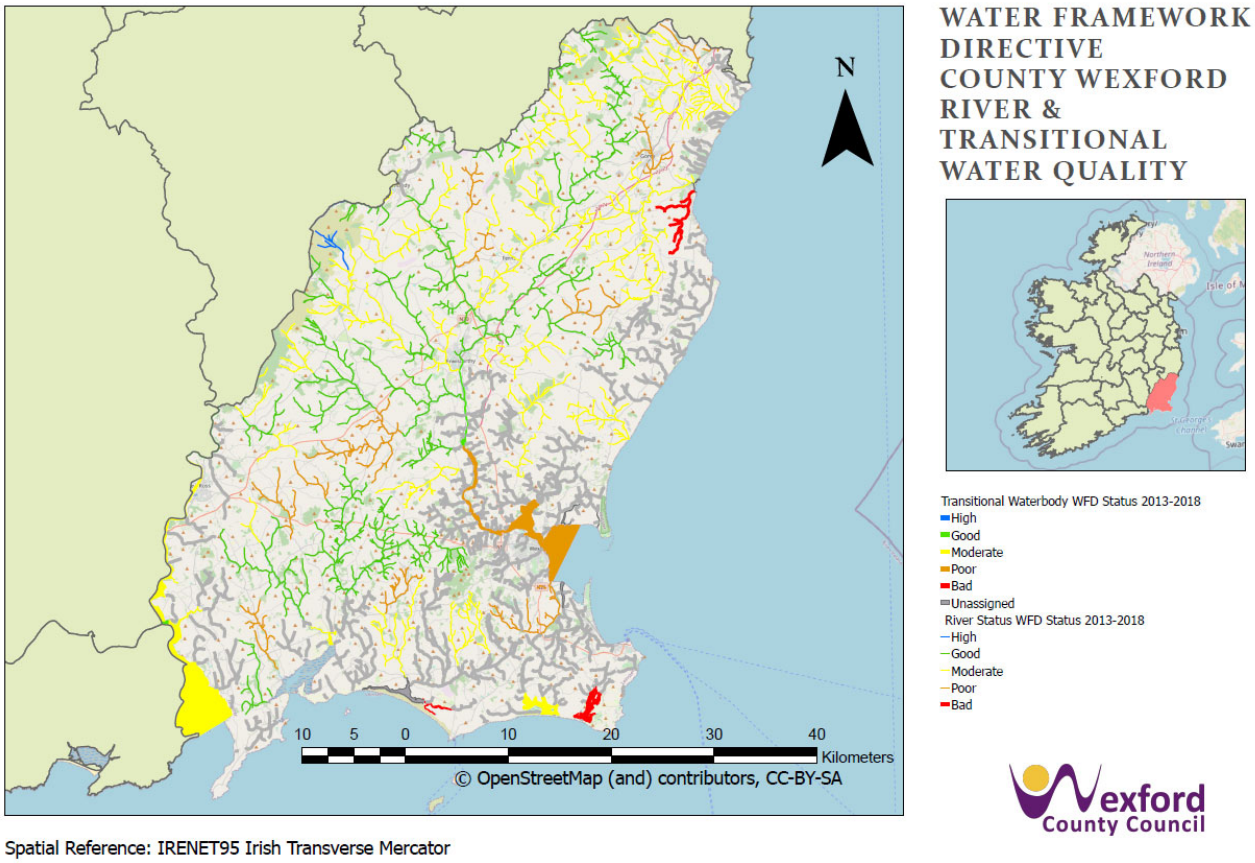
The second cycle of the RBMP 2018-2021 is currently underway and all eight RBDs have merged to form one national RBD. The RBMP sets out the actions that Ireland will take to improve water quality and achieve 'good' ecological status in waterbodies (rivers, lakes,

estuaries and coastal waters) by 2027. Ireland's third River Basin Management Plan is due to be published in December 2021 and will run for six years from 2022 to 2027.

CE CH10.3

Replace Figure 10-1 in Section 10.5.3 Overview of Water Quality in County Wexford on page 405 and re-title as follows:

Figure 10-1 WFD Water Quality Status of the River and Transitional Waterbodies in County Wexford



Spatial Reference: IRENET95 Irish Transverse Mercator

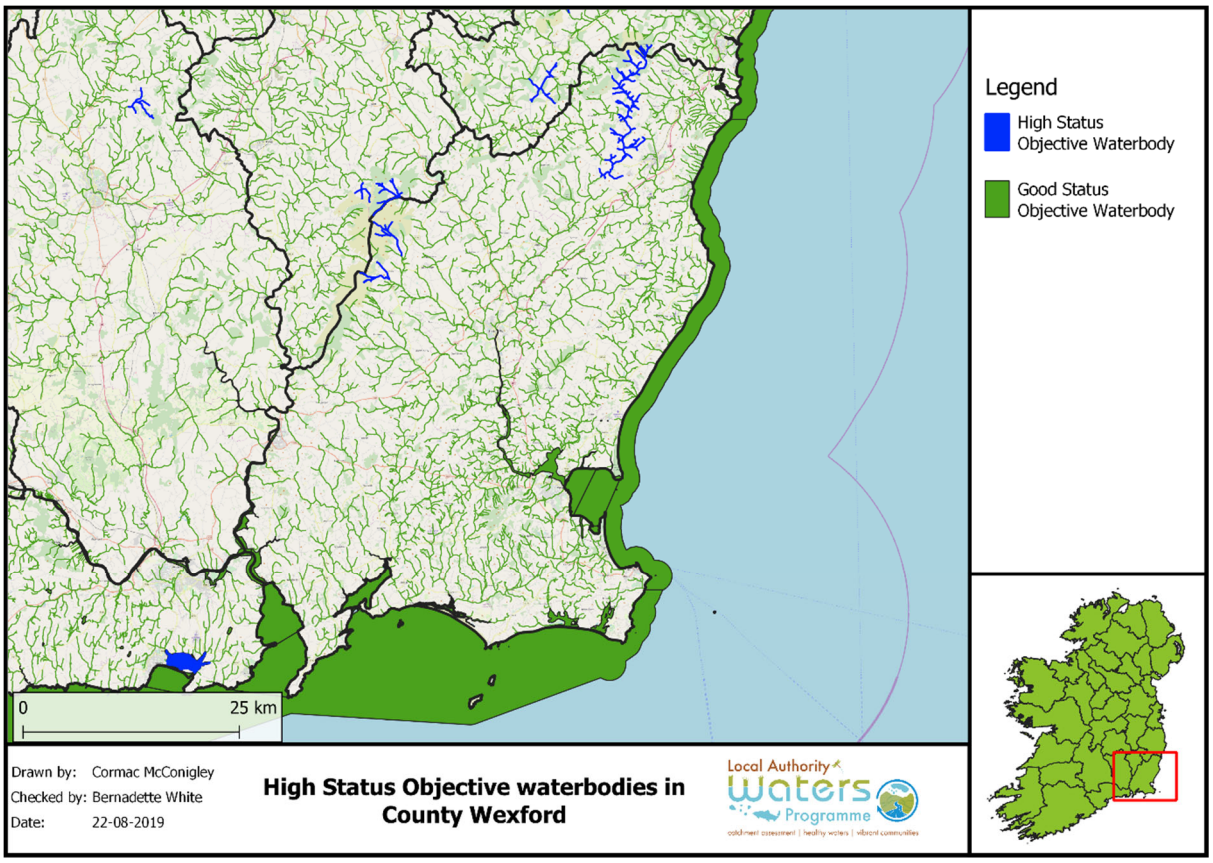
CE CH10.4

Amend text and insert map in Section 10.5.6 Blue Dots Catchment Programme on page 407 as follows:

This is a new programme under the RBMP to create a network known as the Blue Dot Catchment Programme of excellent river and lake areas. Agencies will work together to protect or restore excellent water quality in these water bodies. High status objective sites are water bodies that are at pristine and near pristine condition, or have been at this status

in recent years, and support important species such as Atlantic salmon, or support economic and recreational activities associated with unspoilt areas. They require additional care, and developments in these areas need to reflect their sensitive nature. A targeted programme including supports for septic tank owners to address inadequately functioning treatment systems in these areas will be put in place. Figure 10-2 shows the waterbodies identified for this programme in County Wexford.

Figure 10-2 Waterbodies Identified under the Blue Dot Catchment Programme



CE CH10.5

Amend Objective AQ06 and insert footnote in Section 10.6 Air Quality on page 413 as follows:

To implement Nearly Zero Energy Buildings (NZEB) standards and beyond to reduce the particulate matter generated by the combustion of fossil fuels.[15]

CE CH10.6

Add new External Lighting Objective on page 419 as follows:

To explore opportunities and support the establishment of 'Dark Sky' parks and reserves at suitable locations in the County, where appropriate.

CE CH10.7

Insert new paragraph at end of Section 10.9 Major Accidents Directive on page 421 as follows:

The HSA's Guidance on Technical Land-use Planning Advice for Planning Authorities and operators of COMAH establishments (Consultation Draft) (2020) outlines the risk-based approach which will be used by the HSA to advise on planning applications as well as the development of generic land use planning zones around establishments.

[15] The European Energy Performance of Buildings Directive Recast required that all new buildings be Nearly Zero Energy Buildings (NZEB) by 31st December 2020. NZEB homes are 70% more energy efficient than the performance requirements in 2005.

Section 15 Submissions Relating to Chapter 11 Landscape and Green Infrastructure

Relevant Submissions

- WXF-C3-82 Dept. Tourism, Culture, Arts, Gaeltacht, Sports and Media (Dept. TCAGSM)
- WXF-C3-94 Wexford Environment Network (WEN)
- WXF-C3-116 Coillte
- WXF-C3-134 Irish Water
- WXF-C3-151 Keep Ireland Open (KIO)
- WXF-C3-166 Fáilte Ireland

Summary of Main Issues and Chief Executive's Response

Section 11.1 Introduction

WXF-C3-166 (Fáilte Ireland) notes that while this chapter has limited reference to tourism, the inclusion of a Landscape Character Assessment in Volume 7 is welcomed, along with Objective L09 which aims to protect views worthy of protection, including views to and from tourism sites from inappropriate development.

While relating to the Landscape Character Assessment in Volume 7 and the Energy Strategy in Volume 10, Submission WXF-C3-116 (Coillte) state that each local authority consider/reconsider its Landscape Character Assessment (LCA) and identify landscape sensitivities vis a vis renewable energy developments. It is suggested that a regional approach is adopted.

While relating to the Landscape Character Assessment in Volume 7 and the Energy Strategy in Volume 10, Submission WXF-C3-116 (Coillte) state that each local authority consider/reconsider its Landscape Character Assessment (LCA) and identify landscape sensitivities vis a vis renewable energy developments. It is suggested that a regional approach is adopted.

Section 11.1 Introduction Chief Executive's Response

The submission of WXF-C3-166 (Failte Ireland) is noted. No amendment is necessary.

With regard to the submission from Coillte, the various landscape character units were used in deciding the areas open for consideration in the Volume 10 Energy Strategy.

Section 11.4 Goal

WXF-C3-94 (WEN) requests that biodiversity be included in the goal.

Section 11.4 Goal Chief Executive's Response

The overall goal currently reads "to protect the inherent beauty of our landscape and to promote and enable appreciation and enjoyment of the County's landscapes". Given the inclusion of green infrastructure within this chapter, it is considered appropriate to expand the wording of the goal to include 'the protection, restoration, enhancement and enjoyment of the County's green infrastructure and biodiversity'.

Section 11.5 Strategy

WXF-C3-151 (KIO) requests that an objective be included to 'adopt a regional approach to the protection of the landscape, in co-operation with neighbouring counties.'

Section 11.5 Strategy Chief Executive's Response

As landscapes traverse county and regional boundaries, co-operation and collaboration between local authorities and regional assemblies is important, and accordingly, it is considered appropriate to include an objective supporting such an approach. This would support National Policy Objective 61 which aims to facilitate landscape protection, management and change through the preparation of a National Landscape Character Map and the development of guidance on the preparation of guidance on local landscape character assessment to ensure a consistent approach to landscape planning.

Landscape Objectives

With regard to the Uplands Landscape Character Unit, WXF-C3-151 (KIO) requests the inclusion of additional objectives that address the preservation, maintenance and enhancement of Upland areas; that prohibit inappropriate developments which are likely to

have adverse visual impacts, either individually or cumulatively; ensure development will not interfere or detract from scenic and sensitive uplands and ensure visually prominent sites have been avoided to minimise visibility from scenic routes, walking trails, public amenities, settlements and roads. It is also suggested that the difficulty of establishing and maintaining vegetation in the Uplands needs to be considered.

WXF-C3-151 (KIO) also requests the inclusion of additional general landscape objectives to:

- Provide and increase managed public access to interesting and attractive landscapes or to semi-natural and landscape amenity areas for recreational purposes.
- Protect, conserve, preserve, maintain, safeguard, identify and enhance the visual integrity, scenic quality, general amenity and the visual quality of areas of intrinsically important and outstanding, highly sensitive, designated, natural, unspoilt and open landscapes, scenic areas, high amenity areas and the environs of archaeological or historic sites from intrusive, injurious and inappropriate development.

The submission notes that the fencing or enclosure of land open to or used by the public during the ten years preceding such fencing or enclosure for recreational purposes or as a means of access to any seashore, mountain or other place of natural beauty or recreational utility, requires planning permission. It is noted that wire and barbed wire fencing constitutes visual pollution and destroys the 'away from it all' feeling which makes upland areas such an attraction and that fencing can impede access for recreational usage. The submission suggests the wording for a new section entitled 'Fencing of Hitherto Open Land'. It is requested that an objective is included which would require that:

- Fencing, particularly in upland, highly scenic or amenity areas, will not normally be permitted unless such fencing is essential to the viability of the farm. The nature of the material to be used, the height of the fence, and in the case of a wire fence the type of wire to be used, will be taken in account. Stiles or gates at appropriate places will required. Barbed wire will not be used for the top line of the wire.

Landscape Objectives Chief Executive's Response

Having considered the request by WXF-C3-151 (KIO) to include additional landscape objectives, it is considered that Objectives, L05, L06, L07, L08 and L13, which relate to

Uplands, adequately cover the issues raised and that Objectives L04, L09, L10, L11, L12, L13, L14 and L15 will adequately ensure the protection of all landscapes.

It is considered that there is merit in including an objective relating to the fencing issue raised by WXF-C3-151 (KIO). This objective will provide that the fencing of areas such as upland commonages traditionally open to and used by the public will generally not be favourably considered by the Council.

Section 11.12 Green Infrastructure

WXF-C3-94 (WEN) requests the inclusion of objectives for landscape and green infrastructure restoration, annual minimum green infrastructure restoration/installations; and the retrofitting of existing streets and spaces with green infrastructure.

WXF-C3-134 (Irish Water) encourages the inclusion of policies and objectives on the use of Sustainable Urban Drainage Systems and Green Infrastructure in new developments and retrofitted in existing developed areas. These measures can provide a cost effective and sustainable means of managing stormwater and water pollution at source, keeping surface water out of combined sewers, while providing multiple benefits e.g. improved air quality, amenity and noise reduction.

In order to achieve Objectives GI01, GI02 and GI03, WXF-C3-82 (Dept. TACGSM) indicate that it will be necessary to map existing and proposed green infrastructure and ecological corridors at a settlement plan level, at a minimum. The inclusion of an objective to prepare Green Infrastructure Plans for settlements within the lifetime of this Plan and to map existing and proposed green infrastructure and connections at a suitable scale is therefore recommended. This submission also recommends the inclusion of an objective to submit ecological data collected during Ecological Assessments to the National Biodiversity Data Centre, where possible. This would strengthen the county's knowledge base on biodiversity and aid its protection.

Two submissions, WXF-C3-82 (Dept. TCAGSM) and WXF-C3-94 (WEN), request changes to Objective GI01:

WXF-C3-82 (Dept. TCAGSM) requests the following:

- Add the following text to point **(b)** 'In order to ensure there is no net loss of biodiversity, like for like mitigation and compensation measures required'.
- Add the following text to point **(g)** 'New hedging and hedge reinforcement must comprise native species of Irish origin only'. The submission also recommends that landscaping plans must accord with the "Pollinator Friendly Planting Code – Professional planting recommendations" of the All-Ireland Pollinator Plan 2015-2020.'
- It is suggested that the wording in point **(h)** be changed from 'Avoid culverting where possible' to 'Avoid culverting, unless absolutely necessary and unavoidable'.
- It also recommends the inclusion of additional objective to reopen existing culverts and infilling along watercourses, where possible under Objective GI01. The submission outlines that the removal of historic culverts and infilling would allow for some existing degraded watercourses to return to more naturally functioning systems, provide natural flood relief, provide for biodiversity gain and where appropriate, permit the recreational use of inaccessible riverbanks.

WXF-C3-94 (WEN) requests the following:

- Insert the word biodiversity after environment in the second line of the objective.
- In point **(b),** replace 'where possible' with 'as much as possible retain existing features' and insert 'This is particularly important for development in rural areas and one-off housing' at the end of the second sentence.
- In point **(g)**, the Council should produce a Tree (and Hedgerow) Strategy which could be used, amongst other things, to inform Tree Protection Orders.
- In point **(h)** include 'and daylight streams and rivers where possible as part of providing green infrastructure'

Regarding Objective GI06, WXF-C3-82 (Dept. TCAGSM) considers that clear span bridging structures and box culverts are always the preferred option to piped culverts.

Regarding Objective GI04, WXF-C3-82 (Dept. TCAGSM) advises that the document 'Planning for Watercourses in the Urban Area' has been updated and this objective and other places within the Plan where this document is referenced should be updated to the latest version.

Section 11.12 Green Infrastructure Chief Executive's Response

In response to many submissions, Chapter 13 Heritage will now include an enhanced focus on biodiversity restoration which is also inherently linked to landscape restoration. Notwithstanding, it is considered worthwhile to also include references to biodiversity and landscape restoration in this section and relevant objectives in so far as it can be achieved through the implementation of the green infrastructure objectives.

In response to Irish Water, Chapter 9 Infrastructure and Volume 11 Strategic Flood Risk Management include a suite of SuDS objectives which will work alongside the objectives in this chapter. Additional text relating to the promotion of an integrated, area based approach and the use of nature based solutions has been recommended for inclusion in response to the submission from the Office of Public Works.

Given the broad-based nature of the CDP, it is not considered appropriate to set annual minimum green infrastructure restoration targets/installations. However, this is something that could be given more detailed consideration in future local area plans and the new County Biodiversity Action Plan.

Objective GI02 proposes to 'identify, protect, enhance and manage Green Infrastructure in all Local Area Plans in an integrated and coherent manner'. This will include the mapping of existing and proposed green infrastructure and connections at suitable scale. Accordingly, it is recommended to amend Objective GI01 to confirm this.

Actions relating to the mapping of green infrastructure and data collaboration with the National Biodiversity Data Centre will also be considered as part of the new County Biodiversity Action Plan.

The production of a Tree and Hedgerow Strategy would be onerous at a county level but will be considered as part of the preparation of future LAPs and the new County Biodiversity Action Plan**.** Objectives NH11 and NH12 in Chapter 13 Heritage and Conservation include for the protection of trees, woodlands and hedgerows of amenity and biodiversity value in the development management process. Objective NH12 also provides for the making of Tree Preservation Orders where appropriate. No amendment proposed.

The retrofitting of existing streets and spaces with green infrastructure should be embraced by everyone. This approach can be incorporated into local authority own urban regeneration and public realm projects, town and village renewal scheme projects, and smaller projects led by local community and environmental groups. It is recommended that a new objective be included in the Draft Plan to support this.

Regarding the requested changes to Objective GI01, some of the proposed changes do strengthen the objective and as such it is recommended that those changes be included. The proposed objective to re-opening existing culverts/daylight streams is a very good idea and it is recommended for inclusion in this chapter. This approach should form part of a wider biodiversity restoration programme, and a multi-stakeholder approach is recommended. In the first instance, the OPW will need to be consulted to provide consent to make amendments under the Arterial Drainage Act, as required. Other stakeholders such as Inland Fisheries Ireland, LAWPRO and NPWS be also be engaged, where necessary. It is recommended that an objective be included in the Draft Plan to promote the re-opening of existing culverts, where possible.

Regarding Objective GI04, the updated version of the Inland Fisheries Ireland document 'Planning for Watercourses in Urban Environment' was published in October 2020, after the Draft Plan was placed on public display. The Council contributed to the preparation of the new Guidelines and was pleased to be credited for this contribution. Its predecessor and the new version of the Guidelines proposes the planning of watercourses from a multi-stakeholder perspective and seeks to maximise the significant co-benefits that will arise from this approach. These benefits range from better water quality and more resilient and

natural ecosystems to positive effects of nature and green areas for community well-being, recreation, health and recovery from serious illness and even reduced levels of anti-social behaviour. It is recommended that all references to this document, both in this chapter and throughout the Draft Plan be updated accordingly.

The comments regarding the preferred design for culverts are noted. This is considered a matter for the OPW when authorising the culverting of watercourses. No amendment proposed.

Section 11.9 Scenic Routes and Protected Views

WXF-C3-166 (Fáilte Ireland) welcomes reference to trails such as the Eurovelo, Norman Way, Greenways and Wexford Walking Trails, as being potentially sensitive as visitors are more likely to be concentrated along these walking and cycling trails.

Section 11.9 Scenic Routes and Protected Views Chief Executive's Response

Noted. No amendment necessary.

Chief Executive's Recommendations

It is recommended that the following proposed amendments be made to Chapter 11 Landscape and Green Infrastructure:

CE CH11.1

Amend Section 11.4 Goal on page 426 as follows:

To protect the inherent beauty of our landscape and to promote and enable appreciation and enjoyment of the County's landscapes <u>and to protect, restore and enhance the County's green infrastructure and biodiversity for the benefit of all.</u>

CE CH11.2

Include a new objective in the Landscape Objectives on page 435-436 as follows:

<u>To collaborate with adjoining local authorities, the Southern Regional Assembly and adjoining Regional Assemblies to co-ordinate a consistent approach to landscape planning and management policies, where possible and feasible.</u>

CE CH11.3

Include a new objective in the Landscape Objectives on page 435-436 as follows:

The fencing or enclosure of lands, such as upland commonages, traditionally open to and used by the public will generally not be favourably considered unless it is essential for the operation of an agricultural holding or other demonstratable essential reason. Where permitted the nature of the material to be used and the height of the fence will be required to be visually appropriate. Where rights of way exist stiles or gates at appropriate places will also be required.

CE CH 11.4

Amend the second paragraph in Section 11.12 Green Infrastructure on page 437 as follows:

Green infrastructure has positive economic, social and health benefits. It contributes to the protection of urban and rural environments for people~~,~~ and the protection, enhancement and restoration of biodiversity and ecosystem services, which in turn delivers environmental and quality of life benefits such as improving air, water and soil quality, flood protection, access provisions and linkages, climate change/amelioration and pollution control.

CE CH11.5

Amend the last paragraph in Section 11.12 on page 437 as follows:

River corridors and their associated riparian zones are important for ecological and amenity reasons, flood risk management and water protection. Proposals for development along river corridors and in riparian zones shall have regard to the principle for protecting watercourses as set out in the document 'Planning for Watercourses in the Urban ~~Area~~ Environment' (Inland Fisheries Ireland, 2020) ~~(Shannon Regional Fisheries Board)~~and any updated version of these Guidelines.

