

Chief Executive's Report on the Submissions and Observations received on the Proposed Material Alterations to the Draft
Wexford County Development Plan 2022-2028

June 2022

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Section 1 – Introduction and Overview of the Chief Executive's Report

1.1 Legislative Requirements

This report has been prepared in accordance with the requirements of Section 12(8) 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 2022-2028. The report presents a summary of the issues raised in the submissions and observations received on the Proposed Material Alterations (hereon referred to as PMA) to the Draft Plan and outlines the Chief Executive's response to, and recommendations on, the issues raised therein.

In accordance with Section 12(8)(b) 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; and
 - any relevant policies or objectives of the Government.

1.2 Consideration of the Chief Executive's Report and Making the Development Plan

1.2.1 Timeframe for Consideration

In accordance with Section 12(9) of the Act, the Members shall consider the PMA and the Chief Executive's Report within six weeks of receiving the report.

1.2.2 Making the Development Plan

In accordance with Section 12(10) of the Act, having considered the Chief Executive's Report, the Members may, by resolution, make the Plan with <u>or</u> without the PMA, except where they decide to accept a PMA, they may do so subject to a further modification to the PMA of a minor nature.

1.2.3 What is a Minor Modification?

In accordance with Section 12 (10) of the Act, a further modification to a PMA:

- i. May be made where it is minor in nature and therefore not likely to have significant effects on the environment or adversely affect the integrity of a European site.
- ii. Shall not be made where it relates to an increase in the area of land zoned for any purpose, or an addition to or deletion from the record of protected structures.

1.2.4 Members Considerations

In accordance with Section 12(11) of the Planning and Development Act 2000 (as amended), in making the Development Plan, the Members are restricted to:

- Considering the proper planning and sustainable development of the area to which the development plan relates;
- The statutory obligations of the Local Authority; and
- Any relevant policies or objectives for the time being of the Government or any Minister of the Government.

1.2.5 The New Development Plan

The Development Plan will come into effect six weeks from the day that it is made.

1.2.6 Duty to Notify the OPR

In accordance with Section 31AM (6) of the Act, the Planning Authority shall notify the Office of the Planning Regulator (OPR) within five 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 OPR's submission, 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 OPR accordingly in writing and give the reasons for the decision.

1.3 How the Chief Executive's Report is Organised

1.3.1 Format

- Section 1 provides an overview of the legislative framework for the report, its
 consideration by the Members and the making of the Plan. This section also provides
 an overview of the current stage of the plan preparation process, the public
 consultation undertaken on the PMA and lists the persons and bodies who made
 submissions and observations.
- Section 2 relates to the submission of the OPR. The OPR's submission was divided into six themes which is reflected in the layout of this section. The issues are summarised by the relevant theme, and the full wording of the OPR's Recommendation or Observation pertaining to same are provided. The Chief Executive's response to, and recommendations are provided under each theme.
 Where an issue raised by the OPR was also raised by another submission or observation, the latter are also addressed in this section.
- Section 3 relates to the submission of the Southern Regional Assembly. The issues
 raised are dealt with individually with the Chief Executive's providing a response to
 each issue. The Chief Executive's recommendation is provided at the end of the
 section.
- Section 4 provides a summary of the submissions and observations raised in the remaining submissions and observations. The layout of Section 4 differs to the preceding Sections 2 and 3. It is laid out in tabular format and by PMA in each Volume (and chapters therein).

Each table provides the following information:

- The relevant PMA No(s).;
- The relevant chapter/section in the Draft Plan;
- The relevant submission/observation numbers;

- The wording of the PMA, save in instances where the PMA is lengthy.
 In those instances, the relevant pages numbers from the PMA documents are provided.
- A summary of the issues raised. Where the submission proposes changes to the text, text additions are shown in <u>red underlined</u> and text deletions are shown in <u>red strikethrough</u>.
- The Chief Executive's response to the issues raised in relation to that PMA.
- The Chief Executive's recommendation as to whether the Plan be made with or without the PMA and whether a further modification is recommended.

1.3.2 Identification of Minor Modifications

Where the Chief Executive recommends further modifications to a PMA:

- Text shown in either black strikethrough or black underlined represents the original PMA as publicly displayed.
- The Chief Executive's recommended modifications to the PMA are shown as follows: the omission of text from a PMA is shown in blue strikethrough and additional text is shown in blue underlined.

1.3.3 Formatting of the Final Plan

The PMA, if made by the Members, will result in some additional formatting (e.g., renumbering of objectives and consequential wording changes) in the Plan. These formatting changes will be made in the final version of the Plan.

1.4 Current Stages of the Plan Preparation Process

This report forms Stage 12 of the Plan preparation process and follows the public display of, and consultation on, the PMA to the Draft Plan. The Members consideration of the report forms Stage 13 in the process. These stages are 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.

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.

1.5 Public Consultation on the PMA

1.5.1 Public Display

The PMA to the Draft Plan were placed on public display from Thursday, 7th April 2022 to Friday, 6th May 2022 inclusive. Notice of the publication of the PMA to the Draft Plan was given in the local newspapers and on the Council's website, Twitter page and MapAlerter system.

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

Written submissions and observations in relation to the PMA, the Strategic Environmental Assessment and the Appropriate Assessment were invited online via the Wexford County Council Online Consultation Portal https://consult.wexfordcoco.ie/, by email or in hard copy by post.

1.5.2 Prescribed Authorities, Infrastructure Providers and Stakeholders

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

1.6 Approach to the Consideration of Submissions and Observations

The Planning Authority received **56** submissions and observations within the consultation period. Table 2 lists the persons and bodies who made submissions or observations.

Following the upload of all submissions to the online consultation portal, each submission was read first to allocate the issues raised to the appropriate PMA of the Draft Plan. No submissions or observations were allocated to Chapter 10 Environmental Management or Chapter 14 Recreation and Open Space Strategy in Volume 1 Written Statement, Volume 6 Architectural Conservation Areas or Volume 7 Landscape Character Assessment. Volume 8 Retail Strategy is dealt with in Section 2 of the report.

A number of submissions (or elements thereof) were received in relation to issues which do not relate to any PMA. Accordingly having regard to Section 12(8) of the Planning and Development Act 2000 (as amended) these submissions cannot be considered at this stage in the plan making process. These submissions and observations are noted at the appropriate points in Section 4.

Table 2 List of Persons and Bodies who made Submissions or Observations

Submission Ref:	Name of Person/Body
WXF-C29-PMA-1	Gas Networks Ireland (GNI)
WXF-C29-PMA-2	Environmental Protection Agency (EPA)
WXF-C29-PMA-3	WexBUG
WXF-C29-PMA-4	Brigid Martin
WXF-C29-PMA-5	Carmel O'Brien
WXF-C29-PMA-6	Rachel O'Brien
WXF-C29-PMA-7	Paddy Wallace
WXF-C29-PMA-8	Aiden O'Brien
WXF-C29-PMA-9	Naomi Kloss
WXF-C29-PMA-10	Mary Doyle
WXF-C29-PMA-11	Department of Transport

WXF-C29-PMA-12	Irish Water
WXF-C29-PMA-13	Marie Redmond
WXF-C29-PMA-14	Marie Redmond
WXF-C29-PMA-15	John O'Brien
WXF-C29-PMA-16	April O'Brien
WXF-C29-PMA-17	Kilrane Concerned Residents Group
WXF-C29-PMA-18	Southern Regional Assembly
WXF-C29-PMA-19	Department of Agriculture, Food and the Marine
WXF-C29-PMA-20	Transport Infrastructure Ireland
WXF-C29-PMA-21	Lisa Somers
WXF-C29-PMA-22	Nigel Pierce
WXF-C29-PMA-23	John Mahon on behalf of Stephen Fanning
WXF-C29-PMA-24	Paula English
WXF-C29-PMA-25	Eimear Ryan
WXF-C29-PMA-26	Jeremy English
WXF-C29-PMA-27	Liam O'Brien
WXF-C29-PMA-28	Lisa O'Brien
WXF-C29-PMA-29	Elizabeth Doran
WXF-C29-PMA-30	South-East on Track
WXF-C29-PMA-31	Saundra Buckley
WXF-C29-PMA-32	Thomas English
WXF-C29-PMA-33	William & Breda Kennedy
WXF-C29-PMA-34	OPW
WXF-C29-PMA-35	James Rochford
WXF-C29-PMA-36	Marie Redmond
WXF-C29-PMA-37	Nutricia Infant Nutrition Ltd
WXF-C29-PMA-38	Bernard Doran
WXF-C29-PMA-39	Courtown Community Council
WXF-C29-PMA-40	Audie Murphy
WXF-C29-PMA-41	Courtown Community Council
WXF-C29-PMA-42	Enda & Margaret Kiely

WXF-C29-PMA-43	Crea English
WXF-C29-PMA-44	Department of Housing, Local Government and Heritage
WXF-C29-PMA-45	Fehily Timoney on behalf of Nova Connect
WXF-C29-PMA-46	FuturEnergy Ireland
WXF-C29-PMA-47	Larry Dunne
WXF-C29-PMA-48	Construction Industry Federation
WXF-C29-PMA-49	Wind Energy Ireland
WXF-C29-PMA-50	Department of Environment, Climate and Communications
WXF-C29-PMA-51	Future Developments Ltd
WXF-C29-PMA-52	Der, Joan and Jenny Murphy
WXF-C29-PMA-53	Office of the Planning Regulator
WXF-C29-PMA-54	Department of Education
WXF-C29-PMA-55	National Transport Authority
WXF-C29-PMA-56	John Fleming

1.7 Summary

The Chief Executive has made recommendations in relation to the PMA that were the subject of submissions and observations. With regard to the remaining PMA (which were not the subject of a submission or observation), the Members can decide to make the Plan with or without those PMA.

Section 2 – Submission WXF-C29-PMA-53 Office of the Planning Regulator

Overview

The Office of the Planning Regulator (the Office) notes that the Council will be aware that one of their key functions includes the strategic evaluation and assessment of statutory plans to ensure consistency with legislative and policy requirements relating to planning. It is stated that the Office has evaluated the material alterations to the Draft Plan under the provisions of Sections 31AM (1) and (2) of the Planning and Development Act 2000 (as amended) and within the context of the Office's earlier recommendations and observations. They state that they considered the Draft Plan needed to be amended to respond more fully to the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy for the Southern Region (RSES) and recommended changes to enhance its alignment with these policies and Section 28 Ministerial Guidelines.

They note that 'recommendations' issued by the Office relate to clear breaches of the relevant legislative provisions, of the national or regional policy framework and/or of the policy of Government, as set out in the Ministerial guidelines under section 28. As such, the Council is required to implement or address recommendation(s) made by the Office in order to ensure consistency with the relevant policy and legislative provisions.

They note that 'observations' take the form of a request for further information, justification on a particular matter, or clarification regarding particular provisions of a plan on issues that are required to ensure alignment with policy and legislative provisions. The planning authority is requested by the Office to action an observation. A submission can also include a matter that the Office considers would contribute positively to the proper planning and sustainable development of the area.

The Office acknowledges the extensive work undertaken by the Council in responding to many of the issues raised in their submission. In particular they note that the improved

ambition for growth in Wexford Town together with the amendments to the Settlement Hierarchy provide a more focused and appropriately structured policy framework consistent with national and regional policy.

The Office also:

- Welcomes the inclusion of the Housing Supply Targets (HST) which they state
 provide clarity in relation to meeting housing demand in the County consistent with
 the NPF. However, it is stated that the methodology has been misapplied.
- Notes the stated resource and time constraints which meant that the Planning
 Authority could not address Recommendation 3 in the Office's original submission
 (requirement for land-use zonings and settlement boundaries and strategic
 objectives for settlements). The Office acknowledges the commitment to undertake
 a significant body of work to complete this work following the adoption of the plan.
- Notes the proposal to establish an inter-departmental rural regeneration team to coordinate active land management in rural towns and villages and the commitment to review the rural housing policy when national guidelines are adopted.
- Requests the Council to consider how, having regard to the difficulties cited by the
 Council in facilitating housing in rural towns and villages, active land management
 can be used to meet the housing needs of these areas and prevent unsustainable
 housing development in the open Countryside.
- Raises the issue of tourist accommodation and the need to ensure that economic development in smaller towns and villages is supported.
- Notes that the apartment size restrictions proposed have potential to impact on the delivery of smaller affordable units and infill and regeneration schemes.
- Notes the Council's proactive role and work with 3 Counties Energy Agency in terms
 of leadership in sustainable energy and climate action but considers that care needs
 to be taken in the final stages of the plan to ensure that the finer policy
 requirements do not compromise the delivery of the Council's overall ambitions.

Within this context the Office sets out **7 Recommendations** and **4 Observations** under the following 6 themes:

Key Theme	MA Recommendation	MA Observation
Core Strategy and Settlement Strategy	MA Recommendation 1	MA Observation 1
Sustainable Development	MA Recommendation 2	MA Observation 2
	MA Recommendation 3	
Rural Housing and Regeneration	-	-
Economic Development and	MA Recommendation 4	MA Observation 3
Employment		
Sustainable Transport and	MA Recommendation 5	
Accessibility		
Climate Action and Renewable	MA Recommendation 6	MA Observation 4
Energy	MA Recommendation 7	

Theme 1 Core Strategy and Settlement Strategy

1.1 Population Targets

Observation 1: Population Targets and Plan Timeline

Relevant Alteration No: PMA CH3.34 and PMA CH3.36 and consequential amendments

Summary:

The Office notes that while the population target for the County is aligned with the NPF and RSES there has been a significant passage of time since the Plan was at Draft stage which means that it will be adopted and be effective in 2022, and not 2021 as anticipated.

Therefore the structure and layout of PMA CH3.34 which identifies the allocation of population to the Settlement Hierarchy should reflect the actual plan dates and include targets for 2022 and 2028 in lieu of 2021 and 2027. It is stated that as the table is laid out on a pro rata basis this can be included as additional columns as a minor modification.

Text of Observation 1: Population Targets and Plan Timeline

In the interests of clarity and transparency, the Planning Authority is requested, by way of minor modification, to update Table 3.3 of the Plan (as per PMA CH 3.34) to include columns with a population allocation that corresponds with the 2022 – 2028 plan period.

Chief Executive's Response:

The comments are noted and the value of and reasoning behind amending the timeline is acknowledged. However, it is considered that the adjustment could not be characterised as a minor modification.

At County level the population projections are not pro-rata over the period 2016-2040 as the NPF rate differs between 2016 and 2026 and 2027-2040. Further, the population projections within the Core Strategy are not pro-rata over the period 2021-2040 as population growth was front loaded in the period 2016-2027 in some settlements.

Population growth has been front loaded to the 2021-2027 in the Key Towns of Wexford

and Gorey and in Rosslare Harbour and Kilrane to prioritise their growth as set out in the Council's ambition for these settlements. In other settlements growth has been front loaded to encourage their revitalisation and to facilitate the redistribution of population allocation from rural areas in accordance with the original request from the Office (as outlined in PMA CH3.33).

If the timeline is changed this means that each of these settlements will have one year less at the higher, front loaded, growth rate and one year more at the lower rate. While the total population growth at County level will remain fixed the adjustment will have an unintended and unfortunate impact on the proportion of population that will be allocated to the front loaded, prioritised settlements. Similarly, the HST units figure for the County is a finite number that is divided proportionately per settlement depending on their relative proportion of the county's population allocation. Introducing one year at the lower growth rate to the front loaded settlements will result in a lesser proportion of the HST units going to those settlements.

This will not only impact on the figures in Table 3-4 Core Strategy Population Allocations, Housing Units and Housing Land requirements but will require the HST and all associated tables in the Housing Strategy to be revised. As well as having the inappropriate effect of redistributing population where it is not intended, it is considered that these amendments (a) could not be considered a minor modification and (b) could not be completed within the available time to complete the Chief Executive's Report.

While technically it would be possible to introduce a column for 2022 and 2028 into Table 3.3 Allocation of Population to the Settlement Hierarchy without making the changes to the Table 3.4 Core Strategy Population Allocation, Housing Units and Housing Land 2021-2027 and associated changes to the Housing Strategy, it is considered that this would result in inconsistency within the Plan.

The Draft Plan contained a footnote to Table 3.4 'Core Strategy Population Allocation, Housing Units and Housing Land' which stated that the population allocation would remain fixed and density (and thus zoned land) would be tailored in accordance with the Section 28

Guidelines when Local Area Plans (LAPs) are being prepared. It will be appropriate to reintroduce this footnote but to amend it to state that when the LAPs are being prepared the population will be adjusted to reflect the respective LAP period. It is anticipated that the CSO Census 2022 results will also be available for those settlements at that stage, and this will allow the Planning Authority to adjust the Core Strategy figures for the actual 2022 population to the end of LAP period.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH3.34 and PMA CH3.36 with a further minor modification to PMA CH3.36 to introduce a footnote into Table 3.4 Core Strategy Population Allocations, Housing Units and Housing Land 2021-2027 which states the following:

Final density (and thus zoned land) will be decided in on a site by site basis in accordance with the Sustainable Urban Housing in Urban Areas – Guidelines for Planning Authorities when local area plans are being prepared. Population allocation and housing units will be adjusted to the respective plan period¹.

1.2 Core Strategy and Housing Supply Targets

Recommendation 1: Housing Supply Targets

Relevant Alteration No.: PMA CH3.36, PMA CH4.6, PMA CH4.7, PMA CH4.8, PMA CH4.9,

PMA CH4.10 and PMA HS.2 Volume 9 Housing Strategy

Summary:

The Office strongly welcomes the steps taken by the Planning Authority to incorporate the Section 28 Guidelines Housing Supply Target (HST) Methodology for Development Planning (2020) including the measures to align the core strategy population allocations, housing units and housing land requirements (PMA CH 3.36) and the Housing Strategy (Book 2 PMA

¹ Note that the reference to density in this footnote arrives not out of this submission but out of submission WXF-C29-PMA-48 Construction Industry Federation See pages 104-108 in Section 4 of this report.

HS 1 and 2) to incorporate the HST guidelines.

The Office notes that the HST undertaken by the Planning Authority includes 'Adjustment 1' (Row E), and 'Adjustment 2' (Row F). The Guidelines clearly state, however, that Adjustment 2 ('F') only applies to counties where the actual housing output has been greater than the NPF 50:50 scenario, which is not the case in County Wexford. Furthermore, Sections 4.6 and 4.7 of the Guidelines require a strong justification for the application of this adjustment in accordance with specific criteria, which the Draft Plan does not address.

It is stated that the application of Adjustment 2 ('F') in the revised core strategy is not therefore in accordance with the provisions of the guidelines, and results in an overestimation of house demand for the plan period by c.1,682 units.

Text of Recommendation 1: Housing Supply Targets

Having regard to the Section 28 Guidelines Housing Supply Target Methodology for Development Planning (2020) and Appendix 1 of the accompanying Ministerial letter to Local Authorities, the Planning Authority is required to:

- (i) Review and amend the HST calculations in both the Housing Strategy (Book 2) and the core strategy (Table 3.4) to provide for Adjustment 1 (row E) only and omit the application of Adjustment 2 (row F) (PMA HS.2);
- (ii) Review and amend the proposed core strategy and Housing Strategy to include the total housing supply target for the county and the consequential housing supply targets for each settlement based on the total plan demand as per item (i) above;
 - The Planning Authority should retain the proportionality of the allocation to each level of the settlement hierarchy broadly as indicated in the amendments to Table 3.3 (PMA CH3.34).
- (iii) Review and amend the zoned land requirement identified in the core strategy (Table 3.4) consistent with (ii) above.

Chief Executive's Response:

The introduction of the HST at such a late stage in the Development Plan process required the Council to revise the Core Strategy and to redraft the Housing Strategy. The Council welcomes the acknowledgement of the Office for this work which required significant financial and human resources.

The Guidelines states that while certain planning authorities may have advanced through the statutory process, including publication of a draft plan, it would be necessary to demonstrate general consistency with the ESRI NPF housing demand scenario (subject to the methodology set out in the Guidelines) at Chief Executive's Report and PMA stage.

The application of the HST had the undesirable effect of introducing an artificial, standardised household size throughout the Country which is not suited to application in County Wexford where household size is already below the NPF projected household size in three of the County's four main towns. This results in the actual number of households required to accommodate allocated population being underestimated.

This, together with other components of the HST methodology, has resulted in the number of housing units required to be delivered in the Key Town of Wexford reducing from 2,410 under the Draft Plan to 2,174 under the PMA. Similarly, it resulted in reductions from 998 to 985 units in Gorey Town, from 972 to 888 units in Enniscorthy Town and from 509 to 289 units in New Ross Town.

This is despite the actual percentage of population growth in Wexford, Gorey and Enniscorthy being increased in the PMA to comply with the request from the Office to redistribute population growth on the Settlement Hierarchy. This increased percentage allocation and ambition for growth for these towns has been welcomed by the Office under Section 1.3 of the Office's submission.

The Council remains of the opinion that the method used in the Draft Plan, in advance of the introduction of the HST, which used the actual household size in these settlements tracking

towards NPF household size by 2040 was a more accurate method to determine housing units required to accommodate NPF population allocation. The changes resulting from the implementation of the HST will increase pressure on housing supply in County Wexford in an already pressurised market.

Notwithstanding, the Council does not consider that it has applied the HST methodology incorrectly. While understanding the reasoning put forward by the Office, the Council does not concur with the assertion that the basis for considering Adjustment 2 (F) is not supported by the Guidelines.

There are two permissible adjustments under the Guidelines towards better NPF convergence. Justification is needed to avail of both adjustments. These are Adjustment E and Adjustment F.

- Adjustment E: looks at convergence with the ESRI 'Baseline' scenario (up to Q4 2026); a scenario that uses more contemporary inputs on migration data.
- Adjustment F: looks at a potential increase up to Q4 2026, to facilitate convergence
 with the NPF strategy, where actual new housing supply (up to plan
 commencement) "exceeds or is close" to Plan Housing Demand projected under the
 ESRI NPF scenario.

Wexford County Council has exercised both adjustments.

Justification

- Adjustment E is warranted given the ESRI NPF Scenario (Row A) falls significantly
 short of the ESRI Baseline Scenario (Row E1), and consequently, does not
 appropriately recognise the housing demand in County Wexford, nor the
 demographic change which it has undergone since 2016. Convergence with the more
 contemporary projection provided under the ESRI baseline scenario is essential.
- Adjustment F is warranted as the test set out by the Guidelines is met, i.e. actual housing supply (Row B) is close to Plan Housing Demand under the ESRI NPF Scenario (Row D).

It should be noted that in Table 4.3, Row 'B' is actual housing supply in the period from 2017 to plan commencement. This figure spans less than a 6- year period (4.75 at time of drafting of the Strategy).

Row 'D' represents 'Plan Housing Demand' derived using the ESRI NPF scenario. The ESRI NPF Scenario is modified to deduct row 'B' and include an estimate for homeless and unmet demand (as set by the DHLGH). This figure always spans a 6-year period.

To compare the figures of rows B and D in a like for like manner, the annualised yearly averages are used; given different time periods may apply. This approach is advised by Minister O'Brien in correspondence issued by the Department of Housing, Local Government and Heritage to Chief Executives (18th December 2020), where it states:

"It is therefore envisaged that in some local authority areas, and in particular where recent levels of **annual average housing supply already exceed annual average NPF targets**, such output may, in justified circumstances and within specified limitations, be considered in the years to 2026, in the overall context of convergence with NPF scenario housing projections to 2031" (page 6; emphasis added)

The Guidelines specify the limitations as being up until Q4 2026 only, and only where supply "exceeds or is close to" plan housing demand. In the case of County Wexford, this is true, as Row 'B' (529) is close to Row 'D' (544); indicating that it is appropriate to converge with the ESRI Baseline Scenario, given historic supply is already close to what would be planned for.

Additionally, such a determination is supported by the Guidelines 'Worked Example #3' ² Furthermore, the Guidelines state that "Planning authorities that are seeking to justify total demand converging with the NPF strategy under row 'F' in Table 1 above, will need to both

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² In this Worked Example, comparing the average annualised figures indicate that actual housing supply, B, is 1,414 while Plan Housing Demand, D, is 931; B exceeds D. However, the opposite is so when looking at Total Households: B is lower than D (5,303 to 5,588); but still close. B is a 3.75 year period, and D is a 6 year period, so comparing average annualised values is the appropriate method.

demonstrate and provide satisfactory policy safeguards, to ensure that their core strategy aligns with national and regional policy as set out in the NPF and relevant RSES".

It is stated that, for example, seeking to provide disproportionate levels of new housing development in relatively small settlements with inadequate capacity to provide the necessary supporting services and infrastructure for a new community, and/or with limited public transport accessibility, would not be consistent with national and regional planning objectives.

More specifically, the Guidelines assert that "planning to accommodate additional household demand under potential convergence adjustments must be clearly quantified and must be:

- (i) Consistent with the National Planning Framework and relevant Regional Spatial and Economic Strategy in terms of the settlement hierarchy, i.e. located in cities, regional growth centres, key towns, and other sustainable urban centres;
- (ii) Consistent with the NPF National Strategy outcomes to achieve compact growth, sustainable mobility and transition to a low carbon society;
- (iii) Consistent with the relevant metropolitan area transport strategy, where applicable, and capable of delivering public and active transport mode choice upon occupation;
- (iv) Capable of being serviced by physical and social infrastructure such as water services, schools and public amenities and recreational facilities and energy and communications networks within the plan period".

In accordance with the requirements of the Planning and Development Act, 2000 (as amended), the Core Strategy demonstrates compliance with the objectives of the NPF and the RSES in Section 3.3.

The Settlement Hierarchy and population targets of the NPF and its associated Roadmap and the RSES have been used to inform the Settlement Hierarchy and Core Strategy population allocations (Section 3.7) in the Plan. The Settlement Hierarchy (Section 3.5) details the key locations or types of locations where development will take place. It should be noted that the Council, in developing the Core Strategy, has examined how growth to 2040 (at settlement level) may be appropriately and sustainably delivered at a

higher than pro-rata rate in the period to 2027 – whilst keeping to the overall NPF targets.

In order to achieve Centres of Scale, the Core Strategy allocates 45% and 40% growth to 2040 to Wexford Town and Gorey Town respectively. Considered allocation under the Core Strategy ensures that the level of new housing demand to relatively small settlements with inadequate capacity is avoided. Further detail in this regard was provided in the Capacity Assessment which formed an Appendix to the Chief Executive's Report on the Draft Plan.

Consequently, appropriate policy safeguards are being applied when considering appropriate and proportional allocation of targets throughout the Core Strategy. Indeed, the additional household demand under Adjustment F is entirely integrated in the core strategy allocation justifications (and wider housing chapter) such that the requirements of Section 4.7 of the Guidelines are entirely met.

In addition to the constraints placed on the Council's ability to deliver housing units and zone land as a result of the HST figures there are a number of additional reasons that these estimated housing units should not be further reduced by eliminating Adjustment 2 as requested. These include:

- The Housing Delivery Action Plan for County Wexford has identified a need to deliver 1,150 social and affordable units in the period 2022-2028. Total unmet social housing demand as per Summary of Social Housing Assessment is 1,444 units. If all persons who are currently supported by HAP but who wish to be considered for social housing are also included this figure rises to 3187 units, almost half the allocation for the plan period.
- The Council is committed to providing housing for persons displaced by the conflict in the Ukraine and is in the process of identifying housing units and land which can be used for this purpose.
- There is evident pressure in the market with exceptionally limited properties to purchase or rent in the County³.

³ On Friday 20th May 2022 there were only 20 properties to rent and 410 houses for sale. Source: www.daft.ie

It is considered that the HST Adjustment 2(F) is fully justified and that reducing estimated housing demand would not be in the interests of the proper planning and sustainable development of the County.

Finally, the choice for the Members at this stage is to make the Plan with or without the PMA subject to further minor modifications which must be in accordance with the restrictions set out in Section 12(10)(c) of the Planning and Development Act, 2000 (as amended). The request of the Office would not be making the plan with or without the PMA but rather would require significant alteration to the plan which would not be in accordance with the provisions of the Act.

Chief Executive's Recommendation:

It is recommended that the Plan is made with the PMA CH3.36, PMA CH4.6, PMA CH4.7, PMA CH4.8, PMA CH4.9 and PMA CH4.10.

It is recommended that the Plan is made with PMA HS.2 (Volume 9 Housing Strategy) subject to the following further minor modifications to Section 4.2.2 Future Households (see blue text):

4.2.2 Future Households

The estimation of the projected number of households was undertaken following determination of the projected population (i.e. this is should also be considered an estimation rather than actual figure).

As part of the development plan process, planning authorities must demonstrate the manner in which their plan is consistent with the NPF and established NPF Implementation Roadmap population projections for their local authority area. In December 2020, the DHLGH issued guidelines to assist planning authorities to incorporate these projections into the preparation of development plans and housing strategies in a consistent and coherent approach.

These Guidelines build on research undertaken by the Economic and Social Research Institute (ESRI) into regional demographics and structural housing demand at county level. The ESRI's research applies a projection model to four different development scenarios, including a Baseline ('business as usual') scenario and the 'NPF 50:50 City Scenario.' The Section 28 Guidelines state that "the NPF 50:50 City scenario is broadly consistent with the National Planning Framework strategy and consequently, the 2018 NPF 'Roadmap' document". As such, the Section 28 Guidelines indicate that this is the recommended housing demand scenario to be used by local authorities to plan for the provision of housing to meet projected levels of demand.

