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

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April 2021

## BOOK 4

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



Comhairle Contae  
Loch Garman  
Wexford  
County Council

## Section 1 Volume 8 Retail Strategy

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### Relevant Submissions

- WXF-C3-32 O’Leary International
- WXF-C3-94 Wexford Environmental Network (WEN)
- WXF-C3-141 Tesco
- WXF-C3-164 Office of the Planning Regulator (OPR)

### Summary of Main Issues and Chief Executive’s Response

**Note:** This section of the report has been laid out by submission rather than by Section of the Plan.

#### **WXF-C3-32 O’Leary International ULC**

##### **Summary of the Main Issues and Chief Executive’s Response**

This submission notes that they are the owners of units 1-4 in New Ross Retail Park which are zoned for commercial development. It is stated that they have applied for and have been refused permission for the change of use of these units to allow for mixed retail use.

It is noted that there are only three sites identified for commercial development in the New Ross Town and Environs Plan 2011 -2017 (as extended) and despite being earmarked for development for many years no development has been brought forward on these sites.

It is outlined that rents for commercial property in New Ross are not sufficient to cover construction costs and it is necessary to use existing premises. It is stated that the Retail Strategy for New Ross has failed as the town has the highest level of vacancy and lowest achievable rent of the four main towns in the County.

It is stated that, beside the multinationals, there has been little investment in retailing in New Ross and t stores such as Iceland and Dealz do not have premises in the town as

suitable premises are not available to rent. The submission further notes that the absence of these stores is causing leakage and resulting in a loss of jobs to the town.

The submission is accompanied by a Retail Impact Statement (RIS) which accompanied a planning application for a change of use at these premises which was refused. The conclusions of the RIS were that the development would not have an adverse impact on the vitality and viability of the town and that following a review of sites within and at the edge of the town centre it was concluded that this was the most appropriate site.

The submission requests that the Draft Plan is amended to allow large mixed retail developments in these units.

### **Chief Executive's Response**

The issues raised in this submission with regard to the rental yields, vacancy and retail leakage are noted. With regard to the statement that the New Ross Town Development Plan has identified only 3 sites for retail development, it should be noted that 10 potential sites have been identified in the Retail Strategy contained in the Draft County Development Plan. While not all of these sites will be suitable for the forms of retailing envisaged in the submission, there are a variety of sites identified and a number have significant potential for larger floorplate retail development.

The site in question is zoned for Commercial use under the New Ross Town and Environs Development Plan 2011-2017 (as extended). Within this use class, convenience retail is 'open for consideration' and comparison retail is 'not normally permitted'. When assessing planning applications for retail development the Council must apply the sequential test contained in the Retail Planning Guidelines for Planning Authorities (2012). The sequential test requires that when an application is received for a retail development at edge of centre or out of centre locations, only where the applicant can demonstrate **and** the planning authority is satisfied, that there are no sites or potential sites including vacant units within a city or town centre or within a designated district centre that are (a) **suitable** (b) **available** and (c) **viable**, can these sites be considered. In relation to whether sites can demonstrate suitability, availability and viability, the following should be taken into account:

**a) Suitability:** Matters to be considered include whether or not the development is consistent with development plan objectives, in particular zoning objectives, current land use activity in the vicinity of the site, size, capacity to accommodate development, traffic and transportation issues; and/or;

**b) Availability:** This criterion relates to site ownership, ease of assembly and timing. Sites must be genuinely available for development at the time that site acquisition/assembly begins or within a reasonable time-frame; and/or;

**c) Viability:** The financial viability of a development is also a key consideration. The cost of site acquisition in the town centre may make a proposal unviable and force investors to look elsewhere in the area. Excessive development costs relative to values are also a consideration. For example, the requirement to deal with remediation for a brownfield site may have the potential to make a proposal unviable.

This sequential test can be applied at the development plan or local area plan stage when zoning proposals are being brought forward or at the planning application stage. The Draft Plan does not contain zoning proposals for New Ross Town and as such it is not appropriate to consider the zoning of a particular site in isolation in the County Development Plan. Land use zoning proposals will be considered when the New Ross Town Local Area Plan is being prepared. In the interim any revised planning application would have to demonstrate that it can satisfy the requirements of the sequential test.

No amendment is recommended.

## **WXF-C3-94 Wexford Environmental Network (WEN)**

### **Summary of the Main Issues and Chief Executive's Response**

This submission relates to Objective ED55 in Chapter 6 Economic Development Strategy, however it is more appropriately related to the Retail Strategy. It is stated that smaller, local shops should be prioritised over large supermarkets that can promote unhealthy and/or wasteful lifestyles.