CE CH11.6

Amend the text in Section 11.12 Green Infrastructure on page 437 to include references to nature-based solutions as follows:

Nature-based Solutions (NBS) – with healthy and biodiverse ecosystems at their core - are central to achieving objectives relating to the protection and restoration of biodiversity and play a critical role in climate change adaptation and becoming more climate resilient. NBS

are about using nature's own resources – clean air, water and soil in a smart way to tackle environmental challenges. These solutions work with nature to provide sustainable, cost effective ways to achieve a greener economy that is competitive and resourceful. It will be a key component and will form a key component of surface water management and green infrastructure in the county.

CE CH11.7

Insert an additional bullet point in the paragraph relating to the outputs of a well-designed green infrastructure network on page 439 as follows:

- Incorporate nature-based solutions that contribute to the protection, restoration and enhancement of biodiversity and ecosystem services.

CE CH 11.8

Amend Objective GI01 in Section 11.12 Green Infrastructure on page 439 as follows:

To ensure the protection, enhancement and maintenance of the natural environment and recognise the economic, social, environmental, biodiversity and physical value of green spaces through the integration of Green Infrastructure planning and development in the planning process.~~,~~ ~~p~~Planning applications for development must demonstrate ~~that they have had regard to the following guidance~~ compliance with the following requirements:

a) The integration of Sustainable Drainage Systems (SuDS)~~,~~ and nature-based solutions into the overall site concept and layout;
b) The retention and enhancement of landscape connections, ~~where possible~~ such as trees, hedgerow and water features~~,~~ that provide habitats for species and allow movement between areas, as much as possible. This is particularly important for development in rural areas and one-off housing. Such connectivity both within and to features outside the site should be demonstrated in the application. In the event that it is not possible to retain landscape connections, and in order to ensure that there is no net loss of biodiversity, proposals to mitigate and compensate/provide for new connectivity shall be detailed;
c) To demonstrate, where applicable, the downstream impacts of significant landscape modifications and proposals to mitigate and compensate for same;

d) To design the footprint of the development to avoid impacts on areas of high biodiversity value;

e) Avoid building on flood plains. Incorporate these features into the design and use them as flood prevention and water management features;

f) Ensure that adjacent designated sites are not impacted by the proposed development. This is particularly important for developments adjacent to wetlands;

g) Landscaping plans shall use species appropriate to the physical and environmental conditions of the site including soil conditions, availability of space and aspect. These plans should use a high diversity of native trees, incorporating a ~~Choose a~~ variety of sizes and age classes to improve visual and structural diversity. New hedging and hedge reinforcement in rural areas must comprise native species. Landscaping plans must also incorporate the principles of the 'Pollinator Friendly Planting Code – Professional Planting Recommendations' of the All-Ireland Pollinator Plan 2015 – 2020 and any updated version of this code;

h) Avoid culverting unless absolutely necessary and unavoidable;

i) Creation of open drainage ditches instead of underground pipes where appropriate as these provide additional habitats and water source for wetland species;

j) Ensure that invasive species are not used in terrestrial or aquatic planting schemes; and

k) Reduction of hard, impermeable surface to a minimum and to consider the use of green roofs.

CE CH 11.9

Amend Objective GI02 in Section 11.12 Green Infrastructure on page 440 as follows:

To identify, protect, enhance and manage Green Infrastructure in all local area plans in an integrated and coherent manner. This will include the mapping of existing and proposed green infrastructure and connections at a suitable scale.

CE CH11.10

Amend Objective GI04 in Section 11.12 Green Infrastructure on page 440 as follows:

To have regard to the Planning for Watercourses in the Urban ~~Area~~ Environment (Inland Fisheries Ireland, 2020) and any updated version of this guidance when considering development proposals in the vicinity of rivers and streams.

CE CH11.11

Amend Objective GI05 in Section 11.12 Green Infrastructure on page 441 as follows:

To ensure riparian buffer zones, a minimum of 10 metres in width (in some case buffer zones of up to 50m metres may be appropriate), are created between all watercourses and any future development. In considering the appropriate width, the Council will have regard to 'Planning for Watercourses in the Urban ~~Area~~ Environment (Inland Fisheries Ireland, 2020) and any future update version of these guidelines.

CE CH 11.12

Add a new objective to Section 11.12 Green Infrastructure on page 441 as follows:

To consider the appropriate reopening of existing culverts and infilling along watercourses to allow degraded watercourses to return to more naturally functioning systems, provide natural flood relief, provide for biodiversity gain and where appropriate, permit the recreational use of inaccessible riverbanks. This shall be done in consultation with the Office of Public Works and other key stakeholder such as Inland Fisheries Ireland, LAWPRO and National Parks and Wildlife Service and is subject to compliance with the Habitats Directive and normal planning and environmental criteria.

CE CH11.13

Add a new objective to Section 11.12 Green Infrastructure on page 441 as follows:

To promote the appropriate retrofitting of streets and spaces in towns and villages with green infrastructure.

CE CH11.14

Add a new objective to Section 11.12 Green Infrastructure on page 441 as follows:

To promote the re-opening of existing culverts to daylight streams as part of a wider biodiversity restoration plan. This will require a multi-stakeholder approach including the OPW, Inland Fisheries, LAWPRO and NPWS. Consent, if necessary, should be obtained from OPW to make these amendments of under the Arterial Drainage Scheme.

Section 16 Submissions Relating to Chapter 12 Coastal Zone Management and Marine Spatial Planning

Relevant Submissions

- WXF-C3-10 Geological Survey Ireland (GSI)
- WXF-C3-75 Seal Rescue Ireland
- WXF-C3-82 Department of Tourism, Culture, Arts, Gaeltacht, Sports and Media (Dept. TCAGSM)
- WXF-C3-85 Wexford PPN
- WXF-C3-94 Wexford Environmental Network (WEN)
- WXF-C3-96 Gas Networks Ireland (GNI)
- WXF-C3-143 An Taisce
- WXF-C3-151 Keep Ireland Open (KIO)
- WXF-C3-169 Coastwatch

Summary of Main Issues and Chief Executive Response

Section 12.1 Introduction

WXF-C3-85 (Wexford PPN) welcomes the alignment within the document to their Environment and Sustainability Vision.

WXF-C3-169 (Coastwatch) raises as an issue the need to strengthen the biodiversity component of the Draft Plan. Biodiversity restoration and management creates jobs and the higher environmental quality provides more resilience against climate change. The Wexford coast has many Natura 2000 sites, most are neither at good status under the WFD or favourable status under the Habitats or Birds Directive. Accordingly, restoration and protection needs to feature strongly in the coastal zone and should be reflected throughout the Draft Plan, especially where the Plan mentions just the Habitats Directive.

Section 12.1 Introduction Chief Executive's Response

The need to strengthen the biodiversity component of the Draft Plan has been raised in a number of submissions. It is considered beneficial to strengthen the focus on biodiversity restoration and management in the relevant sections and objectives in this chapter, alongside other chapters in the Draft Plan.

Section 12.2 Climate Action in Coastal Areas

WXF-C3-169 (Coastwatch) recommends that the third bullet point regarding natural features and habitats be amended to omit the words 'the role of' and include 'hedgerows'. The submission also recommends the inclusion of two additional bullet points that propose a county seawall inventory and support of citizen science monitoring of the coastal zone.

Section 12.2 Climate Action in Coastal Areas Chief Executive's Response

The suggested change to the third bullet is considered appropriate and it is recommended that it be amended accordingly.

The Council would welcome the support of citizen science monitoring in the coastal zone, both as part of the County Development Plan and the County Coastal Strategy. It is recommended that a reference to same be included in this section.

The county wall seawall inventory would be more appropriately considered as part of the County Coastal Strategy. No amendment proposed in this regard.

Having reviewed this section, it is also recommended to amend the 8th bullet point, which relates to facilitating development at ports and harbours which will improve safety in marine activities, to avoid potential damage from climate change (such as increased storminess and storm surges).

Section 12.3 Marine Spatial Planning

WXF-C3-75 (Seal Rescue Ireland) and No. 94 (WEN) requests the inclusion of the text to confirm that the Council recognises the inherent socio-economic and environmental value of wildlife, especially apex predators such as seals and the role that biodiverse ecosystems

play in regulating our environment, and therefore, supports the increased protection of wildlife and their habitats'. These submissions also request the inclusion of an objective that supports the introduction and enforcement of new and existing Marine Protected Areas along the coast of County Wexford and the adjacent marine area.

Section 12.3 Marine Spatial Planning Chief Executive's Response

Ecosystem services in the marine area are addressed in Section 12.5.6 of this chapter. It is recommended that Section 12.5.6 be amended to reflect these suggestions. While Marine Protected Areas are also already referenced in this section, it is recommended that further detail on the aim and importance of these areas be included, together with a supporting objective to protect these areas in line with the Council's statutory duties.

Section 12.4 Coastal Zone Management and Marine Spatial Planning

WXF-C3-82 (Dept. TCAGSM) notes the Council has commenced work on a County Coastal Strategy. It is recommended that this Strategy should include Objective 5.1.4 of the National Biodiversity Action Plan 'Promote the incorporation of ecological engineering features in new and existing structures such as coastal defences' and should also investigate 'managed retreat' as a coastal erosion management option. The development of a cost/benefit analysis procedure to assess proposed coastal protection projects, which should include environmental costs, is encouraged.

WXF-C3-169 (Coastwatch) welcomes the strategic objectives, however it notes that the word biodiversity is missing. It is requested that wherever the objectives state 'and compliance with the Habitats Directives', it should instead state 'compliance with national and EU biodiversity policy and law'. This submission also queries how Objective CZM02 (preparation of a County Coastal Strategy) relates to Objective CZM05 (the preparation of an Integrated Coastal Zone Management Plan for the coastal and esturine areas of the county and region). The submission suggests the two objectives be amalgamated with the revised Objective CZM02 focusing on the Coastal Zone Management Plan and Objective CZM05 focusing on the preparation of a Waterford Estuary Management Plan.

The need for public participation and involvement in the preparation of these plans is also highlighted in this submission.

WXF-C3-143 (An Taisce) notes that many of the objectives in the Draft CDP appear to prioritise economic growth in the marine area over the protection of marine ecology, including Objective CZM01. The submission suggests that it must be recognised that a healthy ocean ecosystem is absolutely fundamental for any economic or social benefits. In this regard, the submission welcomes Objective CZM40 (application of an ecosystem approach to planning in the coastal and maritime areas).

Section 12.4 Coastal Zone Management and Marine Spatial Planning Chief Executive's Response

The suggestions to include Objective 5.1.4 of the NBAP and environmental costs into costs/benefit analysis are noted and will be given consideration in the preparation of the County Coastal Strategy.

Regarding WXF-C3-169 and the request for additional biodiversity references, there are objectives throughout the Draft Plan relating to the implementation of relevant EU Directives e.g. Objective WQ14 (Water Framework Directive), Objective NH04 (Birds Directive and Protected Species), Objective AQ01 (Air Directive) and Objective COMAH01 (Major Accidents Directive).The Habitats Directive imposes a higher test for development, in that, the Competent Authority is not allowed to grant permission, and as such the Habitats Directive must be given the treatment it has in the Plan. While it is not considered necessary include more references to biodiversity policy and law, it is recommended to include compliance with the Habitat's Directive be added to Objective CZM35, point (c).

The suggestion to amalgamate Objectives CZM02 and CZM05 is noted. However, it is considered that these objectives remain independent for the following reason. An integrated approach to coastal zone management is the preferred approach as it brings together all those involved in the development, management and use of the coast within a framework that facilitates the integration of their interests and responsibilities. Given the complexity and time involved in co-ordinating this approach, and given the increasing

threats facing our coastal areas from climate change, coastal erosion and flooding, the County Coastal Strategy will provide an interim strategy to co-ordinate the management of these issues. The Council welcomes stakeholder involvement and public participation in preparation of its plans and strategies. Objective CZM05 includes estuarine areas of the county and region. No amendment proposed.

Contrary to the suggestion that the economic growth in the maritime area has been prioritised over environment and social, it is considered that the Draft Plan proposes a very balanced strategy for the management of the county's coastal and maritime areas with a strong focus on protection of social and environmental wellbeing. The objectives have been drafted to ensure the environmental, social and economic wellbeing e.g. Objective CZM01, CZM03, CZM04 and CZM11. This chapter also incorporates the holistic approach to marine spatial planning as proposed in Draft Marine Planning Spatial Framework. Furthermore, the recommended increased references to biodiversity protection and restoration reinforces the Council's commitment in this regard.

Section 12.5 Managing the Coastal Zone and Maritime Area

Section 12.5.2 Universal Access

WXF-C3-169 (Coastwatch) supports this approach but suggests that it would be desirable to build in the responsibility of shore closure or other protections in the interests of biodiversity e.g. ground nesting birds like terns and ringed plovers during the breeding seasons or seal pupping sites.

Section 12.5.2 Universal Access Chief Executive's Response

Comments noted. There are specific objectives in the Draft Plan that will require biodiversity to be carefully considered as part of all new development proposals. Accordingly, no amendment is considered necessary to this section.

Section 12.5.3 Climate Action

WXF-C3-169 (Coastwatch) requests that this section also includes other climate change related issues such as the impacts of increased temperatures on mudflats and the importance of reducing nutrient inputs and opportunistic algae on mudflats.

Section 12.5.3 Climate Action Chief Executive's Response

The comments are noted, and it is recommended that a new paragraph on the impacts of climate change on coastal and maritime ecosystems be included in this section. This should also be given detailed consideration in the new County Biodiversity Action Plan and future County Climate Action Plans.

Section 12.5.4 Coastal Erosion

WXF-C3-169 (Coastwatch) highlights the need for planning enforcement to be active in coastal zones, in particular, given the amount of unauthorised erosion control measures. This submission seeks the setting up of a dedicated Coastal Zone Management Committee which includes community and stakeholder representatives to help bring forward the Coastal Strategy Plan and focus on restoration of ecosystem services and educational tourism. Public participation, monitoring, good accessible data management and enforcement in the coastal zone are essential.

WXF-C3-10 (GSI) outlines that CHERISH data could be used for Objectives CZM21, CZM24, CZM25, CZM29, CZM31 and CZM38 if proposals overlap CHERISH sites. The submission welcomes the mention of Geological Survey Ireland in Objective CZM28, and requests that the Discovery Programme be noted in the fourth paragraph of this section. It also requests wording clarifications regarding the survey work undertaken in Rosslare to date.

This submission also advises that the GSI is undertaking a new coastal vulnerability mapping initiative. The maps produced will provide an insight into the relative susceptibility of the Irish coast to adverse impacts of sea – level rise through the use of a Coastal Vulnerability Index (CVI) and will enable coastal managers to prioritise or concentrate efforts on adaptation.

Section 12.5.4 Coastal Erosion Chief Executive's Response

The concerns expressed about unauthorised coastal erosion protection works are noted, and the Council is and will utilise its planning enforcement powers where necessary. This chapter includes detailed objectives to control coastal protection works including Objectives CZM30, 32, 33, 34 and 35. It is further anticipated that the impending County Coastal

Strategy will provide a balanced framework to co-ordinate coastal protection works, both public and private, along our coastline. No amendment necessary.

The Council welcomes the work of the CHERISH project in the county. The suggested incorporation of the 'Discovery Programme' and updating the text relating to the survey work in Rosslare is recommended.

The Council also welcomes the development of new coastal vulnerable mapping and associated index. This will be an invaluable tool for local authorities in their climate adaptation work, and in this regard it is appropriate to include a reference to this mapping and index as a coastal planning and management tool.

Section 12.5.6 Ecosystem Services

WXF-C3-82 (Dept. TCAGSM) recommends that this section be amended to reflect the fact that coastal habitats such as dune systems and shoreline habitats are dynamic, interconnected habitats. Erosion is a natural process which many coastal habitats depend on. It is vital that the natural circulation of sediment and organic matter is allowed to continue without physical obstruction and that natural erosion is allowed to continue in order to conserve these habitats. In relation to flooding, overtopping is a natural process in certain coastal habitats such as lagoonal systems where such "shock" events, corresponding to a sudden increase in salinities, are a natural feature of their ecology.

Section 12.5.6 Ecosystem Services Chief Executive's Response

The comments are noted. It considered valuable to detail the symbiotic relationship between coastal erosion and flooding and some coastal habitats and species, and it is recommended that the text in this section be amended accordingly.

Section 12.5.9 Water Quality

WXF-C3-75 (Seal Rescue Ireland) and No. 94 (WEN) request the inclusion of an objective to require and enforce the fencing off of all waterways from livestock as per Government regulations that came into operation on January 1st, 2021. The submissions also suggest that aid should be increased to landowners for restoring wetlands and riparian (riverside)

vegetation, specifically preserving mature trees and planting native trees along waterways. This is an evidence-based, natural solution to prevent water quality issues that impact wildlife and habitats in freshwater, estuarine, coastal and marine zones.

Section 12.5.9 Water Quality Chief Executive's Response

The comments are noted. The subject regulations, S.I No. 529/2020 – European Union (Good Agricultural Practice for Protection of Waters) (Amendment) (No. 3) Regulations 2020, relates to farm holdings with specified livestock numbers. The implementation of the Regulations along with the provision of grant aid for farmers falls outside of the remit of the County Development Plan. Accordingly, no amendment is proposed.

Managing the Coastal Zone and Maritime Area Objectives

WXF-C3-94 (WEN) requests that Objective CZM21 be amended to encompass the potential impacts of development on marine life, recognising that fish and their habitats are essential to coastal communities. Similarly, Objective CZM30, should reference marine life in the items that protection works wouldn't be detrimental to.

WXF-C3-151 (KIO) requests that Objective CZM42 be replaced with more detailed objectives to, inter alia, protect beaches, estuaries, sand dunes, designated landscapes and amenity areas, to protect their environmental quality, visual amenity, amenity values and distinctive characteristics, strictly control development, and prohibit development that poses a significant threat to coastal features/coastal erosion and ensure compliance with the Habitats and Birds Directives.

Managing the Coastal Zone and Maritime Area Objectives Chief Executive's Response

The focus of Objective CZM21 is 'to support proposals for new development or activities in coastal and maritime areas that enhance or promote social benefits for the local communities.' The scope of social benefits is wide and would extend to more than the relationship of marine life to coastal communities. Accordingly, it is not considered appropriate to include this specific reference. No amendment proposed.

Objective CZM30 relates to the carrying out of environmental sensitive coastal works and while it already refers to important habitats, coastal features or designated sites, it is recommended that marine life and species be included in this objective. It is considered that Objective CZM40, which relates to an ecosystem approach to planning in the coastal and maritime areas, also provides the protection sought by WXF-C3-94 (WEN).

With regard to the request to replace Objective CZM42, it is considered that this objective (to adopt a presumption against development which would have inappropriate impacts on the seascape and landscape of the coastal area) together with a suite of other objectives both this chapter and other chapters in the Draft Plan provide the protection sought by WXF-C3-151 (KIO). No amendments are considered necessary.

Section 12.6 Specific Land Use/Land Side Developments in the Coastal Zone

Section 12.6.2 Fisheries and Aquaculture

WXF-C3-94 (WEN) requests that this section recognises the damaging impacts of marine litter on marine life, much of which is discarded fishing gear, and to promote litter management and reclamation facilities in all developments associated with fisheries.

Section 12.6.2 Fisheries and Aquaculture Chief Executive's Response

While the issue of marine litter is already referenced in Section 12.5.6 Ecosystem Services, it is considered appropriate to highlight the issue in this section and amend the wording of Objective CZM45 to incorporate the marine litter management.

Section 12.6.3.1 Carbon Capture and Storage

WXF-C3-96 (Gas Networks Ireland) welcomes the inclusion of this section. The submission outlines that in 2019 Ervia and Gas Networks Ireland published 'Vision 2050' which outlines a pathway to achieve a net zero carbon gas network by 2050 via the introduction of biomethane and hydrogen into the gas network and by abating natural gas CO_2 using CCS. Ervia (Gas Network Ireland's parent company) is currently assessing the feasibility of CCS in Ireland. The submission notes that the European Commission recently published its strategies on Hydrogen and Energy Sector Integration which estimate electricity will only provide 50% of Europe's energy by 2050. Even if Ireland increases electricity to the EU

target of 50% by 2050, the remaining 50% of energy must be decarbonised, and zero carbon gases (in particular hydrogen) and Carbon Capture and Storage (CCS) are essential to this.

With regard to Objective CZM46, WXF-C3-143 (An Taisce) highlights that the future technological development of carbon capture and storage (CCS) of any significant scale and in any immediate time frame is very uncertain. It is submitted that future development in Wexford should focus on emissions reductions by proposing policies for transitioning away from fossil fuel use rather than relying on an uncertain technology such as CCS. Objective CZM46 should include a caveat that any CSS development must be predicated on the determination of its overall feasibility and efficacy.

Section 12.6.3.1 Carbon Capture and Storage Chief Executive's Response

The issues raised in both submissions are noted. As outlined in the Draft Marine Spatial Planning Framework, this approach requires further examination to determine the feasibility and cost effective utilisation of CCS in Ireland, either in suitably geological formations such as depleted gas fields or for export to assist Ireland in meetings its CO_2 emissions reduction targets. Accordingly, it is considered appropriate to include 'where considered feasible' in the wording of Objective CZM46.

Section 12.6.3.2 Energy Transmission

With regard to Objective CZM47, WXF-C3-143 (An Taisce) recommends that the objective should be amended to distinguish between gas and electricity proposals and to prohibit further expansion of the fossil gas network. The submission outlines that electricity interconnection enhances renewable energy capacity by allowing better management of peaks and troughs. Gas pipelines, on the other hand, lock in dependence to fossil gas and will become stranded assets as Ireland transitions away from fossil fuels. Any consideration of gas transmission and the associated infrastructure needs to take into account the issue of gas infrastructure becoming a stranded asset as Ireland transitions away from fossil fuel use as required by national and EU law.

WXF-C3-96 (WEN) requests that gas be removed from Objective CZM47 as the development of new fossil fuel infrastructure is not consistent with the Paris Agreement goals or actions needed to response to the climate emergency.

Section 12.6.3.2 Energy Transmission Chief Executive's Response

The points raised in these submissions are noted. The issue of facilitating new gas infrastructure has been raised in other submissions and is discussed in more detail in Chapter 2 Climate Action and Chapter 9 Infrastructure. The focus and narrative of Section 12.6.3.2 relates primarily to the general development of energy interconnection infrastructure. The section does not focus on specific energy types other than the reference to the importance of interconnection infrastructure in absorbing high levels of renewable generation onto the transmission system. Accordingly, it is recommended that the words 'gas and electricity' in the associated Objective CZM47 be replaced by 'energy'.

Section 12.6.3.3 Offshore Renewable Energy

WXF-C3-143 (An Taisce) recommends that that the CDP include a policy requiring the use of a seabird sensitivity map in the early stages of planning, to assess the risk posed by marine renewable energy developments, and to fully comply with legal obligations to protect birds and their habitats. The submission notes that the development of a sustainable and effective offshore energy regime for Ireland is a major strategic priority for the decade ahead. Wind energy installation has been decreasing in costs, and the technology for the deployment of floating turbines is now in place, radically increasing the marine area open to consideration for use.

Section 12.6.3.3 Offshore Renewable Energy Chief Executive's Response

The Draft Plan and Volume 10 Energy Strategy acknowledge the potential for offshore renewable energy. Realising this potential also forms a key component of the current Programme for Government, with a focus on floating wind, tidal and wave power. The programme indicates that a plan will be developed that will, amongst other proposals, set out a path to achieving 5GW in offshore wind by 2030 off Ireland's Eastern and Southern coasts.

As discussed under Volume 10, it is recommended that the seabird sensitivity mapping be used as part of the preparation and assessment of marine energy developments.