Thus, planning authorities must now demonstrate the manner in which their core strategy and other elements of the plan are consistent with the established NPF Roadmap population projections for their local authority area and accordingly, with the related NPF 50:50 City housing demand projection scenario identified by the ESRI.

The Guidelines set a methodology for the application of population and housing projections into Local Authority plan processes and the setting of Housing Supply Targets for the relevant plan period.

As set out below, Wexford County Council have finalised the following calculation of housing demand for the plan period. As 'actual and estimated new housing supply' as calculated in row B, is close to the 'Plan Housing Demand' as calculated in row D (particularly on an annualised average basis), Wexford County Council shall pursue 'Adjustment F' to align with the NPF to 2026. As a result of this a total housing supply target of 6,427 will be applied in the Wexford County Development Plan, over a plan period anticipated to cover Q4 2021—Q3 2027 inclusive.

The Section 28 'Housing Supply Target Methodology for Development Planning' Guidelines set a methodology for the application of population and housing projections into Local Authority plan processes and the setting of Housing Supply Targets for the relevant plan period. As set out below, Wexford County Council have prepared the following calculation of housing demand for the period of the plan in accordance with the guidelines.

In working through the methodology as guided, an adjusted Housing Supply Target Plan

Housing Demand figure of 6,427 dwellings results and will be applied in the Wexford

County Development Plan, over a plan period anticipated to cover Q4 2021 – Q3 2027 inclusive.

Census 2016 indicates that the 54,289 private households in County Wexford have an average household size of 2.73 which is marginally lower than the State average of 2.75. However, the NPF states that the national average is expected to decline to around 2.5 by 2040, whilst acknowledging that urban households tend to be smaller than in the suburbs or rural parts of the country.

A graduated average household size has therefore been used (i.e., the average household size is projected to be 2.62 in every settlement at the end of the plan period21) with the exception of Wexford Town, Enniscorthy Town and New Ross Towns. For those three towns, the average household size has been held fixed from 2016 (i.e., 2.42 for Wexford Town, 2.56 for Enniscorthy Town and 2.46 for New Ross Town) for those reasons as set out in Section 3.84 in Chapter 3 of the Core Strategy. By applying the relevant average household size to projected population, the household numbers have been estimated.

Table 4.2 identifies that the number of households illustrates the calculation of the Housing Supply Targets for in County Wexford is expected to increase by 5,571 6427 households during the plan period. Further detail on at the settlement level household allocations across the period for additional years as well as the information in relation to average household size is also provided in the Core Strategy in Volume 1 Written Statement and Appendix 2 of the Housing Strategy.

Table 4.2: Calculation of Housing Supply Target for County Wexford 2021-2027

	2021	2022	2023	2024	2025	2026	2027
Wexford Town	9,343	9,544	9,744	9,944	10,144	10,345	10,440
Gorey Town	4,062	4,152	4,242	4,332	4,423	4,515	4,566
Enniscorthy Town	4,853	4,933	5,014	5,094	5,174	5,254	5,292
New Ross Town	3,445	3,502	3,559	3,615	3,672	3,729	3,756
Wexford MD (Remainder)	3,325	3,372	3,421	3,471	3,521	3,572	3,631
Gorey MD (Remainder)	12,623	12,817	13,015	13,217	13,425	13,637	13,881
Enniscorthy MD (Remainder)	5,940	6,020	6,101	6,183	6,266	6,351	6,450
New Ross MD (Remainder)	7,423	7,519	7,617	7,716	7,817	7,920	8,043
Rosslare MD	8,343	8,426	8,510	8,594	8,680	8,766	8,868
County Wexford	57,070	58,141	59,212	60,283	61,354	62,426	63,229
County Wextoru	59,357	60,284	61,220	62,167	63,122	64,088	64,928

Wex	ford County Council	Annual Average	<u>Total</u>
		<u>Households</u>	<u>Households</u>
<u>A</u>	ESRI NPF scenario projected new household	<u>527</u>	<u>5,667</u>
	demand 2017 to end Q3 2027		
<u>B</u>	Actual new housing supply 2017 to end Q3	<u>529</u>	<u>2,513</u>
	2021 (Source: CSO to Q4 2020, pro-rata of		
	2020 data for remainder)		
<u>C</u>	Homeless households and unmet need ⁵	=	110
<u>D</u>	Plan Housing Demand = Total (A-B+C)	<u>544</u>	3,264
	For plan period Q4 2021 – Q3 2027 (6 years)		
<u>E</u>	Potential Adjustment 1 to end 2026 portion	Mid-point between	<u>Adjusted</u>
	of plan period	ESRI NPF and baseline	<u>Total</u>
		scenarios to 2026 in	<u>Demand</u>
		<u>lieu of A above</u>	

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⁴ Housing Supply Target Methodology for Development Planning (DHLGH, December 2020)

⁵ Homeless households as of January 2021, plus unmet need as of Census 2016; source: DHLGH, February

<u>E1</u>	ESRI Baseline Scenario projected new	<u>821</u>	8,210
	household demand 2017 to Q4 2026		
<u>E2</u>	ESRI NPF Scenario projected new households	=	419
	Q1 – Q3 2027		
<u>E3</u>	Midpoint between ESRI NPF (A - E2) and	<u>673</u>	6,729
	baseline scenarios to Q4 2026 (E1)		
<u>E4</u>	Adjusted Total Plan Demand	<u>791</u>	4,745
	(E2 + E3 - B +C)		
<u>F</u>	Potential adjustment 2 to end 2026 portion	"building on	<u>Adjusted</u>
	of plan period to facilitate convergence to	adjustment E, plus up	<u>Total</u>
	NPF strategy, applicable where B exceeds or	to 25%"	<u>Demand</u>
	is close to D (where justified)		
<u>F1</u>	<u>E3 + 25%</u>	841	8,412
<u>F2</u>	Remainder plan period demand to Q3 2027	=	419
<u>F3</u>	Adjusted Total Plan Demand	<u>1,071</u>	<u>6,427</u>
	(F1+F2-B)+C		

Table 4.2 illustrates the calculation of the Housing Supply Targets for County Wexford.

Further detail on settlement level household allocations across the period is provided in the

Core Strategy in Volume 1 Written Statement and Appendix 2 of the Housing Strategy.

Table 4.3 identifies the additional households that are anticipated during the plan period whilst Appendix 2 sets out further detail in relation to the distribution of additional households across each of the ten deciles anticipated at the relevant spatial levels. The Core Strategy reflects population and household figures for the period 2021-2027. The additional years and units built will be adjusted when local area plans are being prepared.

Calculation Notes

There are two permissible adjustments under the Guidelines towards better NPF

convergence. Justification is needed to avail of both adjustments. These are Adjustment E

and Adjustment F —

- Adjustment E: looks at convergence with the ESRI 'Baseline' scenario (up to Q4
 2026); a scenario that uses more contemporary inputs on migration data.
- Adjustment F: looks at a potential increase up to Q4 2026, to facilitate convergence
 with the NPF strategy, where actual new housing supply (up to plan
 commencement) "exceeds or is close" to Plan Housing Demand projected under the
 ESRI NPF scenario.

Wexford County Council has exercised both adjustments.

Justification

- Adjustment E is warranted given the ESRI NPF Scenario (Row A) falls significantly
 short of the ESRI Baseline Scenario (Row E1), and consequently, does not
 appropriately recognise the housing demand in County Wexford, nor the
 demographic change which it has undergone since 2016. Convergence with the more
 contemporary projection provided under the ESRI baseline scenario is essential.
- Adjustment F is warranted as the test set out by the Guidelines is met, i.e. actual
 housing supply (Row B) is close to Plan Housing Demand under the ESRI NPF Scenario
 (Row D).

It should be noted that in Table 4.3, Row 'B' is actual housing supply in the period from 2017 to plan commencement. This figure spans less than a 6- year period (4.75 at time of drafting).

Row 'D' represents 'Plan Housing Demand' derived using the ESRI NPF scenario. The ESRI NPF Scenario is modified to deduct row 'B' and include an estimate for homeless and unmet demand (as set by the DHLGH). This figure always spans a 6-year period.

To compare the figures of rows B and D in a like for like manner, the annualised yearly averages are used; given different time periods may apply. This approach is advised by Minister O'Brien, TD. in correspondence issued by the Department of Housing, Local Government and Heritage to Chief Executives (18th December 2020), where it states:

"It is therefore envisaged that in some local authority areas, and in particular where recent levels of annual average housing supply already exceed annual average NPF targets, such output may, in justified circumstances and within specified limitations, be considered in the years to 2026, in the overall context of convergence with NPF scenario housing projections to 2031" (page 6; emphasis added)

The Guidelines specify the limitations as being up until Q4 2026 only, and only where supply "exceeds or is close to" plan housing demand. In the case of County Wexford, this is true, as Row 'B' (529) is close to Row 'D' (544); indicating that it is appropriate to convergence with the ESRI Baseline Scenario, given historic supply is already close to what would be planned for.

Additionally, such a determination is supported by the Guidelines 'Worked Example #3' 6

Furthermore, the Guidelines state that "Planning authorities that are seeking to justify total demand converging with the NPF strategy under row 'F' in Table 1 above, will need to both demonstrate and provide satisfactory policy safeguards, to ensure that their core strategy aligns with national and regional policy as set out in the NPF and relevant RSES".

For example, seeking to provide disproportionate levels of new housing development in relatively small settlements with inadequate capacity to provide the necessary supporting services and infrastructure for a new community, and/or with limited public transport accessibility, would not be consistent with national and regional planning objectives.

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⁶ In this Worked Example, comparing the average annualised figures indicate that actual housing supply, B, is 1,414 while Plan Housing Demand, D, is 931; B exceeds D. However, the opposite is so when looking at Total Households: B is lower than D (5,303 to 5,588); but still close. B is a 3.75 year period, and D is a 6 year period, so comparing average annualised values is the appropriate method.

More specifically, the Guidelines assert that "planning to accommodate additional household demand under potential convergence adjustments must be clearly quantified and must be:

- (i) <u>Consistent with the National Planning Framework and relevant Regional Spatial</u> <u>and Economic Strategy in terms of the settlement hierarchy, i.e. located in cities,</u> <u>regional growth centres, key towns, and other sustainable urban centres;</u>
- (ii) <u>Consistent with the NPF National Strategy outcomes to achieve compact</u> growth, sustainable mobility and transition to a low carbon society;
- (iii) Consistent with the relevant metropolitan area transport strategy, where applicable, and capable of delivering public and active transport mode choice upon occupation;
- (iv) <u>Capable of being serviced by physical and social infrastructure such as water</u>

 <u>services, schools and public amenities and recreational facilities and energy and</u>

 <u>communications networks within the plan period".</u>

In accordance with the requirements of the Planning and Development Act, 2000 (as amended), the Core Strategy demonstrates compliance with the objectives of the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES) in Section 3.3.

The Settlement Hierarchy and population targets of the NPF and its associated Roadmap and the RSES have been used to inform the settlement hierarchy and Core Strategy population allocations (Section 3.7) in this Plan. The Settlement Hierarchy (Section 3.5) details the key locations or types of locations where development will take place.

It should be noted that Wexford County Council, in developing the Core Strategy, has examined how growth to 2040 (at settlement level) may be appropriately and sustainably delivered at a higher than pro-rata rate in the period to 2027 – whilst keeping to the overall NPF targets.

In order to achieve Centres of Scale, the Core Strategy allocates 45% and 40% growth to

2040 to Wexford Town and Gorey Town respectively. Considered allocation, following

capacity assessment, under the core strategy ensures that the level of new housing demand

to relatively small settlements with inadequate capacity is entirely avoided.

Consequently, appropriate policy safeguards are being applied when considering appropriate and proportional allocation of targets throughout the County Wexford Core Strategy. Indeed, the additional household demand under Adjustment F is entirely integrated in the core strategy allocation justifications (and wider housing chapter) such that the requirements of Section 4.7 of the Guidelines are entirely met.

1.3 Settlement Hierarchy and Distribution of Growth

Recommendation: N/A

Relevant Alteration No: PMA CH3.11, PMA CH3.34 and consequent amendments to

Volume 1 and Volume 9 Housing Strategy

Summary:

The Office welcomes the revisions to the settlement hierarchy under PMA CH3.11 and the introduction of sub-levels 3a and 3b to distinguish between the different size, scale and functions of the level three settlements. The Office also welcomes the Planning Authority's response to Recommendation 1 of the Office's submission to the draft Plan in relation to the allocation of new population growth across the settlement hierarchy as set out in PMA CH3.34. In particular the redistribution of growth from lower tiers to the Level 1 Key Towns, such that almost half of new growth (48%) will be in Wexford and Gorey towns is commended.

However, the Office expresses concern that through PMA CH3.34 the overall new population growth allocated to New Ross, a Level 2 Large Town, has been reduced by almost half from the draft Plan stage; such that the actual increase in population in the PMA is 778 by 2027 in comparison to the 1,467 originally identified by the plan.

Nonetheless the Office is willing to accept the Council's approach to the development of the town which includes securing €100,000 for a Town Centre First Plan and other policies in the plan to prioritise economic growth in the short, medium and long term to promote the

attractiveness, vitality and viability of the town.

Text of Recommendation/Observation: N/A

Chief Executive's Response:

In assigning population to the Settlement Hierarchy the Council was constrained by the reduced population and housing resulting from the application of the HST Guidelines. In distributing the limited housing units the Council examined past patterns of growth, level of demand for housing and availability of physical, social and community infrastructure and economic development.

The Council's development approach for New Ross is to continue to prioritise the development of social, community and physical infrastructure and advance the economic development of the town. At present there is an ambitious and transformative programme of regeneration underway with significant public investment in tourism, amenity, economic development and public realm improvements.

As well as Town Centre First Funding of €100,000, the town has received significant investment from the Failte Ireland's Destination Towns Fund (€500,000), the Towns and Villages Renewal Scheme (John Street Hub €73,000, Town Walls Trail €100,000, redevelopment of the Shambles and Brennan's Lane €500,000), RRDF (Wexfordia Tourism Projects €5.56m), ORIS (New Ross Riverside Trail €342,000), Fáilte Ireland (St Mary's Church, €250k, Norman Way Trail, €600k, Quay front public realm, €1.5m) and the Department of Sport (Apex Leisure Centre, €3.8m). The award Winning Library Park has been completed and RRDF grant funding has also been sought for the carrying out public realm works on the Quay (on the site of the former oil tanks) and works to the Dunbrody Visitor Centre.

This investment, combined with development and investment in Waterford MASP, will ensure that New Ross will be a most attractive place to live and work. The Council is committed to review the population allocation for New Ross Town following the two year review of the County Development Plan.

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Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH3.11 and PMA CH3.34.

Theme 2 Sustainable Development

2.1 Development Approach for Settlements

Recommendation 2: Local Area Plans and Policy Frameworks

Relevant Alteration No: PMA CH3.11, PMA CH3.24, PMA CH3.26, PMA CH3.27 and PMA

CH3.29

Summary:

The Office is disappointed with the response to Recommendation 3 of the Office's submission to the draft Plan and note that, aside from the inclusion of a composite map indicating the rural nodes/level 6 (PMA CH3.12), none of the other items in this recommendation have been addressed in full. They note that the Council state that the recommendation could not be complied with due to inadequate resources to complete the tasks within the required timelines.

The Office notes, however, significant additional time has lapsed since the draft Plan was on display and that this period could have provided an opportunity to more substantially address this recommendation including provisional mapping based on existing datasets such as the CSO boundary and specific policy objectives.

Nonetheless, the Office acknowledges the commitments made under PMA CH3.24 - Level 3a and 3b Settlements, PMA CH3.26 – Level 4 Large Villages, PMA CH3.27 – Small Villages and PMA CH3.29 – Small Villages Category 2, to vary the plan to include land-use zoning maps, settlement boundary maps and specific objectives for infill and regeneration. The Office would urge the Planning Authority to commence meaningful engagement at the earliest opportunity with key stakeholders and prescribed authorities.

The Office notes that the Planning Authority will be aware that Section 19(2B) of the *Planning and Development Act 2000* (as amended) requires the Planning Authority to amend or replace local area plans within one year of the making of the development plan.

The Office also considers that the timely preparation of Local Transport Plans (LTPs) using the Area Based Transport Assessment (ABTA) methodology will also be crucial to the preparation of the LAPs, particularly in the context of the provision of sustainable settlements and transportation strategies under Section 10(2)(n) of the Act.

In relation to the Level 3a and 3b Settlements, the implementation of the aforementioned objectives to support the proper planning and sustainable development of these settlements is critical given the weak policy framework for these settlements in the draft Plan and the lack of demonstrable consistency with NPO 3, 6 and 7 and RPO 3, 34 and 35. Consequently, the Office considers that greater clarity and certainty should be provided regarding the timelines for addressing this gap.

Text of Recommendation 2: Local Area Plans and Policy Frameworks

Having regard to the provisions of Sections 18(4)(b) and 19(2B) of the Planning and Development Act 2000 (as amended), and to ensure that the Plan is consistent with the policy framework of the NPF and RSES, in particular NPO 3, 6 and 7 and RPO 3, 34 and 35, the Planning Authority is required to include a modification to the draft Plan to supplement Section 3.6 of the Plan 'Core Strategy and Development Approach' to:

- (i) State that the local area plans for Wexford, Enniscorthy and New Ross towns will be made and have effect within 12 months of the adopted county development Plan.
- (ii) Confirm that these LAPs will include and be informed by Local Transport Plans required under RPO 11 and committed to under Objective TSO8 of the Draft Plan and will also implement other policy commitments as part of the LAP process including: Town Centre Health Checks (PMA CH5.2); urban regeneration framework plans and the economic development spatial strategies (PMA CH6.18); and

- (iii) Include a timeline and work programme for the implementation of the actions indicated in the following proposed material amendments:
 - PMA CH3.24 Level 3a and 3b Settlements
 - PMA CH3.26 Level 4 Large Villages
 - PMA CH3.27 Small Villages
 - PMA CH3.29 Small Village Category 2.

Chief Executive's Response:

The comments of the Office are noted. While there was an amount of time between the display of the Draft Plan and the display of the PMA it should be noted that the Members resolved under Section 12(6) of the Act to amend the Draft Plan on the 6th of September 2021. The time which lapsed between this and the public display of the PMA was due to issues with the Strategic Environmental Assessment of the Plan. This work on settlements could not be completed after the Members had made their resolution.

The Council note the suggestion that provisional mapping, such as CSO boundaries, could be used to form settlement boundaries. This had been considered and it was decided that such an approach would not be an appropriate policy response. These boundaries have no planning basis and the definition used by CSO results in some very anomalous boundaries which do not reflect the area that the Council would consider an appropriate development envelope. The use of such boundaries in the absence of appropriate analysis could result in inappropriate planning decisions and expectations and would not serve the proper planning and development of these settlements.

With regard to item (i) the Council acknowledge the requirement of the Act to amend or replace LAPs within one year of the adoption of the Development Plan. However, the many other requirements of the Act, compliance with Environmental Directives and Section 28 guidelines mean that it will not be possible to complete three LAPs, for towns of such significant scale and complexity, within one year with current staffing levels.

Notwithstanding the Planning Authority will include endeavor to comply with the requirements of the Act. It is not possible to add an objective or modify an objective to state this at this stage in the process as there is no relevant PMA.

With regard to item (ii) the Council note the request to amend Section 3.6 of the Plan to state that the LAPs will be informed by LTPs, Town Health Checks, Urban Regeneration Frameworks and Economic and Spatial Strategies.

The Council notes the request to include an objective to state that LTPs will be prepared as part of the LAPs. There is already a reference in the Development Approach for each of the four towns to state that LTPs will be prepared to inform zoning (Item 9 of the Development Approach for Wexford Town, Item 8 of the Development Approach for Gorey, Item 11 in the Development Approach for Enniscorthy and Item 7 in the Development Approach for New Ross). It is also referenced in Objective TS08 in Chapter 8 Transportation Strategy. It is considered unnecessary to specifically state that it will be prepared as part of the LAPs. The ABTA Guidelines will be used to inform the methodology and this will ensure integration with the LAP.

The request to include an objective in Section 3.6 to confirm that Town Health Checks will be carried out when preparing LAPs is noted. PMA CH5.2 inserted a new strategic objective in Chapter 5 Design and Placemaking in Towns and Villages 'To carry out, as part of the preparation of future local area plans and settlement plans, a comprehensive health check of the settlement. This health check, which will incorporate the Heritage Council's 'Town Centre Health Check' approach, a community health check and audit of social and community facilities and recreation and open spaces, will inform the development of targeted local authority strategies and the spatial planning framework and objectives in the local area plan/settlement plan'. It is considered unnecessary to restate this in the Core Strategy.

With regard to the request to include an objective in Section 3.6 to prepare urban regeneration framework plans as part of the LAPs, the Council note that PMA CH5.3 in Chapter 5 Design and Placemaking in Towns and Villages introduced an objective to prepare

urban regeneration frameworks. It will not always be appropriate for these plans to be prepared as part of LAPs as they require a different level of analysis, a different set of skills and different type and level of consultation. They may also have a different spatial extent. This means that they will not always fit within the statutory timeframes and processes for the LAP. Furthermore, as it is likely that such plans will be funded under the Town Centre First Initiative, their delivery will be dependent on the availability of that funding.

The Council, together with LOCI Consultants, are well advanced in the preparation of the first such Town Centre First Plan (TCFP) for Enniscorthy Town. The level of engagement and extent of consultation mean that the TCFP has been truly shaped by this consultation and the Council is optimistic that this will also assist with implementation. The LAP team has been fully involved in the preparation of the TCFP to ensure that it will be well integrated with the LAP. The TCFP for New Ross will commence in advance of the LAP but it will inform the LAP and be informed by the LAP team.

Finally, the Council notes the request to include an objective in the Core Strategy to state that economic development spatial strategies will be prepared as part of the LAPs. This objective is already included under Objective ED49 of the Draft Plan (as amended) and it is considered unnecessary to restate this objective in the Core Strategy.

The Council notes the request under item (iii) to include a timeline to implement PMA CH3.24 (Zoning and Settlement Plans for Level 3a and Settlement Boundaries and objectives for 3b Settlements), PMA CH3.26, PMA CH3.27, PMA CH3.29 (Settlement Boundaries for Level 4 and 5 Settlements). It is recommended that that a minor modification is made to give a timeline around the preparation of these plans. Having regard to the priority to prepare LAPs for the towns of Wexford, Enniscorthy and New Ross, it is recommended that the objectives should be implemented within three years of the adoption of the Plan or within one year of the adoption of the LAPs, whichever is the sooner.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH3.11.

It is recommended that the Plan is made with **PMA CH3.24** subject to the following minor modification to the second last paragraph of the Development Approach for Level 3a Service Settlements on page 30 of Book 1 of the PMA documents as follows (see blue text):

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 within three years of the adoption of the County Development Plan or within one year of the adoption of the LAPs for Wexford Town, Enniscorthy Town and New Ross Town, whichever is the sooner.

It is recommended that the Plan is made with **PMA CH3.24** subject to the following minor modification to amend the last paragraph of the Development Approach for Level 3.b Strategic Settlements on page 31 of Book 1 of the PMA documents as follows (see blue text) 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 within three years of the adoption of the County Development Plan or within one year of the adoption of the LAPs for Wexford Town, Enniscorthy Town and New Ross Town, whichever is the sooner.

It is recommended that the Plan is made with **PMA CH3.27** subject to the following minor modification to amend the last line on page 33 of Book 1 of the PMA documents for Small Villages as follows (see blue text):

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. within three years of the adoption of the County Development Plan or within one year of the adoption of the LAPs for Wexford Town, Enniscorthy Town and New Ross Town, whichever is the sooner.

It is recommended that the Plan is made with PMA CH3.29 subject to the following minor

modification to amend the second line on page 33 of Book 1 of the PMA documents for

Small Villages Category 2 as follows (see blue text):

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. within

3 years of the adoption of the County Development Plan or within one year of the adoption

of the LAPs for Wexford Town, Enniscorthy Town and New Ross Town whichever is the

sooner.

2.2 Compact Growth and Regeneration

Recommendation:

N/A

Relevant Alteration No: PMA CH3.36, PMA CH5.8 to PMA CH5.15.

Summary

The Office welcomes the various amendments to the Core Strategy and Chapter 5 to

encourage compact growth and regeneration. The Office would encourage the Planning

Authority to set a timeframe for the completion of this exercise. The Office note, that

while it is disappointing that some of the work was not brought into the Plan through

PMA, they welcome the policy commitments to do this work in LAPs and through active

land management. In particular they note:

The establishment of an interdepartmental rural regeneration team to deal with

rural towns and villages.

• The identification of key sites in Level 1 and Level 2 settlements.

The policy to pursue five sites per Municipal District under the Derelict Sites

legislation and three under the Urban Regeneration and Housing Acts.

Text of Recommendation/Observation: N/A

Chief Executives Response:

Noted. At this point it is not possible to commit to a timeline due to resource issues.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH3.36, PMA CH5.8, PMA CH5.9,

PMA CH5.10. PMA CH5.11, PMA CH5.12, PMA CH5.13, PMA CH5.14 and PMA CH5.15.

2.3 Settlement Plans

Observation 2:

Bunclody Town Clarifications

Relevant Alteration No: PMA CH3.36, PMA BT.8 and PMA BT.15

Summary:

The Office welcomes the amendments to the Settlement Plans for Bunclody and Rosslare

Harbour and Kilrane and consider that the amendments to the text, key sites and mapping

are well considered. The Office look forward to a similar approach for future LAPs and

settlement maps.

It is stated the quantum of Phase 1 lands (6.92ha SIC) and units (133) identified in the

Settlement Plan is not consistent with that in the Core Strategy of the Plan in Volume 1 (as

per CH3.36).

The Office further notes that Irish water has stated that there are constraints in water

capacity in Bunclody which may limit development until the planned upgrade is completed.

The Office request that such constraints are identified in the Plan.

Text of Observation 2: Bunclody Clarifications

The Planning Authority is advised that there are minor inconsistencies between the quantum

of lands indicated in Phase 1 for Bunclody and the Core Strategy housing land requirements.

The Planning Authority is advised to ensure that the Plan is internally consistent (making

provision for the modifications required under MA Recommendation 1 above). Furthermore,

any infrastructure constraints in Bunclody should be clearly identified in Table B1 and the text

of the Settlement Plan.

Chief Executive's Response:

The Phase 1 lands identified in the Bunclody Settlement Plan sum to 6.05⁷ha and the identified requirement for zoned land in the Core Strategy is 5.32ha. However, the reason for this is explained in PMA BT.8 which clarifies that the yield from Parcel A will be reduced due to site configuration and the yield from Parcel D will be reduced as it will be necessary to deliver a link road as part of the development of Parcel D. This link road is shown on PMA BT.5 and on Map 2 in the Draft Plan. It is considered reasonable that these factors combined will reduce the area of developable land by a minimum of 0.77ha. No modification is considered necessary.

The comment with regard to water supply in Bunclody is noted. Irish Water state that while there is inadequate water capacity to meet the full plan population allocation at present, a project is progressing to increase capacity and it is anticipated that it will be completed within the lifetime of the Plan. It would be appropriate to amend the Infrastructural Assessment Report to refer to this.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH3.36 and PMA BT.8.

It is recommended that a minor modification is made to PMA BT.15 Bunclody Infrastructural Assessment Report as follows (see blue text):

Bunclody Water Supply Scheme

The town's water supply is currently provided from existing groundwater sources to the west of the town. These feed the Water treatment works at Carrickduff from where it is distributed to the town. The water supply serves a wide area, including the villages of Kilmyshall and Clohamon, hence there will be limitations on the ultimate capacity of the system to serve extensive new development. Currently there is insufficient capacity to serve the full population allocation for the settlement, however a project is progressing to increase capacity and it is anticipated will be completed within the lifetime of the Plan.

-

⁷ Note 6.09ha, stated in text in error

2.4 Standards and Guidelines

Recommendation 3:

Apartment Sizes

Relevant Alteration No: PMA CH4.20 and PMA DMM.7

Summary:

The Office notes that PMA DMM.7 seeks to include, by way of a footnote to Table 3.6 in the Development Management Standards, a floor area standard expressly for apartments in settlements with a population of less than 8,500 (CSO 2016) such that footnote to the table will read as follows:

"The Guidelines outline that the floor area parameters set out in SPPR3 shall generally apply to apartment schemes but do not apply to purpose-built and managed student housing. The Council will require the floor area of all new apartments in settlements with a population less than 8,500 (as of Census 2016) to be a minimum of 90m²".

It is stated that the inclusion of PMA DMM.7 conflicts with Specific Planning Policy Requirement (SPPR) 3 of the Section 28 Guidelines for Planning Authorities of the Sustainable Urban Housing: Design Standards for New Apartments (2018) guidelines which specifies minimum apartment floor areas relative to the number of bedrooms. Under the SPPR, the 90 m² standard applies to 3-bedroom apartments (5 persons).