### **Chief Executive's Response**

This issue is noted. The Council and the Retail Strategy are very supportive to small retailers. However, as stated in the Retail Planning Guidelines for Planning Authorities (2012), it is vital that the planning system continues to play its part in ensuring an effective range of choice for the consumer, thereby promoting a competitive market-place. Retail policy should not inhibit competition. Issues with regard to lifestyle and waste are more appropriately dealt with by health promotion policy and waste regulation respectively. No amendment proposed.

### **WXF-C3-141 Tesco Ireland**

#### **Summary of the Main Issues and Chief Executive's Response**

Tesco state that they welcome the opportunity to identify the importance of convenience retail facilities in County Wexford and request that the Council includes appropriate retail policies in the Wexford CDP 2021 and the Retail Strategy which accompanies same, in order to protect the important function of these facilities and allow for the sustainable provision of new retail centres.

It is stated that given the projected population growth in the County's primary towns, it is considered that there is scope to provide additional stores in the County at appropriate locations over the period of this plan and to improve and expand existing retail facilities. It is requested that the polices and zonings in the Plan are flexible to accommodate this projected growth.

The submission refers to the importance of safeguarding delivery and access routes (including loading areas and associated operations) and the extensive areas and arrangements required to accommodate the central distribution systems utilised by most major retailers. They note that early morning deliveries are important for operational reasons and to reduce traffic congestion.

The submission notes that in order to facilitate operations (including the central distribution system and click and collect arrangements) and to comply with regulatory requirements for modern stores, sites are often required to be very large and of a particular shape and

morphology. It is stated that such premises do not readily fit with town centres. It is requested that where central sites are not available that the local authority will consider sites at edge of centre locations in a sequential manner.

### **Chief Executive's Response**

The comments with regard to the development of new stores in the County are noted. The Retail Strategy contains policies which will ensure that an appropriate level of flexibility is applied in relation to retail development. While the Strategy contains objectives for each of the four main towns, the local area plans for these towns will consider issues such as zoning in more detail.

The comments with regard to access and servicing are noted and it is considered that these issues would be appropriately addressed as part of the Local Transport Plans (LTP) which will be prepared to inform the Local Area Plans for the four main towns.

With regard to the issue of site size requirements, these issues are reflected in the Strategy and Section 6.4.1 outlines that the Council will apply the sequential test when assessing applications for retail development at edge of centre or out of centre locations.

No amendment is recommended.

## **WXF-C3-164 Office of the Planning Regulator**

### **Summary of the Main Issues and Chief Executive's Response**

The OPR submission has been discussed under Section 2 of Book 1 of this report. The submission requested amendments to the Settlement Hierarchy and to the allocation of population growth in Chapter 3 Core Strategy. It also stated that the Retail Strategy should be revised to align with these revised changes.

### **Chief Executive's Response**

The responses to this issue and the recommended amendments to Volume 1 Written Statement are contained in Section 3 of Book 1 of this report. It is recommended that Tables

1.3 and 6.1 in the Retail Strategy are also amended to reflect the revised Settlement Hierarchy.

### Matters Arising

It is proposed to make a number of non-material amendments to the Retail Strategy to reflect updates as a result of the passage of time since the Draft Strategy was completed. Updates relate to items such as changes in the status of non-retail projects like the Rosslare to Waterford Greenway. These amendments do not affect the policies of the Retail Strategy or the capacity assessment therein.

### Chief Executive’s Recommendations

It is recommended that the following proposed amendments are made to Volume 8 Retail Strategy:

#### CE RS1

To update both Table 1.3 on page 14 and Table 6.1 on page 208 in the Retail Strategy to reflect the revised Settlement Hierarchy arising out of submission WXF-C3- 164 (OPR) as follows:

Retail Planning Guidelines Settlement Type	Wexford Core Strategy 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	<del>Bridgetown</del> , Bunclody, <del>Campile</del> , Castlebridge, <del>Clonroche</del> , <del>Coolgreany</del> , Courtown and Riverchapel, Ferns, <del>Kilmuckridge</del> , <del>Kilmore Quay</del> , Rosslare Harbour and Kilrane, Rosslare Strand, <del>Taghmon</del> and <del>Wellingtonbridge</del>	Medium scale convenience along with small to medium scale comparison including tourism related comparison
	<u>Strategic Settlements</u>	<u>Bridgetown</u> , <u>Campile</u> , <u>Clonroche</u> , <u>Coolgreany</u> , <u>Kilmuckridge</u> , <u>Kilmore Quay</u> , <u>Taghmon</u> and <u>Wellingtonbridge</u>	<u>Medium scale convenience along with small to medium scale comparison including tourism related comparison</u>
Level 4: Local Shopping or Neighbourhood Centres	Various Villages and Rural Settlements		Predominantly lower order convenience, but not excluding tourism related comparison