Section 12.6.8 Tourism and Recreation in the Coastal Zone

In relation to the coastal path mentioned on page 475, WXF-C3-82 (Dept. TACGSM) requests that the term 'casual walkway' should be defined as should the type of 'link' envisioned. With regard to associated Objective CZM64, the submission recommends that an objective should be included to conduct a Habitat Survey along the route of coastal way-marked walk to inform the feasibility of this objective and to monitor the impact of existing pathway. It notes that is not clear whether this original route was subject to any environmental assessments. The submission also raises concerns about the potential for hard infrastructure and increased footfall to disturb systems e.g. dune system and species e.g. coastal birds. Other concerns include habitat fragmentation, erosion and spread of invasive species and disturbance of species other than birds and cumulative impacts. Prior to any development adequate baseline data (bird surveys) will be required to establish impacts.

WXF-C3-151 (KIO) recommends that Objective CZM67 be amalgamated with Objective CZM23. This submission also requests the inclusion of additional objectives to, inter alia,

- protect beaches, dunes and other vulnerable areas from car parking and vehicular movements;
- ensure tourism development has no negative impacts on amenities or the integrity of the natural environment;
- prohibit development of facilities for fishing and leisure developments where installation and supporting infrastructure would have adverse effects on the environment, natural heritage or designated sites or detract from the visual amenity of an area or public access to beaches;
- By laws to restrict or prohibiting water skiing;
- Protect established rights of way to coastal areas;
- Ensure water sport developments are compatible, do not have adverse impacts on heritage assets or seascapes and do not unduly restrict access;

- Provide, support, actively promote, maintain, protect, improve and enhance public access to the coast, beaches, seashore, coastal heritage and scenic landscapes in co-operation with landowners, relevant stakeholders and local groups; and
- Where feasible, develop walkways/cycleways between the coast and green spaces in built-up areas.

Section 12.6.8 Tourism and Recreation in the Coastal Zone Chief Executive's Response

With regard to the coastal pathway, the term 'casual walkway' is intended to mean a walkway that people will use for recreation purposes and it is envisioned that the walkway could act as a pedestrian link between settlements along and in the vicinity of the walkway. Objective CZM64, which relates to the development of the walkway, includes the proviso 'where possible and appropriate' and it must comply with Habitats Directives (as do all projects and plans in the county as set out in Objectives EM02 and EM03). Objective CZM40 also applies an ecosystem approach to planning in the coastal and maritime areas to ensure the protection of biodiversity habitats, marine protected areas and species protection and to ensure that development or activity in the coastal zone or maritime area does not give rise to displacement or disturbance of species etc. Notwithstanding, it is considered appropriate to strengthen the biodiversity component of the objective, and in this regard it is recommended that compliance with Objective CZM40 be inserted into the coastal walkway objective.

Consideration has been given to amalgamating Objective CZM23 and Objective CZM67 however, on balance it is recommended that they remain separate. Objective CZM67 is a general objective relating to the promotion of public access and public walkways to beaches and the seashore while Objective CZM23 relates to the specifics of individual accesses to beaches from private properties, requiring such proposals to facilitate public access as part of the proposal.

Many of the objectives proposed by WXF-C3-151 (KIO) are already included in the Draft Plan, and while worded somewhat differently, it is considered that the same output will be achieved, for example,

- Objectives CZM 40, 41 and 42 are focused on protecting ecosystems, heritage assets and seascapes and landscapes respectively.
- Objective CZM44 – relates to land based infrastructure linked to marine activities.
- Objective CZM73 relates to controlling development on or adjacent to beaches.
- Objectives CZM57, 64, 65, 66, 67, 68, 69 and 84 provide for, inter alia, enhanced access and use of the coast, beaches, seashore, coastal heritage, scenic landscapes.
- Objectives CZM56, 57, 58, 62, together with other objectives in this chapter and other chapters, will ensure that water based sport developments will not detract from heritage assets or visual amenities.

Cycleways, walking trails and public rights of way are dealt with in more detail in Chapter 14 Recreation and Open Space Strategy with Objectives ROS33, 34, 35, 36, 37 and 38 particularly relevant to points raised in WXF-C3-151 (KIO).

The suggestion to introduce bye laws restricting or prohibiting water skiing are noted, however by-laws are outside of the remit of the County Development Plan.

Chief Executive's Recommendations

It is recommended that the following proposed amendments be made to Chapter 12 Coastal Zone Management and Marine Spatial Planning:

CE CH12.1

Amend the last paragraph in Section 12.1 Introduction on page 444 as follows:

The CDP sets out the spatial planning framework for future development in the county's coastal areas. The policy approach responds to the challenges facing these areas, controlling the scale and rate of development which can be accommodated without damaging or detracting from the qualities and attractions of the coast. It ~~is~~ also focuses on bringing water to at least good status and protecting and restoring habitats and species to favourable conservation status while maximising the employment potential for the local community and further enhancing these areas as attractive places to live, visit and to work.

CE CH12.2

Amend the 3rd bullet point in Section 12.2 Climate Action in Coastal Areas on page 445 as follows:

- Preserve and enhance ~~the role of~~ natural features and habitats, such as wetlands, hedgerows and vegetated dunes, in regulating flooding and protecting from coastal erosion.

CE CH 12.3

Amend the 8th bullet point in Section 12.2 Climate Action in Coastal Areas on page 445 as follows:

Facilitate development at ports and harbours which will improve safety in marine activities ~~with~~ to avoid potential damage from climate change and such as increased storminess and storm surges.

CE CH12.4

Add the following bullet point to Section 12.2. Climate Action in Coastal Areas on page 445 as follows:

- Support citizen science monitoring of the coastal zone including climate change indicators and impacts of extreme weather and use this for informed timely decision making, covering, in particular, extreme events like mass death of organisms due to heat waves and removal of marine litter accumulations after storms and floods.

CE CH12.5

Amend bullet point no. 8 in Section 12.4.2 Goal on page 451 as follows:

- ~~Adapting~~ Adopting ecosystem-based approaches and ensuring the pressure of human activities take into account the precautionary principle and ~~moves towards~~ the need to achieve~~ment~~ good environmental status and the appropriate management and restoration of habitats and species to favorable conservation status.

CE CH12.6

Amend Objective CZM01 in Section 12.4 Coastal Zone Management Spatial Strategy on page 452 as follows:

To ensure the sustainable development of the county's coastal areas and the maritime area for the long-term benefit of coastal communities~~,~~ and the economic well-being of these areas and the county whilst protecting and enhancing environmental quality and managing and restoring biodiversity.

CE CH12.7

Amend Objective CZM03 in Section 12.4. Coastal Zone Management Spatial Strategy on page 452-453 as follows:

To maximise the economic development potential of the county's coastal and maritime areas subject to compliance with the objectives of the County Development Plan with regard to the location of economic development, the protection of the scenic amenity and views associated with coastal areas and the maritime area which is crucial to the tourism industry, the protection of the amenity, livelihood and cultural well-being of coastal communities, the protection and restoration of coastal features, habitats and species, compliance with the Habitats Directive and normal planning and environmental criteria and the proper planning and sustainable development of these areas.

CE CH12.8

Include an additional paragraph in Section 12.5.3 Climate Action on page 458 as follows:

The impacts of climate change on coastal and marine ecosystems also needs to be carefully considered. Rising sea temperatures and sea levels and ocean acidification have been identified as some of the key climate change impacts for coastal and marine environments. These factors have the potential to seriously affect the functioning of coastal and marine ecosystems, for example, the impacts of increased temperatures on mudflats.

CE CH12.9

Amend the first two sentences in the fourth paragraph of Section 12.5.4 Coastal Erosion on page 458 as follows:

The Geological Survey, ~~of~~ Ireland (GSI), in partnership with the Discovery Programme through the CHERISH project, is surveying sections of the Irish coastline ~~using unmanned aerial vehicles (UAVs)~~ and producing digital elevation models. ~~Where re-surveying occurs, they can provide quantitative assessments of erosion.~~ In Rosslare, ~~sections of eroding sand dunes~~ a 200m section of an eroding sediment cliff was ~~were~~ surveyed in 2017 and in 2018.

CE CH12.10

Re-order and amend Section 12.5.6 Ecosystem Services on pages 460 and 461 as follows:

The biological diversity of our coast is complex and an invaluable part of the county's natural heritage. Natural features~~, habitats and species~~ such as wetlands, ~~and~~ dunes and vegetation ~~play an important role in regulating flooding and preventing erosion. These features are also~~ are important corridors and stepping stones for the ~~spread~~ dispersal of biodiversity and ~~we are~~ the Council is obliged to protect them under Article 10 of the Habitats Directive. ~~The biological diversity of our coast is complex and an invaluable part of natural heritage.~~

~~Some c~~ Coastal habitats such as dune systems and shoreline habitats are dynamic and interconnected ~~habitats~~. Erosion is a natural process which many coastal habitats depend on, and it is therefore important that the natural circulation of sediment and organic matter is allowed to continue without physical obstruction and that natural erosion is allowed to continue in order to conserve these habitats. In relation to flooding, overtopping is a natural process in certain coastal habitats such as lagoonal systems where such "shock" events, corresponding to a sudden increase in salinities, are a natural feature of their ecology.

~~The~~ Other coastal features, habitats and species can be fragile and susceptible ~~to man-made damage, both development and activity and,~~ to damage from natural erosion and flooding and from developments and activities. The Council will ensure that these features ~~and~~ are protected both for the services they provide and in their own right. It is also important to

ensure that non-indigenous species and invasive species introduced by human activities do not adversely alter ecosystems in coastal ~~areas~~ and ~~the~~ maritime areas.

While the provision of public access points to beaches is important, multiple access points can result in negative ecological impacts ~~by~~ such as interfering with ground nesting sites and causing breaks in dunes/grasslands and interrupting Article 10 corridors. The Council will limit the number of accesses from developments to beaches and will consider access points where they provide public access as well, that is, where the applicant will enter into an agreement to provide public access too from the same access. This could be achieved by segregating the access provide the private garden at the edge of the site.

Biodiverse ecosystems play a very important role in regulating our environment and there is a need to ensure ~~increased~~ protection of wildlife and their habitats. The Council recognises the inherent socio-economic and environmental value of wildlife and the importance of protecting ~~It is also important to protect the~~ highly mobile species such as fish, birds, marine mammals such as seals and marine reptiles such as turtles from disturbance which is when species spend extra time or energy to avoid a human activity or output. This must be considered for developments in both the coastal area and the maritime area. Sources of displacement or disturbance can include vessels, offshore structures, lighting on offshore structures and underwater noise. It is also important to ensure that the integrity of the sea floor and deep sea habitats are protected and not adversely affected by development or activity or the deposition of marine litter in the maritime area.

The Marine Strategy Framework Directive, which was put in place to protect the marine ecosystem and biodiversity upon which our health and marine-related economic and social activities depend, requires a coherent and representative network of spatial protection measures, including marine protected areas (MPAs) be put in place where appropriate. The use of this area-based protection approach will help to maintain, conserve and restore marine ecosystems to achieve or maintain the good environmental status of the maritime area.

As outlined in Chapter 13 Heritage, s~~S~~ome MPAs are already in place in the county through the Natura 2000 network of SACs and SPCs designated under the Habitats and Birds Directives respectively. ~~Marine protected areas~~ Both existing and future designated MPAs will ~~also~~ be protected by the Council~~, who will ensure~~ through compliance with the Habitats Directive and other relevant legislation.~~ the protection of SACs and SPAs in the coastal areas and maritime area. It is also important to ensure that the integrity of the sea floor and deep sea habitats are protected and not adversely affected by development or activity or the deposition of marine litter in the maritime area.~~

CE CH12.11

Amend Objective CZM28 in Managing the Coastal Zone and Maritime Area General Objectives on page 464 as follows:

To have regard to all available mapping resources and studies relating to coastal erosion and flooding along the county's coastline in the preparation of local area plans, the assessment of planning applications and in the carrying out of local authority own works. These mapping resources and studies include those of the Geological ~~Society of~~ Survey, Ireland such as the coastal vulnerability index and mapping, those referenced in the ~~emerging~~ County Coastal Strategy, ~~and~~ the flood zone maps ~~which~~ that form part of the Strategic Flood Risk Assessment of the County Development Plan and which include the OPW's Irish Coastal Protection Strategy Study coastal flood maps, and the recently published National Indicative Fluvial mapping prepared by the OPW.

CE CH12.12

Amend Objective CZM30 in Managing the Coastal Zone and Maritime Area General Objectives on page 464 as follows:

To carry out environmentally sensitive local authority own coastal protection works where necessary and subject to the works being appropriately designed and where it is demonstrated that the works would not exacerbate existing problems of coastal erosion or result in altered patterns of erosion, deposition or flooding elsewhere along the coast to the detriment of other properties, important habitats, species, marine life, coastal features or designated sites.

CE CH12.13

Amend Objective CZM35 (new development outside of settlements) in the Managing the Coastal Zone and Maritime Area General Objectives on page 467 as follows:

Where the principle of a development outside of an existing settlement in the coastal zone is acceptable and it complies with the location objectives of the CDP, the Council will only give consideration to the development of ~~a~~ buildings and uses (including caravans and temporary dwellings) where the development is a **minimum of 250m** (or a greater distance as may be specified by the Planning Authority) from the soft shoreline or an area identified as at risk from coastal erosion. In order for the development to be considered:

(a) The applicant must objectively establish based on the best scientific information available at the time of the planning application that the likelihood of erosion at the location is minimal taking into account, inter alia, the effectiveness of any existing coastal protection works and any impacts of the proposed development on erosion or deposition.

(b) The onus will be on the applicant to provide evidence (including appropriate modelling which incorporates climate change) to demonstrate that the development will not be at risk ~~in~~ the over its lifetime. The Planning Authority will have regard to recent and historic trends and events in assessing such applications.

(c) It must be demonstrated that the development will not pose a significant or potential threat to coastal habitats or features and is compliant with the Habitats Directive.

(d) The ~~application~~ Planning Authority will not permit a development where such development could not be adequately defended over ~~the~~ its lifetime ~~of the development~~ without the need to construct new or additional coastal defence works.

(e) This objective will not apply to minor extensions to existing buildings.

CE CH12.14

Amend Objective CZM40 in Managing the Coastal Zone and Maritime Area General Objectives on page 468 as follows:

To apply an ecosystem approach to planning in the coastal and maritime areas to ensure the protection of biodiversity habitats and species and marine protected areas ~~and species~~

~~protection marine protected areas, and~~ to ensure that development or activity in the coastal zone or maritime area does not give rise to displacement or disturbance of species, or does not adversely impact on coastal habitats, species and features such as wetlands and vegetated dunes which play an important role in flood relief and in protecting from coastal erosion, and are important in their own right.

CE CH12.15

Add a new objective in the Managing the Coastal Zone and Maritime General Objectives section on page 469 as follows:

To maintain, conserve and restore marine ecosystems in existing and future designated Marine Protected Areas in order to achieve or maintain good environmental status of the maritime area.

CE CH12.16

Include the following text at the end of the paragraph in Section 12.6.2 Fisheries and Aquaculture on page 470 as follows:

These sectors are an integral part of our coastal economy and co-exist in various locations with other marine sectors such as ports, marine leisure and tourism. As outlined in Section 6 Economic Development, the Council supports the development of sustainable fisheries and aquaculture sectors, driven by skilled workforces and promotes sustainable industries that protects and enhances the social and economic fabric of rural coastal communities, dependent on these sectors. The Council will work with these sectors to promote improved marine litter management and the provision of reclamation facilities, as appropriate, in developments in coastal and maritime areas.

CE CH12.17

Amend Objective CZM45 in Section 12.6.2 Fisheries and Aquaculture on page 470 as follows:

To support the development of vibrant fisheries and aquaculture sectors that produce high quality foods, protects and enhances the social and economic fabric of rural coastal communities, ~~and~~ conserves biodiversity around our coastline and ensures good marine litter management, and to support the development of associated landside infrastructure

subject to compliance with Objective CZM44 and the proper planning and sustainable development of the area.

CE CH12.18

Amend Objective CZM46 in Section 12.6.3.1 Carbon Capture and Storage on page 471 as follows:

To support the use of existing infrastructure and the provision of new landside infrastructure such as pipelines to facilitate the development of carbon capture storage where considered feasible and subject to compliance with Objective CZM44 and ensuring that all safety, health and environmental issues relating to the deployment of this storage are considered and are acceptable.

CE CH12.19

Amend the wording of Objective CZM47 in Section 12.6.3.2 on page 471 as follows:

To support ~~gas and electricity~~ energy transmission proposals that maintain or improve the security and diversity of Ireland's energy supply including interconnectors, while ensure that the development is informed by consideration of space required for other activities of national importance described in the National Marine Planning Framework and subject to Objective CZM44 complying with all relevant safety, health, and environmental requirements.

CE CH12.20

Amend Objective CZM64 in Section 12.6.8 Tourism and Recreation in the Coastal Zone on page 478 as follows:

To support the further development of a way-marked Coastal Walkway, where possible and appropriate, along the full length of the county's coastline and connecting where possible to similar walkways in adjoining coastal counties. This will be done in conjunction with ~~the~~ adjoining local authorities, landowners and other partner agencies. All programmes and works to develop the coastal walkway will be required to respect the residential amenities of coastal communities, comply with Objective CZM40, the Habitats Directive and normal planning and environmental criteria.

Additional proposed amendments not linked to submissions or observations

In the interests of ensuring clarity, the following amendments are proposed to clearly outline the application of Map 3a Coastal Zone and Map 1 Landscape Character Units in Volume 7 Landscape Character Assessment.

CE CH12.21

Amend the text in Section 12.4.1 The Coastal Zone on page 450 as follows:

~~The coastal zone is identified on Map 3. It includes the area between the coastline and in most cases the nearest continuous public road. The foreshore is not identified on the map but is included in the coastal zone. The new nearshore will also be included in coastal zone once defined.~~

The policies and objectives of this chapter refer to the entire coastal area of our County. It includes the foreshore and the areas within any of our coastal towns and villages. It will also include the new nearshore once defined. The area to which these policies apply are not defined on a map.

The Plan contains two maps which relate to the coastal area and they each have a different application:

- Map 3a Coastal Zone in Volume 1 Written Statement shows the Coastal Zone and it is read conjunction with Chapter 4 Sustainable Housing in so far as it relates to rural housing.
- Map 1 Landscape Character Units in Volume 7 shows the Coastal Landscape Unit and it is read in conjunction with the policies and objectives of Chapter 4 Sustainable Housing, Chapter 11 Landscape and Green Infrastructure and Volume 7 Landscape Character Assessment.

Section 17 Submissions Relating to Chapter 13 Heritage and Conservation

Relevant Submissions

- WXF-C3-10 GSI
- WXF-C3-15 CHERISH Project, Discovery Programme
- WXF-C3-35 Jim Hurley
- WXF-C3-38 Michael Breen
- WXF-C3-41 Oisín Ó Conail
- WXF-C3-43 Courtown Community Council
- WXF-C3-44 Courtown Community Council
- WXF-C3-75 Seal Rescue Ireland
- WXF-C3-79 Seal Rescue Ireland
- WXF-C3-82 Department of Tourism, Culture, Arts, Gaeltacht, Sports and Media (Dept. TCAGSM)
- WXF-C3-85 Wexford PPN
- WXF-C3-87 Debbie Ewing
- WXF-C3-94 Wexford Environmental Network(WEN)
- WXF-C3-95 Clohamon Community Group
- WXF-C3-110 Tara Hill Community Development Group
- WXF-C3-129 Danny Forde
- WXF-C3-142 HSE
- WXF-C3-143 An Taisce
- WXF-C3-148 Ballymoney Community Group
  WXF-C3-151 Keep Ireland Open (KIO)
- WXF-C3-156 Larry Dunne
- WXF-C3-166 Fáilte Ireland
- WXF-C3-169 Coastwatch

Summary of Main Issues and Chief Executive Response

Section 13.1 Introduction

WXF-C3-85 (Wexford PPN) notes that the Heritage Chapter aligns with their Values, Culture, and Meaning Vision which identifies Wexford as a proud County that celebrates its rich and extensive heritage and actively shares it with others.

WXF-C3-151 (KIO) generally supports the strategy and objectives in this Section but seeks an additional objective to prepare and implement a strategy for access to heritage routes which would identify, promote and support the development of a network of heritage trails and publish a list (with maps) of heritage sites which are open to the public.

WXF-C3-94 (WEN) recommends the following amendments to bullet points 1, 2 and 3 of the Strategy:

- To sustainably manage ~~the competing pressures on~~ the natural and built heritage in the county;
- To conserve and protect sites and species, both designated and undesignated for their biodiversity, ecological or environmental sensitivity;
- To protect upland peat and bog areas and to ensure their protection from extractive uses and inappropriate recreational use (such as quad bikes);

WEN states that the natural heritage/biodiversity/ environmental pillar should be considered foremost before all planning decisions. It would like to see specific objectives around limiting and reversing net land take and reducing habitat fragmentation. Having regard to its miles of coastline and unique habitats and species (such as Our Lady's Island and the Slobs), WEN would also like to see a large part of Wexford designated as a National Park and seeks the formal designation of the candidate SACs and pNHAs.

It also recommends that Objective HT03 be amended *"To promote initiatives that provide better public access for all visitors to our historic built and natural environment whilst ensuring the full protection of these sites."*

WXF-C3-156 Dunnes notes that the Council is very supportive of heritage projects and it is hoped that this will continue. The appointment of a Heritage Officer, while not perhaps an issue of the CDP, would be welcomed.

Section 13.1 Introduction Chief Executive's Response

The comments from Wexford PPN are noted and welcomed.

The suggestion from KIO to prepare a strategy to support the development of a network of heritage trails and publish a list and maps of heritage sites which are open to the public is noted. In this regard attention is drawn to Section 14.8 of the Plan which promotes the Wexford Trails brand www.wexfordtrails.ie. This includes a Wexford Heritage Trail and the website includes mapped routes and details of sites open to the public. Objective ROS36 supports the Wexford Walking Trails brand and promotes and facilitates the extension of the walking trail network. Attention is also drawn to Objective HT03 in the Heritage Chapter which promotes initiatives that provide better public access for visitors to our historic built and natural environment. No further objectives are considered necessary.

WEN's suggested amendments to the bullet points and Objective HT03 in the Strategy are noted and it is agreed that they should be amended in the Plan. With regard to limiting and reversing net land take and reducing habitat fragmentation, the Draft Plan includes objectives for compact growth, limiting the amount of greenfield development and prioritising brownfield and infill development. The Draft Plan also includes objectives for the maintenance of habitats and habitat connectivity (NH03, NH04, NH05).

The designation of a National Park is the responsibility of NPWS and is subject to a number of criteria under the International Union for the Conservation of Nature (IUCN). The Council will support any such designation. The designation process for candidate SACs and pNHAs is also a matter for NPWS and is outside the remit of this Plan.

The comments from Mr. Dunne are noted. The appointment of a Heritage Office lies outside of the remit of the CDP.

Section 13.2 Natural Heritage

Biodiversity Crisis, Restoration and Biodiversity Action Plan

A number of submissions make reference to the biodiversity crisis and request that it be addressed in the Plan (WXF-C3-82 Dept. TCAGSM, WXF-C3-169 Coastwatch, WXF-C3-143 An Taisce, WXF-C3-94 WEN, WXF-C3-129 Danny Forde and WXF-C3-110 Tara Hill Community Development Group). A number of these submissions seek a dedicated biodiversity section in this Chapter with additional objectives included for biodiversity restoration and management and a commitment to reviewing and updating the Wexford Biodiversity Action Plan 2013-2018 (WXF-C3-142 HSE, in addition to the submissions listed above).