The Office states that by effectively requiring all apartments to be at least the size of a 3bedroom apartment, this requirement could also be considered to be inconsistent with SPPR 1 which states that development plans may only specify a mix for apartment and other housing developments further to an evidence-based Housing Need and Demand Assessment (HNDA). The Office notes that the Housing Strategy identifies a need for 40% 3bedroom units and as such no evidence-based justification has been provided to support a 100% requirement for this size of unit in towns with a population less than 8,500 population under PMA DMM.7.

The Office states that by applying this requirement the draft Plan also risks undermining the delivery of smaller units to meet the needs of the existing and future community who may have a demand for smaller, more affordable housing that still provides a high level of amenity in accordance with national standards. Similarly, development on constrained brownfield and infill sites, which would contribute to the regeneration of urban areas may also be prevented under the provision.

The Office state that while it appreciates the motivation for the policy is to provide a high standard of amenity for future residents, the Draft Plan contains a wide range of objectives to ensure that residential development is consistent with this objective.

In relation to the requirement for consistency with the SPPR, your authority will be fully aware of the statutory obligation of local authorities to ensure that the development plan is consistent with specific planning policy requirements (SPPR) specified in guidelines under Section 12(18) of the Act.

The Office would further comment that the introduction of such requirements via a footnote is not consistent with the need for clarity and transparency in the development plan.

Text of Recommendation 3: Apartment Sizes

Having regard to Specific Planning Policy Requirements 1 and 3 of the Section 28 *Guidelines for Planning Authorities on Sustainable Urban Housing: Design Standards for New Apartments* (2018), NPO 6 and 18a, and RPO 3, 34 and 35, and in the interests of clarity and consistency, the Planning Authority is required to make the Plan without material alteration PMA DMM.7 in relation to the requirement of a minimum floor area for new apartments in settlements with a population less than 8,500 of 90m².

Chief Executive's Response:

In the first instance it is not considered that the inclusion of a higher minimum standard for apartment size conflicts with the SPPR. The inclusion of a higher minimum standard meets and exceeds the standard in the SPPR. The Council notes that the HNDA does not identify

that all units will need to be a minimum of 3 bedrooms but further notes that it does not necessarily follow that all units of 90sqm are 3 bedroom units.

Notwithstanding, it is accepted that this is a significant deviation from the Guidelines and in applying this standard there is a risk that it will prevent the delivery of smaller, more affordable units, particularly in the context of existing, and likely future trends in household size in the county. It is also accepted that the delivery of such units may not be possible on brownfield, infill and otherwise constrained sites.

With regard to Office's statement that the inclusion of the change was not transparent as it was included as a footnote, the Council note that this standard was included in a fully transparent manner through the inclusion in PMA CH4.20 which amends Objective SH14 (page 66 of Book 1 of the PMA documents).

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH4.20 with the following minor modification (without part of the PMA – see blue text):

Amend Future Housing Delivery 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, 20182020), where relevant save for the following deviation which is to require the floor area of all new apartments in settlements with a population less than 8,500 persons (as of Census 2016) to be a minimum of 90m². Proposals for apartment block developments in excess of 50 units will also be assessed 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. Generally, where the site permits it, each apartment should have its own door access to the external street/external communal access area.

It is also recommended that the Plan is made without PMA DMM.7.

Theme 3 Rural Housing and Regeneration

3.1 Rural Housing and Regeneration

Relevant Alterations No: PMA CH4.22, PMA CH4.23, PMA CH4.24, PMA CH4.25 and

PMA CH4.26

Summary:

The Office welcomes a number of the amendments to the text in Table 4.6 of the Draft Plan, which sets out the criteria for one-off rural housing and closer aligns the Plan with the policy of the NPF. In particular, the amendments provide clarity that persons qualifying under Category B, with a demonstrable economic functional need, must be engaged in resource based activity which they need to reside in proximity to. The Office also welcomes further refinements to the text in Table 4.6 for Category A, persons with a demonstrable social functional need, to reaffirm that the dwelling must be their permanent place of residence and that they must never have owned a rural house (PMA CH4.24).

However, as outlined in the Section 12(5)(aa) notification, Recommendation 6 and 7 of the Office's submission to the Draft Plan has not been complied with. In relation to Recommendation 6 and NPO 19, the Draft Plan has retained five rural area types. The Office notes that the Council has agreed to review the rural housing policy when the revised Section 28 Guidelines are published and the Office notes that an objective to confirm this has been included under PMA CH4.26.

In relation to Recommendation 7, the Office notes the response of the Planning Authority that sites in existing settlements are extremely limited, there is a lack of public communal infrastructure, and landowners in smaller towns and villages are slow to release land for development. While the Office appreciates these constraints present a serious challenge, a policy approach that accommodates the housing needs of people from rural settlements in the open countryside is not a sustainable approach to the development of either the towns and villages or the open countryside.

The Office advises the Planning Authority to proactively consider how it might address these

issues through rural regeneration initiatives in conjunction with the review of rural housing

policy when the revised Section 28 Guidelines are published. Such initiatives might include

the identification of land that might be suitable for development of appropriate scale and

the provision of serviced sites and in rural towns and villages.

Text of Recommendation/Observation: N/A

Chief Executive's Response:

The positive comments with regard to the amendments to the rural housing policy are

welcomed. The Council will examine how such rural regeneration initiatives might be

implemented when work to prepare the Settlement Plans, settlement objectives and

settlement boundaries is being carried out (PMA 3.11, PMA CH3.24, PMA CH3.26, PMA

CH3.27 and PMA CH3.29 refer). Consideration will also be given to this issue, if appropriate,

when the review of the rural housing policy, committed to under PMA CH4.26, is taking

place.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH4.22, PMA CH4.23, PMA CH4.24,

PMA CH4.25 and PMA CH4.26.

Theme 4 Economic Development and Employment

4.1 Rural Economy

Recommendation 4:

Tourist Accommodation

Relevant Alteration No: PMA CH6.21 and PMA CH 7.18,

Summary:

The Office welcomes PMA CH6.21 which gives greater clarity to policy ED89 by the removal

of the reference to the term 'commercial' development in rural areas. This policy could be

further reinforced to make it clear that development in rural areas should be location

specific and resource based, so that the vitality and viability of commercial uses in towns and villages in not undermined.

Notwithstanding this amendment, PMA CH7.18 introduces a new policy to allow tourism accommodation for new holiday chalet/caravan/mobile home parks in rural areas on a 'case-by-case' basis. This is in conflict and undermines policy TM49 of the Draft Plan, which clearly directed new holiday home developments to serviced towns and villages and indicated that only new holiday homes in rural areas were to be ancillary to integrated tourism/leisure/recreation complex.

Submission WXF-C29-PMA OPR requests that the Plan is made without this PMA as it will allow for tourism accommodation outside of settlements.

WXF-C29-PMA-12 Irish Water welcomes the inclusion of additional text around the maintenance of wastewater treatment capacity for permanent housing.

Submission WXF-C29-PMA-45 Nova Connect requests a further amendment to this objective (see red text) in order to support the tourism objectives for Kilmore Quay and, in turn, allow for tourism accommodation development to be considered on Nova Connect's lands at Beak, Kilmore Quay:

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

- (a) Within and in close proximity to 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) <u>In rural areas with specific locational qualities such as a forest, or lake or sea and which are part of an integrated development with associated activities</u>

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.

The requested amendment would allow for resort hotel facilities to be considered on appropriate sites within and in close proximity to existing settlements e.g., Kilmore Quay, or where deemed to be a rural area, the amendment includes the sea as a specific locational quality. The submission outlines that their site Beak, Kilmore Quay provides a good opportunity for the development of an integrated tourism resort hotel due to its setting and proximity to Kilmore Quay. The requested amendment would ensure that the development is supported by planning policy.

Text of Recommendation 4: Tourist Accommodation

Having regard to NPO 16, RPO 26 and RPO 27 to reverse rural decline in small towns and villages and to support regeneration of these settlements, the Planning Authority is required to make the Plan without Proposed Material Amendment PMA CH7.18.

Chief Executive's Response:

The comment that Objective ED89 could be amended to make it clear that development in rural areas should be location-specific and resource based is noted. However, this policy is intended to control development in rural areas which is otherwise deemed acceptable under the other policies of the plan that deal with the appropriate locations for development in rural areas. Objective ED41 in Section 6.6.5 which deals with locations for development is 'To ensure that commercial development in rural areas is related to agriculture, horticulture or other rural resource based activity. Exceptions to this objective are detailed in Section 6.7.6, Chapter 7 Tourism, Chapter 12 Coastal Zone Management and Marine Spatial Planning, Volume 8 County Retail Strategy and Volume 10 Energy Strategy'. While it is considered that this adequately covers this issue a further minor modification

could be introduced to make it more explicit that Objective ED89 is subject to Objective ED41.

The intention of the new objective relating to holiday chalet/caravan/mobile home parks in rural areas was to for provide holiday camps similar to those which exist in France and elsewhere in mainland Europe. Such developments tend to be self-sustaining complexes which sit well in their landscape and provide economic benefits to the communities in which they are located.

Notwithstanding, it is accepted that the objective in its current form could result in substandard development which would not support the future development of rural towns and villages. Furthermore, it is considered that the type of development envisaged could be accommodated under Objective TM49 which provides that a critical mass of facilities must be provided.

However, it is considered that part (a) of PMA CH7.18 should be retained as there is no policy position in the Plan to permit chalets/caravan/mobile home parks in settlements (only extensions to existing parks).

The comments of Irish Water are welcomed.

With regard to Submission WXF-C29-PMA-45 Nova Connect, the overall policy of the plan with regard to the location of tourism developments, is that, save for certain specified exceptions, it should be located in towns and villages. The exceptions to this policy are outlined in the Chapter 7. The intention of PMA CH7.18 was to provide a clear spatial planning framework for the development of new holiday chalet/caravan/mobile home parks only. These are considered to a be a different category of tourism development to resort hotels which are already dealt with in Section 7.7.4 Integrated Resorts and Amenities. This section outlines the policies and criteria that such development must comply with. Future applications will be considered on their merits under these policies and criteria. It is further noted that the OPR has requested that the Plan be made without PMA CH7.1.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH6.21 subject to the following minor modifications (see blue text):

Amend Objective ED89 in Section 6.7.6 Rural Economy on page 229 as follows:

To ensure all developments, <u>permitted</u> for commercial purposes in rural areas <u>in accordance</u> <u>with Objective ED41</u>, including agricultural, horticultural and rural diversification do not impact negatively on the quality of the environment or character of the <u>rural</u> area <u>or rural</u> <u>settlement</u>. 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 its 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.

The Council will monitor and report on the number, nature and impacts of applications for economic development granted in rural areas outside of settlements. Reporting will take place as part of the 2 year review of the County Development Plan and as part of SEA

It is recommended that the Plan is made with PMA CH7.18 but without Part B of the PMA (which is now shown in blue strikethrough text):

Insert a new Tourism Accommodation objective after Objective TM50 on page 277 (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.

Observation 3: Monitoring of Rural Economic Policies

Relevant Alteration No: PMA CH6.25 and PMA CH6.26

Summary:

The Office notes that additional policies have been included under PMA CH6.25 and PMA CH6.26 to facilitate small business developments and small workshops within the curtilage of dwellings in rural areas. The Draft Plan does not, however, specify parameters in relation to the nature or extent of such businesses, which could cumulatively adversely affect the vacancy and economic development of rural towns and villages, and lead to unsustainable travel patterns. Careful monitoring will be required to:

- (a) ensure that development in the rural areas is appropriate;
- (b) allow for growth in the agri-food sector in line with government policy;
- (c) ensure the viability of commercial uses in towns and villages is not undermined; and
- (d) to avoid unsustainable travel patterns.

Text of Observation 4: Monitoring of Rural Economic Policies

The Planning Authority is requested to put in place mechanisms to measure, monitor and report (where required) the outcomes as exhibited in the development management systems (including Section 247 pre-application consultation, planning applications and appeals) of the following policies:

- (i) Rural economy Policy ED89, as amended under PMA CH6.21;
- (ii) New policy objectives in respect of commercial development in rural areas and facilitating small workshops within the curtilage of dwellings(PMA CH6.25-6.26).

Chief Executive's Response:

As outlined above, Objective ED89 is not a policy that permits particular types of rural development in rural areas but rather it is intended to introduce controls on development that is acceptable in principle in rural areas under other policies of the Plan.

Notwithstanding, it would be appropriate to include a minor amendment to PMA CH6.21 (see Chief Executive's Recommendation under Recommendation 4 above) to provide for monitoring such development.

With regard to the amendments to PMA CH6.25 and PMA CH6.26 which deal with workshops in rural areas the Council note there is a need to encourage small start-up businesses in the rural area and flexibility in the creation of small businesses based on the talent, skills and creativity of rural people to create quality jobs in the rural area. PMA CH6.25 and PMA CH6.26 are intended to provide that flexibility to enable rural economic development.

The monitoring of such development is accepted as it will also identify the success of the Council's economic development initiatives in the rural areas. This is also provided for in the previous minor modification recommended to PMA CH6.21.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH6.25.

It is recommended that the Plan is made with PMA CH6.26 subject to the following minor modification (see blue text):

To facilitate the development of small workshops within the curtilage of a dwelling to

facilitate the setting up of a small business subject to the criteria set out in-Objective ED89.

Section 6.7.5.6 Commercial Development in Rural Areas and normal planning criteria and

assessment of impacts on neighbouring properties. The Council will monitor and report on

the number and nature of such applications granted.

4.2 Retail

Recommendation/Observation:

N/A

Relevant Alteration No:

PMA CH3.37 and PMA Retail 1

Summary:

The Office notes that, consistent with Observation 1, the Council should consider

amending the Retail Strategy so that the years/lifespan of the quantitative assessment

in the Retail Strategy coincide with the years of the plan.

Text of Recommendation/Observation: N/A

Chief Executive's Response:

See the Chief Executive's response to Observation 1 on pages 13-15 in Section 2 of this

report. No further modifications required.

Chief Executive's Recommendation:

It recommended that the Plan is made with PMA CH3.37 and PMA Retail 1.

Theme 5 Sustainable Transport and Accessibility

Relevant Alteration No:

PMA CH8.3

Summary:

The Office welcomes the Planning Authority's response to Recommendation 8 of the Office's

submission to the Draft Plan. PMA CH8.3 includes baseline figures for modalshare and

targets for 2027 for the county as a whole, and for Wexford, Gorey, Enniscorthy and New

Ross towns. However, they state that the evidence basis for both the county and settlement level targets is not clear, in particular whether a profiling of travel patterns has been undertaken. This is considered important given the level of commuter patterns between the north of the County and the Greater Dublin Area, and to better understand rural transport issues and the functional relationship between urban settlements and their associated rural catchments.

However, they note that the modal share targets will be reviewed as part of the LTP process for the four main towns and this will provide an opportunity for this type of analysis in relation to these settlements and in conjunction with the preparation of the relevant LAPs.

Submission WXF-C29-PMA-55 NTA state that further information should be provided with regard to how the targets were arrived at. They state that profiling should take place to inform these targets. The NTA further suggest that the preparation of a County-level Transport Strategy for this, to link with the LTPs, should be considered.

Submission WXF-C29-PMA-3 WexBUG suggest that the Plan includes a target for everyday cycling, having regard to Government expenditure on the issue. Under Smarter Travel, this target was set at 10% nationally.

Submission WXF-C29-PMA-30 South-East on Track suggest that there should be more ambition here, notwithstanding the need to be realistic, and encourage the following targets:

The Office also welcomes the other commitments to a sustainable transport strategy including implementation of the 10-minute town concept (PMA CH 8.11) and walking and cycling policies (PMA CH 8.21). The Office is aware that the Local Authority has been collaborating with the NTA under the Connecting Ireland project and as referenced above, early engagement in the preparation of LAPs and Settlement Planswill be important to maximise integration of land use and transport and having regard to the climate action agenda.

Text of Recommendations:

N/A

Chief Executive's Response:

The modal share targets of the Council were formulated to be both ambitious and realistic

having regard to the inadequate nature of public transport and the historic under-

investment in public transport, in particular rail, in County Wexford. In formulating the

targets the Council had regard to the information on settlement and County commuter flow

patterns contained in the Council's work with AIRO entitled Socio-Economic Profile 2 -

Commuting Flows (AIRO/WCC 2018).

The Council has committed to prepare LTPs and these will deal in detail and address modal

share targets. It is expected that further information will become available to assist the

Council through the National Annual Household Travel Survey (Action 69 in the National

Sustainable Mobility Action Plan April 2022).

The Council acknowledges the positive comments of the Office with regard to the other

sustainable transport objectives of the plan.

The preparation of a County-level Transport Strategy would be an excellent policy

development for the county. However, the Council has to focus its resources on the

preparation of the LTPs in order to progress the Local Area Plans for those towns.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH8.3.

5.1 Spatial Planning and National Roads Guidelines for Planning

Authorities

Relevant Alteration No: PMA 8.33

Summary:

This section deals with submissions from the Office, Transport Infrastructure Ireland (TII)

and Irish Water with regard to PMA 8.33. This PMA relates to Objective TS59 in Chapter 8

Transportation Strategy which details the Council's policy with regard to the exceptional circumstances under which accesses will be permitted onto National Roads.

The Office and TII welcome material amendment PMA CH 8.33, which gives greater effect to the Section 28 *Spatial Planning and National Roads Guidelines for Planning Authorities* (2012) in compliance to Recommendation 9 (iii) and part of 9(iv) of the Office's submission to the draft Plan.

However, the Office and TII consider that the Planning Authority has not full addressed the amendments required in respect of revisions required to Objective TS59 (Recommendation 9 (iv) of OPR original submission). The amendment retains the Category 1 (developments of national or regional importance) as an exceptional circumstance where access to national roads would be considered. TII state that this has not been subject to agreement with them. OPR and TII consider that retention of Category 1 defers critical road safety and policy considerations to the development management function, which is contrary to the Section 28 Ministerial Guidelines on *Spatial Planning and National Roads* (2012) and should therefore be reviewed to ensure compliance.

The Office notes that there has been a lack of engagement with TII in the preparation of the material amendments which could have avoided such non-compliance and that through minor modifications to the text there is an opportunity to ensure that policy TS59 is compliant with the guidelines.

TII also note that the policy refers to pre-planning discussions with TII. They state that they are not a planning authority and that planning decisions are the responsibility of the Planning Authority. They recommend that this element is removed.

Irish Water note that there are a number of projects planned in County Wexford over the coming years which may require the creation of additional access points or the generation of increased traffic from existing accesses. They state that provision should be made for this in Objective TS59.

Text of Recommendation 5: Spatial Planning and National Roads

Having regard to Recommendation 9 of the Office's submission to the Draft Plan and the *Spatial Planning and National Roads Guidelines for Planning Authorities* (2012), the Planning Authority is required by way of minor modification to include the following additional text (<u>in red</u>) and delete reference (shown strikethrough) to pre-application consultation with TII in Objective TS59 Category 1:

'The Council will only consider developments of national or regional importance under this category where access is proposed to/from non-motorway and non-dualcarriageway national roads. The Council will have regard to whether or not that national road is to be bypassed in its considerations. Such proposals are required to be subject to an evidence base and incorporated into the Development Plan by amendment or variation in accordance with the provisions of the Spatial Planning and National Roads Guidelines (2012) in advance of any decision to permit such proposals. Applicants for development will be required to undertake preplanning consultation with Transport Infrastructure Ireland'.

Chief Executive's Response:

The Council has no objection to further amending the objective to state that the Planning Authority will only permit new entrances under this category subject to an evidence base and that it would be incorporated into the Development Plan by amendment or variation.

It is envisaged that such an application for development of national or regional importance would only be considered in exceptional circumstances and that, in such circumstances, a lengthy delay to carry out a variation may not always be appropriate. A variation to a plan invariably takes six months from procurement of environmental consultants to adoption by Members. The development would then require a planning application which would likely mean that a development of national or regional importance would likely take over a year to get through the planning process.

It is therefore considered appropriate to insert a further modification to refer to such exceptions also being accommodated as a Material Contravention of the Development Plan under Section 34(6) of the Planning and Development Act 2000 (as amended).

Following Irish Water's request to Council to amend Objective TS59 to allow an exception for Irish Water projects the Council has consulted TII. TII state that while they commend Irish Water for engaging with the Council, they consider that the requirements of the Guidelines, particularly with regard to such exceptions being plan-led and evidence-based, have not been met. It is stated that no specific sites have been identified and no details have been provided to demonstrate compliance with Section 2.6 of the Guidelines with respect to developments of national and regional strategic importance. TII state that further engagement will be necessary to develop a plan-led, evidence-based approach to the identification of 'exceptional circumstances'. It will not be possible for the Council to engage in further consultation at this juncture so the introduction of an such an exception into Objective TS59 for Irish Water projects will have to be subject to a variation or material contravention of the Development Plan as set out in the amended Objective TS59.

The Council is aware TII have no role in decision making or formal pre-planning discussions but considered that, as is the case with other infrastructure providers, pre-application discussions would be useful to both the applicants and TII. The Council has no objection to removing this requirement.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH8.33 subject to the following further minor modifications to Category 1 (see blue text):

The Council will only consider developments of national or regional importance under this category where access is proposed to/from non-motorway and non-dualcarriageway national roads. The Council will have regard to whether or not that national road is to be bypassed in its considerations. Such proposals are required to be subject to an evidence base and incorporated into the Development Plan by amendment or variation in accordance with the provisions of the Spatial Planning and National Roads Guidelines (2012) or in exceptional circumstances by Material Contravention of the plan under Section 34(6) of the Planning and Development Act 2000 (as amended). The planning authority will consult with TII and have regard to their advice in all such instances Applicants for development will be required to undertake preplanning consultation with Transport Infrastructure Ireland'.

Theme 6 Climate and Renewable Energy

6.1 Climate Action

Observation 4: Climate Action Strategic Policy

Relevant Alteration No: PMA CH2.2. PMA CH2.3 PMA CH2.17 and PMA CH2.20

Summary:

The Office welcomes inclusion of PMA CH2.17 and CH2.20 which reference the forthcoming Local Authority Climate Action Plans and also commits to review the Plan in the context of the Section 28 Development Plans Guidelines on their adoption.

Both the Office and Submission WXF-C29-PMA-50 DECC observe that the PMA include references to the Climate Action and Low Carbon Development Act 2021 as the Bill and do not reference the Government's Climate Action Plan published in November 2021.

Text of Recommendation/Observation:

The Planning authority is requested to include, by way of minor modifications to the text throughout the Plan and in particular within Volume 10 Energy Strategy, accurate referencing to the enacted Climate Action and Low Carbon Development Act, 2021 (no longer in Bill form) and appropriate reference to the Government's Climate Action Plan 2021.

Chief Executive's Response:

The Climate Action and Low Carbon Development Act was published subsequent to the Chief Executive's Report on the Draft Plan. It is considered appropriate to update references to this Act where there was a PMA.

It is noted that the Climate Action Plan 2021 was published after the Members passed a resolution to amend the Draft Plan. There are a number of references to the Climate Action Plan 2019 in the Draft Plan and in the PMA relating to the Energy Strategy. It is not considered appropriate to amend however as policy documents change over the lifetime of the Plan. Furthermore, the 2019 Plan was used as a basis to calculate the Energy Balance

and it is not possible to update this balance within the available time. It is recommended

that a footnote be added to the Energy Balance to state that the 2021 Plan is now in place

(see response and recommendation to PMA ES.5 in Section 4 of this report with regard to

the Energy Balance and targets).

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH2.3, PMA CH2.17 and PMA

CH2.20.

It is recommended that the Plan is made with PMA CH2.2 subject to the following

minor modification to the new title of Section 2.2.3 and the associated first

paragraph as follows (see blue text to):

Section 2.2.3 Draft Climate Action and Low Carbon Development (Amendment) Bill,

2020-Act, 2021

This Bill, when enacted, will Act commits 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 Act includes the

following key elements:

6.2 Renewable Energy - Solar Development

Recommendation 6:

Solar PV

Relevant Alteration No: PMA ES.7, PMA ES.8, PMA ES.9, and PMA ES.14

Summary:

The Office refers to its previous submission in which it requested that the exclusion

zones around settlements be omitted and notes that instead of omitting exclusion

zones, the Planning Authority has sought to extend the number of settlements for which

exclusion zones apply (15 additional settlements). The Office notes that the Planning Authority has not amended the text setting out the justification for the exclusion zones and remains unconvinced of the soundness of the rationale for these exclusion zones, in the context of compact growth and where there is a considerable excess of lands zoned in settlements. Notwithstanding, it is acknowledged that Map 6 (PMA ES.10) provides for considerable areas of the county where solar farms are open for consideration.

The Office also notes that PMA ES.14 seeks to include a new objective to facilitate small scale solar energy developments in urban areas, industrial estates, business parks and small community-based proposals. They note that this could be considered as conflicting with the policy on exclusion zones around settlements. They state that they recognise that this policy has a different emphasis and relates to smaller scale solar energy development, as opposed to 'solar farms' however the relationship between this policy and the exclusion zones should be made clear.

WXF-C29-PMA-50 (Department of the Environment, Climate and Communications – hereon referred to as DECC) states that the increase in the volume of exclusion zones for solar energy is considered to be inconsistent with the increased ambition for renewable energy as set out in the Climate Action Plan 2021 and the rationale for same is unclear. The necessity for these exclusion zones in the initial Draft Plan is also questionable.

DECC states that it supports PMA ES.14 but states it would be preferable if the objective did not limit the size of such installations by way of an undefined reference to "small scale" as such a limitation is considered unnecessarily restrictive.

Text of Recommendation 6 – Solar PV

Having regard to the Government's commitment in the Climate Action Plan 2021 which sets out a target of increasing the share of electricity demand generated from renewable sources up to 80% by 2030 (including an increased specific targets of up to 12.5GW of solar renewable energy), National Policy Objective 55 which promotes renewable energy use and generation to meet national targets, and in the interests of clarity and transparency, the Planning Authority is required to include a minor modification to the

Energy Strategy (Volume 10) to include the following:

- (i) Clarification of the relationship between new policy objective PMA ES.14 in respect of smaller scale solar developments and the exclusion zones around settlements as per map 5 and PMA ES.7. As these policies couldbe interpreted to be internally conflicting; and
- (ii) A commitment to undertake a strategic review of the solar PV exclusion zones of 1km around the four settlements in Level 1 (SIC) and the 250 metres exclusion zone around settlements in Levels 2-4. This review should be undertaken in tandem with the preparation of Local Area Plans and variations to the Development Plan to incorporate town and village plans(as per PMA CH3.24 and 3.26).

Chief Executive's Response:

The exclusion zones around settlements (PMA ES.7, PMA ES.8 and PMA ES.9 refer) were amended to ensure consistency with the Settlement Hierarchy. It is considered appropriate to include all Level 3 and Level 4 settlements to ensure a consistent approach. The application of these exclusion zones to allow for the future expansion of these settlements is considered reasonable, in particular, in the absence of any national guidelines. It is also considered, and acknowledged by the Office, that sufficient lands have been provided where solar farms are open for consideration.

The Office's recommendation to clarify the relationship between small scale solar developments and the exclusion zones to avoid any misinterpretation in their application is noted and it is recommended that this is done by way of a minor modification to the text in PMA ES.7.

The comment from the DECC with regard to the impact of the exclusion zones on the achievement of energy targets is noted, however it is considered that the exclusion zones will not have a significant effect on the achievement of renewable energy targets during the plan period (Refer to PMA ES.5 in Section 4.8 which deals with Energy Balance and targets).

The comments from DECC with regard to the scale of solar developments in the exclusion zone is noted but the removal of the word 'small scale' would render the exclusion zones ineffective.

The Office's second recommendation to include a commitment to undertake a strategic review of the solar PV exclusion zones when work is being done with regard to settlement boundaries is noted. However, it is considered more appropriate to review the exclusion zones as part of the SEA monitoring and the two-year review process and as part of review of the Energy Strategy following the adoption of national guidelines, where relevant, rather than in tandem with the preparation of Local Area Plans and variations to the development plan to incorporate town and village plans.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA ES.7 subject to the following further minor modification (see blue text) and PMA ES.8, PMA ES.9, PMA ES.14:

Settlements

Ground mounted solar PV developments (solar farms) are generally not considered an efficient use of land within the built-up areas of towns and villages and should be avoided in these areas. A minimum exclusion zone around towns and villages is also considered appropriate to allow for the future expansion of these settlements in a compact and sequential manner. Therefore, an exclusion zone of 1km has been applied around the four main towns while an exclusion zone of 250 metres has been applied around villages. Only key towns, large towns, level 3(a) service settlements, level 3(b) strategic settlements and Level 4 Large Villages included in the Settlement Hierarchy in the Pre-Draft County Development Plan were included 11. The exclusion zones are shown on Map 5. Exceptions may be made for small scale solar energy development projects within these exclusion zones in accordance with Objective ESXX (not number yet PMA ES.14 refers). For applications for ground mounted solar PV developments in proximity to a town or village, the views from the settlement should be considered as part of the design process.