WXF-C3-169 (Coastwatch) states that most of the Natura 2000 sites in the County are not at good status under the Water Framework, Habitats or Birds Directives and their restoration and protection should therefore feature strongly in the Plan, along with the actions to follow.

WXF-C3-143 (An Taisce) refers to the 2019 report on "The Status of EU Protected Habitats and Species in Ireland" which illustrates the poor condition of Ireland's biodiversity and identifies agriculture and development (housing, commercial, industrial, and recreational) as two of the primary threats facing these habitats. It recommends that the implementation of the 14 points in the EU Biodiversity Strategy 2030 be included as a specific heritage objective. An Taisce also notes that Ireland has a poor record when it comes to protecting the natural environment and that the sprawling nature of development and settlement pattern is a driving force for habitat fragmentation, biodiversity loss and agriculture-related land loss and is contributing to climate change.

WEN asks to make biodiversity part of the Core Strategy and states that it would like to see the Council as pioneers in carrying out development that enhances and increases biodiversity. It seeks an additional objective to tackle pollution from agricultural sources and highlights the consistently high levels of nitrate pollution in County Wexford. It also states that improving water quality in SACs, SPAs and Nature Reserves and in sensitive habitats needs to be added as a priority and restoring the status of Our Lady's Island lake and

Ballyteigue waterbodies from “bad” is especially urgent given that they are important ecosystems.

WXF-C3-82 (Dept. TCAGSM) recommends that a section is included focusing on coastal lagoons, an Annex 1 priority habitat under the Habitats Directive, the conservation status of which has been assessed as bad, and the Council could commit to support specific targeted programmes which will be required, particularly for the large sedimentary lagoons of Wexford.

Tara Hill Community Development Group (WXF-C3-110) states that the plan fails to recognise the biodiversity role and value of the hills and ridges in the County.

Habitats Directive

With regard to Objective NH08, WEN makes reference to the Aarhus Convention and Article 9(3) of the Habitats Directive and requests that the criteria (by which the competent authority makes a decision about a development being imperative, despite impacting a Natura site) is published in advance and that public consultation will be held and taken into account before the development commences.

WXF-C3-151 (KIO) recommends amendments/rewording to a number of objectives and text in this Section and seeks additional objectives in relation to public access to heritage sites, as well as adopting a precautionary principle for natural heritage and a regional approach to the protection of the environment. Recommended objectives for ‘Designated Sites’ include, for SACs, SPAs and NHAs, to protect the integrity of and avoid significant impacts on these sites, to assess direct/indirect and cumulative impacts, to protect all sites, apply the precautionary principle and maintain or restore favourable condition. Objectives are also recommended to protect the integrity of Ramsar, Statutory Nature Reserves, Biogenetic Reserves and Wildlife Sanctuaries.

Ecological Stepping Stones, Networks and Wildlife Corridors

WEN states that the Council should produce a policy to develop an Ecological Network throughout the County, which will improve the ecological coherence of the Natura 2000 network in accordance with Article 10 of the Habitats Directive. The network should also include non-designated sites. WEN also states that the Council should produce a Tree (and Hedgerow) Strategy and issue Tree Preservation Orders where relevant, and that development on greenfield sites and/or with features of ecological importance should have an ecologist and/or landscape architect with suitable ecological qualifications to help design the landscape, with native planting prioritised.

WXF-C3-87 (Debbie Ewing) requests that a policy be included to retain grass verges in the countryside and notes that previous resurfacing and widening of lanes around Clonmines has resulted in faster cars and the loss of a safe space for walkers (often mothers with prams), riders and cyclists. Ms. Ewing highlights the visual benefits (part of the character of the rural landscape) and environmental benefits (wild flowers, insects and animals) of grass verges in addition to the safety aspect.

WXF-C3-79 (Seal Rescue Ireland) requests that all land adjacent to motorways is replanted with native, deciduous trees and other native vegetation, to optimise the ecological value of these areas for biodiversity, carbon-storage capacity, tourism and commuter wellbeing.

WXF-C3-41 (Oisín Ó Conail) would like to make the Council aware of the practice of 'wilding' as a sustainable approach to both encouraging biodiversity and enhancing riverine environments and that in order for it to be economically and socially sustainable for farm families, it should be supported at local and state levels.

WXF-C3-151 (KIO) seeks additional objectives to protect woodlands and groups of trees from inappropriate development and protect the existing network of woodlands. It recommends the inclusion of objectives for 'Islands' to support public access for recreational users and protect the landscape character, values and archaeological heritage. Additional objectives are also sought for the protection of Mass Rocks/Holy Wells, peatlands

and wetlands and to promote the designation of Special Amenity Area Orders and a National Park.

Shellfish Areas

WXF-C3-35 (Jim Hurley) comments on designated Shellfish Areas, and although the comments are made under Volume 10 Energy Strategy, it is considered more appropriate to deal with them in this Section as they refer to natural heritage. Mr. Hurley states that there is no evidence to support the view that 'Shellfish Areas' are protecting our natural heritage. He states that they are intensive farms often cultivating, foreign species like Pacific Oysters, and in areas of high biodiversity value they are a threat to nature conservation. Overall, he states, aquaculture damages the environment it operates in and does not protect biodiversity.

Invasive Species

WXF-C3-82 (Dept. TCAGSM) commends the focus on invasive species in objectives NH18 to NH23 but states that further objectives are recommended for the prevention and management of invasive species and to provide support for conservation projects such as the European Innovation Partnerships and LIFE projects (similar to Objective WQ18 in Chapter 10) which aim to achieve the objectives of the Habitats and Birds Directives. The Department also recommends a new objective to implement regulations on the Prevention and Management of the Introduction and Spread of Invasive Alien Species and to amend Objective NH21 to ensure that control and management programs are carried out by a competent and appropriately qualified expert.

WEN states that pesticides and toxic chemicals should only be used as a last resort (and only if they have been proven in the eradication of that particular invasive species) and that more awareness and an educational campaign needs to be instigated in relation to invasive species. In relation to Objective NH24 WEN requests the addition of a ban on the use of pesticides by the Council in the management of parks, open spaces, roadside verges and all vegetation (except for very controlled use to remove invasive species like Japanese Knotweed). WEN also asks for transparency on the Council's use of pesticides and toxic chemicals, its policy on hedgerow cutting (for example if it's for safety reasons along a road)

or felling/cutting street trees and to make sure there is an awareness campaign about its own policies, actions and methods of operation.

WXF-C3-148 (Ballymoney Community Group) states that Japanese knotweed needs to be addressed county-wide.

Citizens Initiatives

WEN suggests that an objective be included to support citizen science initiatives that are used to create awareness and understanding of the importance and value of Natura sites and other sites of high biodiversity value, which could include schools and become part of the educational programmes and/or curriculum.

NHAs and County Geological Sites

WXF-C3-10 (GSI) welcomes the inclusion of the County Geological Sites (CGS) and the associated objectives in the Draft Plan. The submission states that it would also be necessary to include a policy objective to protect geological NHAs as they become designated and notified to the Local Authority during the lifetime of the Plan.

WXF-C3-151 (KIO) recommends additional objectives for geology, including to promote access and PROWs to geological and geo-morphological features.

WXF-C3-43 (Courtown Community Council) notes the absence of two pNHAs from Map 2a Natural Heritage.

Marine Protected Areas

WXF-C3-75 (Seal Rescue Ireland) highlights the importance of Marine Protected Areas and seeks additional objectives for their designation and protection.

Eco-audit

WXF-C3-148 (Ballymoney Community Group) recommends that an eco-audit is carried out on sites where planning is sought and details included in the application of how the environment will gain if planning permission is approved.

Section 13.2 Natural Heritage Chief Executive's Response

Biodiversity Crisis, Restoration and Biodiversity Action Plan

The comments on the biodiversity crisis and the need to manage and restore favourable status to designated sites are noted and it is considered appropriate, in light of recent EU policy on this issue, to include text and objectives to support the restoration of sites. An objective should also be included to review and update the County Biodiversity Action Plan. Notwithstanding this, it is noted that Objective NH05 in the Draft Plan already states that the Planning Authority will have regard to *"the identified conservation objectives to ensure the maintenance or restoration of the features of interests to favourable conservation status"* in the assessment of planning applications and the NPWS will be required to lead the way on this.

In response to An Taisce's comments regarding the sprawling nature of development and settlement pattern as a driving force for habitat fragmentation, biodiversity loss and agriculture-related land loss, the Core Strategy of the Plan is based upon the principles of compact growth, limiting the amount of new greenfield development and prioritising brownfield and infill development, which will in turn reduce urban sprawl and its associated impacts.

The 14 points in the EU Biodiversity Strategy 2030 relate to an EU wide approach to protecting and restoring ecosystems and are dependent on targets and plans being set at a national level, as well as changes to the agricultural system which is outside the remit of this Plan. However it is noted some of the issues are already addressed at a strategic level in the Plan e.g. protection of habitats and species (with no deterioration in conservation trends and status) (NH01, NH04, NH05), reversing the decline in pollinators (NH24) and objectives relating to the control of invasive alien species (NH18-NH23). Further consideration will be given to these issues following the adoption of a national policy and as part of the preparation of the new County Biodiversity Action Plan.

WEN's comments are also noted and while it not proposed to include biodiversity as a standalone section in the Core Strategy it is recommended that it be included as an

underlying theme in Chapter 1. In this regard it is noted that biodiversity is already embedded as an underlying theme across a number of Chapters in the Draft Plan.

In relation to the Council carrying out development that enhances and increases biodiversity, it should be pointed out that the Council is currently undertaking a number of pilot biodiversity projects, including pollinator projects (Wex Bee Aware) and the reintroduction of native planting (Woodland Creation on Public Lands Scheme) on public owned land. Further projects will be identified as part of the preparation of a new County Biodiversity Action Plan.

WEN's comments on pollution from agricultural sources and consistently high levels of nitrate pollution in waterbodies which support important ecosystems is noted and in this regard it is considered that appropriate objectives are included for water quality in Section 10.5 (WQ01-WQ18) and Section 12.5.9 (CZM39, CZM43) of the Draft Plan. This includes the identification of 'Priority Areas for Action'. The Council will continue to work to improve the status of waterbodies in accordance with the River Basin Management Plan, which will in turn benefit important ecosystems.

The Department's recommendation to include a section on coastal lagoons and for the Council to support specific targeted programmes which will be required for the large sedimentary lagoons of Wexford is also acknowledged, particularly in light of the recently published Draft Prioritised Action Framework (PAF) for Natura 2000 in Ireland (pursuant to Article 8 of the Habitats Directive). This report identifies the conservation status of coastal lagoons as 'bad', with the main pressures affecting structure and functions being water quality and hydrological issues. The inclusion of an objective in the Plan to support programmes for the restoration of these sites is appropriate.

Tara Hill Community Development Group's comments on the biodiversity role and value of hills and ridges is also noted and in this regard it is considered that appropriate objectives are included in the Draft Plan for the protection of these landscapes and for the protection of non-designated sites and ecological features and corridors.

Habitats Directive

WEN's reference to the Aarhus Convention and Article 9(3) of the Habitats Directive is noted and the Council will comply with all requirements of the Habitats Directive.

The detailed submission from KIO is acknowledged and while all the suggestions are welcome, attention is drawn to the OPR submission which requests that the text of the Draft Plan be reduced. It is therefore not proposed to add additional text, however the suggestions have been incorporated into the proposed amended objectives, where appropriate. Following a review of this submission and the Natural Heritage Section of the Draft Plan, it is considered that adequate objectives are included to ensure the protection of natural heritage, which includes designated and non-designated sites (including those which may be identified during the lifetime of the Plan) and ecological corridors and features (NH01-NH10). The point in relation to maintaining or restoring favourable condition to designated sites is noted and it is considered appropriate to amend objectives in this regard. Access to heritage sites is addressed under Objective HT03. With regard to a regional approach to the protection of the environment, there is a hierarchy of Plans and the CDP is consistent with these higher tier plans.

Ecological Stepping Stones, Networks and Wildlife Corridors

WEN's suggestion to produce a policy to develop an Ecological Network throughout the County is noted. This would be difficult to achieve at a county level within the period of the Plan but will be considered as part of the preparation of future LAPs and the new County Biodiversity Action Plan. Notwithstanding this, Objective NH10 will ensure that important ecological corridors, stepping stones and networks are protected in the development management process.

The production of a Tree and Hedgerow Strategy would also be onerous at a county level but will be considered as part of the preparation of future LAPs and the new County Biodiversity Action Plan. Objectives NH11 and NH12 include for the protection of trees, woodlands and hedgerows of amenity and biodiversity value in the development management process. Objective NH12 also provides for the making of Tree Preservation Orders where appropriate.

The suggestion for a qualified ecologist and/or landscape architect to design the landscape for all developments on greenfield sites and/or with features of ecological importance, with native planting prioritised, is also noted. In this regard it is considered that sufficient objectives and development management standards are included in the Draft Plan to retain existing landscape features of biodiversity value (NH10), to ensure native planting in new developments (NH13) and to submit arboriculture assessments and landscape design schemes prepared by qualified professionals where appropriate (Section 7.4 of Volume 2 Development Management Manual).

The Council will endeavour to retain grass verges where appropriate and subject to road safety. Section 6.1.4 'Country Roads/Green Routes' of Volume 2 Development Management Manual provides guidance in this regard and states that approaches will need to be bespoke given the individual character and the characteristics of country roads.

In addition, the Council will promote the 're-wilding' concept and, as mentioned above, is currently actively pursuing a number of pilot biodiversity projects on Council owned land. It is also recognised as an opportunity for community based projects and will be given further consideration as part of the preparation of future LAPs and the new County Biodiversity Action Plan.

Seal Rescue Ireland's suggestion to plant all land adjacent to motorways with native, deciduous trees and other native vegetation is noted and welcomed. This falls under the remit of Transport Infrastructure Ireland (TII) but will be supported by the Council. It is noted that their document 'A Guide to Landscape Treatments for National Road Schemes in Ireland' (NRA) promotes native planting in accordance with the Native Woodland Scheme.

In response to KIO it is considered that appropriate objectives are included for the protection of woodlands and trees of particular amenity, nature conservation and biodiversity value (NH11, NH12 and ED106 in Section 6.7.5.4 Forestry). Wetlands are considered under Ramsar Sites in Section 13.2.3 and objectives are included for their protection (NH01, NH04). Additional objectives for Islands, Mass Rocks/Holy Wells and peatlands are not considered necessary. The designation of a National Park falls under the

remit of NPWS. There are also no current proposals to designate an Area of Special Amenity in the County however the Plan will not preclude such Orders from being made.

Shellfish Areas

Mr. Hurley's comments on Shellfish Areas are noted however these areas are designated under the EU Shellfish Waters Directive, transposed into Irish law through the European Communities (Quality of Shellfish Waters) Regulations 2006, and are required to be designated to support shellfish life and growth. The Council is required to have regard to the Pollution Reduction Programmes for these areas when assessing the impacts of new developments, or discharges to waters courses which discharge to the shellfish area. It is therefore important that they are included in the development plan and objectives are included for their protection.

Invasive Species

The Department's comments on invasive species are noted and further objectives are recommended to implement regulations on the Prevention and Management of the Introduction and Spread of Invasive Alien Species, to support EU funded conservation programmes and to amend Objective NH21 to ensure that control and management programs are carried out by a competent and appropriately qualified expert.

With regard to WEN's comment that more awareness and an educational campaign needs to be instigated in relation to invasive species attention is drawn to Objective NH20 in the Draft Plan around raising awareness. This will be considered further as part of the preparation of a new County Biodiversity Action Plan.

In relation to the use of pesticides and toxic chemicals Objective NH24 states that it is an objective of the Council *"to incorporate the actions of the All Ireland Pollinator Plan 2015-2020 (and any subsequent Plan) when managing our parks, open spaces, roadside verges and all vegetation in a way that provides more opportunities for biodiversity while being cognisant of the threat of the spread of invasive species".* This includes reducing or eliminating the use of pesticides where possible. Objective NH16 of the Draft Plan also states *"to ensure the protection of natural heritage is integral to the Council's own*

developments, actions and methods of operation.". These issues will be considered further as part of the preparation of a new County Biodiversity Action Plan.

The Council agrees with Ballymoney Community Group that Japanese knotweed needs to be addressed countywide but this is considered to be outside the remit of this Plan. Objective NH18 states that it is an objective of the Council *"to promote best practice in the control of invasive species and support measures for the prevention and/or eradication of invasive species as appropriate and as opportunities and resources allow."* This includes Japanese Knotweed. Further consideration will be given in the County Biodiversity Action Plan.

Citizens Initiatives

WEN's suggestion to include an objective to support citizen science initiatives that are used to create awareness and understanding of the importance and value of Natura sites and other sites of high biodiversity value is welcomed. The Council supports initiatives such as the Green Schools Programme and the Green Communities Programme and will promote them in the preparation of a new County Biodiversity Action Plan.

NHAs and County Geological Sites

GSI's proposed objective in relation to future designated geological NHAs is noted, however Objective NH06 is considered sufficient for the protection of existing and future designated sites.

In response to KIO submission it is considered that appropriate objectives are included for Geology (NH06, NH07) and Objective HT03 provides for initiatives that provide better public access to the historic and natural environment. PROWs are addressed in Chapter 14 Recreation and Open Space Strategy.

The omission of two pNHAs from Map 2a is noted. In this regard it is noted that that conflicting data sources were made available to the Council. However, both Map 2a and Table 13.2 will be updated in the final version of the Plan to reflect the most recent information available on pNHAs, in consultation with NPWS.

Marine Protected Areas

Seal Rescue Ireland's comment in relation to Marine Protected Areas is noted and it is considered, in light of recent EU policy, the recently published Draft Prioritised Action Framework (PAF) for Natura 2000 in Ireland (pursuant to Article 8 of the Habitats Directive) and the forthcoming National Marine Planning Framework, that the Draft Plan should be amended to incorporate these areas and any upcoming national policy.

Eco-audit

With regard to the call for an eco-audit to be carried out on sites where planning is sought and details of environment gain, current practice is to consider each proposal on its merits having regard to all of the objectives in the Plan and the Development Management Standards in Volume 2. Depending on the location, nature and scale of development a number of assessments may be required to ensure that development proposals will not adversely impact on the environment, including heritage and landscape appraisals, Environmental Impact Assessment, Appropriate Assessment, Flood Risk Assessment, etc.

Section 13.3 Archaeological Heritage

WXF-C3-110 (Tara Hill Community Development Group) would like the Plan to include a commitment by the Council to investigate sites of archaeological interest in the Tara Hill area and work to preserve them for future generations, tourism and local heritage and states that the historical heritage of Tara Hill and its surrounding areas could and should form an integral part of the development of Failte Irelands' Ancient East tourism initiative.

WXF-C3-151 (KIO) supports a number of objectives in this Section but seeks a number of amendments/rewording as well as additional objectives to promote and provide signage to archaeological sites and monuments, designate traditional access routes as PROWs and protect and preserve sites and features identified subsequent to the RMP.

WCF-C3-82 (Dept. TCAGSM) states that the Draft Plan deals comprehensively with the archaeological heritage but recommends that Objective AH03 be amended to include all archaeological sites and monuments (including those identified by the Archaeological Survey of Ireland) rather than just national monuments.

Submissions WXF-C3-10 (GSI) and WXF-C3-15 (CHERISH Project) outline the work of the CHERISH/Discovery Programme, an EU funded project through the Ireland-Wales programme 2020, which investigates the impacts of climate change on coastally located and submerged cultural heritage sites. It is noted that the datasets and monitoring strategies developed through this programme will feed into a number of the archaeology and built heritage objectives contained in the Draft Plan. GSI request that specific reference be made in the Plan to the database of shipwrecks mapped by the INFOMAR programme, which is jointly managed by GSI's Marine and Coastal Unit in partnership with the Marine Institute.

Section 13.3 Archaeological Heritage Chief Executive's Response

The investigation of sites of archaeological interest in the Tara Hill area and the statement that the historical heritage of Tara Hill and its surrounding areas should form an integral part of the development of Failte Irelands' Ancient East tourism initiative is noted. This is a specific project which is considered to be outside the remit of the Plan but will be supported by the objectives therein.

The detailed submission from KIO is acknowledged, however it is considered that appropriate objectives are included in the Draft Plan for the protection and preservation of archaeological heritage. An objective is included to promote public access to archaeological sites in consultation with landowners (AH10). Objective AH07 also promotes access to historic and archaeological landscapes, including battlefields. Objective AH01 includes for the protection of sites and monuments (including their settings), both listed and scheduled for inclusion on the RMP/RHM, as well as newly discovered remains. PROWs are addressed in Chapter 14. The suggestion to promote and provide signage to archaeological sites and monuments is noted and it is recommended that Objective AH10 be amended to include the provision of appropriate information signage.

The comments from the Department are noted and it is recommended that Objective AH03 be amended to include archaeological sites and monuments in place of national monuments.

The ongoing work and data collation under the CHERISH/Discovery programme and the shipwrecks database is noted and it is recommended that this section of the Plan be updated to include reference to this data.

Section 13.4 Built Heritage

WXF-C3-82 (Dept. TCAGSM) refers to a number of emerging national policy documents, including the National Policy on Architecture, to be published in 2021, and the Draft Heritage Plan 2030 which will position archaeology and built heritage as a central and integrated theme within all government policy, planning and funding frameworks.

The Department recognises the role of built heritage in revitalising town centres, especially post COVID as people look to relocate to more rural towns and villages. It also notes the important role of cultural and natural heritage sites, which supported well-being in communities particularly in urban centres during the pandemic lockdown. It welcomes the opportunity for making cultural heritage more accessible and better integrated with the wider tourism and recreational opportunities of the county.

The Department's submission focuses on the importance of having in-house expertise to advice the public on issues surrounding climate change and energy efficiency design in historic buildings, in terms of their appropriate adaptation and sensitive upgrades and to ensure the long term survival of historic structures, their uses and their contribution to the sense of place. It also highlights the importance for enhanced policies for historic-led urban regeneration. A key recommendation is the appointment of a Conservation Architect, Archaeologist and Heritage Officer to undertake the delivery of the Department's policies in relation to initiating research, implementing policy, raising awareness and providing guidance to owners of historic buildings on such issues as thermal upgrading and building repair.

The following themes are recommended for inclusion in the Plan along with objectives and policies that accord with the conservation of the county's built heritage:

- Local Authority Climate Change Adaptation Strategy – the Department states that the preparation of Local Authority Adaptation Strategies should identify the

architectural heritage at risk in the area, assess its vulnerability to climate change and develop disaster risk reduction policies for direct and indirect risks.

- The revitalisation of Historic Urban Centre – the Department outlines the role for historic-led regeneration and a number of initiatives which may feed into this.
- The National Inventory of Architectural Heritage (NIAH) – the Local Authority is reminded of its duty to have regard to any Ministerial recommendations for the RPS. The Department also states that the structures that are not formally protected benefit from a form of protection through Section 53(2) of the legislation, which allows the Planning Authority to have regard to the Minister's recommendations where a building is subject to a planning application.
- NIAH Garden Survey – the Department outlines the additional benefits of protecting historic gardens and demesnes for aesthetic interest, biodiversity, climate change and physical and mental well-being. The submission includes recommendations to identify significant historic designed landscapes, demesnes and gardens for protection under the development plan; to designate Architectural Conservation Areas, to identify and protect significant views to or from such places and to require a detailed appraisal of the potential impacts of any development proposed within or adjacent to these places, or that might affect its setting.
- Built Vernacular Heritage - The submission recommends the inclusion of objectives for vernacular heritage in the introduction to the plan, rural housing/settlement plan, Climate change and sustainability/energy efficiency, Rural development/farm diversification/tourism, Architectural heritage/conservation.

WXF-C3-10 (GSI) outlines its new research programme, in collaboration with Trinity College Dublin and the OPW, which aims to document building and decorative stone in Ireland to inform government agencies, building owners and conservationists of the sources for suitable replacement stone in restoration work and to develop a greater awareness among the general public. It is stated that this programme will assist with Section 57 declarations and it is recommended that the programme is considered as part of the themes and objectives in Section 13.4 'Built Heritage'.

WXF-C3-143 (An Taisce) states that the Plan should ensure the effective promotion of the Architectural Heritage provisions of the Planning and Development Act 2000 and therefore the protection of Wexford's built heritage, including Architectural Conservation Areas (ACAs) and Protected Structures. Crucially, it states the Plan should include policies for monitoring buildings at risk and using the provision of Section 59 of the Planning Act to serve notices of endangerment to negligent property owners.

WXF-C3-94 (WEN) seeks the extension of Objective BH12 to conduct an assessment of species and habitats at/in the grounds of protected structures so that protected structures that have an ecological function (e.g. bat roosts) can be identified and this ecological function be protected.

WX-C3-95 (Clohamon Community Group) highlights the work undertaken by the local community to protect and maintain the bridge at Clohamon and requests that uplighting be installed underneath the bridge, which they state is a focal point of the village and has enhanced many local events.

WXF-C3-44 (Courtown Community Council) requests the inclusion of Courtown Harbour as an Architectural Conservation Area.

WXF-C3-151 (KIO) supports the objectives in this Section and seeks an additional objective to protect archaeological/historic graveyards and their settings through improved access and to promote local involvement and community stewardship.

Section 13.4 Built Heritage Chief Executive's Response

The Council thanks the Department for their detailed submission and the recommendations set out therein. The appointment of a Conservation Architect, Archaeologist and Heritage Officer is outside the remit of a development plan.

The National Policy on Architecture and the National Heritage Plan will be incorporated when published. The Draft Heritage Plan is referenced in Section 13.1.2 Policy Context and Objective HT01 states that it is an objective of the Council: *"On adoption of the National*

Heritage Plan "Heritage 2030" to commence the preparation of a County Heritage Plan to assist the management and promotion of our valuable heritage in a sustainable manner." The National Policy on Architecture is also referenced in Chapter 5 Design and Place-making in Towns and Villages.

In relation to the themes which are recommended for inclusion in the Plan, the following is noted:

The County Wexford Climate Change Adaptation Strategy 2019-2024

The Wexford Climate Change Adaptation Strategy 2019-2024 includes actions under the theme of infrastructure and built environment (including built heritage) to identify and protect against the key vulnerabilities to the impacts of climate change and to undertake risk assessment of built heritage for extreme weather events and assess for future impacts from climate change. The Draft Plan includes an objective (CA03) to implement the Strategy in future local area plans and in the assessment of planning applications.

The revitalisation of Historic Urban Centre

Regeneration is a key theme throughout the Draft Plan and is one of the Core Strategy Guiding Principles. The Council acknowledges the role for historic-led regeneration, especially in our main towns and villages, and this will be central to the preparation of future LAPs. Objective BH03 in the Draft Plan states that it is an objective of the Council *"to engage in and promote initiatives to revitalise the historic cores of our towns and villages together with local communities, heritage property owners and other stakeholders."* Chapter 5 Design and Place-making in Towns and Villages also includes an objective (TV37) *"to encourage and participate in heritage led regeneration, including consideration of the potential to participate in the Heritage Council's Historic Towns Initiative."* Notwithstanding this, it is considered appropriate to include an additional objective in the Heritage Chapter.

The National Inventory of Architectural Heritage (NIAH)

The structures included on the NIAH were considered for inclusion on the Record of Protected Structures during the preparation of the various development plans since its publication, including the Wexford Town and Environs Development Plan 2009-2015 (as

extended), the New Ross Town and Environs Development Plan 2011-2017 (as extended) and the Wexford County Development Plan 2013-2019. The NIAH structures in Enniscorthy Town and Environs have been considered in the preparation of this Plan. On foot of the Department's submission, it is proposed to include reference to the NIAH in the text of the Plan.

NIAH Garden Survey

The Department's recommendations in relation to the NIAH Garden Survey are noted in particular the recommendation to identify significant historic designed landscapes, demesnes and gardens for protection under the development plan; to designate Architectural Conservation Areas, and to identify and protect significant views to or from such places. In this regard the Plan includes objectives for the retention of historic gardens (BH12) and the designation of ACAs including views and prospects (ACA01). A minor amendment is proposed to the wording of Objective ACA01 to ensure consistency with this submission.

With regard to the recommendation to require a detailed appraisal of the potential impacts of any development proposed within or adjacent to these places, or that might affect its setting, attention is drawn to Objective BH08 which requires an Architectural Heritage Impact Assessment (AHIA) report to be submitted with planning applications where the proposed development may impact on the architectural heritage and the area in which it is located. Objective ACA08 also requires a Character and Landscape Impact Assessment report and/or AHIA to be submitted where a proposed development may impact on the character of the architectural heritage and/or landscape within an ACA.

On foot of the Department's submission, it is proposed to include reference to the NIAH garden survey in the text of the Plan. Further consideration will be given to historic designed landscapes in the preparation of future LAPs and the County Heritage Plan.

Built Vernacular Heritage

Chapter 4 Sustainable Housing includes a section on Vernacular Houses and states that the Planning Authority will continue to protect this vernacular building stock and promote its

sensitive restoration including restoring houses which are derelict, as an alternative to the construction of new single rural houses elsewhere in the countryside. This is embedded in Table 4.7 and Objective SH44.

In Chapter 13 Heritage and Conservation, Objective BH07 promotes the retention (and re-instatement) of original or early building fabric including vernacular architectural details (whether relating to a Protected Structure or not) and Objective BH13 encourages improvements to energy efficiency in traditional buildings.

Objectives are included in Chapter 6 Economic Development to support farm diversification while maintaining and protecting the built heritage (ED82) and to require new rural developments to be located within existing farm buildings or redundant or underutilised buildings that are of value to the rural landscape where possible (ED89, ED98). Objectives TM53 in Chapter 7 Tourism Development and CZM83 in Chapter 12 Coastal Zone Management promote the re-use of existing farmhouses and traditional farm buildings for tourist accommodation and small-scale rural resource based economic or tourism businesses respectively.

Notwithstanding this, it is considered that the Heritage Chapter would benefit from additional text and objectives in relation to vernacular heritage to ensure consistency across the Plan.

GSI's reference to the decorative stone project is noted and while the information which emerges from this project will be useful in the consideration of restorative projects and section 57 declarations, it is not considered necessary to give specific mention to the project in Section 13.4 which provides strategic objectives for built heritage in the County.

An Taisce's comments are also noted and in this regard it is considered that the objectives in the Draft Plan will ensure the protection of Wexford's built heritage, including Architectural Conservation Areas (ACAs) and Protected Structures.

It is not proposed to designate Courtown Harbour as an ACA at this time, however Objective BH04 states that the Council will endeavour to monitor and review the RPS and ACAs during the plan period.

With regard to monitoring buildings at risk and using the provision of Section 59 of the Planning Act to serve notices of endangerment to negligent property owners, the Council will continue to pursue all avenues and use any legislative powers open to it.

WEN's request to extend Objective BH12 to conduct an assessment of species and habitats at/in the grounds of protected structures is noted and in this regard it is considered that Objective NH09 is sufficient. This issue may be explored further as part of the preparation of the County Biodiversity Plan and/or County Heritage Plan.

The request for up-lighting at Clohamon bridge is noted however this is considered a site-specific project which would be subject to an assessment of the impacts on wildlife etc at the project level. It is not considered a strategic project for the Plan.

In response to KIO, it is considered that appropriate objectives are included for the protection of historical graveyards (archaeology section) and for the maintenance, access and community stewardship of all graveyards and the protection of graveyards identified on the RMP (Section 13.4.13 Graveyards).

Section 13.4.14 Cultural Heritage

One submission (WXF-C3-38 Michael Breen) was received in relation to rooftop art.

WXF-C3-129 (Danny Forde) suggests that the Plan should commemorate the memory, work and legacy of the many women and men with strong local associations who dedicated their lives to the betterment of life through the arts, science, politics and discovery.

WXF-C3-41 (Oisín Ó Conail) recommends that linguistic heritage should be considered a key part of heritage, and that the Council should actively and passively promote our linguistic heritage (Gaeilge, even Yola in areas) with the most basic passive action being for the

council to enhance its signage (even on vehicles) to be bilingual. The entire natural physical landscape, he states, is embodied in features most of which originally had Gaelic names and that the loss of appreciation for this language would be as destructive as physical removal of priceless features.

Section 13.4.14 Cultural Heritage Chief Executive's Response

The suggestion for rooftop art is noted and is not precluded by the objectives in the Draft Plan.

The point in relation to commemorating the men and women who contributed to the arts, science, politics and discovery is acknowledged but considered to be outside of the remit of the Development Plan.

In relation to the point on linguistic heritage attention is drawn to the Council's policy on placenames which, as outlined in Section 2.10 of the Development Management Manual, requires the use of bi-lingual names for new developments and states that the name should reflect local townlands, a local historical person, a local landscape and/or the culture or history of the area. A Placenames Guide is available on the Council's website.

Chief Executive's Recommendations

It is recommended that the following proposed amendments be made to Chapter 13 Heritage and Conservation:

CE CH13.1

Amend last paragraph in Section 13.1.2 Policy Context on page 490 as follows:

The aim of the County Wexford Biodiversity Action Plan 2013 ~~aim~~ is to create and promote an increased knowledge, awareness and appreciation of the natural heritage and biodiversity of County Wexford and to conserve it for future generations to enjoy. The preparation of the plan included a substantial audit of biodiversity in the county both within and outside of designated sites, and this information will be used in the development

management process. It is the intention of the Council to update the County Wexford Biodiversity Action Plan during the life of this Plan.

CE CH13.2

Amend bullet points 1-3 in Section 13.1.4 Strategy on pages 490-491 as follows:

- To sustainably manage ~~the competing pressures on~~ the natural and built heritage in the county;
- To conserve and protect sites and species, both designated and undesignated for their biodiversity, ecological or environmental sensitivity;
- To protect upland peat and bog areas and to ensure their protection from extractive uses and inappropriate recreational use (such as quad bikes);

CE CH13.3

Amend Objective HT03 in Section 13.1.4 Strategy on page 491 as follows:

To promote initiatives that provide better public access for all visitors to our historic built and natural environment whilst ensuring the full protection of these sites. Wexford County Council will ensure that decision making on projects/developments to improve access and facilities are informed by an appropriate level of environmental assessment.

CE CH13.4

Amend first paragraph in Section 13.2 Natural Heritage on page 492 as follows:

Natural heritage, often referred to as biodiversity, is the variety of life, its physical or geological foundation and the landscapes which form our surroundings. Biodiversity includes everything from trees to weeds, from mammals to birds, from coast to countryside. Biodiversity is important for many things including food, fertile soils and clean air and water. It is therefore important that the development objectives in the Plan are balanced with objectives which ensure that the county's natural heritage is protected, conserved, ~~and~~ enhanced and restored where possible.

CE CH13.5

Insert new section 13.2.1 titled Biodiversity Restoration on page 492 as follows:

Recent studies have highlighted the poor status of habitats and species in Ireland and have called for biodiversity restoration as a priority. The EU Biodiversity Strategy aims to restore degraded ecosystems by 2030 and manage them sustainably, addressing the key drivers of biodiversity loss including changes in land and sea use, overexploitation, climate change, pollution, and invasive alien species. As part of this plan, the Commission will propose binding nature restoration targets by the end of 2021 and will introduce measures to tackle the global biodiversity challenge.

The Council will support initiatives which aim to protect and restore ecosystems and achieve the objectives of the Habitats and Birds Directives. The Council will also prepare a new County Biodiversity Action Plan which will incorporate EU and national restoration targets and will include measures to address biodiversity enhancement and restoration locally.

CE CH13.6

Replace Table 13.2 on pages 496-497 to include updated pNHA's as follows[16]:

Table 13.2 Proposed Natural Heritage Areas and Proposed Ecological Natural Heritage Areas

~~Site No.~~	~~Site Name~~
~~000703~~	~~Keeragh Islands~~
~~000695~~	~~Ballyhack~~
~~000696~~	~~Ballyteige Burrow~~
~~000697~~	~~Bannow Bay~~
~~000698~~	~~Barrow River Estuary~~
~~000699~~	~~Boley Fen~~
~~000702~~	~~Leskinfere Church, Clough~~
~~000706~~	~~Mountgarrett Riverbank~~
~~000711~~	~~Tintern Abbey~~
~~000712~~	~~Wexford Slobs and Harbour~~
~~000741~~	~~Ballyconnigar Sandpits~~
~~000742~~	~~Ballyconnigar Upper~~
~~000744~~	~~Ballykelly Marsh~~
~~000745~~	~~Ballymoney Strand~~
~~000746~~	~~Ballynabarney Wood~~

[16] Note that at time of writing confirmation of NHAs is awaited from NPWS. The list and map will be included in the final plan.

~~000747~~	~~Ballyroe Fen and Lake~~
~~000750~~	~~Bunclody Slate Quarries~~
~~000754~~	~~Carrhill Wood~~
~~000755~~	~~Cone Fox Covert~~
~~000757~~	~~Courtown Dunes and Glen~~
~~000761~~	~~Forth Mountain~~
~~000765~~	~~Killoughrim Forest~~
~~000774~~	~~Oaklands Wood~~
~~000782~~	~~St. Helen's Burrow~~
~~000812~~	~~Pollmounty River Valley~~
~~001733~~	~~Ardamine Woods~~
~~01736~~	~~Cahore Point North Sandhills~~
~~001737~~	~~Donaghmore Sandhills~~
~~001738~~	~~Duncannon Sandhills~~
~~01741~~	~~Kilmuckridge–Tinnabearna Sandhills~~
~~001834~~	~~Kilgorman River Marsh~~
~~001930~~	~~Ballyteige Marsh~~

Table 13.2 Proposed Natural Heritage Areas

Site Code	Site Name
000699	BOLEY FEN
000702	LESKINFERE CHURCH, CLOGH
000703	KEERAGH ISLANDS
000711	TINTERN ABBEY
000741	BALLYCONNIGAR SAND PITS
000742	BALLYCONNIGAR UPPER
000744	BALLYKELLY MARSH
000745	BALLYMONEY STRAND
000747	BALLYROE FEN AND LAKE
000750	BUNCLODY SLATE QUARRIES
000757	COURTOWN DUNES AND GLEN
000761	FORTH MOUNTAIN
000765	KILLOUGHRUM FOREST
000774	OAKLANDS WOOD
000782	ST. HELEN'S BURROW
001733	ARDAMINE WOOD
001736	CAHORE POINT NORTH SANDHILLS
001737	DONAGHMORE SANDHILLS
001834	KILGORMAN RIVER MARSH
001930	BALLYTEIGE MARSH

CE CH13.7

Insert new section 13.2.8 titled Marine Protected Areas on page 502 as follows:

A Marine Protected Area (MPA) may be defined as "*a geographically defined area of marine character or influence which is protected through legal means for the purpose of conservation of specified species, habitats or ecosystems and their associated ecosystem services and cultural values, and managed with the intention of achieving stated objectives over the long term*."[17]

Although much of Ireland's marine environment is in generally good condition, biodiversity loss and ecosystem degradation are of wide concern due to increasing pressures such as overexploitation, habitat loss, pollution, and climate change.

MPAs will provide a long term, area-based management approach to maintain, conserve and restore marine ecosystems, with the primary objective of conserving habitats and/or species and other natural features. A degree of area-based protection is already in place through the Natura 2000 network of sites established under the EU Birds and Habitats Directives. However, a more coherent network is needed. Ireland has a target to designate 30% of its marine area by 2030 and it is expected that there will be further designation of MPAs under the EU Marine Strategy Framework Directive in the coming years. The Council will support the conservation, sustainable management and restoration of marine ecosystems in existing and future designated MPAs through compliance with relevant Directives including the Habitats and Water Framework Directive.

CE CH13.8

Insert new section 13.2.9 titled Coastal Lagoons on page 502 as follows:

It is recognised that measures are required to improve and restore the conservation status of Coastal lagoons, an Annex 1 priority habitat under the Habitats Directive. The conservation status of coastal lagoons has been assessed as bad, with the main pressures affecting structure and functions being water quality and hydrological issues. Measures to improve water quality will continue to be delivered through the river basin planning cycles

[17] EXPANDING IRELAND'S MARINE PROTECTED AREA NETWORK A report by the Marine Protected Area Advisory Group for the Department of Housing, Local Government and Heritage October 2020

but specific targeted programmes will be required, particularly for the large sedimentary lagoons of the south-east coast.[18] The Council will support any future programmes for the restoration of these sites.

CE CH13.9

Amend Objective NH01 in Natural Heritage Objectives on page 504 as follows:

To ensure the protection of all designated ecological sites (as detailed in Section 13.2.1 to 13.2.8) in relevant Local Area Plans ~~with due consideration when assessing~~ and in the assessment of planning applications and promote the restoration of sites where required.

CE CH13.10

Amend Objective NH03 in Natural Heritage Objectives on page 504 as follows:

To promote biodiversity protection, restoration and habitat connectivity both within protected areas and in the landscape through promoting the integration of green infrastructure and ecosystem services, including landscape, heritage and biodiversity and management of invasive and alien species in the plan making and development management processes.

CE CH13.11

Amend Objective NH15 in Natural Heritage Objectives on page 507 as follows:

To prepare a new Biodiversity Action Plan for the County and to implement the actions identified in the County Wexford Biodiversity Action Plan 2013, or ~~any~~ the subsequent plan, in partnership with all relevant parties and stakeholders.

CE CH13.12

Add a new Natural Heritage Objective on page 507 as follows:

To support the conservation, sustainable management and restoration of marine ecosystems in any existing or future Marine Protected Area which may be designated during the lifetime of the Plan.

[18] Draft Prioritised Action Framework (PAF) for Natura 2000 in Ireland (NPWS, 2020)

CE CH13.13

Add a new Natural Heritage Objective on page 507 as follows:

To support any targeted programmes or projects which will be required to improve and restore the status of the large sedimentary lagoons of Wexford.

CE CH13.14

Add a new Natural Heritage Objective on page 507 as follows:

To provide support for communities in the application of EU funded programmes such as the Roseate Tern Recovery Project, the Blackstairs Farming Futures (BFF) Sustainable farming project and other LIFE and European Innovation Partnership programmes which aim to achieve the objectives of the Habitats and Birds Directives.

CE CH13.15

Add a new Natural Heritage Objective on page 507 as follows:

To implement the requirements of EU Regulations 1143/2014 on the Prevention and Management of the Introduction and Spread of Invasive Alien Species and Regulation 49 and 50 of the EU (Birds and Natural Habitats) Regulations 2011(S.I. No. 477/2011), as amended.

CE CH13.16

Amend Objective NH21 in Natural Heritage Objectives on page 508 as follows:

To ensure that proposals for development do not lead to the spread or introduction of invasive species. If developments are proposed on sites where invasive species are or were previously present, the applicants will be required to submit a control and management program for the particular invasive species carried out by a competent and appropriately qualified expert as part of the planning process.

CE CH13.17

Insert new paragraph in Section 13.3.2 Maritime and Underwater Archaeology after the first paragraph on page 513 as follows:

CHERISH is an EU funded project through the Ireland-Wales programme 2020 that investigates the impacts of climate change on coastally located and submerged cultural

heritage sites. The Discovery Programme, in collaboration with GSI, through the CHERISH project, is producing measured datasets and creating archaeological records and monitoring strategies for coastally located and submerged cultural heritage sites being impacted by climate change within County Wexford.

CE CH13.18

Amend text in second paragraph of Section 13.3.2 Maritime and Underwater Archaeology on page 513 as follows:

~~The Shipwreck Inventory of Ireland includes all known wrecks for the years up to and including 1945.~~ A database of shipwrecks has been produced under the INFOMAR programme, which is jointly managed by GSI's Marine and Coastal Unit in partnership with the Marine Institute. The National Monuments Service also maintains a Wreck Inventory of Ireland Database and Viewer which is available on their website. All shipwrecks over one hundred years old and underwater archaeological objects are protected under the National Monuments Acts 1930-2004.

CE CH13.19

Amend Objective AH03 in Archaeological Heritage Objectives on page 516 as follows:

To protect the heritage of groups of important ~~national monuments~~ archaeological sites and monuments, inclusive of their contextual setting and interpretation, in the operation of development management.

CE CH13.20

Amend Objective AH10 in Archaeological Heritage Objectives on page 517 as follows:

To identify appropriate archaeological sites in the county to which public access could be provided, and work to secure public access and the provision of signage and interpretation panels where appropriate in consultation with the landowner and the National Monuments Service, subject to normal planning and environmental criteria and the development management standards contained in Volume 2.

CE CH13.21

Insert new paragraph at end of Section 13.4 Built Heritage on page 518 as follows:

In addition, the National Inventory of Ireland (NIAH) has compiled a survey of the architectural heritage of County Wexford. The purpose of the NIAH is to identify, record, and evaluate the post-1700 architectural heritage of Ireland as an aid in the protection and conservation of the built heritage. A key part of the work of the NIAH is to raise awareness of the richness of the architectural heritage and in this regard, the NIAH maintain a website, www.buildingsofireland.ie.

The NIAH has also published a Garden Survey which showcases the historic designed landscapes, demesnes and gardens in the County. As well as being a source of information about history and society, the Council recognises the additional benefits of these landscapes for biodiversity, climate change and, where such places are open to the public, physical and mental well-being.

CE CH13.22

Amend text in Section 13.4.4 Requirement for Supplementary Information on page 520 as follows:

An Architectural Heritage Impact Assessment will be required in all cases where it is considered the proposed development entails extensive or complex works with a potential to have an impact on the architectural heritage, and should include an appraisal of the wider context of the site or structure and the visual impact. The design, form, scale, height, proportions, siting and materials of new development should relate to and complement the special character of the protected structure (or other building which the Council deems worthy of protection of heritage value such as vernacular). The traditional proportionate relationship in scale between buildings, returns, gardens and mews structures should be retained and the retention of landscaping and trees (in good condition) which contribute to the special interest of the structure shall also be required.

CE CH13.23

Amend text in Section 13.4.5 Change of Use and Extension of Protected Structures on page 520 as follows:

The historic use of the structure is part of its special interest and in general the best use for a building will be that for which it was built. However, the change of use will be the best way to secure the long-term conservation of a structure.

Sympathetic and suitable reuse and/or development of structures, including appropriately designed additions to Protected Structures (or other buildings which the Council deems worthy of protection of heritage value such as vernacular), will be supported where they will ensure the long-term survival of the building.

It is often necessary to permit new extensions to a Protected Structure (or other building which the Council deems worthy of protection of heritage value such as vernacular). so as to adapt it to modern living or to make it economically viable.

Proposals for new structures or extensions need careful consideration and the new development should seek to avoid adverse effects on the character of the structure.

A high-quality sympathetic design approach will be promoted when larger scale extensions are proposed, or for new buildings in the curtilage of Protected Structures (or other building which the Council deems worthy of protection of heritage value such as vernacular). Contemporary design approaches may include traditional, vernacular or modern styles.