6.3 Renewable Energy – Wind

Recommendation 7: Wind Farm Consent Letter

Relevant Alteration No: PMA ES.17 and PMA ES.20

Summary:

The Draft Plan stated that a turbine would not be permitted without a letter of consent from a landowner where a turbine would be located within 250m of an adjacent landholding. PMA ES.17 and PMA ES.20 increased this distance to 300m and stated that it would include residential and agricultural landholdings.

The Office notes that there is no basis for the requirement for letters of consent from adjoining landowners and states that this policy is inconsistent with Section 28 Wind Energy Development Guidelines (2006) and the associated Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change (2017) and could impede the delivery of wind energy development which is a government commitment in the Climate Action Plan 2021.

WXF-C29-PMA-50 (DECC) states that the increase in the mandatory set-back to 300m is not supported and, in particular, the reference to "agricultural landholdings" is considered to have significant practical implications for the future development of wind energy in the County and not a concept that is referred to in any statutory guidance. The DECC state that the Council should map this restriction against the available land for wind energy as set out in Map 14 to establish whether the targets set out in the preceding tables can be met, given this restriction. It is submitted that these amendments would render it extremely difficult to develop any wind energy in the County as currently worded and should be removed.

WXF-C29-PMA-46 (FuturEnergy Ireland) notes that no sound evidence basis is provided for the application of this restriction, the impact of it has not been considered in terms of the Council's onshore wind targets and it has no basis in national or regional policy and is contrary to the requirements in the Wind Energy Guidelines 2006 and Draft Guidelines 2019. This also does not appear to have been considered in the SEA Report in terms of

impact on the climatic factor. It is requested that this amendment be removed from the Plan in its entirety.

WXF-C29-PMA-49 (WEI) references the Office's submission on the Draft Plan and considers this to be an unnecessary and uncorroborated figure to insert into a policy and is of the view that it will lead to a greater substantial reduction in the viability of deliverable land for Wind Energy developments.

WXF-C29-PMA-56 (John Fleming) requests that the distance stated in PMA ES.17 be amended to state 6 times the tip height or 900 metres from an adjoining boundary of an adjacent landholding (including residential and agricultural landholdings) unless the written consent of the owner is given.

WXF-C29-PMA-13 and WXF-C29-PMA-14 (Marie Redmond) and WXF-C29-PMA-15 (John O'Brien) request that the PMAs include 'river' in addition to boundary (i.e., wind turbines will not be permitted within 300m of a river) as the landholdings in the lowlands that are open for consideration and acceptable in principle have many rivers flowing through them.

Text of Recommendation 7 – Wind Consent Letter

Having regard to the Government's commitment in the Climate Action Plan 2021 which sets out a target of increasing the share of electricity demand generated from renewable sources up to 80% by 2030 (including an increased specific targets of up to 5 GW of offshore renewable energy), National Policy Objective 55 which promotes renewable energy use and generation to meet national targets, and the section 28 guidelines *Wind Energy Development Guidelines* (2006) and the *Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change* (2017), the Planning Authority is required to omit the requirement for adjoining land owner consent in the written narrative of the Plan and to make the Plan without PMA ES.17 and PMA ES.20.

Chief Executive's Response:

The Interim Guidelines for Planning Authorities and Statutory Plans, Renewable Energy and Climate Change (2017) contains a Specific Planning Policy Requirement to "demonstrate"

detailed compliance with item number (2) above in any proposal by them to introduce or vary a mandatory setback distance or distances for wind turbines from specified land uses or classes of land use into their development plan or local area plan. Such a proposal shall be subject to environmental assessment requirements, for example under the SEA and Habitats Directives. It shall also be a material consideration in SEA, when taking into account likely significant effects on climatic factors, in addition to other factors such as landscape and air, if a mandatory setback or variation to a mandatory setback proposed by a planning authority in a development plan or local area plan would create a significant limitation or constraint on renewable energy projects, including wind turbines, within the administrative area of the plan."

Item 2 of the Interim Guidelines for Planning Authorities and Statutory Plans, Renewable Energy and Climate Change (2017) contains a Specific Planning Policy Requirement to "indicate how the implementation of the relevant development plan or local area plan over its effective period will contribute to realising overall national targets on renewable energy and climate change mitigation, and in particular wind energy production and the **potential** wind energy resource (in megawatts)".

It is considered that PMA ES.5 adequately sets out how the development plan will contribute to realising overall national targets on renewable energy. Tables 5 and 6 demonstrate what would be required to achieve County Wexford's share of the national 70% target by 2030 (albeit the national target is now 80%). The Draft Energy Strategy (Page 27) and the PMA (page 14 of Book 3) outline the Council's is commitment to achieving the national renewable energy targets and state that the Strategy sets a target of 100% of the County's consumption (1,536 GWh) by 2027 thus setting out that County Wexford will be providing well in excess of its population share towards the 70% national renewable energy target by 2030. It is further stated that the target will be met through a combination of renewable energy developments

With particular reference to wind, the Energy Balance shows that installed onshore wind farms in County Wexford currently provide 182MW with the projected installed capacity as 244MW in 2030, to reach 70% at county scale following the trajectory in the NECP thus

setting out the potential contribution. Chapter 5 identifies the areas 'acceptable in principle' and 'open for consideration' for new wind farm developments and sets out the policy for extending and/or repowering of existing wind farms in all areas.

The requirement for the written consent of the adjoining landowner for wind turbines within 250 metres of the boundary of an adjacent landholding was included in the Wind Energy Strategy contained in the CDP 2013 and was carried forward in the Draft CDP 2021-2027. This policy is considered reasonable, as to exclude it could result in the sterilisation of adjoining land.

It is acknowledged that the increase to 300 m proposed in the PMA ES.17 and ES.20 could potentially affect the achievement of renewable energy targets for the County and, on review and having regard to the submission from the Department of Environment, Climate and Communications, could have negative impacts in terms of potential conflict with SEOs in the Environment Report in relation to climate. It is considered that increasing this to 900m as requested in submission WXF-C29-PMA-56 would exacerbate that situation.

The comments from Marie Redmond are noted, however it is not considered necessary to include a setback from rivers in the PMA and any potential impact on rivers will be assessed at the project level on a case-by-case basis. There are also objectives in Volume 1 Written Statement Chapter 11 regarding buffer zones around rivers which will apply to any development.

See also Section 4.8 which deals in further detail with submissions relating energy and energy targets.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA ES.17 and PMA ES.20 as further modified (revert to the distance in the Draft plan but retain the wording on residential and agricultural holdings) – (see blue text)

PMA ES.17

Amend the last line of the third paragraph on page 54 as follows:

Similarly, turbines shall not be permitted within <u>250 metres</u> <u>300m</u> of the boundary of an adjacent landholding <u>(including residential and agricultural landholdings)</u>, unless the written consent of the owner is given.

PMA ES.20

Insert an additional bullet point in Section 5.7 Siting, Layout and Design after bullet point 2 on page 74 as follows:

Wind turbines will not be permitted within 300250 metres of the boundary of an adjacent landholding (including residential and agricultural landholdings), unless the written consent of the owner is given.

Section 3 - Submission WXF-C29-PMA-18 Southern Regional Assembly

Overview

The Southern Regional Assembly (SRA) acknowledge and commend the continued work undertaken in the preparation of the Plan and commend the Council on the inclusion of amendments which address key RSES Strategy policy objectives.

The SRA note and welcome in detail many of the PMAs to Volume 1 Written Statement of the Draft Plan. The PMA to Volume 2 Development Management Manual, Volume 3 Settlement Plans and Specific Objectives, Volume 4 Section 28 Statement of Compliance, Volume 5 Record of Protected Structures, Volume 8 Retail Strategy and Volume 9 Housing Strategy are also noted.

The SRA further notes that Volume 12 Strategic Environmental Assessment was updated to include a more detailed consideration of the Preferred Plan Scenario as requested by SRA in their submission on the Draft Plan.

Summary of Issues Raised

The SRA raise a number of issues in relation to PMA which the Planning Authority are requested to address. The observations/issues raised are intended to assist and support the Council in achieving successful alignment of the Development Plan with the Regional Spatial and Economic Strategy for the Southern Region (RSES) and National Policy Objectives.

Summary of Issue No. 1:

In relation to PMA CH2.2, PMA CH2.3 and PMA CH2.25 in Chapter 2 Climate Action:

- (a) The Planning Authority is requested to update references to the Climate Action Plan 2021 and associated legislation – PMA CH2.2 (Climate Action and Low Carbon Development (Amendment) Bill, 2020 and PMA CH2.3 (Climate Action Plan 2019) refer.
- (b) PMA CH2.25 refers to a new Climate Action Strategic Objective with regard to a 'Decarbonisation Zone' in the county but does not state where or when this will be

identified. The Council is requested to address this issue, which relates to a requirement under the Climate Action Plan 2021.

Chief Executive's Response

In relation to Point (a) this was noted in a number of submissions and observations received, including the OPR. Please refer to the Chief Executive's Response under Theme 6 – Climate Action and Renewable Energy - Observation 4 in Section 2 of this report regarding same.

In relation to Point (b), the Council has submitted their proposed Decarbonisation Zone to the Department of Housing, Local Government and Heritage and are currently awaiting approval. As such it is considered premature to amend the wording to specify an area in the county in the Plan.

Summary of Issue No. 2:

In relation to **PMA 3.34** in Chapter 3 Core Strategy, the SRA is concerned about the reduction in population allocated to New Ross Town. PMA 3.34 would result in a reduction in projected population increase for New Ross from 9,247 to 8,558. While it is acknowledged that PMA CH3.54 incorporates a review mechanism as part of the two-year review of the County Development Plan, the PMAs for New Ross would result in a lower growth trajectory for New Ross and would be contrary to the SRA's previous observation on the Draft Plan with regard to Waterford MASP policy to support 'sustainable growth of settlements in the Hinterland Area' as locations which can provide 'long-term options for employment and residential locations, supported by sustainable transport links to the Metropolitan Area'. In this regard, the Council is requested to review PMA CH3.34 with regard to the population allocation for New Ross.

Chief Executive's Response

Concerns relating to the allocation of population to New Ross Town were also raised in the OPR's submission. Please refer to the Chief Executive's Response and Recommendation under Recommendation 2 of the OPR in Section 2 of this report regarding same.

Summary of Issue No. 3:

In relation to PMA CH6.4 Strategic Economic Development Objective ED04 regarding the Eastern Economic Corridor, it is requested that the stakeholders referenced also include the SRA.

Chief Executive's Response

The request is noted, and it is recommended that PMA CH6.4 is further modified to include the SRA as a stakeholder.

Summary of Issue No.4:

The SRA state that the Council should ensure that the PMA including PMA ES.16 and Map 14 in Volume 10 Energy Strategy meets the requirements of the 'Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change' (DHPC, July 2017), and in particular, Section 4 which relate to the SPPR.

Chief Executive's Response

Please refer to the Chief Executive's Response and Recommendation in Section 4.8 under PMA ES.16.

Summary Issue No.5:

The Planning Authority should note that the RSES is informed by extensive environmental assessments which looked at environmental sensitivities for all parts of the Region. The SRA recommend that the Council review these documents to inform the Council's own environmental assessments of the PMA and to ensure that the mitigation measures identified to address the environmental sensitivities and constraints are included in the final Plan where relevant.

Chief Executive's Response

Please refer to Section 4.10 which deals with submissions relating to the SEA.

Chief Executive's Recommendation

It is recommended that the Plan is made with PMA CH6.4 subject to the following minor modification (see blue text):

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. The Council will consult with relevant stakeholders including other local authorities, the Southern Regional Assembly and the Eastern and Midlands Regional Authority in order to plan and optimise economic development.

Section 4 - Other Submissions and Observations

Volume 1 - Chapter 1 Introduction 4.1.1

The following submissions were received on the PMA to Chapter 1:

Alteration No.	PMA CH 1.8
Chapter/Section	Section 1.6.4

Proposed Material Alteration

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 highquality 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.

Submission(s) Received on PMA:	WXF-C29-PMA-30 South-East on Track
	WXF-C29-PMA-47-Dunne
Summary of Issues:	

Submission WXF-C29-PMA-47 Dunne welcomes this PMA.

Submission WXF-C29-PMA-30 South-East on Track suggests that the second paragraph be further amended by adding the words 'increased access to sustainable transport' after 'active travel' in the fifth sentence.

Chief Executive's Response:

The support for the PMA is noted and welcomed. The focus of the PMA is to improve health and well-being by increasing physical activity through the active travel modes of walking and cycling, rather than a focus on increasing access to sustainable transport. Accordingly, it is not considered relevant to include the suggested line to this paragraph.

Chief Executive's Recommendation:

It is recommended that that the Plan is made with PMA CH1.8.

General Observations Received on Chapter 1 Introduction

Submission WXF-C29-PMA-47 Dunne notes PMA numbers CH.1, CH1.2, CH1.3, CH1.4, CH1.5, CH1.6 and CH1.7.

Chief Executive's Response:

No issues raised in relation to the PMAs.

Chief Executive's Recommendation:

None required.

4.1.2 Volume 1 - Chapter 2 Climate Action

The following submissions were received on the PMA to Chapter 2:

Alteration No.	PMA CH2.2
Chapter/Section	Section 2.2.5 Climate Action Plan 2019

Proposed Material Alteration

Delete Section 2.2.3 National Mitigation Plan on pages 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.

Submission(s) Received on PMA: WXF-C29-PMA-50 Department of the Environment, Climate and Communications (DECC)

Summary of Issues:

The issues raised in relation to this PMA are summarised under Theme 6 Climate and Renewable Energy in Section 2 of this report.

Chief Executive's Response:

Please refer to pages 58-59 in Section 2 of this report for the Chief Executive's Response

Chief Executive's Recommendation:

Please refer to the Chief Executive's Recommendation under Theme 6 – Observation 4 in Section 2 of this report which recommends a minor modification to the wording of PMA CH2.2 (see page 59 in Section 2).

Alteration No.	PMA CH2.3 and PMA CH2.25
Chapter/Section	Section 2.2.5 Climate Action Plan 2019 and Section 2.4 Climate Action Spatial Planning Strategy
	Chinate Action Spatial Flamming Strategy

Proposed Material Alteration

PMA CH2.23

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.

PMA CH2.25

Insert a new Climate Action Strategic 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.

Submission(s) Received on PMA:	WXF-C29-PMA-47 Dunne
	WXF-C29-PMA-50 Department of the Environment, Climate and Communications (DECC)

Summary of Issues:

Submission WXF-C29-PMA-47 Dunne queries what is meant by a Decarbonising Zone, and is it envisaged that such zones can be visited?

The issues raised by Submission WXF-C29-PMA-50 DECC are summarised under Theme 6 Climate and Renewable Energy in Section 2 of this report.

Chief Executive's Response:

With regard to the Climate Action Plan 2021, the comments are noted. This issue is addressed under Theme 6 – Climate Action and Renewable Energy - Observation 4 of the OPR's submission. Please refer to pages 58-59 in Section 2 of this report for the Chief Executive's Response and Recommendation.

As outlined in the wording of the PMA, a Decarbonising Zone can be applied to an urban area with a population of 5,000 or more or a rural area with an area of 4km² or more. Its purpose is to focus on implementing measures and projects that reduce carbon emissions from all aspects of life in the 'zone', thereby 'decarbonising' the zone/spatial area e.g. private dwellings houses, local businesses, open spaces, parks, active travel and electric vehicles. This will lead to complimentary social, health and well-being improvements for people living in the zone, economic improvements and opportunities for local businesses and improvements in local natural heritage and biodiversity. There may be public projects that can be visited as part of that zone e.g. energy-related projects.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH2.25.

Please refer to the Chief Executive's Recommendation under Theme 6 – Observation 4 in Section 2 of this report for the response and recommendation relating to PMA CH2.3 (see pages 58-59).

Alteration No.	PMA CH2.5
Chapter/Section	Section 2.2.11 Climate Action Regional Office

Proposed Material Alteration

Insert a new Section 2.2.11 titled Climate Action Regional Office on pages 29-30 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.

Submission(s) Received on PMA:	WXF-C29-PMA-47 Dunne
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Summary of Issues:

This submission is concerned that CAROs will introduce another layer of scrutiny into the planning system.

Chief Executive's Response:

The comment is noted. The Council welcome the work of the CARO who provide invaluable expertise and research assistance to the local authority in its climate action work.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH2.5.

Alteration No.	PMA CH2.8
Chapter/Section	Section 2.4.2 Mitigation and Spatial Planning

Proposed Material Alteration

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

<u>Transportation Strategy, encouraging encourage</u> 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.

Submission(s) Received on PMA:

WXF-C29-PMA-30 South-East on Track

WXF-C29-PMA-47 Dunne

Summary of Issues:

Submission WXF-C29-PMA-30 South-East on Track requests a re-ordering of existing text to reflect the following hierarchy - active travel, sustainable/public transport, finally electric vehicles. The re-ordered text would read as follows:

Facilitate a modal shift towards sustainable transport options as set out in Chapter 8

Transportation Strategy, encourage and facilitate a significant increase in the active travel modes of walking and cycling and associated infrastructure, 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 the use of electric vehicles by ensuring EV infrastructure is in place.

Submission WXF-C29-PMA-47 Dunne submits that this is contradicted by the hugely conservative new housing aspirations and sequential development strategy. Why not encourage waking and cycling to work as well as for leisure by planning for self-contained compact settlements where work and school is as close to home as possible.

Chief Executive's Response:

The comments are noted, and it considered appropriate to re-order the wording of the text in the first paragraph as suggested by South-East on Track.

As previously discussed in the Chief Executive's Response to the OPR's submission (see Theme 1 Core Strategy and Settlement Strategy – Recommendation 1 Housing Supply Targets pages 14-29 in Section 2 of this report), the housing targets in the Plan are informed by the Section 28 Housing Supply Targets issued by the Department of Housing, Local Government and Heritage to all local authorities.

The Plan strongly promotes the development of a sustainable transport/active travel model together with the '10-minute town' concept which aims to have all community facilities and services accessible within a 10-minute walk or cycle from homes or be accessible by public transport services connecting people to larger scaled settlements.

The sequential approach to development is an important spatial planning tool. Its purpose is to avoid the 'leap frogging' to less centrally located areas. This approach ensures that the most centrally located development sites in a settlement are prioritised for development first, with more peripheral located development sites being considered subsequently. The implementation of this approach is central to the delivery of compact growth, the 10-minute town concept, achieving an efficient use of land and maximising investment in enabling physical infrastructure.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH2.8 subject to a further minor modification (see blue text):

Facilitate a modal shift towards sustainable transport options as set out in Chapter 8

Transportation Strategy, encourage and facilitate a significant increase in the active travel modes of walking and cycling and associated infrastructure, 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 the use of electric vehicles by ensuring EV infrastructure is in place. encourage and facilitate a significant increase in the active travel modes of walking and cycling and associated infrastructure.

Alteration No.	PMA CH2.9
Chapter/Section	Section 2.4.2 Mitigation and Spatial Planning

Proposed Material Alteration

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 <u>and promote the development</u> <u>of remote working hubs in towns and villages</u> so as <u>in order</u> to reduce the amount of unsustainable commuting out of the county for work, much of which is car-based commuting.

Submission(s) Received on PMA:	WXF-C29-PMA-47 Dunne
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Summary of Issues:

The submission welcomes this PMA but notes that the provision of adequate housing is needed.

Chief Executive's Response:

The comments are noted. This submission raises the issue of inadequate population allocations and housing allocations under a number of different PMA. This issue is collectively responded to under PMA CH3.33 in Chapter 3 Core Strategy.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH2.9.

Alteration No.	PMA CH2.23
Chapter/Section	Climate Action Strategic Objective CA16

Proposed Material Alteration

Amend Climate Action Strategic 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, Climate Action and Communications.

Submission(s) Received on PMA:

WXF-C29-PMA-50 Department of the Environment, Climate

and Communications (DECC)

Summary of Issues:

The DECC request that this PMA is corrected to refer to them as the Department of the Environment, Climate and Communications.

Chief Executive's Response:

The request is noted and it is recommended that the PMA be further modified as requested.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH2.23 subject to the following further minor modification to the last line of the paragraph (see blue text):

....and the Department of Communications, Climate Action and the Environment the Environment, Climate Action and Communications.

General Observations Received on Chapter 2 Climate Action

Submission WXF-C29-PMA-47 Dunne notes PMA CH2.1, PMA CH2.2, PMA CH2.4, PMA CH2.6, PMA CH2.7

Chief Executive's Response:

No issues raised in relation to the PMAs.

Chief Executive's Recommendation:

None required.

4.1.3 Volume 1 - Chapter 3 Core Strategy

The following submissions were received on the PMA to Chapter 3:

Alteration No.	PMA CH3.2
Chapter/Section	Core Strategy Guiding Principle D – Utilising the proximity to the Waterford MASP
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Proposed Material Alteration

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 <u>and the possible</u> 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.

Submission(s) Received on PMA:	WXF-C29-PMA-47 Dunne
Summary of Issues:	

Summary of Issues:

This is an excellent policy; the retention of a permanent railway in tandem with the Greenway.

Chief Executive's Response:

The comments are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH3.2.

Alteration No.	PMA CH3.4
Chapter/Section	Core Strategy Guiding Principle E— Utilising the
	proximity to the Waterford MASP
Proposed Material Alteration	

Amend Section 3.4 Core Strategy Guiding Principle E on page 47-48 by adding the following

text at the end of the paragraph:

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.

Submission(s) Received on PMA: WXF-C29-PMA-47 Dunne

WXF-C29-PMA-55 National Transport Authority (NTA)

Summary of Issues:

Submission WXF-C29-PMA-47 Dunne submits that this is stalling the provision of new housing and employment centres. There is far too much emphasis on phasing. Sites should be developed if the infrastructure is available. Planning conditions and development levies will ensure that a serviced site is properly developed.

Submission WXF-C29-PMA-55 NTA supports this PMA. The preparation of local transport plans for the larger settlements should play a critical role in the delivery of compact, sustainable growth with the timely delivery of appropriate infrastructure in a plan-led manner.

Chief Executive's Response:

The concerns about this approach, in particular, phasing is noted. The tiered approach to zoning is embedded in the National Planning Framework to ensure appropriate linkages between the zoning of land and the availability of infrastructure. The phased approach to development is critical in ensuring that identified and required new infrastructure is delivered in tandem with new development.

The NTA's support for this PMA is noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH3.4.

Alteration No.	PMA CH3.8
Chapter/Section	Chapter 3 Core Strategy

Proposed Material Alteration

Amend Figure 3-1 Core Strategy Map on page 50 to include the Rosslare –

Waterford rail line and potential greenway.



Submission(s) Received on PMA: WXF-C29-PMA-30 South-East on Track

Summary of Issues:

The Wexford/Rosslare-Waterford rail link should be shown going through the village of Campile and not north of it as currently detailed. The rail line should possibly be delineated in a similar colour to the active rail line from Rosslare to Dublin.

Chief Executive's Response:

The comments are noted. It considered appropriate to modify the map to show the rail line going through Campile village. A different colour was applied to this rail line as it is referring to

both a rail line and a potential greenway. As such it is not considered appropriate to modify the colour.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH3.8 subject to a further minor modification to show the rail line going through Campile village.

Alteration No.	PMA CH3.13
Chapter/Section	Section 3.6.1 Level 1 Key Towns

Proposed Material Alteration

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.

Submission(s) Received on PMA:	WXF-C29-PMA-47 Dunne
Summary of Issues:	

This is an excellent amendment.

Chief Executive's Response:

The comments are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH3.13.

Alteration No.	PMA CH3.15
Chapter/Section	Wexford Town Development Approach

Proposed Material Alteration

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, <u>commercial redevelopment</u>, 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, and Monck Street and the Commercial Quay area.

Submission(s) Received on PMA:	WXF-C29-PMA-9 Kloss
Summary of Issues	

Summary of Issues:

The submission notes the priority is to build on existing brownfield and infill sites in the town in order to achieve compact growth. The town centre is seriously over-crowded already all throughout the year and there are existing pressures including traffic congestion and accessibility issues for older people. There is a need for greater space and more disabled car parking in the town.

Increased housing density building upon existing infrastructure may increase traffic congestion. The town needs expansion outwards in a safe and environmentally friendly way, and should expand, possibly towards Rosslare or at least the existing by-pass, thereby taking the pressures away from the town centre. This would mean that the new Trinity Wharf development can be more readily accommodated.

Priority should be given to further provision for remote learning as well as the building of a new campus for the University of the South-East.

Chief Executive's Response:

The concerns outlined in the submission are noted. The spatial planning framework for the town will be set out in the new Wexford Town and Environs Local Area Plan (LAP) which will also be informed by a Local Transport Plan and a Town Centre Health Check.

The comments regarding the need to facilitate remote learning are noted. Chapter 15 Sustainable Communities and Social Infrastructure Strategy includes a suite of objectives to support education and lifelong learning in the county. These, together with the objectives in the Plan to improve broadband connectivity across the county, will improve opportunities for remote working and remote learning.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH3.15.

Alteration No.	PMA CH3.16
Chapter/Section	Wexford Town Development Approach

Proposed Material Alteration

Amend the following points in the Wexford Town Development Approach on pages 55-56 as follows:

- 4. Focus on development in the town that supports the function and expansion of Rosslare Europort, <u>including improvements to transport links</u>, 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.

Submission(s) Received on PMA:

WXF-C29-PMA-9 Kloss

WXF-C29-PMA-30 South-East on Track

Summary of Issues:

Submission WXF-C29-PMA-30 South-East on Track strongly supports the mention of rail infrastructure and services in this PMA.

Submission WXF-C29-PMA-9 Kloss refers to the need for further economic development and infrastructure development in Wexford Town. The positive impact of Rosslare Europort as a gateway to continental Europe needs to lead to beneficial effects for Wexford and its environs. In this regard, the submission welcomes the references to the need for entrance links from Rosslare and Wexford to the new Oilgate – Rosslare Harbour Scheme. The delivery of housing, infrastructure and industrial needs to be accelerated in Wexford, particularly given Wexford's geographical position as a priority gateway for continental Europe. The bypass of the town will soon be inadequate given all these future pressures.

Chief Executive's Response:

The Council agrees that the delivery of housing, infrastructure and economic development and employment is very important for Wexford Town. The Council will continue to work with all key State agencies and stakeholders to progress the development of Wexford Town as a Key Town and self-sustaining regional driver including the delivery of infrastructure such as rail.

As previously outlined, the spatial planning framework for the town will be considered in detail during the preparation of the Wexford Town Local Area Plan. This LAP will be informed by a number of strategies including a Local Transport Plan, an Economic Development Strategy and a Town Centre Health Check.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH3.16.

Alteration No.	PMA CH3.22
Chapter/Section	Section 3.6.2 Level 2 Large Towns – New Ross Town

Proposed Material Alteration

Insert a new bullet point after bullet point 2 in Section 3.6.2 Level 2 Large Towns – New Ross Town on page 64 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. This strategy will be informed by a report commissioned by the Council which will consider the strengths, opportunities, impacts and consequences of the Waterford MASP on South Wexford and New Ross.

Submission(s) Received on PMA:	WXF-C29-PMA-55 National Transport Authority (NTA)

Summary of Issues:

In relation to the importance attributed to the Waterford MASP for the future development of New Ross, the NTA reiterate its recommendation that 'of particular importance in Wexford County will be the identification of and spatial definition of those areas which come under the influence of the Waterford Metropolitan Area through the examination of movement patterns across a range of journey purposes'.

Chief Executive's Response:

The comments are noted. The Local Transport Plan and the New Ross Town and Environs Local Area Plan will consider the various different relationships between the town and the Waterford MASP.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH3.22.

Alteration No.	PMA CH3.11 and PMA CH3.24
Chapter/Section	Section 3.5 Core Strategy Settlement Hierarchy and
	Section 3.6.3 Level 3 Settlements

Proposed Material Alteration

PMA CH3.11

Amend Table No 3-2 County Wexford Settlement Hierarchy in Section 3.5 Core Strategy Settlement Hierarchy on page 52 to show the sub-division of Level 3 settlements into Level 3a and Level 3b and the movement of a number of settlements between Levels 4, 5 and 6. Please refer to page 22 of Book 1 of the PMA documents for the full wording and associated table.

PMA CH3.24

Amend Section 3.6.3 Level 3 Settlements and insert a new Section 3.6.4 titled Level 3b Strategic Settlement from page 65 as follows:

3.6.3 Level 3<u>a</u> Service Settlements

There are 14-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 oOthers 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 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. 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 <u>Courtown and Riverchapel-Kilmore Quay</u>, 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. <u>Settlement Plans including Sepecific objectives and land use zoning for these settlements are included in Volume 3.</u>

Castlebridge and Rosslare Strand also have populations >1,500. Settlement Plans including Sepecific 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 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 growth 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.

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.

Submission(s) Received on PMA:	WXF-C29-PMA-30 South-East on Track
	WXF-C29-PMA-47 Dunne

Summary of Issues:

Submission WXF-C29-PMA-30 South-East on Track suggests that the following alteration be made to the fifth bullet point under the Development Approach for Level 3a Service Settlements (see red text below):

Focus on maximising opportunities presented to settlements located on, or in close

proximity, to planned greenway routes, rail lines and at coastal locations.

This submission also suggests the same alteration to the fifth bullet point under the Development Approach for Level 3b Strategic Settlements (see red text below):

 Focus on maximising opportunities presented to settlements located on, or in close proximity to planned greenway routes, rail lines and the coast.

The submission also recommends that an additional bullet point be added to the Level 3b Strategic Settlements Development Approach (see red text below):

In the event of the reopening of the Wexford/Rosslare to Waterford Rail Line,
 tailor population growth, infrastructure, and development in Bridgetown,
 Campile, and Wellingtonbridge to reflect the new possibilities offered by this
 sustainable transport connection.

Submission WXF-C29-PMA-47 Dunne welcomes the amendment from moderate population growth to tailored population growth, particularly in relation to Rosslare Harbour and Kilrane. However, as the sequential approach is being retained and cannot be commented on at this stage, it is unclear what this shift will mean in practice.

Chief Executive's Response:

There is merit in including the reference to rail lines as suggested by South-East on Track, and it is recommended that those two bullet points be modified accordingly.

While the premise behind the requested additional bullet point is noted, the Council has already considered these issues and settlements when deciding their position on the Settlement Hierarchy in the Core Strategy. No modification required.

As previously responded to under PMA CH2.8 (Chapter 2 Climate Action), the application of the sequential approach is an important planning tool prioritising the development of spatially central sites first and avoiding the leap frogging to less centrally located sites. As outlined in the Tiered Approach to Zoning (see PMA CH4.17), residential zoned lands will be prioritised for development based on a number of 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, availability of and proximity to amenities, schools, shops or employment, accessibility to transport services and the availability of infrastructure.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH3.11.

It is recommended that the Plan is made with PMA CH3.24 subject to the following further minor modification (see blue text) to the fifth bullet point in the Development Approaches for both the Level 3a Service Settlements and Level 3b Strategic settlements:

 Focus on maximising opportunities presented to settlements located on, or in close proximity, to planned greenway routes, <u>rail lines</u> and at coastal locations.

Alteration No.	PMA CH3.32
Chapter/Section	Section 3.7.2 Achieving NPF Brownfield/Infill Targets

Proposed Material Alteration

Amend Section 3.7.2 Achieving NPF Brownfield/Infill Targets 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 <u>land use</u> zoning <u>plans</u> 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 <u>or Settlement Plans</u> to determine their ability to achieve infill <u>or</u> brownfield development, compact growth and higher densities. As such <u>for the purposes of the Core Strategy</u> an assumed density of 25 <u>35</u> 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 <u>3a Settlements</u>. 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 Development in Urban Areas (DEHLG, 2009). <u>See Section 4.7.2.1 for further details.</u>

Submission(s) Received on PMA: WXF-C29-PMA-47 Dunne

Summary of Issues:

This PMA is welcomed. Compact growth should mean what it is says; housing, workplace and education as near as locally possible.

Chief Executive's Response:

The comments are noted and welcomed. As previously responded to under PMA CH2.8 (Chapter 2- Climate Action), the Plan strongly promotes the development of new housing, employment and services in towns and villages in the county.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH3.32.

Alteration No.	PMA CH3.33
Chapter/Section	Section 3.7.3 Core Strategy Population Allocations

Proposed Material Alteration

Amend Section 3.7.3 Core Strategy Population Allocations 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 the four main towns growth was front loaded to that 60% of the growth allocated to 2040 would take place in between 2016 – 2026 and the remainder would take place between 2026 – 2040. 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.

Submission(s) Received on PMA:	WXF-C29-PMA-47 Dunne
	WXF-C29-CH3.33 National Transport Authority (NTA)

Summary of Issues:

Submission WXF-C29-PMA- 47 Dunne notes that it will be hard to achieve the Vision for the county set out in Chapter 3 (PMA CH3.1 refers) due to the unambitious new residential strategy. This submission further notes that PMA CH3.33 represents a modest shift in the right direction. However, the growth strategies for Wexford Town and Gorey Town should be 50% for this 18-year period.

With regard to Rosslare Harbour, this submission notes that that despite the increased activity and permitted development proposals in Rosslare Europort, the population allocation amounts to an increase of only 41 persons per annum/15 additional dwellings over the 18 year period, and at a density of 25 units per ha, it is only planned to develop 0.6ha of land annually over this timeframe. Consideration should be given to revising these targets upwards. The current wastewater treatment plant is operating at 21% capacity and the Europort aspires to achieve Tier 1 status. It is submitted that, at minimum, 300 dwellings should be built in Rosslare Harbour and Kilrane between 2022-2028. The land is serviced and there is a shortage of affordable housing both in the county and nationally. How can compact growth and sustainable transport strategies as per the RSES and NPF be compatible with such meagre new residential aspirations? Furthermore, how is it compatible with Objective CS09 (which is the subject of PMA CH3.40)?.

Submission WXF-C29-PMA-55 NTA notes and supports the great emphasis on the two key settlements in the allocation of population growth. The increase growth allocation to Enniscorthy is also noted in the amended Table 3.3 up to 2031, but no equivalent increase in the population numbers for 2040. This distinction would benefit from some further explanation, especially given the current status of Enniscorthy as the county's second largest urban centre and the proximity of New Ross to the Waterford MASP.

The submission outlines that the preparation of local transport plans, in conjunction with the preparation of local area plans for these towns should play a critical role in informing the delivery of compact, sustainable growth, as referenced in PMA CH3.4 and the timely delivery of supporting transport infrastructure and services.

Chief Executive's Response:

The concerns outlined are noted. In the first instance, it is considered important to note that the Council shares the concerns with regard to population allocation, and a detailed response to this issue has been provided in the Chief Executive's Response to the OPR's submission (See Theme 1 Core Strategy and Settlement Strategy – pages 13-32 in Section 2 of this report).

The Council is required to have regard to the Section 28 Housing Supply Targets and the Section 28 Sustainable Residential Development in Urban Areas Guidelines. The housing target provided for in Housing Supply Targets Guidelines must be distributed amongst all of the settlements in the county. To give more to one settlement means that it must be deducted from another settlement, and accordingly there is a lot of assessment and analysis involved in that distribution.

Both Wexford Town and Gorey Town have been allocated 45% and 40% population growth between 2016-2040 based on their Key Town status and this allocation is considered sufficient.

Given the strategic importance of Rosslare Harbour, it has been allocated 40% growth over its 2016 population to 2040. This translates to an additional 739 people between 2016 and 2040/41 person per annum over the 18-year period. However, the population allocation has been front loaded to provide 62% (+462) of this growth between 2016 and 2027 with the remaining 38% (+277) to be provided between 2028-2040. The population allocation for the plan period is therefore 252 persons. This translates to 172 additional households over the plan period, which in turn (at a density of 25 units/ha) translates to a requirement of 6.8ha of residential zoned land. The residential zoning is complemented by the significant employment related land use zonings in the Settlement Plan area that can cater for both the direct and indirect spin offs from Rosslare Europort.

With regard to the Enniscorthy Town population allocation and as outlined in PMA CH3.33, in order to achieve a shift in population from rural areas to urban areas growth in certain settlements has been front loaded, where appropriate, following the application of the capacity test for these settlements. The population allocation for Enniscorthy Town is 30% growth over its 2016 population to 2040 (which is an increase of 3,414 people from 2016 to 2040). The role of the Local Transport Plans in contributing to compact growth and sustainable growth is also noted.

Chief Executive's Recommendation:

It is recommended that the Plan is made with the PMA CH3.33.

Alteration No.	PMA CH3.34
Chapter/Section	Section 3.7.3 Core Strategy Population Allocation

Proposed Material Alteration

Please refer to pages 36 to 38 of Book 1 of the PMA documents for the wording and tables associated with this PMA.

Submission(s) Received on PMA:	WXF-C29-PMA-54 Department of Education

Summary of Issues:

Submission WXF-C29-PMA-54 Department of Education notes the proposed amendments to population figures as outlined in Table 3-3. It further notes that the proposed population increases to all settlements concerned could result in minor increases to projected school place requirements in those towns at both primary and post-primary level. However, it is anticipated that the level of additional potential requirements arising could be met at the existing facilities (or expansion thereof). Therefore, the Department re-confirms the projected school requirements outlined in its submission on the Draft Plan (9th December 2020).

Chief Executive's Response:

The Department of Education's comments regarding the capacity of existing facilities to meet additional population increases are noted but the Council are aware of pressure on post-primary school places in the county e.g., Wexford Town. The Council will continue to work with the Department to ensure the delivery of additional educational facilities in the county and to address the current issues around shortages of post-primary school places as expediently as possible.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA 3.34.

Alteration No.	PMA CH3.36
Chapter/Section	Section 3.7.8 Residential Zoned Land Housing Land Requirements

Proposed Material Alteration

Please refer to pages 39 to 41 of Book 1 of the PMA documents for the wording and tables associated with this PMA.

Submission(s) Received on PMA:	WXF-C29-PMA-48 Construction Industry Federation (CIF)

Summary of Issues:

The primary concern of CIF and its members is the significant reduction in the quantum of zoned residential development land, combined with increased density requirements and a focus on infill/brownfield sites in the absence of any structural incentives, or initiatives to increase the viability of such development. CIF is concerned about the impact that restricted land supply will have on land values, development viability and housing output.

The proposed changes to the Core Strategy will have significant and profound implications for the extent of lands that can be zoned under the future local area plans for Wexford, Enniscorthy and Gorey. Furthermore, the increase in the average density from 25 units to 35 units per hectare has significantly reduced the extent of lands proposed for zoning in the main settlements. The extent of land for development is wholly insufficient to meet unrealised demand to date and future demand over the plan period. The LAPs will be bound by the allocations proposed in terms of the extent of the population they can cater for, and the associated quantum of land zoned for development:

- Wexford Town: The PMA reduces the quantum of zoned lands from 96ha in the Draft Plan to 62.1ha.
- Enniscorthy Town: The PMA reduces the quantum of zoned lands from 39ha in the Draft
 Plan to 25.3ha.
- Gorey Town: The PMA reduces the quantum of zoned lands from 40ha to 28.1ha.

The foregoing will result in the de-zoning of a significant quantum of land in each of these settlements (Wexford Town 343.6ha, Gorey Town 70.8ha and Enniscorthy Town 295.6ha).

The ambitions of the Plan in terms of economic development, employment and growth will not be facilitated by overly restrictive land use zoning policies and the associated extensive dezoning of lands for development in the key settlements.

Land costs remain the main driver of house prices and limiting supply of available land is directly reflected by increased costs and increased house prices which are ultimately borne by the buyer.

While it is acknowledged that there is a national requirement for more economic use of land, particularly within the established urban footprint of settlements, the arbitrary application of minimum density requirements per development proposal together with required ratios for unit types and minimum design standards is leading to design uniformity which is unresponsive to individual site characteristics and market demand.

There is an established market resistance to high density developments and particularly apartment developments in locations outside of the core of our urban centres. CIF consider that the density objectives set out for the settlements will not be achievable and will have a significant negative impact on the deliverability of housing units in these settlements. While higher densities in some areas of the main urban centres may be achievable in proximity to town centres and major public transport hubs, there is a need for far greater flexibility on lands outside town centres. An overall higher density can be achieved within a plan area, with high density 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.

CIF understand that it is the intention of the Minister for Housing to review the NPF population targets following the publication of Census 2022 results in June/July this year and call on the Council to consider delaying the adoption of the Plan until such time as there is a review of the NPF population targets.

It is critical that the 2-year review provided for under the Planning and development Act, 2000 (as amended) assesses the impact that Covid-19 has had on living arrangements, and to examine if the target number of residential units needed are being built annually in the county, and if not the reasons why.

The Council should be prepared to undertake a variation of the Plan at the 2-year review stage to provide for additional residential zoned land if there is any evidence of the shortage in housing supply continuing or deepening.

Chief Executive's Response:

The concerns outlined in CIF's submission are noted, and as previously outlined the Council shares concerns about housing supply targets and delivery during the plan period. The Chief Executive has responded to this issue under Theme 1 Core Strategy and Settlement Strategy - Recommendation 1 in the OPR's submission (see pages 15-32 in Section 2 of this report).

The concerns outlined about higher density development and density allocations are noted. The Council is required to ensure the Plan is consistent with the NPF and the RSES and to have regard to the relevant Section 28 Guidelines at the local level. This includes the Section 28 Sustainable Residential Development in Urban Areas Guidelines. This is reinforced for greenfield or edge of city/town locations under Specific Planning Policy Requirement 4 in the Section 28 Building Height Guidelines, 2018. The NPF Implementation Road Map, the population and Housing Supply Targets, together with requirements to achieve compact growth and higher density developments, results in a smaller quantum of residential zoned land.

The Council agrees that the application of a set density of 35 units/ha is not appropriate in all locations and it will be appropriate to achieve an overall net density at local area plan level for this reason. As outlined in PMA CH3.32, as the land use zoning plans for the towns are not included in the County Development Plan, it is not possible to tailor densities to particular sites (such as central sites or those on public transport corridors). While the allocated population is set by the CDP, the quantum of zoned land cannot be set until each of the specific towns are

examined in their Local Area Plans or Settlement Plans to determine their ability to achieve infill or brownfield development, compact growth and higher densities. For the purposes of the Core Strategy, an assumed average density of 35 units/ha was applied to the Level 1 Key Towns and Level 2 Large Towns and 25 units/ha to the Level 3a settlement. It is recommended that a footnote (which formed part of the Draft Plan) be re-introduced to the 'Average Density Unit/Ha' column in Table 3-4 to clarify the above.

The points raised in relation to design uniformity which is unresponsive to individual site characteristics is noted. In response, the Local Area Plan Guidelines for Planning Authorities 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. Accordingly, the new Local Area Plans for Wexford Town, Enniscorthy Town and New Ross Town will focus on translating the development plan urban design policies and objectives to the local level. It is further noted that the 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, Section 2.6 Amenity and Section 3.12 Multi-Unit Residential Schemes in Volume 2 Development Management Manual. Furthermore Objectives TV30 and TV35 in Chapter 5 Design and Place Making in Towns and Villages also give a commitment to apply 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 comments regarding a forthcoming review of NPF population targets following the publication of the Census 2022 are noted. It is recommended that there should be no further delays to the adoption of the Plan. The Council undertakes to review any revised NPF population targets that may be issued to the local authority after the adoption of the Plan, and if deemed necessary, to vary the CDP to address the implications of same. It is further noted that the results of Census 2022 will be available to inform the preparation of the forthcoming LAPs.

As set out in Section 15(2) of the Planning and Development Act, 2000 (as amended) the Chief Executive shall, not more than two years after the making of a development plan, give a report

to the members of the authority on the progress achieved in securing the objectives of the development. This will include a review of the success in securing the housing supply targets and the associated objectives relating to housing delivery.

The Council, through its Strategic Environmental Assessment, will monitor the implementation of the Plan.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH3.36 subject to a further minor modification to include a footnote with regard to tailoring densities in LAPs in Table 3-4 Core Strategy Population Allocations, Housing Units and Housing Land 2021-2027. Please refer to page 15 in Section 2 of this report for the wording of this modification.

Alteration No.	PMA CH3.42
Chapter/Section	Chapter 3 Core Strategy and Settlement Objectives

Proposed Material Alteration

Insert a new Core Strategy and Settlement Strategy 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.

Submission(s) Received on PMA:	WXF-C29-PMA-20 Transport Infrastructure Ireland (TII)

Summary of Issues:

TII notes this PMA and requests that where there are implications for the safe and efficient operation of the national road network, existing and proposed, that appropriate consultation with TII will occur.

Chief Executive's Response:

The comments are noted. The Council will consult with the TII as required.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA 3.42.

Alteration No.	PMA CH3.44
Chapter/Section	Core Strategy and Settlement Objectives - Wexford
	Town Strategic Objectives

Proposed Material Alteration

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.

Submission(s) Received on PMA:	WXF-C29-PMA-55 National Transport Authority (NTA)

Summary of Issues:

The NTA request the following modification to this PMA (see red text):

To ensure that the local transport plan prepared in consultation with the NTA, in accordance with the Area Based Transport Assessment (ABTA) approach set out in the NTA/TII guidance and pilot methodology documents, 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.

Chief Executive's Response:

The comments are noted. However, it is considered that the wording of Objective TS08 adequately references the incorporation of the ABTA guidelines. It is therefore not considered necessary to modify this PMA.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH3.44.

Alteration No.	PMA CH3.47
Chapter/Section	Objective WT07 in Wexford Town Strategic Objectives

Proposed Material Alteration

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 improved 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.

Submission(s) Received on PMA:	WXF-C29-PMA-30 South-East on Track
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Summary of Issues:

This submission strongly supports this PMA.

Chief Executive's Response:

The comments are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH3.47.

Alteration No.	PMA CH3.53
Chapter/Section	Objective ET08 in Enniscorthy Town Strategic Objectives

Proposed Material Alteration

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.

Submission(s) Received on PMA:	WXF-C29-PMA-54 Department of Education
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Summary of Issues:

The Department of Education welcomes this amendment relating to school requirements for Enniscorthy and notes that the reference to a post-primary school relates to the acquisition of a site at Quarry Park for Meanscoil Gharman.

Chief Executive's Response:

The comments are noted, and the Council welcome the development of a new post-primary school in Enniscorthy Town.

Chief Executive's Recommendation:

It is recommended that the Plan is made PMA CH3.53.

Alteration No.	PMA CH3.55
Chapter/Section	Core Strategy and Settlement Objectives – New Ross
	Strategic Objectives

Proposed Material Alteration

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. This strategy will be informed by a report

<u>commissioned by the Council which will consider the strengths, opportunities, impacts</u> and consequences of the Waterford MASP on South Wexford and New Ross.

Submission(s) Received on PMA:

WXF-C29-PMA-55 National Transport Authority (NTA)

Summary of Issues:

In relation to the importance attributed to the Waterford MASP for the future development of New Ross, the NTA reiterate its recommendation that 'of particular importance in Wexford County will be the identification of and spatial definition of those areas which come under the influence of the Waterford Metropolitan Area through the examination of movement patterns across a range of journey purposes'.

Chief Executive's Response:

The comments are noted. The Local Transport Plan for the town (as for PMA CH3.56) and the New Ross Town and Environs Local Area Plan will consider the various different relationships between the town and the Waterford MASP.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH3.55.

Alteration No.	PMA CH3.56
Chapter/Section	Core Strategy and Settlement Objectives - Wexford
	Town Strategic Objectives

Proposed Material Alteration

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 the 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.

Submission(s) Received on PMA:

WXF-C29-PMA-55 National Transport Authority (NTA)

Summary of Issues:

The NTA supports this PMA which makes specific reference to the preparation of a local transport plan for New Ross, and for clarity, the additional text (see red text) is recommended: To prepare a local transport plan in consultation with the NTA, in accordance with the Area Based Transport Assessment (ABTA) approach set out in the NTA/TII guidance and pilot methodology documents 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 development of the town bus network, improvements to cycling and walking infrastructure and rural transport services into the town.

Chief Executive's Response:

The comments are noted. However, as responded to under PMA CH3.44 it is not considered necessary to further modify this PMA.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH3.56.

4.1.4 Volume 1 - Chapter 4 Sustainable Housing

The following submissions were received on the PMA to Chapter 4:

Alteration No.	PMA CH4.16
Chapter/Section	Section 4.7 Future Housing Delivery

Proposed Material Alteration

Amend the text in Level 6 Rural Nodes in Section 4.7 Future Housing Delivery on page 111 as follows:

In general, the guiding principle is that <u>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 rural node during the period of this Plan. The houses should preferably 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.</u>

Submission(s) Received on PMA:	WXF-C29-PMA-12 Irish Water

Summary of Issues:

Irish Water notes that in accordance with Section 5.3.1 of the Draft Water Services Guidelines for Planning Authorities "It is the policy of Irish Water to facilitate connections to existing infrastructure, where capacity exists, in order to maximise the use of existing infrastructure and reduce additional investment costs. There is a general presumption that development will be focused into areas that are serviced by public water supply and wastewater collection network. Alternative solutions such as private wells or wastewater treatment plants should not generally be considered by planning authorities. Irish Water will not retrospectively take over responsibility of developer provided treatment facilities or associated networks, unless agreed in advance".

Chief Executive's Response:

The comments are noted. As outlined in Section 9.6.3 of the Draft Plan, communal private wastewater treatment plants will not be considered for residential developments. It is envisaged that dwelling houses in Rural Nodes will be served by private individual on-site wastewater treatment plants and private wells/group water schemes (unless public wastewater and/or public water supplies are available).

Chief Executive's Recommendation:

It is recommended the Plan is made with PMA CH4.16.

4.1.5 Volume 1 - Chapter 7 Tourism Development

The following submissions were received on the PMA to Chapter 7:

Alteration No.	PMA CH7.11
Chapter/Section	Section 7.7.1 Activity and Adventure Tourism

Proposed Material Alteration

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-lt will-link in with the New Ross Town Greenway project.

Submission(s) Received on PMA:	WXF-C29-PMA-30 South-East on Track
Summary of Issues:	

The submission supports this PMA, and requests, if there is a possibility to make a commitment to examine further greenway opportunities throughout the country via analysis of government owned land in the county (e.g., New Ross-Macmine, Bridgetown-Kilmore Quay) etc.

Chief Executive's Response:

The support for this PMA is noted and welcomed. It is considered that Objectives TS21 and TS26 in Chapter 8 Transportation Strategy and Objective ROS41 in Chapter 14 Recreation and Open Space Strategy and their associated PMA already suitably address the request. In particular, 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.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH7.11.

Alteration No.	PMA CH7.13
Chapter/Section	Section 7.7.2 Business Tourism

Proposed Material Alteration

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.

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	Connect
Submission(s) Received on PMA:	WXF-C29-PMA-45 Fehily Timoney on behalf of Nova

Summary of Issues:

This submission requests a further amendment to this objective (see red text) in order to support the tourism objectives for Kilmore Quay and in turn allow for tourism accommodation development to be considered on Nova Connect's lands at Beak, Kilmore Quay:

"To support the development of hotel and conference facilities at on appropriate

<u>sites locations</u> in <u>and proximate to</u> towns and villages as a means of attracting business and tourism subject to compliance with normal planning and environmental criteria.

The requested amendment would allow for hotel facilities to be considered on appropriate sites in and proximate to towns and villages. The submission notes that while the Council is committed to the importance of plan-led tourism development in rural locations, more assertive steps should be taken to underpin the tourism strategy. While the tourism policies outlined in the PMA to the Draft Plan provide for an intent towards a robust tourism strategy for the county, there is inadequate detail on the provision of resort hotels. The submission outlines that the Beak site provides a good opportunity for the development of an integrated tourism resort hotel due to its setting and proximity to Kilmore Quay. The Beak site offers the opportunity to enhance the tourism potential of Kilmore Quay in a manner that will not disturb the unique characteristics of the village setting whilst complying with the locational requirements of integrated tourism resorts. The requested amendment would ensure that the development is supported by planning policy.

Chief Executive's Response:

As outlined in the Chief Executive's Report on the Draft Plan and in response to Nova Connect's submission at that time, Section 7.6 Locations for Tourism clearly outlines that the spatial planning strategy is to direct tourism (and conferencing) developments 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.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH7.13.

Alteration No.	PMA CH7.18
Chapter/Section	Section 7.7. Tourist Accommodation

Proposed Material Alteration

Insert a new Tourism Accommodation objective after Objective TM50 on page 277 (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.

Submission(s) Received on PMA:	WXF-C29-PMA-12 Irish Water
	WXF-C29-PMA-45 Fehily Timoney on behalf of Nova
	Connect
	WXF-C29-53 PMA- Office of the Planning Regulator (OPR)

Summary of Issues:

Please refer to Theme 4 Economic Development and Employment – Recommendation 4 Tourist Accommodation in the Section 2 (OPR) of this report for the summary of the issues.

Chief Executive's Response:

Please refer to Theme 4 Economic Development and Employment – Recommendation 4 Tourist Accommodation in Section 2 of this report for the Chief Executive's Response.

Chief Executive's Recommendation:

Please refer to Theme 4 Economic Development and Employment – Recommendation 4 Tourist Accommodation in Section 2 of this report for the Chief Executive's Recommendation.

4.1.6 Volume 1 - Chapter 8 Transportation Strategy

The following submissions were received on the PMA to Chapter 8:

Alteration No.	PMA CH8.2
Chapter/Section	Section 8.4.3 Our Transport Network
Proposed Material Alteration	

Amend Figure 8-1 Strategic Transport Network in Section 8.4.3 Our Transport Network on page 290 to show the disused railway line and potential greenway.



Submission(s) Received on PMA: WXF-C29-PMA-30 South-East on Track

Summary of Issues:

The submission notes that South-East on Track supports this PMA.

Chief Executive's Response:

The comments are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH8.2.

Alteration No.	PMA CH8.3
Chapter/Section	Section 8.4.4 Modal Shift

Proposed Material Alteration

Please refer to pages 103-105 of Book 1 of the PMA documents for the full text.

Submission(s) Received on PMA:	WXF-C29-PMA-3 WexBUG
	WXF-C29-PMA-30 South-East on Track
	WXF-C29-PMA-53 Office of the Planning Regulator (OPR)
	WXF-C29-PMA-55 National Transport Authority (NTA)

Summary of Issues:

Please refer to Theme 5 Sustainable Transport and Accessibility in Section 2 of this report for the summary of the issues raised in relation to this PMA.

Chief Executive's Response:

Please refer to Theme 5 Sustainable Transport and Accessibility in Section 2 for the Chief Executive's response to the issues raised.

Chief Executive's Recommendation:

Please refer to Theme 5 Sustainable Transport and Accessibility in Section for the Chief Executive's recommendations on the issues raised.

Alteration No.	PMA CH8.4
Chapter/Section	Section 8.4 Sustainable Transport Strategy
Proposed Material Alteration	

Amend Strategic Transport Objectives Objective TS01 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.

Submission(s) Received on PMA: WXF-C29-PMA-11 Department of Transport

Summary of Issues:

The Department of Transport notes that a new National Sustainable Mobility policy, to replace Smarter Travel, was published in April 2022 and should be referenced in the Plan.

Chief Executive's Response:

The request is noted. The PMA does already reference the emerging Government Sustainable Mobility policy. It is considered appropriate to modify the PMA to reflect the final published policy document and to omit reference to the Smarter Travel policy document that it now replaces.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH8.4 subject to the following further minor modification (see blue text):

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 the National Sustainable Mobility Policy 2022 and the other

guidance listed in Section 8.3 above and any updated version of these documents.

Alteration No.	PMA CH8.5
Chapter/Section	Section 8.4 Sustainable Transport Strategy

Proposed Material Alteration

Amend Strategic Transport Objective TS02 on page 295 as follows:

To minimise the generation of greenhouse gases by the transport sector <u>using the avoid-shift-improve principle and</u> 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,
- <u>Directing larger scale trip intensive developments, such as offices and retail,</u>
 <u>into central locations</u> <u>which are highly accessible by sustainable transport</u>
 <u>modes; and</u>

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.

<u> </u>		
Submission(s) Received on PMA:	WXF-C29-PMA-30 South-East on Track	

Summary of Issues:

Submission WXF-C29-PMA-30 South-East on Track requests that the wording of the 3rd and 4th bullet points in the PMA be further amended and an additional bullet point added (see red text):

3rd bullet point:

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 transport.

4th bullet point:

Directing larger scale trip intensive developments, such as offices, <u>medical</u>, <u>government</u>, <u>tourism</u> and retail, into central locations which are highly accessible by sustainable transport modes; and

Additional bullet point:

<u>Ensuring there is integration between various sustainable transport infrastructure, especially in</u> developing connections between active travel, rail, and bus.

Chief Executive's Response:

The comments are noted. It is considered appropriate to modify the 3rd bullet point as suggested.

With regard to the modification sought to the 4th bullet point, it is considered that central locations may not always be the most optimum for medical, government and tourism uses but locations accessible by sustainable transport modes should be prioritised for such uses. It is recommended that the PMA be further modified to refer to this, and to incorporate the additional bullet point suggested in the submission.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH8.5 subject to the following further minor modification to the third and fourth bullet points are follows: (see blue text):

3rd bullet point:

 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 transport,

4th bullet point:

Directing larger scale trip intensive developments into locations which are highly
 accessible by sustainable transport modes and direct uses such as office and retail
 such as offices and retail, into central locations which are highly accessible by
 sustainable transport modes; ensuring there is integration between various

sustainable transport infrastructure, especially in developing connections between active travel, rail, and bus.

Alteration No.	PMA CH8.9
Chapter/Section	Section 8.4 Sustainable Transport Strategy

Proposed Material Alteration

Amend Strategic Transport Objective TS08 on page 296 as follows:

To prepare Local Transport Plans in accordance with the Area Based Transport

Assessment Guidelines (TH <u>Transport Infrastructure Ireland</u>, 2018) for Wexford, Gorey,

Enniscorthy and New Ross towns <u>and their hinterlands</u>.