Historic buildings in town centres present an opportunity to provide accommodation in upper floors, for instance above ground floor shops and offices. Mixed uses also provide variety and vibrancy to an area whilst preventing a building from falling into dereliction.

In finding the optimum viable use for protected structures (or other building which the Council deems worthy of protection of heritage value such as vernacular), other land-use policies and site development standards may be relaxed to achieve long-term conservation.

In some circumstances, short-term uses may provide a way to help keep a building weather-tight and in use pending long-term solutions.

CE CH13.24

Insert new section 13.4.8 titled Vernacular Buildings on page 522 as follows:

County Wexford has a wealth of vernacular buildings, including thatched cottages, which are characteristic of our local communities and contribute to their authenticity, and to their cultural, traditional, architectural, archaeological, historical and social interest and diversity. Vernacular buildings, through their siting, orientation and materials, display an intimate connection with their landscape. The Council will facilitate appropriate, high-quality design solutions for adaptations of vernacular buildings that carefully consider their vernacular qualities. Where it is proposed to extend a vernacular house, the design, scale, footprint and materials should be sympathetic to the existing building and its setting.

CE CH13.25

Amend objective BH03 in Built Heritage Objectives on page 522 as follows:

To promote the development of heritage-led regeneration and engage in and promote initiatives to revitalise the historic cores of our towns and villages together with local communities, heritage property owners and other stakeholders.

CE CH13.26

Add a new Built Heritage Objective on page 522 as follows:

To consider, in the preparation of future local area plans, a *Town first* approach to the revitalisation of historic urban centres, which focuses on the repair and upgrade of existing historic buildings and their adaptation to new uses with regard to their architectural character and significance.

CE CH13.27

Add a new Built Heritage Objective on page 524 as follows:

To protect, maintain and enhance the established character and setting of vernacular buildings which are worthy of protection of have architectural heritage value, farmyards and

settlements where they make a positive contribution to the built heritage and encourage the re-use and sensitive refurbishment of vernacular buildings using appropriate design and materials and having regard to best practice conservation guidelines.

CE CH13.28

Amend Objective BH12 in Built Heritage Objectives on page 524 as follows:

To ensure that elements of the architectural heritage of the county, such as historic gardens and historic designed landscapes, stone or brick walls, ditches and street furniture that make a positive contribution to the built heritage, are retained.

CE CH13.29

Amend title and first paragraph in Section 13.4.12 List of Proposed and Adopted ACAs in County Wexford on page 527 as follows:

13.4.12 List of ~~Proposed and Adopted~~ ACAs in County Wexford

At present there are ACAs in Wexford, Enniscorthy, Gorey, ~~and~~ New Ross and Bunclody. ~~It is proposed to alter some of these ACAs in this plan and proposed to designate an ACA in Bunclody. These are identified in Volume 6.~~ This section contains general objectives relating to ~~all~~ the ACAs~~,~~ and further information and advice is contained in Volume 6.

CE CH13.30

Amend Objective ACA01 in Architectural Conservation Areas Objectives on page 528 as follows:

To protect and enhance the character of the designated Architectural Conservation Areas ~~including views and prospects~~ in Wexford, Enniscorthy, ~~and~~ New Ross, Gorey and Bunclody, ~~and the proposed Architectural Conservation Areas in Gorey and Bunclody~~ including the views and prospects to and from these areas ~~with coherence to all conservation designations and objectives~~.

Section 18 Submissions Relating to Chapter 14 Recreation and Open Space Strategy

Relevant Submissions

- WXF-C3-3 Peter Branigan
- WXF-C3-29 Healthy Wexford Committee
- WXF-C3-48 Courtown Community Council
- WXF-C3-51 Sports Active Wexford
- WXF-C3-62 Wexbug
- WXF-C3-70 Re-Imagining Enniscorthy Town
- WXF-C3-82 Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media (Dept. TCAGSM)
- WXF-C3-85 Wexford PPN
- WXF-C3-94 Wexford Environmental Network (WEN)
- WXF-C3-101 Roisin Markham
- WXF-C3-110 Tara Hill Community Development Group
- WXF-C3-116 Coillte
- WXF-C3-123 Ann Walsh
- WXF-C3-127 South East on Track
- WXF-C3-138 Ferns Development Association
- WXF-C3-142 HSE
- WXF-C3-150 Patsy Cosgrave
- WXF-C3-151 Keep Ireland Open (KIO)
- WXF-C3-165 Ciarán Breen

Summary of Main Issues and Chief Executive's Response

Section 14.2 Climate Action and Recreation

WXF-C3-94 (WEN) seeks the inclusion of additional bullet points:

- 'Develop well-managed, well-located and well-connected open spaces that operate as part of a wider green network in the urban settlements.'

- ‘Protect existing trees (particularly any mature trees identified in the Tree Survey) and planting new trees in green spaces…..’

Section 14.2 Climate Action and Recreation Chief Executive’s Response

The development and management of open spaces and green infrastructure in urban settlements is an important aspect of climate action and it is therefore recommended that this bullet point be included in the Plan. In relation to the second point, this Section already contains a bullet point to “*protect and expand green infrastructure provisions in existing and new recreation and open space areas*” and this includes protecting existing and planting new trees. In the interest of clarity, it is recommended to amend this bullet point to include trees. Objectives in Chapter 11 Landscape and Green Infrastructure (GI01) and Chapter 13 Heritage and Conservation (NH03, NH11, NH12) will also ensure the retention of landscape connections and features such as trees.

Section 14.3 Policy Context

WXF-C3-94 (WEN) requests the inclusion of UN Sustainable Development Goal (SDG) 11 Sustainable cities and communities, Habitat III the United Nations’ New Urban Agenda and EPA Research - Eco-Health: Ecosystem Benefits of Greenspace for Health.

WXF-C3-29 (Healthy Wexford Committee) requests that specific mention be given to their Healthy Wexford County Plan 2020-2022.

Section 14.3 Policy Context Chief Executive’s Response

With regard to the documents referenced by WEN, having regard to the OPR’s submission to reduce the text in the Draft Plan, it is not recommended to include these documents in the policy context section. However, the Council is aware that accessible and well-designed green spaces are essential for the health and well-being of thriving and inclusive communities and this is incorporated into policies of the Draft Plan and will also be considered as part of the preparation of future LAPs. The UN Sustainable Development Goals are outlined in Chapter 1 of the Draft Plan.

The proposals by the Healthy Wexford Committee are noted and it is considered appropriate to update the policy context section (Section 14.3) to include reference to the Healthy Wexford Plan 2020-2022, which was launched after the Draft Plan was adopted.

Section 14.4 Recreation and Open Space Strategy

WXF-C3-29 (Healthy Wexford Committee) refers to their Healthy Wexford County Plan 2020-2022 which aims to improve the health and wellbeing of everyone in the County. The Committee commends the focus on climate change and the way that it is a constant throughout the plan but states that more could be done to establish ourselves as Ireland's Healthiest County. It is recommended that Healthy Wexford be included as an Underlying Theme in the Plan, is referenced in the Core Strategy, and in the main theme and goals of each chapter in the Plan. It is requested that specific mention be given to Wexford as a Healthy County, to the Healthy County Committee and to the Healthy County Plan 2020-2022.

WXF-C3-85 (Wexford PPN) outlines key elements of their Vision for Community Wellbeing for consideration in the recreation and open space strategy. This includes ensuring that there is good provision of community facilities which has positive benefits for health and wellbeing, there are well-developed and accessible recreational amenities and activities in the built and natural environments which can benefit all, and that our natural environment is an important asset which must be utilised respectfully for accessible recreation and tourism.

WX-C3-123 (Ann Walsh) commends the Council on aiming to meet many key psychological needs through the Plan and highlights the importance of the provision of safe and secure housing, a sense of community belonging, public consultation and environmental protection, all of which impact on our mental health and well-being.

WXF-C3-51 (Sports Active Wexford) recommends the inclusion of the 'National Sport Plan 2018-2027' and 'Sport Ireland Policy on Sport and Physical Activity in the Outdoors' in Objective ROS01.

With regard to Objective ROS03, WXF-C3-94 (WEN) states that consideration should be given to the specific design attributes that afford different groups of people opportunities for healthy activities and how people's needs vary over their life course.

WXF-C3-142 (HSE) welcomes Objective ROS04 but notes that there remains a high rate of car reliance in Ireland and there needs to be a sustained and concerted effort by Wexford County Council to promote behavioral change in the population of Wexford and to bring about a reduction in the dependence on car travel, facilitate a greater choice of transport modes and provide the appropriate infrastructure.

WXF-C3-151 (KIO) seeks additional objectives in relation to public access to outdoor recreation and amenities to include riverside walks, linear parks and walking and cycling routes, developing blueways, promoting recreational use of the coastline, working with relevant stakeholders to protect waterbodies and associated riparian zones and the amenity of the shoreline from degradation and protecting recreational attractions including woodlands, waterways, coastal areas and beaches, natural heritage and scenic landscapes. It also seeks the adoption of bye-laws for water sports, to prohibit noise generating sports and to adopt bye-laws to ban motor bikes, quads and motorised paragliders on private owned land and commonage.

Section 14.4 Recreation and Open Space Strategy Chief Executive's Response

In response to the submission from the Healthy Wexford Committee, the theme of healthy communities is embedded in the Recreation and Open Space Strategy in Section 14.4 of the Draft Plan and in particular the overall goal which is *"to ensure that County Wexford is a healthy county with physical environments, amenities and resources that everyone, regardless of their age or ability, can use and to ensure good physical and mental health and wellbeing."* This is supported by a number of strategic aims and objectives in this chapter and also within a number of other chapters in the Draft Plan, including Chapter 5 Design and Place-making in Towns and Villages, Chapter 8 Transportation Strategy and Chapter 15 Sustainable Communities and Social Infrastructure.

Nevertheless, to ensure consistency with this submission and within the Plan, the Healthy County theme will be included as an underlying theme in Chapter 1 and will also be referenced in Chapter 3 Core Strategy. It is also considered appropriate to amend Objective ROS01 to include reference to the Healthy Wexford County Plan. Some of the actions in the Healthy Plan will also be considered as part of the preparation of future LAPs for the four main towns, where relevant.

The comments from Wexford PPN are noted and in this regard it is considered that the Draft Plan has adequate objectives to ensure good provision of community facilities and recreational amenities which are accessible by all. The Council recognises that our natural environment is an important asset which must be utilised respectfully for accessible recreation and tourism and this is also reflected in the Draft Plan.

The importance of safe and secure housing, socially inclusive communities and environmental protection for our health and mental wellbeing is also recognised by the Council. The provision of safe and secure housing is addressed in Chapter 4 Sustainable Housing. Social inclusion and accessibility is identified as an underlying theme in Chapter 1 and is embedded across a number of objectives and chapters in the Draft Plan. Environmental protection is also a key principle throughout the Draft Plan and is addressed, in particular, in Chapter 10 Environmental Management. The Plan is also subject to Strategic Environmental Assessment (SEA) and an Environmental Report is contained in Volume 12.

The recommendation by Sports Active Wexford to update references to national sports policy is noted and it is considered appropriate to update Objective ROS01 and the policy context section of this chapter.

WEN's point in relation to Objective ROS03 is noted and, notwithstanding a number of existing objectives for socially inclusive, accessible and age-friendly facilities in the Draft Plan, a minor amendment is recommended to the wording of this objective to ensure that open space, sporting, recreation and play facilities are accessible to all.

The HSE's comments on the high rate of car reliance in Ireland is also noted and in this regard the Draft Plan contains a number of objectives to promote a reduction in car dependence, facilitate a greater choice of transport modes and provide the appropriate infrastructure, including in Chapter 2 Climate Action (CA14), Chapter 3 Core Strategy (CS04, CS05, CS07, CS08, CS09), Chapter 5 Design and Place-making in Towns and Villages (TV03, TV10), Chapter 7 Tourism Development (TM28), Chapter 8 Transportation Strategy (TS01-TS36 and in particular TS09 which relates to modal share targets), Chapter 10 Environmental Management (AQ05) and this Chapter (ROS04, ROS33-ROS43).

In relation to KIO submission, it is considered that appropriate objectives are included in the Draft Plan to support public access to outdoor recreation and amenities, including riverside walks and walking and cycling routes (ROS33-ROS43), to promote the recreational use of the coastline and rivers (ROS44-ROS48, ROS50-ROS51), develop blueways (TM28), protect woodlands (ED106, NH11-NH12), waterways (TM34, TM36, ROS50), coastal areas and beaches (CZM70, CZM72, CZM73), natural heritage (NH01-NH24) and scenic landscapes (L01-L15). Riparian zones are addressed in Section 9.11.9 Riparian Zones and Flood Risk Management and Section 11.12 Green Infrastructure (which includes objectives to provide appropriately sized buffer zones between new development and watercourses). Issues with regard to noise generating sports and bye-laws for water sports and motor bikes, quads and motorised paragliders are outside the remit of this Plan.

Section 14.5 Open Space

WXF-C3-142 (HSE) welcomes the proposal to implement an 'Open Space and Recreation Strategy'. However, it states that projects should be identified and dedicated funding mechanisms provided to ensure progress on this issue and that all types of green projects should be considered, from small scale initiatives such as tree planting to larger projects such as public parks. The HSE welcomes Objective ROS08 to ensure a range of accessible open spaces in towns and villages.

WXF-C3-82 (Dept. TCAGSM) agrees with the opening statement in Section 14.5.2 that compact growth, and the consolidation of the existing built-up areas in our towns and villages through increased residential densities and maximising the potential of under-

developed land, requires careful consideration and there must be an increased focus on the delivery of high quality public and private open spaces. The Department states that this is not just important to human health and well-being but also to avoid negative impacts such as disturbance on nearby nature conservation sites. The Department states that this is particularly pertinent when zoning land for development and should be considered, mitigated for and monitored at the SEA level.

The Department notes that Special Protection Areas (SPAs) for birds (uplands and coastal) are particularly sensitive to disturbance and reference is made to the Suitable Alternative Natural Greenspace (SANG) concept in the UK which is promoted by Natural England.

In relation to designing Open Spaces (Section 15.5.7) the HSE states that opportunities for green infrastructure should be explored and integrated into the design. It is stated that the plan should to identify areas where biodiversity can be integrated into the urban fabric. The HSE also recommends the provision of public outdoor gyms for areas not currently serviced such as Enniscorthy town and supports the provision of allotments, in particular in built-up areas, which contributes to the government's campaign of "healthy Ireland".

WXF-C3-101 (Roisin Markham) refers to a recent EPA study 'Research 328: Eco-Health: Ecosystem Benefits of Greenspace for Health' which advances the perspective that accessible and well-designed green spaces are essential infrastructure that is fundamental to the health and well-being of thriving and inclusive communities. By enhancing the provision and design of green spaces (further detail on key design principles are provided in the submission), local authorities and public agencies can contribute towards key objectives within the NPF relating to healthy communities, compact growth and sustainable land use management.

WXF-C3-94 (WEN) requests the Planning Authority to consider the provision of allotments/ community gardens as part of the open space provision in a residential scheme and on publicly owned land. They also suggest that additional text be included to ensure that open spaces are accessible spaces with good links, have a networked approach, are inclusive in design, well managed and maintained, have multifunctional uses, enhance urban greening

through planting strategies and create multisensory restorative environments that help mitigate the psychological stresses of modern living.

WEN highlights the opportunity for Wild areas/nature pockets as Open Spaces which could have sensitive and/or controlled (or no) access to the public. The idea would be that these nature pockets would enhance the general biodiversity of the locality and therefore people's experience of nature. These spaces would add to the ecological networks already in existence. WEN recommends an amendment to Objectives ROS07, ROS12 and ROS18 in this regard.

In relation to Objectives ROS09 and ROS13 WEN highlights the importance of developing innovative community engagement models and requests the Council to organise green infrastructure workshops with local communities at the beginning of plan-making initiatives and to organise green space co-design workshops with local communities to collaboratively develop enhancements to existing local green spaces. WEN requests that an additional objective be included to support citizen science initiatives that are used to interest and involve communities in the planning and design of their local environments from a health and well-being perspective.

WEN strongly supports Objectives ROS17 and ROS18 but would like to add that wildlife signage be added to help citizens identify the biodiversity in their local green spaces to increase awareness and educate citizens on the importance of local biodiversity.

Section 14.5 Open Space Chief Executive's Response

The HSE's comments are noted however identifying and providing dedicated funding mechanisms for green projects are considered to be outside the remit of this Plan.

The Department's comments on the importance of open spaces in our towns and villages to avoid negative impacts such as disturbance on nearby nature conservation sites, in particular SPAs in uplands and coastal areas, is noted. SANG's are a relatively new planning tool in the UK and research is ongoing as to their success in mitigating against disturbance to SPAs. As such it is not proposed to include an objective in this Plan. However, they may be

given further consideration as part of the preparation of future LAPs. It should be noted that the Draft Plan, including the Core Strategy which seeks to consolidate towns and villages and increase residential densities in line with national guidelines, has been subject to SEA and AA which included an assessment of the impacts on SPAs. Similarly, the NPF and RSES have been subject to SEA and AA.

In response to the HSE's comments on the design of open spaces it is noted that Section 14.5.7 includes a section on biodiversity which highlights the importance of ecological corridors and stepping stones in the design process and the opportunity that exists to increase biodiversity in our towns and villages. Objective ROS17 requires that the design of residential schemes, including open spaces, to optimise "the existing features of the site and to ensure that biodiversity and green infrastructure are fully considered and integrated into schemes. Opportunities for the integration of green infrastructure and biodiversity into the urban fabric will be considered further in the preparation of future LAPs.

In relation to outdoor gyms, it is considered that Table 14-1 should be amended to include them in Hub Parks and Neighbourhood Parks and a new objective included to support them at appropriate locations in the County. Section 14.5.4 also provides that outdoor gym equipment may be considered as a deviation from quantitative standards as part of new residential developments.

Ms. Markham's comments relating to green space are also noted and, in this regard, the Draft Plan addresses the importance and role of green spaces and green infrastructure in contributing to good health and wellbeing, high quality living environments, climate action and protecting biodiversity and ecosystem. This is supported by a suite of objectives and development management standards to ensure this forms an integral part of developments in the county, including local authority own development.

Allotments and community gardens are addressed in Section 14.5.7. Objective ROS12 provides for the facilitation of allotments and community gardens at appropriate locations and states that the Council will identity land for use as allotments and community gardens

in larger towns and villages during the preparation of LAPs and will also consider them as part of the public open space provision in new residential schemes.

In response to WEN's comments on the design of open spaces, it is noted that section 14.4 refers to the provision of a high quality network of open spaces and recreation facilities, the importance of merging and linking public open spaces (section 14.5.6) and that open spaces should be located so that they are accessible by the largest possible number of people in a scheme (section 14.5.7). Objectives are included to ensure that open spaces are mutli-functional (ROS05), accessible (ROS10) and linked (ROS13). Further consideration will be given to the design of open spaces in future LAPs and at the project level.

The Council welcomes the suggestion in relation to wild areas/nature pockets to enhance the general biodiversity of the locality and people's experience of nature. The Council is already pursuing a number of pilot projects in this regard, including pollinator projects (Wex Bee Aware) and native planting projects (Woodland Creation on Public Lands Scheme) on public owned lands. A number of Community Orchards have also been planted across the county, with a view to increasing the number of orchards at additional locations. A Green Estate Pilot Programme has also just been launched by the Council (with input from WEN) in the Wexford Municipal District. This programme is an initial step to encourage residents to begin to think about creating areas for nature within the public spaces of their estate. It is therefore agreed that Objectives ROS12 and ROS18 should be amended to include reference to wild areas/nature pockets in addition to allotments and community gardens and measures specifically designed to enhance wildlife in residential schemes.

With regard to (i) developing innovative community engagement models (ii) organising green infrastructure workshops with local communities at the beginning of plan-making initiatives and (iii) organising green space co-design workshops with local communities to collaboratively develop enhancements to existing local green spaces, these are all considered to be outside the remit of this Plan but will be considered as part of the preparation of the County Biodiversity Action Plan. The Environmental Awareness Officer is also involved in ongoing community projects with engagement from the public. It should also be noted that public consultation will form an important part of the preparation of

future LAPs, which will include consultation on green infrastructure networks in towns and villages and the zoning of areas for open space. Planning applications and Local Authority Own Developments are also subject to public consultation.

With regard to wildlife signage, the Council agrees that this is important to increase awareness and educate citizens on the importance of local biodiversity and it is considered appropriate to amend Objective ROS18 to promote the use of information signage in new residential schemes.

Section 14.6 Play Facilities

WXF-C3-142 (HSE) notes Objective ROS19 regarding the availability of a range of play facilities for all children and states that younger children are generally better catered for but the Council should consider providing a range of facilities such as skate parks, graffiti/art walls, playing courts, meeting areas etc. to cater for adolescents. It welcomes the Council's proposals for youth cafes (Objective SC12 in Chapter 15) but recommends that suitable sites are identified and specific funding put aside for multifunctional community spaces, with young people being centrally involved in the development and management of the programmes and venues; and increased access to school facilities in out of-school hours. It also recommends that the Council establishes processes that enable consultation with young people in the development and implementation of programmes in which they are involved, i.e. playgrounds, activity centres and public spaces.

WXF-C3-70 (Re-Imagining Enniscorthy Town) seeks objectives for the provision of new and improved youth amenity facilities in Enniscorthy Town, including the development of a skate park, an upgrade of the Duffry Gate playground, the delivery of a public space and playground facilities in St. Senan's parish and the strengthening of cultural facilities to support young musicians and artists. It also seeks a clear ambition around developing watersport activities on the River Slaney and targeting the delivery of a Blueway from Bunclody to Edermine and to support the ongoing use of the Promenade playground during Flood Relief Works.

Section 14.6 Play Facilities Chief Executive's Response

The HSE's comments are noted and it is considered appropriate to include an objective to development skate parks at appropriate locations in the County. The identification of suitable sites and specific funding for multifunctional community spaces is outside the remit of this Plan. However, the Local Community Development Committee (LCDC) has a role in this regard and the Draft Plan support the implementation of their Local Economic and Community Plan (LECP). Facilities for young people in the four main towns will be considered further as part of the preparation of future LAPs, which will involve public consultation.

With regard to increased access to school facilities, Objective ROS29 encourages *"the use of school grounds and associated recreational facilities outside of school hours by all members of the community provided that this does not conflict with the delivery of the education service."* Objective SC23 in Chapter 15 also encourages *"the multi-use of school buildings and facilities provided that this does not conflict with the delivery of the education service."*

Re-Imagining Enniscorthy Town's suggestions, which are specific to Enniscorthy Town, will be considered as part of the preparation of the Enniscorthy Town and Environs LAP. In terms of developing watersports and the Blueway from Bunclody to Edermine there are already a number of Objectives in the Draft Plan which support this (ET05, TM28, TM33, TM35, ROS50) and Chapter 3 Core Strategy states that there are plans to develop a blueway from Bunclody through Enniscorthy Town to Wexford Town and that the Council will focus on developing a Blueway between Bunclody and Enniscorthy to include adjacent cycleway and walking trail.

Section 14.8 Walking and Cycling Routes

WX-C3-110 (Tara Hill Community Development Group) asks the Council to recognise the importance of the walking trails at Tara Hill, their natural heritage, social and recreational value to Wexford and points out that it is an important link between Ballymoney and Castletown as part of coastal trail/walk initiative.

WXF-C3-138 (Ferns Development Association) suggests that private landowners be incentivised to provide access to new walking routes through programmes which motivate them towards participation and acknowledge their generous and valued contribution.

WXF-C3-48 (Courtown Community Council) requests that the Council make provision for a cycle path/ greenway from Courtown Riverchapel to Gorey (while preserving any mature trees wherever possible) which could be linked into an established network of forest trails in Coutown Woods and beyond.

WXF-C3-62 (Wexbug) and WXF-C3-165 (Ciarán Breen) would like to see greenways/ cycleways/ walking trails linked to settlements and highlight the importance of these routes for the commuter as well as the tourist. WXF-C3-142 (HSE) also notes that walking and cycling routes in this section appear to be based on those in scenic areas with the routes being developed for tourism and recreational purposes. It recommends that investment is made in the landscaping or greening of common commuter routes in towns so as to build in a healthy beneficial green experience into people's everyday commute. It also recommends that consideration is given to improved cycle routes within all towns to encourage cycling to work and reduce the level of traffic congestion within the town. Such measures are a commitment to promoting walking and cycling for health under Healthy Ireland and also to reduce the level of traffic in the town centre and reduce air emissions.

WXF-C3-116 (Coillte) supports Objectives ROS33, ROS34, ROS43 and ROS49 and is committed to protecting and enhancing the recreation infrastructure in County Wexford, including the walking trails at Carrickbyrne Forest, Forth Mountain, Three Rocks Trail, Tintern Abbey and at Coolmelagh Forest Recreation Area. Coillte welcomes the opportunity to explore the provision of further strategic recreation infrastructure at appropriate locations in the Coillte estate in partnership with Wexford County Council and relevant stakeholders in the county.

WXF-C3-3 (Peter Branigan) and WXF-C3-127 (South East on Track) express concern over the conversion of the Rosslare-Waterford rail line to a greenway. The latter requests the Council to commit to a redesign of the project allowing an operable rail line and greenway to exist

concurrently. WXF-C3-165 (Ciarán Breen) also states that the development of greenways should not be planned in a way that impedes future development of rail links on currently disused railway lines.

South East on Track and Re-Imagining Enniscorthy Town request the Council to explore the extension of the New Ross Greenway to Macmine Junction via the old rail line. They also request the Council to upgrade the Euro Velo Route 1 and Wexford Cycle Hub Route 1 respectively. Re-Imagining Enniscorthy Town also seeks a commitment from the Council to extend and upgrade walking and cycling trails at the Promenade (to Edermine, Ringwood and Borodale), Vinegar Hill, Bree Hill and the Blackstairs Mountains.

WXF-C3-94 (WEN) notes that objectives ROS33, ROS43, ROS47 and ROS50 will increase public access to upland areas, forestry, coastal areas and ecological networks which may be part of Natura sites, areas of high biodiversity, greenways, blueways, natural amenity areas and so on and there should be a public awareness/educational campaign on the wildlife and sensitivity of habitats to public use within these areas and of the potential for the public to damage/destroy or kill wildlife in these areas by going off-route, bringing dogs into wildlife sensitive areas, leaving behind non-biodegradable plastic litter and so on.

WXF-C3-151 (KIO) supports a number of objectives in this Section but seeks the rewording of others and the re-location of some to other chapters in the Plan. It requests the inclusion of two Tables (with maps) of way-marked ways and cycle routes. It also seeks the inclusion of 34 new objectives relating to the development, protection and maintenance of safe walking and cycling routes, the development of a network of trails (regional and local, rural and urban, old and new), the development of a Walking and Cycling Strategy, the development of a network of greenways (linking to regional and national greenway networks), the protection of routes and potential linkages, signposting and waymarking of routes, the provision of car parking for walkers and cyclists at important locations, ensuring that cycle routes are designed using best practice, lower speed limits and prioritised over motorised transport, the establishment of new walkways on a legal and permanent basis and the development of a strategy to underpin funding.

Section 14.8 Walking and Cycling Routes Chief Executive's Response

The walking trails at Tara Hill are included on the Wexford Walking Trails website. Section 14.8 of the Draft Plan highlights these trails and Objective ROS36 supports the Wexford Walking Trails brand and promotes and facilitates the expansion of the walking trail network. Objective ROS37 also facilitates the development and use of the Wexford Coastal Pathway (Slí Charman) as a recreation and tourist facility.

The incentivisation of private landowners to provide access to new walking routes is outside the remit of this Plan. However, Objective ROS35 states that it is an objective of the Council to engage with landowners in order to support the sustainable development of walking and cycling routes.

The requests to extend the New Ross Greenway to Macmine Junction and the development of a Greenway in the north of the county (Courtown) are addressed in Chapter 8 Transportation Strategy.

Objective ROS41 states that the Council will *"support investment in the development of walking and cycling facilities and greenways and to explore the potential to develop greenway corridor linkages between settlements to create interregional greenways."* Objective TS26 (as proposed to be amended) in Chapter 8 Transportation Strategy will also allow for new walking and cycling routes between settlements with green infrastructure incorporated into the design, while Objective TS21 (as proposed to be amended) will require Local Transport Plans to consider walking and cycling networks in the four main towns with linkages to the towns from their surrounding hinterlands. This also addresses the points made by Wexbug and the HSE in relation to commuter routes into settlements.

Further measures to promote walking and cycling within towns, in order to promote a healthy county and to reduce the level of traffic congestion and associated air emissions, are contained in Chapters 3 Core Strategy, Chapter 5 Design and Place-making in Towns and Villages, Chapter 8 Transportation Strategy and Chapter 10 Environmental Management.

In relation to the concerns regarding the conversion of the Rosslare-Waterford rail line to a greenway this issue is addressed in detail in the submission responses and associated proposed amendments under Chapter 3 Core Strategy, Chapter 7 Tourism Development Strategy and Chapter 8 Transportation Strategy. No amendments are required to this Chapter.

The comments from Coillte are welcomed and the Council will continue to facilitate and support the protection of existing and development of additional forest amenity sites and walking and cycling trails as outlined in the objectives in the Draft Plan.

The development and improvement of trails throughout the County will be supported by the objectives in the Draft Plan. Bree Hill is specifically mentioned in Objective ROS43 which states that the Council will engage with Coillte in the investigation of the suitability of developing off-road cycling trails.

With regard to upgrading the Euro Velo Route 1 and Wexford Cycle Hub Route 1, Objective ROS42 states that it is an objective of the Council *"to facilitate the development of the National Cycle Network in the county, improve cycle routes with better signposting, better road surfaces and greater safety for the cyclist…"*

WEN's comments on increased public access to sensitive areas and the need for a public awareness campaign on the wildlife and sensitivity of habitats to public use within these areas is noted and, given the potential threat to wildlife and sensitive habitats, it is considered appropriate to include an objective in the Plan. Potential impacts will also be considered at the project level as part of any development of these areas.

The detailed submission from KIO is acknowledged. While all the suggestions are welcome, it is considered that walking and cycling are adequately addressed in the Draft Plan. It is therefore not proposed to add additional text, however the suggestions have been incorporated into the proposed amended objectives, where appropriate.

With regard to walking and cycling trails attention is drawn to the Wexford Trails Brand (which includes maps and details of way-marked walking trails and cycle routes) and the National Cycle Network which are supported by the Draft Plan (Objectives ROS36 and ROS42). It is not considered appropriate to replicate this information in the development plan. The development of a Walking and Cycling Strategy and a strategy to underpin funding is also outside the remit of this Plan. Appropriate objectives are included in the Draft Plan to promote safe walking and cycling routes, the development of a network of trails and to ensure that new routes are designed using best practice. However, in the interests of clarity, a minor amendment is recommended to Objective ROS42 to include reference to the Wexford Cycling Trails.

In relation to car parking, Chapter 7 includes an objective (TM31) "*to consider the development of car parking facilities at designated entry/exit points along greenway and blueways routes*" and Chapter 12 Coastal Zone Management includes an objective (CZM68, CZM74) "*to maintain and upgrade facilities in coastal areas through the provision of appropriate support facilities such as car parking, coach parking, cycle parking…"* Car parking facilities will also be considered at the project level as part of the development of new routes.

Section 14.9 Public Rights of Way

WXF-C3-151 (KIO) suggests some rewording to the text in this Section (definition and legal) and requests that Public Rights of Way (PROWs) be listed and mapped within one year of making the Plan. It seeks additional objectives to create a network of PROWS by facilitating the creation of new and extension of existing PROWs (by agreement or CPO), identifying links to PROWS in adjoining counties, preserving existing PROWs for amenity purposes, designating (as PROWs) pilgrim paths, mass paths and routes to holy wells, mass rocks and penal mass stations, routes to traditional outdoor amenities and heritage sites and greenways, improving signposting and waymarking, identifying PROWs prior to new forestry, infrastructural/energy/telecommunication or golf course developments, prohibiting development where a PROW might be prejudiced unless suitable alternative linkages and level of amenity are maintained, and favouring planning applications which

include proposals to improve PROWs. It also seeks an objective to ensure that golf club development does not impinge on PROWs,

One submission (WXF-C3-150 Patsy Cosgrave) relates to the obstruction of a public right of way at Cahore.

Section 14.9 Public Rights of Way Chief Executive's Response

The suggestions from KIO are acknowledged and attention is again drawn to the OPR submission which requests that the text of the Draft Plan be reduced. It is therefore not proposed to add additional text. It is considered that appropriate objectives are included in this section to preserve PROWs in accordance with the requirements of the Planning and Development Act 2000 (as amended) (Objectives ROS44 and ROS45). This will involve research on all types of PROWs and will be subject to a public consultation process, as outlined in Objective ROS45. Due to the process involved, it is not feasible to do this within one year of making the Plan. Objective ROS46 states that it is an objective of the Council to ensure that development does not impinge on public walking routes and PROWs and this will be implemented at the development management level. The point in relation to golf club development impinging on PROWs would also need to be considered on a case-by-case basis at the project level but is subject to both PROW objectives.

The issue pertaining to the obstruction of a public right of way at Cahore is outside the remit of this Plan.

Chief Executive's Recommendations

It is recommended that the following proposed amendments be made to Chapter 14 Recreation and Open Space Strategy.

CE CH14.1

Insert additional bullet point in Section 14.2 Climate Action and Recreation on page 536 as follows:

- Develop well-managed, well-located and well-connected open spaces that operate as part of a wider green network in the urban settlements.

CE CH14.2

Amend the fourth bullet point in Section 14.2 Climate Action and Recreation on page 536 as follows:

- Protect and expand green infrastructure provisions in existing and new recreation and open space areas, including the retention of existing and planting of new trees.

CE CH14.3

Insert two new paragraphs in Section 14.3 Policy Context after National Physical Activity Plan on page 537:

National Sports Policy 2018 – 2027 (Department of Transport, Tourism and Sport, 2018)

This policy sets out a Vision for Irish Sport in 2027 along with 57 actions to transform the sporting landscape over the next decade. Action 13 of the Plan focuses on how the wider natural and built environment can facilitate participation in sport and physical activity taking account of the type of activities in which adults are increasingly participating such as running, cycling, outdoor adventure pursuits and recreational walking.

Sport Ireland Policy on Sport and Physical Activity in the Outdoors

This policy recognises and encourages all forms of sport and physical activity in the outdoors undertaken for social, recreational or competitive purposes. It includes sport and recreation facilities that are carried out in a natural or semi-natural environment and involve dealing with natural elements. It also includes sport and recreation activities that take place on infrastructure such as trails, greenways, cycle tracks and roads, both in urban and rural landscapes. The Policy highlights the social, physical and health benefits associated with participating in sport and physical activity and it also supports the implementation of policies on participation in sport by people with disabilities and women in sport.

CE CH14.4

Insert new section titled Healthy Wexford County Plan 2020-2022 in Section 14.3 Policy Context on page 539 as follows:

This Plan supports the implementation of Healthy Ireland, the national health and wellbeing framework, at a local level, to improve the health and wellbeing of all in County Wexford. The Plan has six key priority areas and includes a number of associated actions. These include the development of local infrastructure such as trails, playgrounds, nature corridors and parks, providing access to physical activity infrastructure such as beaches and trails to people with disabilities, integrating physical activity infrastructure (i.e. cycle paths) into new developments and rejuvenating town and village spaces for the enjoyment of the community. The County Development Plan supports the Healthy County Plan in this regard.

CE CH14.5

Amend Objective ROS01 in Recreation and Open Space Strategic Objectives on page 540 as follows:

To support the implementation of the National Sport Plan 2018-2027, Get Ireland Active-the National Physical Activity Plan for Ireland 2015-2020, Sport Ireland Policy on Sport and Physical Activity in the Outdoors, the Wexford Healthy County Plan 2020-2022, the Wexford Local Economic and Community Plan 2016-2021 and the Sports Active Wexford Strategic Plan 2017-202~~2~~1 and any updated version of these plans as a means of promoting physical activity and active living in order to enhance health, wellbeing and social inclusion subject to the objectives of the County Development Plan.

CE CH14.6

Amend Objective ROS03 in Recreation and Open Space Strategic Objectives on page 541 as follows:

To ensure urban and rural communities have access to a range of high quality open space, sporting, recreation and play facilities that are appropriate in scale and location and are universally accessible and suitable for all ages. These facilities should be located in existing settlements, close to residential areas and other community facilities so as maximise participation levels and reduce the need to travel.

CE CH14.7

Add new Recreation and Open Space Strategic Objective on page 541 as follows:

To promote an awareness/educational campaign on the wildlife and sensitivity of habitats to public recreational use in areas of high biodiversity such as upland areas, coastal areas, designated sites and ecological networks, including the provision of appropriate signage.

CE CH14.8

Amend first and second categories of Table 14-1 Hierarchy of Open Spaces on page 543 as follows:

Table 14-1 Hierarchy of Public Open Spaces

Level	Description	Function
1	Hub Parks	These are the highest level of open space and provide a range of high quality open spaces for active and passive recreation, e.g. open playing fields, walking tracks, park runs, cycle paths, outdoor gym and a playground[19]. These parks will be located at strategic, accessible locations within a town.
2	Neighbourhood Parks	These are high quality open spaces which should be distributed so that most homes are within a 10 minute walk of them. These spaces must be sufficient in size to be useful spaces and as such should be between 1ha-2ha. In general, 15%[20] of the total area of a residential site will be allocated to public open space. Neighbourhood parks will account for 10% of this allocation. These parks may be achieved by combining with existing spaces to make one large

[19] See Section 14.6 Play Facilities. It is envisaged that this will be to a Destination playground or an equivalent standard as set out in the Council's Playground Strategy 2017-2022.

[20] It will not be appropriate to provide small parcels to aggregate to the required 15% public open space. A minimum of 10% must be in one large useful space.

Level	Description	Function
		useful open space. It is envisaged that they will provide active playing fields, a playground[21], outdoor gym equipment and seating areas.
3	Pocket Parks	Pocket parks will account for the remaining 5% of the public open space allocation in a residential scheme. These are the lowest level of public open space but are very important components of successful neighbourhoods. These spaces provide important visual and social functions and they provide play areas for small children. Pocket parks must be well located within the development and be adequately overlooked and protected from vehicular traffic.

CE CH14.9

Amend Objective ROS07 in Open Space Objectives on page 550 as follows:

To support investment in the on-going maintenance and enhancement of existing public open space facilities, and support the provision of new public parks, green space corridors, pollinator projects, native planting and wild areas and rewilding projects and other public open spaces in tandem with planned population growth to create green, biodiversity rich and healthy settlements throughout the county.

CE CH14.10

Amend Objective ROS12 in Open Space Objectives on page 551 as follows:

To facilitate the development of ~~allotments and community gardens~~ allotments, community gardens and pollinator projects, native planting, wild areas and rewilding projects at appropriate locations and on suitable sites which are accessible from the built-up areas of the county taking into consideration the demand for such facilities and subject to normal planning and environmental criteria including potential impacts on residential and visual

[21] See Section 14.6 Play Facilities. It is envisaged that the playground will perform a Neighbourhood Playground function as defined in the Council's Playground Strategy 2017-2022.

amenities. The Planning Authority will identify land for use as ~~allotments and community gardens~~ allotments, community gardens and linked networks of green infrastructure in larger towns and villages during the preparation of local area plans. The Planning Authority will also consider the provision of ~~allotments and community gardens~~ allotments, community gardens and wild areas/nature pockets as part of the public open space provision in new residential schemes subject to appropriate siting, design and layout, protection of residential and visual amenities and normal planning and environmental criteria.

CE CH14.11

Add new Open Space Objective on page 552 as follows:

To support the development of skate parks and outdoor gyms in public open spaces and parks at appropriate locations in the County.

CE CH14.12

Amend Objective ROS18 in Open Space Objectives on page 553 as follows:

To encourage the use of measures specifically designed to enhance wildlife in residential schemes such as holes ~~should be~~ left in boundary walls to allow for passage of hedgehogs between gardens~~,~~ the installation of bat and swift boxes and pollinator projects, native planting and wild areas and rewilding projects. The incorporation of wildlife information signage will be encouraged.

CE CH14.13

Amend Objective ROS42 in Walking and Cycling Objectives on page 563 as follows:

To support the Wexford Cycling Trails brand and facilitate the development of the National Cycle Network in the county, improve cycle routes with better signposting, better road surfaces and greater safety for the cyclist and to ensure that new urban road infrastructure and traffic management measures are designed to be cyclist friendly.

Section 19 Submissions Relating to Chapter 15 Sustainable Communities and Social Infrastructure Strategy

Relevant Submissions

- WXF-C3-1 Naomi Kloss
- WXF-C3-29 Healthy Wexford Committee
- WXF-C3-55 Greenville Court Residents
- WXF-C3-70 Re-imagining Enniscorthy Town
- WXF-C3-85 Wexford PPN
- WXF-C3-86 Jean Gregg
- WXF-C3-94 Wexford Environmental Network (WEN)
- WXF-C3-109 3CEA
- WXF-C3-115 Department of Education and Department of Further and Higher Education, Research, Innovation and Science) (DFHERIS)
- WXF-C3-142 HSE
- WXF-C3-156 Larry Dunne

Summary of Issues and Chief Executive Response

Section 15.1 Introduction

WXF-C3-85 (Wexford PPN) outlines its vision for social and community development and states that this mostly aligns with the Plan but that the Plan could recognise the volunteer activity in the community. Wexford PPN also outlines its Health Vision, certain aspects of which it states are relevant to the Plan: 'Wexford is a county where everyone has the opportunity to live a healthy and fulfilling life. Holistic health is supported by the good provision of health and community services, our high-quality natural and built environments, and accepting and inclusive society.'

WXF-C3-29 (Healthy Wexford Committee) also highlights it's vision for a Healthy Wexford and states that the focus over the next decade is to ensure that everything we do and facilitate supports an improvement in the lives, wellbeing and health of all our citizens, to

establish ourselves not only as a Healthy County but Ireland's Healthiest County. It is requested that specific mention be given to Wexford as a Healthy County, to the Healthy County Committee and to the Healthy County Plan 2020-2022.

Section 15.1 Introduction Chief Executive's Response

Wexford PPN's Community and Health Visions and their alignment with the Plan are noted. The Council recognises the invaluable volunteer work of the community and is committed to working with the local community to provide sustainable, healthy and inclusive communities which offer a range of high quality community facilities to enhance people's lives and wellbeing. This is reflected in the goals and objectives of the Draft Plan.

The issues raised by Healthy Wexford Committee are noted and the recommended amendments are outlined below, including reference to the Healthy Wexford Plan 2020-2022, which was launched after the Draft Plan was adopted. Further amendments are proposed in Chapters 1, 3 and 14. It is also noted that this Chapter provides the spatial planning framework to support the achievement of the Local Economic and Community Plan (LECP) with specific reference made to High Level Goal 2 of that Plan to "*support and promote the development of socially inclusive, sustainable communities and ensure that all citizens enjoy optimal health and well-being*." The Strategic aims and Objectives outlined in Section 15.5.2 of the Draft Plan include the development of healthy sustainable communities (SC01) and tackling of regional disparities through the provision of a range of facilities and the promotion of healthcare and well-being (SC04).

Section 15.2 Climate Action and Sustainable Communities

WXF-C3-94 (WEN) would like to see reference made to the climate and biodiversity emergency in this Chapter and an acknowledgement that communities are the delivery mechanisms for a decade of urgent transformational change that the EPA calls for the in the latest State of the Environment Report (Ireland's Environment: An Integrated Assessment 2020).

WXF-C3-109 (3CEA) requests that mention be given to the support of the council to audit community buildings through Sustainable Energy Communities funding and notes that there is no mention of refurbishment/retrofit, only new builds.

Section 15.2 Climate Action and Sustainable Communities Chief Executive's Response

WEN's comment in relation to the role of communities in the delivery of change for climate and biodiversity is noted. This section of the Draft Plan states that the spatial planning of our communities can play a significant role in climate action and the Planning Authority will, through the PPN, raise awareness and assist our communities to become climate resilient. Additional recommendations in relation to climate change and biodiversity are outlined in Chapters 2 and 13.

The points raised by 3CEA are also noted. This section already contains a bullet point to promote the retrofitting of existing developments. The auditing of community buildings through Sustainable Energy Communities funding is outside the remit of this Plan. However, Chapter 2 Climate Action contains an objective (CA12) *"to support the decarbonisation of the energy sector by supporting the implementation of the National Energy Efficiency Action Plan and investment in initiatives to improve energy efficiency and future proof the county's residential, commercial, industrial, agricultural and public building stock, including retrofitting in urban and rural areas and reduction in fuel poverty..."*

Section 15.4 Tackling Deprivation in County Wexford

WXF-C3-142 (HSE) welcomes Objective SC04 in relation to tackling regional disparities and areas of deprivation and states that it is imperative that the Council addresses health inequalities, implements initiatives to develop a more socially inclusive society and includes more focused solutions to the need for emergency accommodation.

Section 15.4 Tackling Deprivation in County Wexford Chief Executive's Response

The HSE's comments in relation to addressing health inequalities and implementing initiatives to develop a more socially inclusive society are noted. The Council will continue to support the HSE and other Government agencies to address health inequalities. With regard to inclusive communities and regional disparities the Strategy in the Draft Plan includes a

number of strategic aims and objectives to support strong inclusive communities, tackle regional disparities and address areas of higher deprivation and promote healthy communities (SC01, SC02, SC04, SC05). More focused objectives are included in Section 15.6 Social Inclusion. Emergency accommodation is addressed under Chapter 4 Sustainable Housing.

Section 15.5 Strategy

WXF-C3-94 (WEN) requests that the 'goal' be amended to include that all residents and visitors live in a healthy environment that meets all the environmental and health standards for air and water quality, waste management and environmental noise levels. It also requests an amendment to the last bullet point and Objective SC01 to include environmental (along with social, community and cultural).

Section 15.5 Strategy Chief Executive's Response

In response to WEN's comments and the submission from Wexford Healthy Committee outlined above, it is considered appropriate to add 'healthy' to the goal in this Strategy, particularly since it is included in the strategic aims under this goal (to work with key service providers to promote healthy communities…) and is proposed to be included as an underlying theme in the Plan.

Chapter 10 Environmental Management and Volume 2 Development Management Manual set out a number of objectives and environmental standards in relation to air and water quality, waste management and noise. It should also be noted that all of the objectives in the Plan were subject to SEA and the Environmental Report is contained in Volume 12. It is not considered necessary to make further amendments to the Sustainable Communities and Social Infrastructure Strategy in this regard.

Section 15.6 Social Inclusion

WXF-C3-55 (Greenville Court Residents) state that all public buildings, shopping centres and entertainment venues should provide a designated changing area with toilet facilities suitable for adults and their carers, in the interests of creating an inclusive society. They also suggest a pilot local multi-disciplinary, inclusive community project involving and engaging

teenagers in the development and creation of a safe, positive community space suitable for their age group or an inclusive creative arts hub within the locality.