Submission(s) Received on PMA: WXF-C29-PMA-55 National Transport Authority (NTA)	1
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Summary of Issues:

The NTA request that the following additional text be included in this PMA:

To prepare Local Transport Plans (LTP) in accordance with the Area Based Transport
Assessment (ABTA) Guidelines and associated Pilot Methodology prepared by the

National Transport Authority (NTA) and (TIII-Transport Infrastructure Ireland, 2018) for
Wexford, Gorey, Enniscorthy and New Ross towns and their hinterlands.

The NTA also recommend that the following explanatory text (in red) be included in this section of the Plan:

The LTP would represent the lowest tier of the NPF's framework for the integration of land use and transport planning and the achievement of compact smart growth. It is expected that the preparation of LTPs would:

- Maximise the opportunities for the integration of land use and transport planning;
- Assess the existing traffic, transport and movement conditions within the Plan area and in its wider context;
- Plan for the efficient movement of people, goods and services within, to and from the
 Plan area;

- Identify the extent to which estimated transport demand associated with local development objectives can be supported and managed on the basis of existing transport assets; and
- Identify the transport interventions required within the Plan area and in the wider context, to effectively accommodate the anticipated increase in demand.

Chief Executive's Response:

The comments are noted. It is considered that the existing text in Section 8.4.3 Our Transport Network in the Draft Plan together with the wording of Objective TS08 adequately references the function of LTPs and incorporation therein of Area Based Transport Assessment guidelines. It is therefore not considered necessary to further modify the PMA.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH8.9.

Alteration No.	PMA CH8.11
Chapter/Section	Section 8.4 Sustainable Transport Strategy

Proposed Material Alteration

Amend Strategic Transport Objective TS16 on page 298 as follows:

To ensure that all urban roads and streets¹⁴ 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, <u>and the TII document 'Treatment of Transition Zones to Towns and Villages on National Roads' where relevant</u> in order to¹⁵:

- 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 <u>cycling and walking networks</u> 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.

Where amendments or extensions are being proposed to existing schemes, they shall also be consistent with the Manual.

Footnote ¹⁴: i.e. Streets and roads with a speed limit of 60kmh or less and new development in towns and villages where such limits will apply in the future, subject to the exceptions outlined above.

Footnote ¹⁵: See Section 5.6 in Chapter 5 Towns and Villages for further detail in this regard.

Submission(s) Received on PMA:	WXF-C29-PMA-3 WexBUG
	WXF-C29-PMA-11 Department of Transport
	WXF-C29-PMA-55 National Transport Authority (NTA)

Summary of Issues:

Submission WXF-C29-PMA-3 WexBUG comment that:

 Where this section references speed limits of 60 kmh or less, this could lock-in high speeds and lower speeds e.g., 30kph should be explicitly referenced as a desirable end point;

- Reference to 'where possible' in the objective should be omitted as it would give an
 excuse for inaction;
- The Strategy should commit to the implementation of programme of retrofitting to be implemented annually e.g., five projects in each of the four main towns.

Submission WXF-C29-PMA-11 Department of Transport comments that references to the DMURS Interim Advice Note – Covid 19 Pandemic Response should be made which explicitly references universal design and accessibility issues.

Submission WXF-C29-PMA 55 NTA requests that the second last sentence of the PMA be amended as follows (see red text):

Where possible retrofitting modifications of existing roads and streets shall be undertaken as necessary, as part of a whole of network approach, to be informed by the county level sustainable transport strategy and local transport plans, to achieve the goals of this objective.

Chief Executive's Response:

The comments and suggestions are noted.

With regard to Submission WXF-C29-PMA-WexBug, the following is noted:

- The reference to '60 kmh or less' is set out in the Government's requirement to apply DMURS on such roads and does not imply that lower speed limits will not be considered.
- The words 'where possible' is included as cases may present where retroffiting of
 existing roads and streets may not be possible due to the existing conditions, and as
 such it is considered that the words should be retained.
- The suggestion to include project targets is noted. However, this is considered premature pending the preparation of the LTPs.

With regard to the Department of Transport request, the current reference to DMURS 2013/2019 and 'and any further version of the Manual' in Objective TS16 adequately covers the 2020 update and any future updates that may be issued. The Council is fully committed to

the development of roads and streets that are 'fully accessible and safe places' and this is reflected by a suite of objectives throughout the Plan which reference universally accessible environments. This will also form a detailed consideration in the preparation of the LTPs and Walking and Cycling strategies which will consider network wide requirements.

With regard to the NTA's request, the modifications sought to the objective are not considered necessary. The Council has committed to the preparation of LTPS and Walking and Cycling Strategies which will also address these issues.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH8.11.

Alteration No.	PMA CH8.13
Chapter/Section	Section 8.5 Walking and Cycling

Proposed Material Alteration

Insert the following text in Section 8.5 Walking and Cycling after the first paragraph on page 301:

The Council will prepare strategies for walking and cycling in the county to inform and co-ordinate the development of the necessary accessible infrastructure to facilitate and encourage more walking and cycling for both everyday transport and leisure purposes.

Submission(s) Received on PMA:	WXF-C29-PMA-55 National Transport Authority (NTA)
	WXF-C29-PMA-20 Transport Infrastructure Ireland (TII)

Summary of Issues:

The NTA recommends that the following text be included at the start of this PMA:

<u>As part of the preparation of the county level Sustainable Transport Strategy and Local</u>

<u>Transport Plans......</u>

TII requests that in relation to the preparation of the proposed strategies, where there are implications for the safe and efficient operation of the national road network, existing and proposed, that appropriate consultation with TII occurs.

Chief Executive's Response:

The requests are noted.

As outlined in the response to PMA CH8.3 while the preparation of a County-wide Sustainable Transport Strategy is an excellent idea, the Council must focus on preparation of the LTPs first. It is agreed that there will be an inter-relationship between the LTPs and the Walking and Cycling strategies but it is considered that the wording of this PMA together with other text and objectives in the Plan in relation to LTPs adequately address the issue.

The Council will continue to consult with TII in relation to the national road network in the county.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH8.13.

Alteration No.	PMA CH8.14
Chapter/Section	Section 8.5 Walking and Cycling

Proposed Material Alteration

Insert a new Walking and Cycling objective before Objective TS21 in Section 8.5 Walking and Cycling on page 301 as follows:

To prepare a Walking Strategy for the county to inform the development and coordination of the necessary accessible infrastructure to facilitate and encourage more walking for both everyday transport and leisure purposes.

Submission(s) Received on PMA:	WXF-C29-PMA-3 WexBUG
	WXF-C29-PMA-55 National Transport Authority (NTA)
Summary of Issues:	

Submission WXF-C29-PMA-3 WexBUG express their support for this PMA.

Submission WXF-C29-PMA-55 NTA recommends that the following text be added to the start of the objective (see red text):

As part of the preparation of the County level Sustainable Transport Strategy and Local Transport Plans,

Chief Executive's Response:

The comments are noted. With regard to the NTA's request and as responded to under PMA CH8.13, it is considered that the wording of this PMA together with other text and objectives in the Plan in relation to LTPs adequately address the issue.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH8.14.

Alteration No.	PMA CH8.15 and PMA CH8.16
Chapter/Section	Section 8.5 Walking and Cycling

Proposed Material Alteration

PMA 8.15

Insert a new Walking and Cycling objective before Objective TS21 in Section 8.5 Walking and Cycling on page 301 as follows:

To prepare a Cycling Strategy for the county to inform the development and coordination of the necessary infrastructure to facilitate and encourage more cycling for both everyday transport and leisure purposes.

PMA 8.16

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.

Submission(s) Received on PMA: WXF-C29-PMA-3 WexBUG

Summary of Issues:

WexBug express their support for these PMAs. They note, in particular, that they sought the amendment in PMA CH8.16 and welcome it.

Chief Executive's Response:

The support is noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH8.15 and PMA CH8.16.

Alteration No.	PMA CH8.18
Chapter/Section	Section 8.18 Walking and Cycling

Proposed Material Alteration

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 (including by mobility scooters) 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.

Submission(s) Received on PMA:	WXF-C29-PMA-3 WexBUG
	WXF-C29-PMA-11 Department of Transport

Summary of Issues:

Submission WXF-C29-PMA-11 Department of Transport welcomes reference to the provision of dropped kerbs.

Submission WXF-C29-PMA-3 WexBug notes the following:

- The phrase 'as resources allow' should be deleted as it can be barrier to implementation.
- The reference to 'where possible' should be deleted from the sentence "Cycleways shall
 be segregated where possible", as it significantly waters down a laudable objective and
 the Council should require and promote segregated cycleways at all times.
- WexBUG support the use of trials and would welcome any invitation to design and participate in trials.

Chief Executive's Response:

The comments of the Department of Transport are noted and welcomed.

With regard the requests outlined in WexBug's submission:

- It is recommended that the phrase 'as resources allows' be retained as it reflects the realities of funding and resourcing issues faced by the Council.
- It is agreed that that segregated cycle lanes offer clear advantages for all roads users. It is the Council's preference to have full segregation, however, it must be acknowledged that this is not possible in all situations. It is recommended that the PMA be further modified to refer to a clear preference for segregated cycleways.
- The comments on, and willingness to, participate in infrastructure trials are noted and welcomed by the Council.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH8.18 subject to the following further minor modification to the second sentence (see blue text):

There shall be a clear preference for cycleways to be segregated where possible. Cycleways shall be segregated where possible.

Alteration No.	PMA CH8.20
Chapter/Section	Section 8.5 Walking and Cycling

Proposed Material Alteration

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.

Submission(s) Received on PMA:	WXF-C29-PMA-3 WexBug
	WXF-C29-PMA-41 Courtown Community Council
	WXF-C29-PMA-55. National Transport Authority
Summary of Issues:	

Submission WXF-C29-PMA-3 WexBug request the following:

- The phrase 'as resources allow' should be deleted as it could become a barrier to implementation.
- The proposed cycle way between County Wicklow, Gorey, Camolin, Ferns and Enniscorthy, with a view to extending this cycleway towards Rosslare Europort and New Ross must be segregated and there are multiple forms which segregation could take.

Submission WXF-C29-PMA-41 Courtown Community Council request a further modification to refer to proposed Natural Heritage Areas (pNHAs), alongside the reference to SACs and SPAs.

Submission WXF-C29-PMA-55 NTA recommends that the following text be added to the start of this objective (see red text):

As part of the preparation of the County level Sustainable Transport Strategy and local transport plans,

Chief Executive's Response:

As outlined in the Chief Executive's response to PMA CH8.18, it is recommended that the phrase 'as resources allows' be retained as it reflects the realities of funding and resourcing issues faced by the Council.

As outlined in the same response (PMA CH8.18) the Council is committed to the provision of segregated cycle lanes, and it will seek to provide segregation of an appropriate design on this cycle route. It is recommended that the PMA be further modified to reflect this.

The references to SACs and SPAs in this objective directly relate to Appropriate Assessment which is not applicable to pNHAs. The PMA to this objective includes a new sentence to say that 'the provision of such cycling and walking routes shall be subject to the protection of habitats, environment, amenity and heritage' which will include pNHAs. No modification is therefore considered necessary.

The NTA's request is noted. As previously responded to, it is considered that the wording of this PMA together with other text and objectives in the Plan in relation to LTPs adequately address

the issue.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH8.20 subject to the following further minor modification to the second sentence (see blue text):

The Council will provide a cycle way, segregated where possible, between County Wicklow, Gorey, Camolin, Ferns and Enniscorthy, with a view to extending this cycleway towards Rosslare Europort and New Ross.

Alteration No.	PMA CH8.22
Chapter/Section	Section 8.6 Public Transport

Proposed Material Alteration

Amend Objective TS30 in Public Transport Objectives on page 306 as follows:

To support and facilitate the provision of infrastructure serving public transport including, but not limited to, new transport mode-interchanges, bus and rail stations, bus shelters, adequate bus parking, bus lanes, car parking facilities, taxi ranks and cycle parking and lanes. Such facilities will be supported, <u>particularly in settlements on and in proximity to national routes</u>, where they:

- Facilitate universal access,
- Promote the effectiveness and viability of services,
- Promote the convenience and attractiveness of public transport for all sections of the community,
- Allows for efficient integration between different transport modes,
- Connect key locations such as tourism assets, leisure, and recreational destinations, and
- Provide appropriate and sensitive parking and infrastructure for all modes at tourism and amenity sites.

Submission(s) Received on PMA: WXF-C29-PMA-55 National Transport Authority (NTA)

Summary of Issues:

The NTA query the rationale for the amendment which refers to settlements 'on and in proximity to national routes'. It is not clear and requires further explanation. It is noted that all four main towns in the county are on and in proximity to national routes, along with a number of lower settlements. Is the purpose of the amendment to reflect this?

In relation to planning for bus service provision, the NTA reiterate (as for its submission on the Draft Plan):

- The existing and potential of bus services should be examined as part of the development plan review process, falling within the scope of the transport profiling process.
- The Plan's Transportation Strategy should recognise and understand the significance of bus services in the county level transport profiling and the local transport plan process and facilitate their improvement through supportive land use policies and design standards.
- The Plan should recognise the opportunities presented by investment currently being committed to the improvement of bus infrastructure and services and should seek to inform the prioritisation of future investment for the appropriate consolidation of future development in areas which support the use of public transport.

The need for consultation with the NTA on these matters is emphasised.

Chief Executive's Response:

Having reviewed the comments, it is not considered necessary to further modify this PMA.

The purpose of the reference to 'settlements on and in proximity to national routes' is to acknowledge that such facilities are even more desirable at locations adjacent to the existing inter-county network.

Bus services in the county were and will continue to be considered in the Council's work on improving sustainable public transport provision in the county.

The spatial planning framework in the County Development Plan promotes the development of settlements that have existing and planned investment in public transport (including bus). The future LAPs and Settlement Plans will also contain spatial strategies and objectives to maximise access to and support the further expansion of bus services in those settlements and between settlements.

The Council acknowledges the investment in bus services in the county and will continue to work with the NTA and all other stakeholders in the development of bus service provision in the county.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH8.22.

Alteration No.	PMA CH8.23
Chapter/Section	Section 8.6 Public Transport

Proposed Material Alteration

Amend Objective TS36 in Public Transport Objectives on page 308 as follows:

To promote <u>and facilitate the provision of</u> bus passenger waiting facilities including the provision of <u>accessible and age-friendly</u> bus shelters. <u>The use of pollinator-friendly bus</u> shelters will be encouraged.

Submission(s) Received on PMA: WXF-C29-PMA-11 Department of Transport

Summary of Issues:

The Department of Transport welcomes the reference to accessible and age-friendly bus shelters.

Chief Executive's Response:

The comments are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH8.23.

Alteration No.	PMA CH8.24	
Chapter/Section	Section 8.6 Public Transport	
Proposed Material Alteration		
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		

Submission(s) Received on PMA:	WXF-C29-PMA-3 WexBUG
	WXF-C29-PMA-30 South-East on Track
Summary of Issues:	

Council will seek appropriate funding to facilitate the development of this important

corridor between Rosslare Europort and Belview and Waterford MASP.

Submission WXF-C29-PMA-3 WexBUG welcomes the PMA and notes that the proposal to reopen a passenger and freight railway line will have a very long lead time and there are many potential barriers to success. The submission also recommends that other potential greenways should be referenced in this new objective including an alternative Wexford to Curracloe route and Wexford to Rosslare (to form an internationally attractive Raven to Rosslare greenway), and the former rail line leading to Macmine junction (to link with the Enniscorthy Promenade, the Barrow Valley greenway and the South-East greenway). Existing greenways are in the south-east of the county and are currently entirely road-based.

Submission WXF-C29-PMA-30 South-East on Track strongly supports this PMA and suggests that the text be further amended as follows (see red text):

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 <u>potential</u> greenway for active travel and amenity use <u>if this can be done in a manner which does not prejudice the operation or reopening of the line.</u> The Council will seek appropriate funding to facilitate the development of this important corridor between Rosslare Europort and Belview and Waterford MASP.

Chief Executive's Response:

Having reviewed the comments and the PMA, it is not considered necessary to further modify the wording of this PMA.

It is considered that the possible provision of additional greenways is already suitably addressed in Section 7.7.1 Activity and Adventure Tourism in Chapter 7 Tourism Development Strategy and Section 14.8 Walking and Cycling in Chapter 14 Recreation and Open Space Strategy. The Council's proposed future Walking and Cycling strategies will also consider possible future greenway routes.

The additional text clarifications sought by South-East on Track are not deemed necessary. This will be further considered following the outcome of the Rail Review.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH8.24.

Alteration No.	PMA CH8.28
Chapter/Section	Section 8.7 Roads

Proposed Material Alteration

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.

Submission(s) Received on PMA:	WXF-C29-PMA 20 Transport Infrastructure Ireland (TII)	
	WXF-C29-PMA 36 Redmond	

Summary of Issues:

Submission WXF-C29-PMA-20 TII comment that grid connections accommodated on national roads have the potential, inter alia, to result in technical road safety issues such as differential settlement due to backfilling trenches and can impact on the ability and cost of general maintenance and safety works to existing roads. Constraints and costs arise to on-line national road improvements and upgrades also. TII suggest that the wording of the new objective should be amended as follows (see red text):

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. Such infrastructure should be avoided in the strategic national road network having regard to the availability of alternative options.

Submission WXF-C29-PMA-36 Redmond notes that exempted planning permission should not apply to the above insertion to the new Objective as it would greatly affect the general public.

Chief Executive's Response:

Having reviewed the issue raised in the TII submission, it is not considered necessary to modify the objective further. The objective already states that the use of the road network for grid connection and other non-roads related infrastructure will only be allowed when it has been demonstrated that the infrastructure would not adversely impact upon the structures, maintenance and safety of the road.

The comments outlined in Submission WXF-C29-PMA-36 are noted. However, this lies outside the remit of the Development Plan.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH8.28.

Alteration No.	PMA CH8.29, PMA CH8.30 and PMA CH8.31
Chapter/Section	Section 8.7.1.1 National Roads Projects

Proposed Material Alteration

PMA CH8.29

Amend Section 8.7.1.1 National Roads Projects on pages 313 -314 as follows:

N11/N25 Oilgate to Rosslare Europort Harbour

The improvement of road linkages to Rosslare Europort is supported in the NPF, the National Development Plan 2018 – 2027, the National Marine Planning Framework and the RSES for the Southern Region.

The first Concept and Feasibility phase for the Oilgate to Rosslare Europort project was completed in 2011. A Route Selection report completed at that time identified a Preferred Route Corridor. However, it has been determined that, given the lapse of time which has passed since 2011, the scheme would be reviewed from the start. After a comprehensive feasibility and constraints study, 8 scheme options are currently being considered.

Following an option selection process which assessed possible route options against Economic, Safety, Environmental, Accessibility & Social Inclusion, Integration and Physical Activity criteria, and examined multi-modal scheme options and alternatives, a preferred scheme option

corridor was selected and published in June 2021. Following detailed scheme design and the completion of environmental and appropriate assessment processes, it is anticipated the scheme could proceed through the statutory planning processes in 2023.

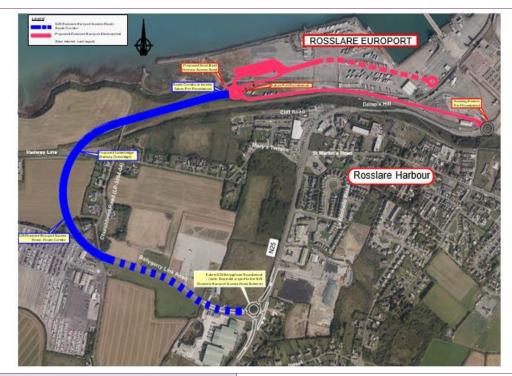
PMA CH8.30

Amend the 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 has confirmed the scheme option. The chosen option combines the construction of a new offline access road to the port and the upgrade of the existing Ballygerry Link Road as shown in blue 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, and the approved Rosslare Europort Masterplan development (shown in red in Figure 8.2).

PMA CH8.31

Replace Figure 8.2 relating to the N25 Rosslare Europort Access Road on page 315 with the following: Figure 8.2 Option Selection Scheme Option



Submission(s) Received on PMA:

WXF-C29-PMA 20 Transport Infrastructure Ireland (TII)

Summary of Issues:

TII notes that it is critical that corridors for national roads schemes are safeguarded pending the delivery of any scheme. Section 2.9 of the Spatial Planning and National Roads Guidelines refers. On this basis, the inclusion of Objective TS57 is acknowledged and welcomed by the TII.

The submission notes that the Council is aware that the implementation of all national road schemes is subject to budgetary constraints and is subject to prioritisation and adequacy of funding resources available to TII. As such the relative priority or timeframe for national road schemes may be subject to alteration.

Prior to the finalisation of the Draft Plan, TII recommends consultation with the scheme projects teams to ensure the most up-to-date information is incorporated into the Plan.

Chief Executive's Response:

The Council will continue to support, facilitate and enable the implementation of national roads in line with Objective TS57 in Chapter 8 Transportation Strategy.

While the Council is aware of the impact of budgetary constraints on the delivery of projects the N11/N25 Oilgate to Rosslare Harbour national road scheme must be prioritised based on the strategic importance of Rosslare Europort for the county and region.

The April 2022 monthly report from TII provides the following updates on these schemes.

Having regard to the update, it is not considered necessary to update the wording in the Plan as the schemes have not progressed beyond the stages/timelines referred to therein.

N11/N25 Oilgate to Rosslare Harbour

Tender documents for a geotechnical investigation contract are currently being finalised and it is anticipated that fieldworks could commence in September after the main harvest seasons have ended. The Project Liaison Officer will engage with all impacted land-owners before commencement. The initial design development has commenced and will evolve through the year in tandem with the development of transport studies, ground investigation data, environmental assessments etc. The development of the design will generate increasing engagement with land and property owners.

N25 Rosslare Europort Access Road

Documentation for a planning application and Compulsory Purchase Order have been finalised for approval and it is anticipated that a Section 177AE planning application and CPO will be submitted to An Bord Pleanála at the end of May following approval to proceed. Copies of the applications will be available to view and notices of the applications, arrangements and further details will be published in advance. Any submissions or observations may be made to An Bord Pleanála which may at is discretion hold an oral hearing into the proposed development. The project continues to consult with directly impacted land and property owners in advance of the submission of the planning application. A project newsletter will also be published in advance of the planning application and will be circulated in local outlets and public buildings in Rosslare Harbour as well as the project website and social media to provide the public with further information on the planning process.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH8.29, PMA CH8.30 and PMA CH8.31

Alteration No.	PMA CH8.32
Chapter/Section	Section 8.7.1 National Roads

Amend Objective TS56 in National Roads Objectives on page 318 as follows:

To support the future upgrading of the N80 to improve capacity and safety given the roads importance to connect to the Midlands and Rosslare Europort. Further to this objective, the Council will work with Transport Infrastructure Ireland and all other stakeholders in the development and assessment of options, including those relating to the link road and/or a possible by-pass, to improve regional journey times and to reduce the impacts of national road traffic on the public realm and maximise opportunities for walking and cycling in Bunclody town centre. Any such options shall be subject to compliance with the Environmental Impact and Habitats Directives.

Submission(s) Received on PMA:	WXF- C29- PMA-3 WexBUG

Summary of Issues:

WexBug request that Objective TS56 be further amended as detailed below:

- The reference to Bunclody Town Centre should be amended further as follows (see red text) '.....and maximise opportunities for <u>safe</u> walking and cycling in Bunclody town centre, <u>its access routes and hinterlands.'</u>
- A safe segregated cycle route should be provided linking Clohamon to Bunclody and beyond;
- The reference to "Any such options shall be subject to compliance with the Environmental Impact and Habitats Directives." should be deleted as all projects are subject to these non-discretionary statutory obligations and do not need to be explicitly written as potential limitations/excuses to implementation of schemes to improve the public realm.

Chief Executive's Response:

Having reviewed the comments,

• There is merit in further modifying the text of the PMA to reflect the comments made

- on the impacts of the national road on cycling outside of Bunclody town centre.
- Objective B36 in the Draft Bunclody Town Settlement Plan is "to provide a cycle route, segregated where possible, from Bunclody to Clohamon on the N80..". PMA BT.14 also amends Map 2 Objectives to show a footpath and cycle path on the N80 as far as the Settlement Plan boundary. The development and further expansion of this cycle route can be explored through the County Cycling Strategy.
- The Appropriate Assessment (Volume 13 Natura Impact Report) identifies certain types
 of developments that present a threat to Natura 2000 sites, and it is prudent that the
 Plan serves to protect these sites from such threats.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH8.32 subject to the following further minor modification (see blue text):

To support the future upgrading of the N80 to improve capacity and safety given the roads importance to connect to the Midlands and Rosslare Europort. Further to this objective, the Council will work with Transport Infrastructure Ireland and all other stakeholders in the development and assessment of options, including those relating to the link road and/or a possible by-pass of Bunclody Town, to improve regional journey times and to reduce the impacts of national road traffic on the public realm and maximise opportunities for walking and cycling in Bunclody town centre, its access route and hinterlands. Any such options shall be subject to compliance with the Environmental Impact and Habitats Directives.

Alteration No. PMA CH8.33			
Chapter/Section	Section 8.7.1 National Roads		
Proposed Material Alteration			
This PMA relates to Objective TS59 on new accesses to the national road network. Please			
refer to pages 117-118 of Book 1 of the PMA documents for the wording of this PMA.			
Submission(s) Received on PMA:	WXF-C29-PMA-12 Irish Water		

WXF-C29-PMA 20 Transport Infrastructure Ireland (TII)
WXF-C29-PMA-54 Office of the Planning Regulator (OPR)

Summary of Issues:

The issues raised in relation to this PMA are summarised in Section 2 of this report.

Chief Executive's Response and Recommendation

Please refer to the Chief Executive's Response and Recommendation relating to the issues raised in Section 2 of this report.

Alteration No.	PMA CH8.42
Chapter/Section	Section 8.11 Ports

Proposed Material Alteration

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

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

Submission(s) Received on PMA: WXF-C29-PMA-30 South-East on Track

Summary of Issues:

The submission welcomes the PMA.

Chief Executive's Response:

The support for the PMA is welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH8.42.

4.1.7 Volume 1 - Chapter 9 Infrastructure Strategy

The following submissions were received on the PMA to Chapter 9:

Alteration No.	PMA CH9.2
Chapter/Section	Table 9.1 in Section 9.5.1 Public Water

Proposed Material Alteration

Please refer to pages 123 to 125 in Book 1 of the PMA documents for the full text of this PMA.

Submission(s) Received on PMA:	WXF-C29-PMA-12 Irish Water	

Summary of Issues:

The submission refers to the new 10-year Water Supply Capacity Register dated March 2022 which should be referenced in this PMA. This includes analysis of Irish Water's ability to meet the population targets outlined in the Plan.

Chief Executive's Response:

The comments are noted. The capacity information included in PMA CH9.2 was based on the Irish Water Public Water Supplies and Capacities information issued to the Council in Q1, 2021. In March 2022, Irish Water provided the local authority with a 10-year water supply capacity register. This register indicates if capacity is available to support the 2031 population targets in the Draft Plan rather than the population targets provided for in the Plan period (up to 2027). As the 10-year register does not marry with the plan period it is not considered appropriate to it include it.

The Irish Water submission, however, is accompanied by two tables. Table 1 is a draft water capacity assessment for the Level 1, 2 and 3a settlements for the period up to 2027. It is considered appropriate to use this information for the purposes of updating the information/statement of facts set out in this PMA relating to those particular settlements. With regard to the remaining settlements, as an updated capacity assessment has not been provided for the 2027 population targets, it is recommended that the information remain as

published in the PMA. It is further recommended that a new footnote be added to this PMA to say that the information set out in the table is subject to change/updates.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH9.2 subject to the following minor modifications (see blue text) to the table title and the text relating to Level 1 Key Towns, Level 2 Large Towns and Level 3a Service Settlements:

Table 9-1 Irish Water Public Water Supplies and Capacities Source: Irish Water Q1 2021 March 20228

Settlement	Settlement	Water Resource Zone	Capacity of source/treatment
Hierarchy		<u>(WRZ)</u>	
Level 1 Key	Wexford Town	South-East Wexford	Capacity available.
Towns			Capacity available in the main
			networks to cater for the 2027
			population target. Capacity is
			available in the WRZ to cater for the
			population targets with assistance
			of water conservation measures and
			network improvements to provide
			the level of services required.
	Gorey	Gorey	Capacity available in the main
			networks serving the town and in
			the WRZ to cater for the 2027
			population target.
Level 2 Large	Enniscorthy Town	Enniscorthy	Currently there is limited capacity.
Towns			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.
			Capital upgrades are progressing to
			increase capacity for the town which
			will allow additional water to be
			delivered into the town. There is
			capacity available in the main
			networks to cater for the 2027

⁸ The information contained in this table is subject to change/updates.

	New Ross Town	New Ross	population target. Capital upgrades required to the WRZ. There is a project in the Capital Investment Programme which will be delivered during the lifetime of the Plan. Capacity available in the main networks supplying the town. Capacity available in the WRZ to cater for the population targets to 2027 with assistance of water conservation measures and network improvements to provide the level of services required.
Level 3a Service Settlements	Bunclody Town	Bunclody	Limited capacity available – further assessment needed. Capacity available in the main networks to cater for the 2027 population target. Capacity available in the WRZ but not for the full 2027 population target. A project is progressing to increase capacity which is anticipated will be completed within the lifetime of the Plan.
	Castlebridge	South-East Wexford	Capacity available in the main networks supplying the village to cater for the 2027 population targets. Capacity potentially available in the WRZ to cater for the 2027 population targets with the assistance of water conservation measures and network improvements to provide the level of service required.
	Courtown and Riverchapel	Gorey Rural	Capacity available in the main networks serving the villages and in the WRZ to cater for the 2027 population target.
	Ferns	Ferns Regional	Limited capacity, options being investigated. Capacity is available in the main networks supplying the village to cater for the 2027 population targets. Capacity is potential available in the WRZ to cater for those targets with the assistance of

		water conservation measures and network improvements to provide the level of service required.
Rosslare Harbour and Kilrane	South-East Wexford	Capacity available in the main networks serving the villages and in the WRZ to cater for the 2027 population target.
Rosslare Strand	South-East Wexford	Capacity available in the main networks serving the village and in the WRZ to cater for the 2027 population target.

Alteration No.	PMA CH9.6
Chapter/Section	Section 9.5 Water Supply

Insert a new Water Supply 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.

Submission(s) Received on PMA:	WXF-C29-PMA-12 Irish Water

Summary of Issues:

Irish Water welcome the proposal to provide drinking water refill points, however, the proposals to facilitate these connections must be in accordance with the Irish Water Connection Charging Policy, if a new connection from the public infrastructure is required.

Chief Executive's Response:

The comments are noted.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH9.6.

Alteration No.	PMA CH9.10
Chapter/Section	Section 9.6.3 Small Towns and Village Scheme

Amend Table 9-6 Candidate Settlements for the 'New Homes in Small Towns and Villages' Programme in Section 9.6.3 Small Towns and Village Scheme on page 354 as follows:

Table 9-6 Candidate Settlements for the New Homes in Small Towns and Villages Growth Programme

<u>Settlement</u>	Settlement Level
Wellingtonbridge	3 <u>b</u>
Campile	<u>3b</u>
Bree	4
Adamstown	4
Ballindaggin	4
Ballycanew	4
Camolin	4
Clongeen	4
<u>Killinerin</u>	4
Oilgate	4
Tagoat	4
The Ballagh	4
<u>Davidstown</u>	<u>5(1)</u>

Submission(s) Received on PMA	WXF-C29-PMA-12 Irish Water
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Summary of Issues:

Irish Water notes that upgrades to the Wellingtonbridge and Tagoat Wastewater Treatment Plants have been recently announced via the Small Towns and Villages Growth Programmes. These are at extremely early stages of the development and clarity on completion dates will be provided as these projects progress.

Chief Executive's Response:

The comments are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH9.10.

A	Iteration No.	PMA CH9.14
С	hapter/Section	Section 9.6 Wastewater

Proposed Material Alteration

Insert a new Wastewater objective on page 358 as follows:

<u>To protect existing wastewater infrastructure, including way leaves and buffer zones,</u>
<u>from inappropriate development and zoning.</u>

Submission(s) Received on PMA:	WXF-C29-PMA-12 Irish Water

Summary of Issues:

Irish Water welcomes the inclusion of the additional text around the introduction of buffer zones around wastewater treatment plants.

Chief Executive's Response:

The comments are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan is made with CH9.14.

Alteration No.	PMA CH9.19
Chapter/Section	Section 9.10 Telecommunications and ICT Strategy

Insert a new Telecommunication and ICT Objective on page 374 as follows:

To support the provision of appropriate infrastructure to facilitate the development of remote working hubs in settlements.

Submission(s) Received on PMA:	WXF-C29-PMA-50 Department of the Environment,
	Climate and Communications (DECC)

Summary of Issues:

The DECC request that, in order to ensure that decisions made on foot of these policy revisions are consistent with the National Planning Framework, additional references to the national objectives as expressed in 'Harnessing Digital – the Digital Ireland Framework' and the National Development Plan be included in this PMA.

Chief Executive's Response:

The request is noted and agreed with.

Chief Executive's Recommendation:

It is recommended that the Plan is made with the PMA subject to the following minor modification (see blue text):

To support the provision of appropriate infrastructure to facilitate the development of remote working hubs in settlements in line with Harnessing Digital- the Digital Ireland

Framework and the National Development Plan.

Alteration No.	PMA CH9.20
Chapter/Section	Section 9.10 Telecommunications and ICT Strategy

Insert a new Telecommunication and ICT Objective on page 376 as follows:

To 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, the environment, biodiversity and built or natural heritage.

Submission(s) Received on PMA:	WXF-C29-PMA-50 Department of the Environment,
	Climate and Communications (DECC)

Summary of Issues:

The DECC request that, in order to ensure that decisions made on foot of these policy revisions are consistent with the National Planning Framework, additional references to the national objectives as expressed in 'Harnessing Digital – the Digital Ireland Framework' and the National Development Plan be included in this PMA if possible.

Chief Executive's Response:

The request is noted; however, the premise of this new objective is to facilitate the relocation or replacement of existing infrastructure where it represents a visual, residential amenity, environmental or heritage related gain. As such, referencing of those policy documents is not considered necessary in the objective.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH9.20.

Alteration No.	PMA CH9.21
Chapter/Section	Section 9.11.3 Sources of Flood Risk in County Wexford

Proposed Material Alteration

Insert the following paragraph after the second paragraph in Section 9.11.3 Sources of

Flood Risk in County Wexford on page 380:

<u>Groundwater</u>

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.

Submission(s) Received on PMA:	WXF-C29-PMA-34 Office of Public Works (OPW)
	WXF-C29-PMA-50 Geological Survey Ireland (GSI) (forms part of the DECC's submission).

Summary of Issues:

Submission WXF-C29-PMA-34 OPW welcomes this PMA which provides clarifications regarding groundwater flooding.

Submission WXF-C29-PMA-50 GSI welcomes the inclusion of the text relating to groundwater flooding, and they recommend the ongoing use of their groundwater maps and datasets within the Development Plan. It is also noted that proposed County Development Plans should consider Groundwater Protection Schemes for groundwater protection (see Circular SP5-03).

Chief Executive's Response:

The comments are noted and welcomed. It is further noted that Section 9.5.3 and Objective WS01 in Chapter 9 Infrastructure Strategy and Objective WQ09 in Section 10.5.7 of the Draft Plan refers to Groundwater Protection Schemes.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH9.21.

Alteration No.	PMA CH9.22
Chapter/Section	Section 9.11.5 Flood Mapping

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 Fluvial 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 <u>some of</u> the above. These maps are available to view on the Council's website. <u>The OPW National Indicative Fluvial Mapping do not form part of the SFRA.</u>

Other flood mapping resources include the OPW benefitting land maps, mineral alluvial soil mapping and the Ordnance Survey 'lands liable to floods' mapping, <u>Geological Survey of Ireland flood mapping and climate research projects such as the GWFlood project and the GWClimate project,</u> flood studies and reports and working knowledge from local authority engineers.

Submission(s) Received on PMA:	WXF-C29-PMA-34 Office of Public Works (OPW)
	WXF-C29-PMA-50 Geological Survey Ireland (GSI) (forms part of the DECC's submission).

Summary of Issues:

Submission WXF-C29-PMA-34 OPW welcomes this PMA which provides clarifications in relation to the National Indicative Fluvial Mapping (NIFM).

Submission WXF-C29-PMA- 50 GSI welcomes the inclusion of their GWClimate and GWFlood projects in this PMA.

Chief Executive's Response:

The comments are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH9.22.

Alteration Numbers.	PMA CH9.23 to PMA CH9.27
Chapter/Section	Section 9.11.9 Riparian Zones and Flood Risk
enapser, essaion	Management and Section 9.11 Flood Risk and Surface
	Water Management

Proposed Material Alteration

Please refer to PMA CH9.23, PMA CH9.24, PMA CH9.25, PMA CH9.26 and PMA CH9.27on pages 134 to 135 in Book 1 of the PMA documents for the text of these PMA.

Submission(s) Received on PMA:	WXF-C29-PMA-34 Office of Public Works (OPW)

Summary of Issues:

The OPW welcomes PMA CH9.23 to CH9.27 regarding the use of Nature Based solutions in flood risk management and sustainable drainage.

Chief Executive's Response:

The comments are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH9.23, PMA CH9.24, PMA CH9.25, PMA CH9.26 and PMA CH9.27.

Alteration No.	PMA CH9.28 and PMA CH9.29
Chapter/Section	Section 9.11.11 Surface Water Management
Proposed Material Alteration	

PMA CH9.28

Amend Surface Water Management Objective SWM01 on page 389-390 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.

PMA CH9.29

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.

Submission(s) Received on PMA: WXF-C29-PMA-12 Irish Water

WXF-C29-PMA-34 Office of Public Works (OPW)

Summary of Issues:

Submission WXF-C29-PMA-34 OPW welcomes PMA CH9.28 and CH9.29 regarding the use of Nature Based solutions in flood risk management and sustainable drainage.

Submission WXF-C29-PMA-12 Irish Water welcomes the addition of objectives promoting the use of Nature based solutions to manage rainwater at the surface in new developments. However, they recommend the introduction of further objectives to retrofit/introduce nature-based SuDS in areas contributing to combined drainage systems where streetscape enhancement programmes or resurfacing programmes are planned. This will provide additional capacity in combined drainage areas for growth and reduce CSO spills.

Chief Executive's Response:

The comments are noted and welcomed.

PMA CH11.14 in Chapter 11 Landscape and Green Infrastructure relates to the use of green infrastructure in the retroffiting of streets in towns and villages. It is considered that a further minor modification could be made to that PMA to address Irish Water's request to use nature-based SuDS in areas contributing to combined drainage system. Please refer to the Chief Executive 's Recommendation under PMA CH11.14 for the wording of the minor modification.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH9.28 and PMA CH9.29.

General Observation Received

Submission WXF-C29-PMA-1 Gas Networks Ireland advise that they have no comment to make in regard to Draft Plan.

Chief Executive's Response:

No issues raised.

Chief Executive's Recommendation:

None required.

Issues raised in submissions that do not relate to a specific PMA

Submission No:	WXF-C29-PMA-12 Irish Water
Cumprosus of Ionicos	

Summary of Issues:

In respect of the proposed zoning of areas, Irish Water draw the attention of the Planning Authority to the requirements of the Irish Water Connection Charges Policy which sets out the requirements of developers to provide the local infrastructure to cater for their developments or to pay the costs associated with the delivery of the quotable element of the infrastructure provision to service their zoned lands. See https://www.water.ie/connections/ for further details.

Chief Executive's Response:

The comments are noted.

Chief Executive's Recommendation:

No recommendation required as it does not relate to a specific PMA.

Submission No:	WXF-C29-PMA-12 Irish Water

Summary of Issues:

Irish Water provide a general comment on all PMAs amending land use zoning:

- Available network information indicates short network extensions may be required to service some zoned sites.
- Depending on the extent of development realised, localised network upgrades may also be required, particularly in areas served by 150mm diameter sewers or watermains with a diameter of 80mm or less.
- Third party agreement may be required where it is proposed to service a new development via private property or private water services infrastructure.
- Within Village boundaries, where a development is not serviced by existing
 infrastructure, the feasibility of extending the public network, to the unserviced sites
 would be assessed via the Irish Water New Connections process.
- In order to maximise the capacity of existing collection systems for foul water, the
 discharge of additional surface water to combined (foul and surface water) sewers is not
 permitted. The removal of stormwater from combined sewers as part of roads, public
 realm, residential or other developments is strongly encouraged. This is particularly
 relevant to the achievement of compact growth objectives.
- Where network reinforcements such as upgrades or extensions are required, these shall be developer driven unless there are committed Irish Water projects in place to progress such works.
- All new residential and commercial/industrial developments wishing to connect to an
 Irish water network are to be assessed through Irish Water's Connections and Developer

 Service process which will determine the exact requirements in relation to network and

treatment capacity.

- Where Irish Water assets are within a proposed development site, these assets must be
 protected and diverted. A diversion agreement may be required if there is a possibility
 that Irish Water assets will need to be altered or diverted as a result of a proposed
 development.
- Development in the vicinity of Irish Water assets must be in accordance with Irish
 Water's standard details and codes of practice.

Chief Executive's Response:

The submission does not identify the specific spatial areas in Bunclody Town and/or Rosslare Harbour and Kilrane that these comments relate to. Both the Bunclody Town Settlement Plan and the Rosslare Harbour and Kilrane Settlement Plan include comprehensive Infrastructure Assessment Reports (IARs) detailing the infrastructural requirements for individual residential zoned sites. The Irish Water submission does not provide specific comments on the PMA relating to the IARs.

The Council will have regard to the points raised in the preparation of future Local Area Plans, Settlement Plans and Settlement boundaries and in the assessment of planning applications.

Chief Executive's Recommendation:

No recommendation required as it does not relate to a specific PMA.

4.1.8 Volume 1 - Chapter 11 Landscape and Green Infrastructure

The following submissions were received on the PMA to Chapter 11:

Alteration No.	PMA CH11.6
Chapter/Section	Section 11.12 Green Infrastructure

Proposed Material Alteration

Insert the following new paragraph after the second paragraph in Section 11.12 Green Infrastructure on page 437:

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.

Submission(s) Received on PMA:	WXF-C29-PMA-12 Irish Water
	WXF-C29-PMA-34 Office of Public Works OPW)

Summary of Issues:

Submission WXF-C29-PMA-12 Irish Water welcome the addition of objectives promoting the use of Nature based solutions to manage rainwater at surface in new development. However, they recommend the introduction of further objectives to retrofit/introduce nature-based SuDS in areas contributing to combined drainage systems where street scape enhancement programmes or resurfacing programmes are planned. This will provide additional capacity in combined drainage areas for growth and reduce CSO spills.

Submission WXF-C29-PMA-34 OPW welcome this PMA relating to the use of Nature Based solutions in flood risk management and sustainable drainage.

Chief Executive's Response:

The comments are noted and welcomed. As previously responded under PMA CH9.28 and PMA CH9.29 in Chapter 9 Infrastructure Strategy, it is recommended that PMA CH11.14 in this chapter can be further modified to address Irish Water's request to use nature-based SuDS in areas contributing to combined drainage system. Please refer to the Chief Executive's Recommendation under PMA CH11.14 for the wording of the further minor modification.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH11.6.

Alteration No.	PMA CH11.9
Chapter/Section	Section 11.12 Green Infrastructure

Proposed Material Alteration

Amend Green Infrastructure Objective GI01 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., pPlanning 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 <u>unless absolutely necessary and unavoidable.</u>
- i. Creation of open drainage ditches instead of underground pipes where appropriate as these provide additional habitats and water source for wetland species.
- 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.

Submission(s) Received on PMA: WXF-C29-PM

WXF-C29-PMA-34 Office of Public Works OPW)

Summary of Issues:

The OPW welcome this PMA relating to the use of Nature Based solutions in flood risk management and sustainable drainage.

Chief Executive's Response:

The comments are noted and welcome.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH11.9.

Alteration No.	PMA CH11.13, PMA CH11.14 and PMA CH11.15
Chapter/Section	Section 11.12 Green Infrastructure

PMA CH11.13

Insert a new Green Infrastructure Objective 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 stakeholders 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.

PMA CH11.14

Insert a new Green Infrastructure Objective on page 441 as follows:

To promote the appropriate retrofitting of streets and spaces in towns and villages with green infrastructure.

PMA CH11.15

Insert a new Green Infrastructure Objective 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 the OPW to make these amendments of under the Arterial Drainage Scheme.

Submission(s) Received on PMA:	WXF-C29-PMA-34 Office of Public Works (OPW)
Summary of Issues:	

The OPW welcome these three PMA regarding river restoration and reopening of culverts where appropriate, and the retrofitting of green infrastructure.

Chief Executive's Response:

The OPW's comments are noted and welcomed.

As previously responded to under PMA CH9.28, PMA CH9.29 and PMA CH11.6, it is considered that PMA CH11.14 can be further modified to address the request of Irish Water to highlight the use of nature-based solutions in the retroffiting of streets in areas contributing to combined drainage system.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH11.13 and PMA CH11.15.

It is recommended that the Plan is made with PMA CH11.14 subject to the following minor modification (see blue text):

To promote the appropriate retrofitting of streets and spaces in towns and villages with green infrastructure and nature-based SuDs solutions particularly in areas contributing to combined drainage systems.

4.1.9 Volume 1 - Chapter 12 Coastal Zone Management and Marine Spatial Planning

The following submissions were received on the PMA to Chapter 12:

Alteration No.	PMA CH12.10
Chapter/Section	Section 12.5.4 Coastal Erosion

Proposed Material Alteration

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 resurveying 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.

Submission(s) Received on PMA:	WXF-C29-PMA-50 Geological Survey Ireland (GSI) (forms
	part of the DECC's submission)

Summary of Issues:

GSI welcomes the amendment to the paragraph to highlight the role of the CHERISH project in surveying sections of the Wexford coast.

Chief Executive's Response:

The comments are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH12.10.

Alteration No.	PMA CH12.13
Chapter/Section	Section 12.5.4 Coastal Erosion

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.

Submission(s) Received on PMA:	WXF-C29-PMA-50 Geological Survey Ireland (GSI) (forms
	part of the DECC's submission).

Summary of Issues:

GSI welcomes the inclusion of their Coastal Vulnerability Index and mapping datasets and advise that this map and dataset are updated regularly and refined as new data becomes available.

Chief Executive's Response:

The comments are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH12.13.

4.1.10 Volume 1 - Chapter 13 Heritage and Conservation

The following submissions were received on the PMA to Chapter 13:

Alteration No.	PMA CH13.17 and PMA CH13.18
Chapter/Section	Section 13.3.2 Maritime and Underwater Archaeology
Proposed Material Alteration	

PMA CH13.17

Insert a 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.

PMA CH13.18

Amend the text in the 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.

Submission(s) Received on PMA:	WXF-C29-PMA-44 Department of Housing, Local
	Government and Heritage
Summary of Issues:	
National Monuments Service (NMS) advises that policies for the protection of our	

archaeological heritage must also incorporate explicit protection for underwater sites and archaeology. The marine area, rivers and lakes of the county play host to an abundance of underwater archaeological heritage that requires protection and merits promotion. Urban riverscapes in the county's medieval towns (e.g. New Ross, Enniscorthy and Wexford) are repositories of a dense concentration of a diverse range of archaeological heritage in a variety of settings, including terrestrial, underwater, reclaimed ground, floodplains, industrial, vernacular, estuarine and maritime. While the importance of underwater archaeology has been noted in this section of the plan, this is not reflected in the emerging statement of policy. NMS recommends inclusion of the following additions to Section 13.3.2:

- The Council will protect, preserve and promote the archaeological value of underwater archaeological sites and objects in rivers, lakes, intertidal and subtidal environments. In assessing proposals for development, the Council will take account of the Archaeological Potential of rivers, lakes, intertidal and sub-tidal environments.
 Where flood relief schemes are being undertaken, the Council will have regard to the Archaeological Guidelines for Flood Relief Schemes (DHLGH and OPW 2021) and will seek to minimise the impact of these developments on underwater archaeological heritage, particularly in historic towns.
- The Council will seek to secure the preservation in situ of all sites, features, protected
 wrecks and objects of archaeological interest within the county. In securing such
 preservation the Council will have regard to the advice and recommendations of the
 National Monuments Service, Department of Housing, Local Government and Heritage
 and the National Museum of Ireland.
- The Council will ensure that proposed development (due to location, size, or nature) which may have implications for the archaeological heritage of the county will be subject to referral to the National Monuments Service and an Archaeological Assessment (including Underwater Archaeological Impact Assessment) which may lead to further subsequent archaeological mitigation avoidance/buffer zones/exclusion zones, monitoring, pre-development archaeological testing, dive survey, archaeological excavation and/or refusal of planning permission. This includes areas close to archaeological monuments, development sites which are extensive in area (half hectare).

- or more) or length (1km or more) or include potential impacts on underwater cultural heritage and development that requires an Environmental Impact Assessment.
- The Council will ensure the protection and preservation of archaeological monuments, wrecks and features, not yet listed in the Record of Monuments & Places (RMP), Sites & Monuments Record (SMR) or Wreck Inventory of Ireland Database and such unrecorded sites, through on-going review of the archaeological potential of the plan area. In securing such protection the council will have regard to the advice and recommendations of The National Monuments Service, Department of Housing, Local Government and Heritage.
- The Underwater Archaeology Unit (UAU), Department of Housing, Local Government and Heritage is engaged in the compilation of an inventory of shipwrecks recorded in Irish waters, including the Wexford Coast. The Wreck Inventory of Ireland Database (WIID) includes all known wrecks over 100 years old and approximately 18,000 records have been compiled and integrated into the shipwreck database thus far. Wrecks 100 or more years old have full legal protection under the National Monuments Acts. They (along with archaeological objects) are automatically protected and generally do not feature in statutory listings (the Record of Monuments and Places and the Register of Historic Monuments). A total of 1660 wrecks are recorded in the WIID from Co. Wexford. 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 Monument Service's Wreck Viewer has been developed to facilitate easy access to the WIID. The Wreck Viewer displays only wrecks for which we have a recorded location (approx. 22% of total entries in the WIID). Of the wrecks listed for Ireland, most are without exact locations and the records of wrecking pertaining to them date from the 18th century or later. Many more previously unknown wrecks therefore await discovery in the coastal waters off Wexford, dating to earlier times but which went unrecorded when lost.
- The Council will seek to protect and preserve the industrial, military, maritime, riverine,
 lacustrine and post- gun batteries, towers, and demesnes. Proposals for refurbishment,
 works to or redevelopment of these sites should be subject to a full architectural and
 archaeological assessment, including, where appropriate, underwater archaeological

impact assessment.

Chief Executive's Response:

The comments are noted. It is considered that the Draft Plan includes appropriate objectives in relation to archaeological heritage, including underwater archaeology. The objectives include conserving and protecting archaeological sites, monuments (including their settings), underwater archaeology and objects including those listed on the Record of Monuments and Places, the Register of Historic Monuments and newly discovered sub-surface remains (Objective AH01), presumption in favour of preservation in situ (Objective AH06), archaeological assessments and consultation with National Monuments Service and (Objectives AH02, AH04 and AH05), amongst others. No amendments are proposed to those objectives and it is considered that PMA CH13.17 and 13.18 provide adequate information in relation to the Wreck Database.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMAs CH13.17 and CH13.18.

Issues raised in submissions that do not relate to a PMA:

The following submission received did not relate to a PMA:

Volume 6

WXF-C29-PMA-39 (Courtown Community Council) requests that Courtown Harbour be included as an Architectural Conservation Area.

Chief Executive's Response:

No amendments were proposed to Volume 6. Objective BH04 in the Draft Plan states that the Council will endeavour to monitor and review the RPS and ACAs during the plan period.

4.1.11 Volume 1 - Chapter 15 Sustainable Communities and Social Infrastructure Strategy

The following submissions were received on the PMA to Chapter 15:

Alteration No.	PMA CH15.8
Chapter/Section	Section 15.7.2 Education

Proposed Material Alteration

Amend the third paragraph under Primary and Post Primary Schools on page 585-586 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 sites for these this schools and any additional schools required during the lifetime of this Plan.

Submission(s) Received on PMA:	WXF-C29-PMA-54 Department of Education

Summary of Issues:

The Department of Education welcomes the addition of text relating to the announcement of its decision to establish a new post primary school for Gorey Town.

Chief Executive's Response:

The comments are noted and welcomed. As the school opened in temporary buildings in September 2021, it is considered appropriate to modify the wording of the PMA to reflect that position.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH15.8 subject to the following minor modification (see blue text):

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 A new post primary school for in Gorey Town which is expected to open in opened in temporary accommodation in September 2021. The Council will work with the Department to find a suitable sites for these this schools and any additional schools required during the lifetime of this Plan.

Alteration No.	PMA CH15.9
Chapter/Section	Section 15.7.2 Education

Proposed Material Alteration

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 to adequate amenity and sports facilities being maintained.

Submission(s) Received on PMA:	WXF-C29-PMA-54 Department of Education
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Summary of Issues:

The Department of Education welcomes the additional text relating to the intensification of school sites.

Chief Executive's Response:

The comments are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan is made PMA CH15.9.

Alteration No.	PMA CH15.11
Chapter/Section	Section 15.7.2 Education

Proposed Material Alteration

Insert a 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.

Submission(s) Received on PMA:	WXF-C29-PMA-54 Department of Education
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Summary of Issues:

The Department of Education welcomes this new objective which relates to the intensification of school sites. It notes that the Council will support the intensification of development on existing school sites, where appropriate, and that the Council will seek to accommodate additional educational requirements which may emerge over the lifetime of the Plan.

Chief Executive's Response:

The comments are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH15.11.

Alteration No.	PMA CH15.12
Chapter/Section	Section 15.7.2 Education

Proposed Material Alteration

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.

Submission(s) Received on PMA:	WXF-C29-PMA-54 Department of Education

Summary of Issues:

The Department of Education notes this amendment which proposes to include additional text in this objective. The Department further notes its concerns 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 Conard Little will be addressed in the forthcoming Local Transport Plan and Local Area Plan for the town.

Chief Executive's Response:

The comments are noted. The Council is collaborating with the stakeholders on the route and design of this road. The Orbital Road will also be addressed in the forthcoming Local Transport Plan and Local Area Plan for Wexford Town.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA CH15.12.

4.2 Volume 2 - Development Management Manual

The following submissions were received on the PMA to Volume 2:

Alteration No.	PMA DMM.15 and DMM.16
Chapter/Section	Section 8.2.1 Surface Water Management

Proposed Material Alterations

PMA DMM.15

Insert the following text at the start of the second paragraph in Section 8.2.1 Surface Water Management on page 126:

The application of SuDS should prioritise the use of appropriate nature-based solutions where possible. The design of SuDS measures should have regard to the CIRIA report C753 the SuDS Manual (2015) in order to maximise benefits.

PMA DMM. 16

Amend the first sentence of the third paragraph in Section 8.2.1 Surface Water Management on page 126 as follows:

SuDS <u>and natural based solutions</u> include <u>devices such as</u> <u>bioretention areas</u>, swales, permeable pavements, filter drains, storage ponds, <u>basins</u>, <u>rain gardens</u>, and constructed wetlands, <u>filter drains</u>, soak ways and green roofs.

Submission(s) Received on PMA:	WXF-C29-PMA-34 Office of Public Works (OPW)

Summary of Issues:

The OPW welcomes both PMAs which relates to the use of Nature Based solutions in flood risk management and sustainable drainage.

Chief Executive's Response:

The comments are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA DMM.15 and PMA DMM.16.

Issues raised in submissions that do not relate to a PMA.

Submission(s) Received on PMA: WXF-C29-PMA-55 National Transport Authority (NTA)

Summary of Issues:

In relation to Section 6.4.2 Bicycle Facilities and Storage Table 6-10 Bicycle Parking Standards, the NTA recommend that these standards should be informed by the 'Standards for Cycle Parking and Associated Cycling Facilities for New Developments' document issued by Dun Laoghaire – Rathdown County Council in 2018, which includes comprehensive guidance on the design of cycling parking.

Chief Executive's Response:

The issue raised does not relate to a PMA and as such cannot be considered at this stage.

Chief Executive's Recommendation:

No recommendation as it does not relate to a specific PMA.

Submission(s) Received on PMA: WXF-C29-PMA-38 Construction Industry Federation (CIF)

Summary of Issues:

Access to preplanning meetings and associated timescale for same remains a growing concern and a clear contributor to slowing the delivery of residential developments. While CIF welcome the mandatory timescales for both the pre-planning process and the appeals process associated with the new Large Scale Residential Developments (LRD), development plans should include aspirational targets for dealing with and facilitating pre-planning discussions in line with the Development Management Guidelines recommendations for same. There should also be consistency from pre-planning advice to the outcomes of a planning applications. This should be a priority of the Local Authority and reflected in the Plan.

Chief Executive's Response:

The issues raised do not relate to a PMA and as such cannot be considered at this stage.

Notwithstanding, it is considered important to note the following. With regard to pre-planning, the Planning Authority is guided by the timeframes set out under Section 247 of the Planning

and Development Act, 2000 (as amended). The section outlines that an applicant is required to engage in pre-application discussions with the Planning Authority for a proposed development of 10 or more residential units. The Planning Authority is required to hold this consultation within 4 weeks of the date of receipt of the request, but this period may be extended at the discretion of Planning Authority. It is noted that this section further prescribes that if the consultation is not held within the designated timeframe, the applicant can proceed to submit the planning application. The legislation pertaining to Large-Scale Residential Schemes (100 or more dwellings) also provides for an 8-week consultation stage with the Planning Authority. Accordingly, as pre-planning consultation timeframes for residential schemes are prescribed by statute, it is not considered necessary to include timeframes in the Plan.

Chief Executive's Recommendation

No recommendation as it does not relate to a specific PMA.

4.3 Volume 3 – Settlement Plans and Specific Objectives

4.3.1 Section 1 Bunclody Town Settlement Plan

The following submissions were received on the PMA to the Bunclody Town Settlement Plan

chapter/ occion	and the Zening and Metric and Costion 1.C
	and Use Zoning and Matrix and Section 1.6 wn Infrastructural Assessment Report

Proposed Material Alteration

For PMA BT.9 – please refer to page 195 and Map 1 in Book 1 of the PMA documents.