WXF-C3-70 (Re-imagining Enniscorthy Town) seeks the enhancement of amenities for young families, teenagers, older generations and for intergenerational interactions in the town and seeks specific objectives for: improving existing youth amenity facilities (such as the Duffry Gate Playground, the Promenade Playground and the Sports Hub); supporting the development of key assets (like the 1798 Centre, Athenaeum and the Enniscorthy Presentation Arts Centre); strengthening creative and cultural activity and facilities; targeting the development of a skate park; and setting a specific timeframe for the delivery of public space and playground facilities in St. Senan's.

WXF-C3-142 (HSE) welcomes Objective SC11 and the incorporation of universal design principals into all new housing developments. However, it states that there needs to be a range of options in housing provision for the elderly. It recommends that sites in towns and villages are identified and earmarked for age friendly settlements, that the Council promotes the provision of age friendly parking arrangements, invests in a rural public transport system and promotes 'age friendly initiatives' in local towns and villages. Other health aims include designing 'age friendly' urban environments, transport and buildings, promoting access to continued learning and education for older people, promoting the concept of active citizenship and promoting the development of opportunities for engagement and participation of people of all ages in a range of activities in their local communities.

This submission also requests the inclusion of a to see a planning policy adopted where Changing Places are a planning requirement for all new large public buildings throughout the county. Places such as: Local authority buildings, Train and bus stations, Motorway service stations, Hospitals, Shopping centres, Educational facilities, Sports, leisure, large entertainment venues, large galleries, and museums.

Section 15.6 Social Inclusion Chief Executive's Response

In relation to Changing Places Facilities, this has been addressed in the Draft Plan which includes an Objective (SC15) *"to require 'Changing Place Facilities' in any large building development where the public have access in numbers, and/or where the public might be expected to spend longer periods of time, in accordance with the criteria and design standards set out in Volume 2 Development Management Standards."*

In relation to the provision of youth amenity facilities, the Draft Plan includes objectives to facilitate the provision of youth centres and youth cafes at appropriate locations (SC12) and to facilitate the design needs of children and young people in community facilities, public open spaces and recreational areas (SC14). Further objectives for the development of inclusive public open spaces and sports facilities are included in Chapter 14 Recreation and Open Space Strategy. A new objective is also proposed under that Chapter to support the development of skate parks and outdoor gyms in public open spaces and parks at appropriate locations in the County.

A specific pilot project involving and engaging teenagers in the development and creation of a safe, positive community space or an inclusive creative arts hub in Enniscorthy is outside the remit of the development plan. However, improving youth amenity facilities, the development of particular key assets, cultural facilities, skate park and public space and playground facilities in Enniscorthy Town will all be considered as part of the preparation of the Enniscorthy Town and Environs LAP. Further submissions will be invited as part of the process of that Plan.

The HSE's comments in relation to the range of options in housing provision for the elderly is noted and in this regard attention is drawn to Objective SC08 (Universal Design and Lifetime Housing) and Objective SC11 (provision of care facilities including independent living options, sheltered housing, day-care facilities, nursing homes and specialised care units) in the Draft Plan.

The HSE's comments in relation to 'age friendly' settlements, urban environments, transport, buildings, parking arrangements and the promotion of 'age friendly initiatives' in

local towns and villages is also noted and welcome. In this regard it is noted that the Draft Plan includes a number of strategic aims and objectives for universally access and design (SC08, SC09), the creation of safe and barrier free environments accessible by all (SC10), facilitating the design needs of older people in community facilities, public open spaces and recreational areas (SC13, SC31) and to facilitate the implementation of the Wexford Age Friendly Strategy (SC07). Appropriate objectives are also included for further education and adult learning (SC19). Rural public transport is addressed in Chapter 8 Transportation Strategy. Age friendly initiatives in towns and villages, urban environments and design will be considered further as part of the preparation of future LAPs.

The HSE's suggestion around the concept of active citizenship and promoting the development of opportunities for engagement and participation of people of all ages in a range of activities in their local communities is noted. This is a priority under the Wexford Local Economic and Community Plan and the Draft Plan supports the implementation of that Plan (Objective SC03).

Section 15.7.2 Education

WXF-C3-115 (Department of Education) welcomes the inclusion of objectives SC18 to SC23 which support the provision of required school accommodation to meet the needs of local communities and welcomes the commitment towards adhering to the guidelines concerning the location of new schools proposed in the NPF and in the RSES. The Department requests the inclusion of a specific objective in the Plan explicitly supporting the intensification of development on existing school sites to accommodate additional educational requirements which may emerge over the lifetime of the Plan, should the projected population increases materialise, and having regard to the NPF objectives around achieving compact growth.

The Department confirms the acquisition of sites for the provision of a new primary school (Wexford Educate Together) and a new building for Selskar College in Wexford Town (Clonard Little) and a new post-primary school (Meanscoil Gharman) in Enniscorthy Town (Quarrypark). The Department also recently announced its decision to establish a new post-primary school for Gorey Town which will open in September 2021 and is actively seeking a suitable site.

WXF-C3-86 (Jean Gregg) objects to the location of two schools at Clonard which will add to traffic congestion and affect quality of life for residents.

WXF-C3-85 (Wexford PPN) welcomes the concept of multi-use school buildings and facilities outside of school hours to extend the existing facilities available to communities.

Four submissions support the objectives to develop a Technical University for the South East Region (TUSE) (WXF-C3-1 Naomi Kloss, WXF-C3-142 HSE,WXF-C3-115 DFHERIS and WXF-C3-156 Dunne). Dunne states that efforts should be made to identify a suitable site within the county in the final CDP. DFHERIS concurs that the development of TUSE and the Wexford Campus will increase the intellectual capital of the region and states that the role of Higher Education, and the future TUSE, as a centre for higher education excellence within the regional economy should remain an explicit objective within the development plan. DFHERIS also requests that objectives be included for:

- The improvement and expansion of existing facilities, and selection and development of future sites for higher and further education at appropriate locations.
- Residential accommodation, compatible for use by students of the technological university (TUSE) on or adjacent to existing and proposed campus sites, to promote sustainable travel, mixed mode use, sustainable communities, and enhance place making and community reach.

DFHERIS also notes the opportunity for sustainable design and practices in the development of new educational buildings.

Section 15.7.2 Education Chief Executive's Response

The clarification from the Department in relation to the requirement for new schools in Wexford, Enniscorthy and Gorey is noted and this section will be updated accordingly. With regard to the request to include a specific objective in the Plan to support the intensification of development on existing school sites to accommodate additional educational requirements which may emerge over the lifetime of the Plan, it is considered appropriate to include a new objective in this regard having regard in the interests of compact growth

and the ten minute town concept. Attention is also drawn to page 586 of the Draft Plan (Location of new Schools) which states that *"Multi-campus school arrangements is sustainable and a good use of resources and infrastructure and will be encouraged by the Council".* It is also appropriate to include an objective in this regard.

The request to include an objective for the improvement and expansion of existing facilities, and selection and development of future sites for higher and further education at appropriate locations is noted. In this regard attention is drawn to Objective SC19 and SC20 in the Draft Plan. No further objectives are considered necessary.

With regard to student residential accommodation, compatible for use by students of the technological university (TUSE) on or adjacent to existing and proposed campus sites attention is drawn to Objective SH36 in Chapter 4 Sustainable Housing. In the interests of clarity, it is considered that this objective should be repeated in the education section of the Plan. This will be considered further in the zoning objectives as part of the preparation of future LAPs.

The objection to the location of two schools at Clonard is noted. However, this will be more appropriately addressed at the LAP/planning application level.

Additional issues raised not linked to any section in this Chapter

Healthy Eating

The HSE (WXF-C3-142) states that more action needs to be taken to address the rising levels of overweight and obesity. In this regard it states that the Council can influence and regulate the built environment to improve health and reduce the extent to which it promotes obesity. It states that an assessment of food outlets should be carried out in every town and village in Wexford to ensure that choices of healthy food options are equally available and to prevent a proliferation of fast food outlets. Providing easy access and choice to healthier food options should be promoted as outlined in government policy and the Council should create environments that make the healthy choice the easy choice.

It should also be a strategic aim of the Plan to facilitate the production of more locally produced healthy, high quality food.

Healthy Eating Chief Executive's Response

The HSE's comments in relation to overweight and obesity are noted and in this regard the Draft Plan includes objectives to promote walking and cycling, active transport and the provision of recreation and community facilities which are accessible to all. While the suggestions are noted they fall within the remint of health promotion rather than land use planning.

While an assessment of food outlets is outside the remit of this Plan Section 5.10.6 of Volume 2 Development Management Manual sets out the development management standards for fast food/hot food take away outlets and states that proposals for this type of development will not be permitted where it is likely to give rise to a proliferation of this use in a particular area or within 400m radius of an educational establishment. The promotion of locally produced food and sustainable food production is discussed further in Chapters 6 Economic Development and 7 Tourism. (see Section 6.7.6.2 Rural Diversification including Agri-food including Objective ED95 and Section 7.7.3 Creative Arts, Culture and Food Tourism including Objective TM41).

Chief Executive's Recommendations

It is recommended that the following proposed amendments be made to Chapter 15 Sustainable Communities and Social Infrastructure Strategy.

CE CH15.1

Amend third paragraph in Section 15.1 Introduction on page 569 as follows:

This role complements and supports the Council's enhanced responsibilities in promoting local and community development. Community development, through its core values of social inclusion, equality and respect for diversity, helps to build strong, healthy, sustainable and inclusive communities.

CE CH15.2

Insert additional paragraph in Section 15.3 Policy Context after the second paragraph on page 572 as follows:

The Healthy Wexford County Plan 2020-2022 includes six key priority areas and a number of actions to improve the health and wellbeing of all citizens in County Wexford. These include rejuvenating town and village spaces for the enjoyment of the community, providing safe spaces for young people to meet, achieving a culture of educational attainment and lifelong learning and promoting health and physical wellbeing.

CE CH15.3

Amend the third paragraph on page 572 in Section 15.3 Policy Context as follow:

The strategy and objectives in this chapter do not duplicate those set out in the Wexford LECP or Healthy Wexford County Plan. This chapter provides the spatial planning framework to support the achievement of those Plans

CE CH15.4

Amend text in Section 15.5 Strategy on page 573 as follows:

The strategy provides a spatial planning framework that places social inclusion, universal design and equality at the heart of all future developments in the county. The strategy will guide the future development of social and community facilities, supporting the delivery of the local and community development elements of the Wexford LECP and the Healthy Wexford County Plan.

CE CH15.5

Amend goal in Section 15.5.1 Goal on page 573 as follows:

It is the goal of the Council to ensure that County Wexford has a strong network of healthy, socially inclusive sustainable communities, where all residents and visitors enjoy equal opportunities to participate fully in the economic, social and cultural life of the county.

CE CH15.6

Amend Objective SC03 in Strategic Objectives on page 574 as follows:

To facilitate the implementation of the Wexford Local Economic and Community Plan 2016-2021, the Healthy Wexford County Plan 2020-2022 and any updated version of these Plans.

CE CH15.7

Amend third paragraph under Primary and Post Primary Schools on page 585 as follows:

The county has, and continues to benefit from, significant investment in education infrastructure with a range of new and extended primary and post primary schools delivered across the county. The Department of Education ~~and Skills~~ has identified the need for a new primary school in Wexford Town and a new post primary school in Enniscorthy Town and has acquired sites for these schools. The Department has also recently announced its decision to establish a new post primary school for Gorey Town which is expected to open in September 2021. The Council will work with the Department to find a suitable site~~s~~ for ~~these~~ this school~~s~~ and any additional schools required during the lifetime of this Plan.

CE CH15.8

Insert new text at end of page 586 under Location of New Schools as follows:

In the interests of achieving compact growth in line with the NPF and the "10 minute town" concept in the RSES, consideration will be given to the intensification of existing school sites (e.g. higher buildings), where appropriate, subject adequate amenity and sports facilities being maintained.

CE CH15.9

Add new objective in Education Objectives on page 588 as follows:

To support the intensification of development on existing school sites, where appropriate, to accommodate additional educational requirements which may emerge over the lifetime of the Plan, subject to the schools maintaining adequate sporting and amenity provision and subject to normal planning and environmental criteria.

CE CH15.10

Amend Objective SC22 in Education Objectives on page 588 as follows:

To encourage multi-campus school arrangements where appropriate and ~~To~~ restrict new developments adjacent to existing schools where the proposed development would conflict with the education use or restrict the future expansion of that school.

CE CH15.11

Add new objective (repeat of Objective SH36) in Education Objectives on page 588 as follows:

To facilitate the development of suitably located and well-designed student accommodation which will enable and encourage students to attend third level institutions in the county. These facilities should be located along public transport routes, where possible, and in close proximity to the third level facility.

Appendix A

Capacity Test

Table A-1 Capacity Test

FID	Settlement	Settlement Typology	WWTP Capacity (PE)	Water Supply	Jobs to resident workers ratio	Train stn	Bus stops	Wexford Link	Primary School Provision	Secondary School Provision	GP/Health Centre	Hospital	Garda	Fire stn	Post office	Other Comments
1	Wexford Town	Level 1	14,011	Capacity available for Draft Core Strategy population - potential need for future supply for higher growth	1.551	1	50+	Y	9	5	26	2	1	1	3	Very strong on transport, employment base, services, green infrastructure and WWTP Capacity, very high Jobs to Workers ratio
2	Gorey		14,442	Capacity available for Draft Core Strategy population	0.967	1	4	Y	5	2	7	1	1	1	3	Strong transport connections, strong employment base and good jobs to workers ratio
3	Enniscorthy		12,451	Limited capacity - additional projects being examined	1.111	1	6	Y	5	3	11	1	1	1	2	Strong transport connections, strong employment base and good jobs to workers ratio.
4	New Ross	Level 2	6,038	Capacity available for Draft Core Strategy population	1.072	0	2	Y	4	5	10	1	1	1	2	Strong service provision and jobs-to-workers ratio, low longitudinal population growth, no train service.
5	Bunclody Town		3,833	Limited capacity - additional projects being examined	1.057	0	2	Y	2	2	4	0	1	1	0	
6	Castlebridge		Wexford WWTP	Capacity available for Draft Core Strategy population	0.254	0	2	Y	1	0	0	0	0	0	1	
7	Courtown and Riverchapel		Shared with Gorey	Capacity available for Draft Core Strategy population	0.269	0	8	Y	1	0	1	0	1	0	2	Need to develop services/employment/social and community facilities. Weak employment/jobs to workers ratio.
8	Ferns		449 TP on hold	Limited capacity - additional projects being examined		0	2	Y	1	0	1	0	1	0	1	
9	Rosslare Harbour and Kilrane	Level 3	6,885	Capacity available for Draft Core Strategy population	0.775	1	6	Y	1	0	0	0	0	0	0	
10	Rosslare Strand		2,826	Capacity available for Draft Core Strategy population	0.775	1	6	Y	1	0	1	0	1	0	1	
11	Bridgetown		1,305	Capacity available for Draft Core Strategy population		0	4	Y	0	1	0	0	0	0	1	
12	Campile		0	Capacity available for Draft Core Strategy population		0	2	Y	0	0	0	0	0	0	1	
13	Clonroche		166	Limited capacity - additional projects being examined		0	2	Y	1	0	1	0	1	0	1	
14	Coolgreany		1,171	Capacity available		0	0		1	0	1	0	0	0	0	

FID	Settlement	Settlement Typology	WWTP Capacity (PE)	Water Supply	Jobs to resident workers ratio	Train stn	Bus stops	Wexford Link	Primary School Provision	Secondary School Provision	GP/Health Centre	Hospital	Garda	Fire stn	Post office	Other Comments
15	Kilmore Quay		WWTP scheme on hold - WCC want to allocate growth	Capacity available for Draft Core Strategy population		0	3	Y	0	0	0	0	0	0	0	
16	Kilmuckridge		475	Capacity available for Draft Core Strategy population		0	2	Y	1	1	2	0	0	1	0	
17	Taghmon		[Wexford WWTP]	Capacity available for Draft Core Strategy population		0	2	Y	1	0	1	0	1	1	1	
18	Wellingtonbridge		0	Capacity available		0	2	Y	0	0	0	0	0	0	1	
19	Adamstown		162	Limited capacity - additional projects being examined		0	2	Y	1	1	0	0	0	0	1	
20	Ballaghkeen		185	Capacity available		0	0	Y	1	0	0	0	0	0	1	
21	Ballycanew		0	Capacity available		0	2	Y	1	0	0	0	0	0	1	
	Ballindaggin		18	Limited capacity		0	2	Y	1	0	0	0	0	0	0	
22	Ballycullane		251	Capacity available		0	2	Y	1	0	0	0	0	0	0	
23	Ballyhogue		45	Limited capacity		0	2	Y	1	0	0	0	0	0	0	
24	Ballymurn		77	Capacity available		0	0	Y	1	0	0	0	0	0	0	
	Ballywilliam		206	Capacity available		0	2	Y	0	0	0	0	0	0	0	
25	Barntown		[Wexford WWTP]	Capacity available		0	2	Y	1	0	0	0	0	0	0	
26	Blackwater		1,171	Capacity available		0	2	Y	1	0	0	0	1	0	0	
27	Bree		68	Limited capacity		0	0	Y	1	0	1	0	0	0	1	
28	Camolin	Level 4	0	Capacity available		0	2	Y	1	0	0	0	0	0	0	
29	Carrig on Bannow		341	Capacity available		0	2	Y	1	0	0	0	0	0	0	
30	Clongeen		0	Capacity available		0	2	Y	1	0	0	0	0	0	0	
	Craanford		0	Capacity available		0	0	Y	1	0	0	0	0	0	0	
31	Duncannon		None - new scheme due 2023	Capacity available		0	1	Y	1	0	0	0	1	0	1	
32	Fethard		Project on hold	Capacity available		0	1	Y	1	0	0	0	0	0	0	
33	Killinerin		Limited	Capacity available		0	0	Y	1	0	0	0	0	0	1	
34	Murntown		[Wexford WWTP]	Capacity available		0	2	Y	1	0	0	0	0	0	1	
35	Oilgate		47	Capacity available		0	2	Y	1	0	0	0	0	0	1	
36	Oulart		127	Limited capacity		0	0	Y	1	0	0	0	0	0	1	

FID	Settlement	Settlement Typology	WWTP Capacity (PE)	Water Supply	Jobs to resident workers ratio	Train stn	Bus stops	Wexford Link	Primary School Provision	Secondary School Provision	GP/Health Centre	Hospital	Garda	Fire stn	Post office	Other Comments
37	Piercestown		Limited wwtp	Capacity available		0	1	Y	1	0	0	0	0	0	0	
38	Ramsgrange		0	Capacity available		0	2	Y	1	1	0	0	0	0	1	
39	Tagoat		319	Capacity available		0	2	Y	1	0	0	0	0	0	0	

Appendix B

Allocation of Population on the Settlement Hierarchy

Table B-1 Allocation of Population on the Settlement Hierarchy

Settlement	Settlement Typology	2016 Population	Population 2021	Population 2027	Population 2031	Population 2040	Population Growth 2021-2027	New Households 2021-2027	Draft Plan		Proposed Allocation	
									% growth 2016-2040	% growth 2016-2027	% Growth 2016-2027	% Growth 2016-2040
Wexford Town	Level 1	20,188	22,849	26,043	27,036	29,273	3,193	2,174	40	25.14	29	45
Gorey		9,822	11,027	12,474	12,867	13,751	1,447	985	35	22	27	40
Level 1 Total		**30,010**	**33,877**	**38,516**	**39,903**	**43,023**	**4,640**	**3,159**	**38.4**	**24.1**	**28.3**	**43.4**
Enniscorthy	Level 2	11,381	12,467	13,771	14,086	14,795	1,304	888	30	18.86	21	30
New Ross		7,780	8,134	8,558	9,037	10,114	424	289	30	18.85	10	30
Level 2 Total		**19,161**	**20,601**	**22,329**	**23,123**	**24,909**	**1,728**	**1,177**	**30**	**19**	**16.5**	**30**
Bunclody Town	Level 3a Service Settlements	1,430	1,593	1,788	1,810	1,859	195	133	30	13.75	25	30
Castlebridge		1,840	1,965	2,116	2,201	2,392	151	103	30	13.75	15	30
Courtown and Riverchapel		3,591	3,673	3,771	3,881	4,130	98	67	20	9.17	5	15
Ferns		1,415	1,511	1,627	1,693	1,840	116	79	30	13.75	15	30
Rosslare Harbour and Kilrane		1,847	2,057	2,309	2,394	2,586	252	172	40	18.33	25	40

Settlement	Settlement Typology	2016 Population	Population 2021	Population 2027	Population 2031	Population 2040	Population Growth 2021-2027	New Households 2021-2027	Draft Plan		Proposed Allocation	
									% growth 2016-2040	% growth 2016-2027	% Growth 2016-2027	% Growth 2016-2040
Rosslare Strand		1,620	1,730	1,863	1,938	2,106	133	90	30	13.75	15	30
Level 3a Total		**11,743**	**12,529**	**13,473**	**13,916**	**14,912**	**944**	**643**	**29**	**13**	**14.7**	**27**
Bridgetown (462), Campile (448), Clonroche (326), Coolgreany (376), Kilmore Quay (372), Kilmuckridge (722), Taghmon (585), Wellingtonbridge (137).	**Level 3b Strategic Settlements**	3,428	3,628	3,869	4,019	4,356	241	164	12.8	28	12.9	27.1

Settlement	Settlement Typology	2016 Population	Population 2021	Population 2027	Population 2031	Population 2040	Population Growth 2021-2027	New Households 2021-2027	Draft Plan		Proposed Allocation	
									% growth 2016-2040	% growth 2016-2027	% Growth 2016-2027	% Growth 2016-2040
Adamstown (293), Ballaghkeen (515), Ballycanew (516), Ballycullane (318), Ballindaggin (237), Ballyhogue (269), Ballymurn (524), Ballywilliam (141), Barntown (459), Blackwater (339), Bree(193), Camolin (415), Carrig on Bannow (258), Craanford (121), Clongeen (234), Duncannon (305), Fethard (311), Killinerin (244), Murntown (365), Oilgate (358), Oulart (274), Piercestown (535), Ramsgrange (126), Tagoat (439).	**Level 4 Large Villages**	7,849	8,346	8,942	9,330	10,204	596	406	11.500	26	13.9	30
Level 1-4 Total		**72,191**	**78,981**	**87,130**	**90,291**	**97,405**	**8,148**	**5,548**	**32.8**	**19.1**	**20.7**	**34.9**
Wexford MD	**Level 5 - 7 and**	6,591	6,706	6,815	6,989	7,379	110	75	16.5	4.9	3.4	11.9

Settlement	Settlement Typology	2016 Population	Population 2021	Population 2027	Population 2031	Population 2040	Population Growth 2021-2027	New Households 2021-2027	Draft Plan		Proposed Allocation	
									% growth 2016-2040	% growth 2016-2027	% Growth 2016-2027	% Growth 2016-2040
Gorey MD	**Open Countryside**	26,259	26,716	27,153	27,843	29,397	437	298	16.5	4.9	3.4	11.9
Enniscorthy MD		12,328	12,542	12,748	13,072	13,801	205	140	16.5	4.9	3.4u	11.9
New Ross MD		17,691	17,999	18,293	18,758	19,805	294	201	16.5	4.9	3.4	11.9
Rosslare MD		14,662	14,917	15,161	15,547	16,414	244	166	17	5.4	3.4	11.9

Appendix C

Map of Settlements

Figure 3-2 Settlement Hierarchy Settlements