For PMA BT.15 – please refer to pages 200-210 in Book 1 of the PMA documents.

Submission(s) Received on PMA:	WXF-C29-PMA-12 Irish Water
	WXF-C29-PMA-53 Office of the Planning Regulator (OPR)

Summary of Issues:

Submission WXF-C29-PMA-12 Irish Water notes the zoning PMA proposals and outlines that the information provided in the capacity registers as well as the attached Table 1 and Table 2 can be utilised to assist in the determination. Irish Water notes that developers and planning authorities should be aware that the feasibility of servicing of a site can be determined by submitting a PCE Enquiry to Irish Water.

Submission WXF-C29-PMA-53 OPR notes that Irish Water has stated that there are constraints in the water capacity which may limit development until the planned upgrade is completed.

Chief Executive's Response:

The Council welcomes the indication that the PCE Enquiry system can be used to inform the Infrastructural Assessment Report/Land Use Zoning process.

The most up-to-date Irish Water Capacity Registers were issued to the Council in March 2022. These registers indicate that:

- There is an available headroom of 3,803 p.e. in the Bunclody Town wastewater treatment plant.
- There is potential capacity available (level of service improvement required) in the water supply.

Table 1 referred to in the Irish Water submissions indicates that:

- It is envisaged that capacity is available in the main water networks supplying the town to cater for the population targets identified to 2027. Local network upgrades would need to be delivered to provide capacity to individual sites. These can be customer driven/funded in accordance with Irish Water's Connections Charging Policy.
- In relation to the Water Resource Zone, capacity is available but not for the full population target identified in the Draft CDP/PMA. A project is progressing to increase capacity which is anticipated will be completed within the lifetime of the Plan.

Table 2 referred to in the Irish water submission indicates that:

- Currently it is envisaged that there is capacity available in the wastewater network to
 cater for the population targets identified in the Draft CDP to 2027. Local network
 upgrades would need to be delivered in some areas to provide capacity to individual
 sites, these can be customer driven/funded in accordance with the requirements of the
 Connections Charging Policy.
- Bunclody Town's wastewater treatment plant has sufficient capacity to cater for the
 projected growth within the lifetime of the plan. It is noted that approximately 30% of the
 Bunclody agglomeration area is within County Carlow and will need to cater for that
 additional load.

Having regard to the foregoing it is considered appropriate to update the details in the Infrastructural Assessment Report pertaining to the wastewater and water capacities. However, as the information set out in Section 1.3.7 Infrastructure of the Settlement Plan is not the subject of a PMA, it is not possible to amend same.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA.BT.9.

It is recommended that the Plan is made with PMA BT.15 subject to a minor modification.

Please refer the Chief Executive's Recommendation under Theme 1 Sustainable Development Observation 2 Bunclody Town Clarifications on pages 39-40 in Section 2 of this report for the wording of the proposed modification.

Alteration No.	PMA BT.11
Chapter/Section	Section 1.4.9 Transport and Movement

Proposed Material Alteration

Insert a new objective after Objective B39 on page 35 as follows:

To work with Transport Infrastructure Ireland and all other stakeholders in the development and assessment of options, including those relating to the link road and/or a possible by-pass, to improve regional journey times and to reduce the impacts of national road traffic on the public realm and maximise opportunities for walking and cycling in Bunclody town centre. Any such options shall be subject to compliance with the Environmental Impact and Habitats Directives.

Submission(s) Received on PMA:	WXF-C29-PMA-20 Transport Infrastructure Ireland (TII)
	WXF-C29-PMA-3 WexBug

Summary of Issues:

Submission WXF-C29-PMA-20 TII notes this PMA outlines the Council's objective to develop and assess options for road links in the Settlement Plan area, which may include a possible bypass of the N80 national road. As outlined in TII's observations on the Draft Plan, such proposed road schemes are in addition to relevant national road schemes identified in the National Development Plan. While such 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, the Council will be aware that 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 should be developed in consultation with and subject to the agreement of TII and in accordance with the requirements of the DoECLG Spatial Planning and National Roads Guidelines.

Submission WXF-C29-PMA-3 WexBug in their submission to PMA CH8.32 (Volume 1, Chapter 8 Transportation Strategy) contend that priority should be given to creating a safe segregated cycling route linking Clohamon to Bunclody Town centre and beyond. Further project liaison with Carlow County Council could help provide a segregated cycle lane through Carrigduff linking onto the hard shoulder on the Carlow side of the N80. The uphill section here should be prioritised. It is also suggested that the words "Any such options shall be subject to compliance with the Environmental Impact and Habitats Directives" should be deleted as all projects are subject to these non-discretionary statutory obligations and need not be_explicitly written as potential limitation/excuses to implementation of schemes to improve the public realm.

Chief Executive's Response:

The TII's comments are noted.

With regard to WexBug's comments about the prioritisation of a segregated cycling route, it is noted that Objective B36 in the Draft Bunclody Town Settlement Plan is "to provide a cycle route, segregated where possible, from Bunclody to Clohamon on the N80 subject to Appropriate Assessment in accordance with the Habitats Directive to ensure the protection and preservation of all designated SACs and SPAs". PMA BT.14 also amends Map 2 Objectives to show a footpath and cycle path on the N80 as far as the Settlement Plan boundary.

As outlined in the Chief Executive's Response to PMA CH8.32, it is the Council's preference to provide segregated cycling routes, however, this is not always possible for reasons including road widths and alignment. The Council will continue work with Carlow County Council to coordinate infrastructure projects.

With regard to the compliance with Directives, as outlined in the Chief Executive's Response to PMA CH8.32 (Chapter 8 Transportation) certain infrastructure is identified as a potential threat to Natura 2000 sites, and as such the Council must ensure that Plan protects those sites.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA BT.11.

Alteration No.	PMA BT.14
Chapter/Section	Section 1.4.9 Transport and Movement

Proposed Material Alteration

Amend Map 2 Objectives to:

- (a) Show a footpath and cycle path on the N80 as far as the Settlement Plan boundary, and
- (b) Amend the route of the indicative Link Road from the R746 to the N80.

Submission(s) Received on PMA:	WXF-C29-PMA-20 Transport Infrastructure Ireland (TII)

Summary of Issues:

TII's initial submission on the Draft Plan stated that it will be critical that any proposals for providing cycle lanes along the N80 ensure road safety standards for all road users are adhered to and standards comply with TII publications. In addition, TII recommends early consultation in relation to any potential impacts for the national road network and to ensure schemes can be progressed consistent with the provisions of official policy and complementary to safeguarding the strategic function of national roads and the safety of all road users. This remains TII's position.

Chief Executive's Response:

The comments are noted. The Council will continue to consult with the TII in matters relating to the national road network.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA BT.14.

4.3.2 Section 2 Rosslare Harbour and Kilrane Settlement Plan

The following submissions were received on the PMA to the Rosslare Harbour and Kilrane Settlement Plan:

Alteration No.	PMA RHK.3
Chapter/Section	Section 2.3.9 Built and Natural Heritage

Proposed Material Alteration

Insert the following text after paragraph 2 in Section 2.3.9 Built and Natural Heritage on page 68 as follows:

There are also newly identified archaeological sites which are scheduled for inclusion on the next Record of Monuments and Places. These are:

- WX048-017 17th century house, Ballygerry
- WX048-018 Windmill, Ballygerry
- WX048-154001 Ring ditch, Churchtown
- WX048-154002 Ring ditch, Churchtown
- WX048-154003 Ring ditch, Churchtown
- WX048-155 Excavation, Ballygerry
- WX048-156 Ring-ditch, Ballyaddragh
- WX048-016001 Church, Churchtown
- WX048-016002 Graveyard, Churchtown

Submission(s) Received on PMA:	WXF-C29-PMA-47 Larry Dunne

Summary of Issues:

The submission welcomes the protection of these sites.

Chief Executive's Response:

The comments are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA RHK.3

Alteration No.	PMA RHK.7	
Chapter/Section	Section 2.4.8 Residential and Table RHK – 1 Future	
	Residential Development and Delivery Approach	
Proposed Material Alteration		
Please refer to pages 215 and 216 of Book 1 of the PMA documents for the wording of		
this PMA.		
Submission(s) Received on PMA:	WXF-C29-PMA-47 Larry Dunne	
Summary of Issues:		
The previous observations regarding the limited population allocation apply.		
Chief Executive's Response:		
Noted. The issues around population allocations have been responded to in the Chief		
Executive's Response to PMA CH3.33 in Chapter 3 Core Strategy.		
Chief Executive's Recommendation:		
It is recommended that the Plan is made with PMA RHK.7.		

Alteration No.	PMA RHK.9
Chapter/Section	Section 2.4.9 Transport and Movement
Proposed Material Alteration	

This PMA proposes to replace the text and Figure RHK-4 relating to the Rosslare Europort Access Road in Section 2.4.9 on pages 86-78 with the following text and new figure RHK-4:

N25 Rosslare Europort Access Road

The proposed access road to Rosslare Europort is also discussed in Section 8.7.1.1 in Chapter 8 Transportation Strategy in Volume 1 Written Statement. Following the completion of Phase 2 (Option Selection), the Council confirmed the selected scheme option. The chosen option combines the construction of a new offline access road to the port, and the upgrade of the existing Ballygerry Link Road as shown in blue in Figure RHK-4.

The selected 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.

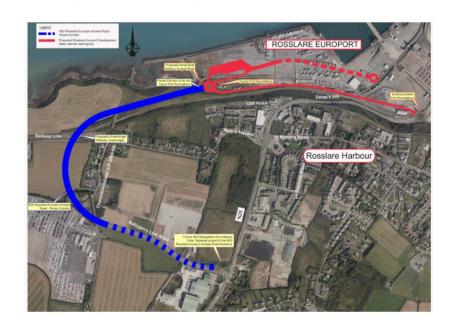


Figure RHK-4 Selected Scheme Option for the N25 Rosslare Europort Access Road.

Submission(s) Received on PMA:

WXF-C29-PMA- 20 Transport Infrastructure Ireland (TII)

WXF-C29-PMA-47 Dunne

Summary of Issues:

Submission WXF-C29-PMA-47 Dunne supports this PMA.

Submission WXF-C29-PMA-20 TII outlines that the PMA including PMA RHK.9 are similar to those included in Volume 1 relating to the N25 Rosslare Europort Access Road, therefore, TII's comments outlined above in relation to PMA CH8.29 apply.

Chief Executive's Response:

The support for this PMA is welcome. The TII's comments are noted. Please refer to the Chief Executive's Response provided under PMA CH8.29 (Volume 1, Chapter 8 Transportation Strategy).

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA RHK.9.

Alteration No.	PMA RHK.10
Chapter/Section	Section 2.4.9 Transport and Movement

Proposed Material Alteration

Amend Objective RHK21 in Transport and Movement Objectives on page 88 as follows:

To improve pedestrian and cycle facilities in general and particular in the plan area by facilitating the footpath and cycle ways identified on Map 4 Objectives, improve crossings at junctions, to-improve the quality and width, where appropriate, of all footpaths in the settlement plan area and improved access for people with disabilities and to provide cycle friendly routes to/from the school with cycle parking facilities and encourage the school to provide cycle training to all pupils.

Submission(s) Received on PMA:	WXF-C29-PMA-47 Larry Dunne

Summary of Issues:

This PMA, which facilitates footpaths and cycleways, is a good move. It is suggested that the current speed limit from the south of Rosslare Harbour village to the north of Kilrane village

should be reversed to 50kph. The cycle ways and pedestrian ways are in constant use by school children and adults.

Chief Executive's Response:

The comments are noted. The Council continues to develop active travel infrastructure in the Settlement Plan area. The setting of speed limits is not a matter for the Development Plan. This suggestion will be referred to the Transportation Section for consideration.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA RHK.10.

Alteration No.	PMA RHK.15
Chapter/Section	Section 2.4.9 Transport and Movement

Proposed Material Alteration

Amend the first paragraph relating to the Europort on page 93 as follows:

The RSES also highlights the need for continued development and improvement of ports by the relevant responsible commercial State-Owned Enterprises consistent with the sectoral policies defined through the National Ports Policy. It also highlights the need for continued support for Rosslare Europort (including the port's Strategic Plan) and the need for a strategic review of Rosslare Europort. A Strategic Development Plan is currently being prepared by Irish Rail and proposals include building a longer berth for much bigger ships and more than doubling the number of spaces (to 800) for unaccompanied trailers once the existing customs checkpoints are moved. larnród Éireann, as the Port Authority for Rosslare Europort, has recently secured planning permission for a major transformation of Rosslare Europort, as part of its Port Masterplan. The Masterplan will see significant investment in the infrastructure of the port and allow for expansion in the current key areas of RORO freight and passenger transport.

The Masterplan will also be providing the infrastructure necessary to facilitate the impending border inspection requirements while also creating increased capacity to

<u>Capitalise on new business opportunities</u> <u>becoming available to the port. The</u>

<u>Masterplan, together with initiatives under the strategic plan for the port, will see</u>

<u>over €30 million invested by larnród Éireann in Rosslare Europort over a five-year</u>

<u>period. It will ensure that Rosslare Europort will be equipped with the capacity,</u>

<u>facilities and technology to facilitate major growth for the benefit of the region and the wider national economy. The major changes at Rosslare Europort will be:</u>

- New configuration of the port aligned to maximise future growth of the port and support regional and national development.
- Significant new facilities and infrastructure to develop Rosslare Europort to its
 full potential as Ireland's gateway port to both the United Kingdom and
 Continental Europe.
- Design and develop a Sustainable, Seamless and Smart Pot that will be best in class internationally

Submission(s) Received on PMA:

WXF-C29-PMA-47 Larry Dunne

Summary of Issues:

The PMA is welcomed however the previous observations relating to pro-rata residential development to facilitate and complement the proposed port expansion apply.

Chief Executive's Response:

The support for this PMA is welcomed. The Chief Executive has responded to the issues raised in relation to the population allocation to Rosslare Harbour and Kilrane under PMA CH3.33 in Chapter 3 Core Strategy.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA RHK.15.

Alteration No.	PMA RHK.16
Chapter/Section	Section 2.4.9 Transport and Movement

Proposed Material Alteration

Amend the first paragraph relating to Tourism on page 95 as follows:

The proposed Greenway from Rosslare Europort to Waterford will also attract a lot of visitors and stimulate economic activity. The section of the Greenway from Rosslare Harbour to Rosslare will travel mostly adjacent to the Dublin to Rosslare Europort railway line for approximately 6.2km. Greenways are discussed further in Chapter 7 Tourism and Chapter 14 Recreation and Open Space in Volume 1 Written Statement. The Council have been planning the development of a greenway on the rail line from Rosslare Harbour to Waterford City. However, 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.

Motwithstanding the Council would support such an approach subject to funding being made available by central government. In the interim the Council will support the development of a greenway from Rosslare Harbour to Rosslare Strand if this can be done in a manner which does not prejudice the operation or reopening of the lines.

Submission(s) Received on PMA:	WXF-C29-PMA-30 South-East on Track
	WXF-C29-PMA-47 Larry Dunne

Summary of Issues:

Submission WXF-C29-PMA-30 South-East on Track strongly supports this PMA and suggests that the words 'encourage modal shift' be inserted after sustainable travel on the third last line.

Submission WXF-C29-PMA-47 Dunne welcomes this PMA as it is the sensible approach. This rail link needs to be retained; however, it is difficult to see how a parallel greenway can be achieved without extensive land acquisition.

Chief Executive's Response:

The support for this PMA is welcomed. The insertion of the words 'encourage modal shift' is not considered necessary as it is already encompassed in/intended by the wording 'aims of sustainable travel' of paragraph 1.

The comments relating to the need for extensive land acquisition to accommodate a parallel greenway are noted. This will be matter for any future feasibility assessment.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA RHK.16.

Alteration No.	PMA RHK.18
Chapter/Section	Section 2.4.8 Economic Development

Proposed Material Alteration

Amend Objective RHK 55 in Economic Development Objectives on page 99 as follows:

To provide for the section of the Rosslare Harbour to Waterford Greenway within the settlement plan area and ensure that the Greenway does not conflict with the operation of the Rosslare Europort- Dublin railway and subject to compliance with the Habitats Directive and normal planning and environmental criteria.

To support the development of a greenway from Rosslare Harbour to Rosslare Strand subject to this being achieved in a manner which does not prejudice the operation of existing or reopening of unused lines and subject to compliance with the Habitats Directive.

Submission(s) Received on PMA:	WXF-C29-PMA-47 Larry Dunne
Summary of Issues:	

It is difficult to see how this can be achieved in practice. Coastal erosion is a major problem on this stretch of the shoreline. Irish Rail are currently providing major rock armour to protect the Rosslare to Dublin railway. Unless a greenway could become part of the erosion protection works.

Chief Executive's Response:

The comments are noted. The purpose of this objective is to support the development of a greenway between Rosslare Harbour to Rosslare Strand. The issue of coastal erosion will be considered as part of any future feasibility assessment.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA RHK.18.

Alteration No.	PMA RHK.19
Chapter/Section	Section 2.4.8 Economic Development

Proposed Material Alteration

Insert a new Economic Development Objective on page 99 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.

Submission(s) Received on PMA: WXF-C29-PMA-30 South-East on Track

Summary of Issues:

The submission strongly supports this PMA and suggests that the following text be added to the end of the first sentence 'if it can be done in a manner which does not prejudice the operation or reopening of the line'.

Chief Executive's Response:

The support for this PMA is welcomed. As outlined the Chief Executive's Response to PMA

CH8.24 in Chapter 8 Transportation Strategy the additional text clarifications sought by South-East on Track are not deemed necessary. This will be further considered following the outcome of the Rail Review.

Chief Executive's Recommendation:

It is recommended that the Plan is made PMA RHK.19.

Alteration No.	PMA RHK.24 and PMA RHK.26
Chapter/Section	Section 2.5 Land Use Zoning and Matrix

Proposed Material Alteration

Please refer to page 227, Map 3 and page 231 in Book 1 of the PMA documents.

Submission(s) Received on PMA: WXF-C29-PMA-17 Kilrane Concerned Residents Group

Summary of Issues:

The purpose of this submission is to highlight issues around the current usage at, and any further planned development in Kilrane Village, Kilrane Business Park and Kilrane Enterprise Park. The correct planning of current and future access to the business park is crucial to improved functionality of the business park and also to improvements in the quality of life of all residents of the Kilrane-Rosslare Harbour area. It is submitted that issues around the business park need to be addressed immediately, while the options to do so are still there. As things currently stand the land is available to solve these issues, we feel this may not be the case in the future if action is not taken. The future of Kilrane Village and its development is dependent on this issue being resolved within the lifetime of the proposed County Development Plan.

Kilrane Business Park and Kilrane Enterprise Park

The submission takes issue with statements on page 78-79 of the Chief Executive's Report on the Submissions and Observation on the Draft Plan (April 2021) regarding the inclusion of additional Light Industry zoned lands to the east of Kilrane Business Park in the Draft Settlement Plan. It is submitted that before the consultation process had begun in 2020 on the

new plan, these lands to the east of Kilrane Business Park had been earmarked for rezoning in advance of the consultation phase. It is submitted that this is an affront to all landowners who applied through the correct channels, and to the residents of the area who have to deal with the decisions of the Council and an affront to the democratic process and to the correct planning of the Kilrane area.

The lands earmarked for the rezoning are currently occupied by a company who have been operating, known to WCC, without planning permission for two years on these lands. This rezoning is an affront to the rule of law and to the law-abiding businesses and residents of Kilrane. In light of the serious, life threatening, traffic concerns around the school and on the St Helen's Road since the implementation of Brexit, involving businesses accessing KBP and KEP (which WCC are aware of), we feel any further rezoning to allow for further haulage businesses around this area would be negligent on behalf of the Council.

The submission also takes issue with a statement on page 87 of the Chief Executive's Report that "all uses, except for waste management facilities, are potential compatible with the light Industry zoning". The submission quotes the definition of light industry from the Local Government (Planning and Development) Act, 1963 (Exempted Development) Regulations, 1964 as follows; 'Light industry is defined as any 'industrial building in which the processes carried on or the plant or machinery installed are such as could be carried on or installed in any residential area without detriment to the amenity of that area by reason of noise, vibration, smell, fumes, smoke, soot, ash, dust or grit' and submits that no industry currently located there would be a light industry under the definition for same. Complaints have been logged for many years with the Council and the EPA. These businesses are having a detrimental impact on life in Kilrane and local residents with serious traffic safety concerns along St. Helen's Road and around the national school.

The submission states that while they have no problems with the businesses involved (many of them are involved in green industries and they welcome the employment that they provide in the area) it is considered that their current locations are wholly unsuitable.

Visual Improvements at the Business Park

The submission requests the Council to work with the owners of Kilrane Business Park to raise the wall and to landscape the front of the business park to lessen its visual impact and to help with reducing noise and other pollutants and to bring it in line with the standards for business parks and industrial parks set out in the County Development Plan. It is submitted that over the last 20 years, the Council has allowed two separate planning conditions relating to this wall and landscaping, lapse at this site.

Rezoning of Kilrane Business Park and Kilrane Enterprise Park

The submission requests that the lands be rezoned to a mix of residential, business and technology, commercial, community and education and open space and amenity in order to eliminate the life-threatening health and safety traffic issues around Kilrane Village and Kilrane National School, and the major issues affecting the quality of life of the residents of Kilrane. This rezoning is urgent as the problems around the St Helen's Road will only be exacerbated in the coming years with this expansion of port activities in the area. It is further requested that:

- No business in those parks should be haulage based or involved in waste management or heavy industry. Such heavy industries are not appropriate in a residential, community and tourism-based area.
- No haulage or waste management businesses should be located to the south or east of the N25 in the Kilrane and Rosslare Harbour area as many children from Rosslare Harbour have to access the school in Kilrane using this route.
- Rezoning these lands would allow the existing businesses to relocate to lands zoned for industry to the north of Kilrane Village, keeping employment in the area. It would allow those businesses to operate as they need, as they currently are restricted to certain hours of operation by their planning conditions.
- The new rezoned lands would be home to businesses and enterprises that would operate
 only between the hours of 8am to 6pm therefore not affecting the quality of life of the
 residents of Kilrane, or affecting our very important tourism sector, or putting the
 children of Kilrane at risk.

Kilrane Bypass

The submission refers to the progressive decision taken by the Council on the 1st of December 2020 regarding the new access road to Rosslare Port, a decision rectifying many issues around Rosslare Harbour Village regarding the transportation of freight in the area. It is submitted that the residents of Kilrane should be afforded the same solutions to the same problems. The submission calls on the Irish Government to begin the process of rectifying these issues as a matter of urgency through the development of a new access road, bypassing Kilrane at a point to the north of the village and linking with the new proposed port access road.

While welcomed, there are concerns that the life-threatening issues regarding HGV use through Kilrane village and around Kilrane National School will only get worse in light of the major investment in Rosslare Harbour announced in April 2022. In order to achieve the Strategic Aim for Kilrane as outlined in the Settlement Plan, a bypass is crucial to the correct planning and development of Kilrane and to ensure that the quality of life of all the residents of the area is maintained and improved. A petition is attached signed by 400 residents of Kilrane regarding this issue.

Chief Executive's Response:

The issues raised in the submission have been considered in detail. Many of the issues were previously raised at Draft Plan stage and were responded to in detail in the Chief Executive's Report on the Draft Plan (April 2021).

It is the intention of the Council that future heavy industry development will be directed to the 'Industry' lands located to the west and north of the N25.

The suggestion that lands to the east of Kilrane Business Park had been earmarked for rezoning in advance of the consultation phase is noted. Any land use zoning requests received prior to the publication of the Draft Plan were not considered in accordance with the Section 11 (2) (bc) of the Planning and Development Act, 2000 (as amended). The Kilrane Business Park was zoned Light Industry in the 2012 Local Area Plan. This zoning was carried forward to the Draft Settlement Plan, with a commensurate increase in this zoning to allow for expansion or the development of new light industry developments. However, notwithstanding the land use

zoning, all future developments on these lands will be assessed in accordance with the objectives and land use zoning matrix in the Settlement Plan and all the relevant objectives and development management standards in the County Development Plan e.g., traffic safety, noise and environmental management.

The comments regarding unauthorised development on the additional Light Industry lands are noted. There is a current enforcement case relating to these lands.

Having considered the submissions received on the Draft Settlement Plan which raised concerns about the zoning and operation of Kilrane Business Park, three material alterations to the Draft Settlement Plan were proposed:

PMA RHK. 26 – This PMA amends the Land Use Zoning Matrix as follows:

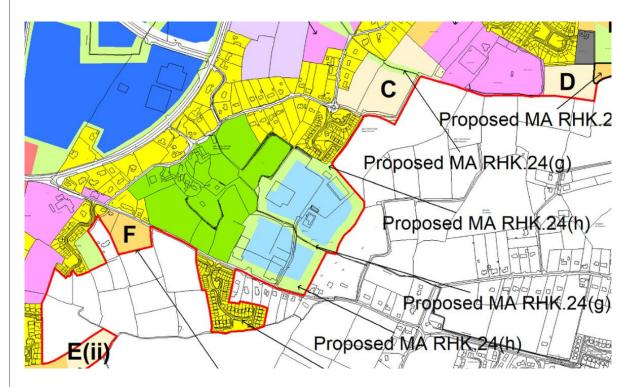
(a) In the Light Industry (LI) column change Waste Management Facilities from Open to Consideration to Not Permitted.

PMA RHK.24 (g) Change the zoning of a portion of the Light Industry lands to Open Space and Amenity (to protect the riparian zone).

This PMA, in turn, reduces the quantum of land zoned for Light Industry development.

PMA RHK.24 (h) Increase the Open Space and Amenity zoning at Kilrane Business Park. This buffer will be a minimum width of 30m at all points along the boundaries of the Business Park. This PMA, in turn, reduces the quantum of land zoned for Light Industry development.

The net effects of these changes were to reduce area of zoned land, increase the buffer to provide protection and remove waste management from the Light Industry column in the Land Use Zoning matrix.



The submission does not refer to these PMAs. It requests the rezoning of the lands to other uses. However, it is not possible to consider that rezoning request at this stage in the plan preparation process. At this juncture, the Settlement Plan can be made with or without the PMA relating to these lands, that is, the lands will be zoned for Light Industry as for the Draft Settlement Plan or with the reduced Light Industry zoning with a small Open Space and Amenity buffer around its boundaries or the lands will be zoned with an increased Open Space and Amenity zoning and a decreased Light Industry zoning as for PMA RHK.24 (g) and (h). It is recommended that the Plan is made with PMR RHK.24 (g) and (h).

It would appear that the submission is of the opinion that in the Chief Executive's Report on the Draft Plan the Council stated that the existing uses in the Business Park fall under the category of Light Industry. What the Chief Executive's Report was referring to was the consideration that all uses in the Land Use Zoning Matrix (except for waste management) would conform with the definition of Light Industry.

The Settlement Plan applies the definition of light industrial as set out under the definition for light industrial buildings in the Planning and Development Regulations 2001 (amended) and which is the same as that definition cited in the submission. As previously outlined in the Chief Executive's Report on the Draft Plan (Book 2, page 87), the land use zoning matrix is intended as a general guideline in assessing the acceptability or otherwise of developments proposed in each zone. The indication that a use would be 'permitted in principle' or 'open to consideration' relates to the acceptability in principle of the use only. Factors such as density, height, traffic generation, environmental factors and design criteria are also of importance in establishing whether a development proposal conforms to the proper planning and sustainable development of an area. It is also important to note that the 'open for consideration' means that the Council may permit where it is satisfied that the suggested form of development will be compatible with the policies and objectives for the zone, will not conflict with permitted uses and conforms with the proper planning and sustainable development of the area.

The land use zoning matrix was reviewed in light of the points raised in the submissions on the Draft Settlement Plan. Regarding the Light Industry zoning, the land use zoning matrix identified the following as 'open for consideration' – agricultural merchants, civic amenity/recycling centre, enterprise centre, office, port-related, public utilities, storage/transport depot, service garage, warehousing and waste management facilities. It was considered that all the uses, except for waste management facilities, were potentially compatible with the light industry definition, and it was therefore recommended that waste management facilities be changed to **N** - **Not Permitted** in the matrix. It is recommended that the Plan is made with this PMA – PMA RHK.26.

The support for the N25 Rosslare Europort Access Road is noted. The request for the fast-tracking of a bypass of Kilrane and the associated petition are further noted. However, the fast tracking of a bypass of Kilrane Village, or any other section of the proposed N11/N25 Oilgate to Rosslare Harbour Scheme, is not feasible from a strategic planning, environmental, procurement or construction point of view. From a timescale and delivery aspect, the project cannot be split as it will negate the completed project Phases 1 and 2, including studies and approvals to date. The CPO process will run in tandem with Phase 3 project deliverables, both

of which are commenced in Q2 2022.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA RHK.24(h) and (g) and PMA RHK.26.

Alteration No.	PMA RHK.24 and PMA RHK.27
Chapter/Section	Section 2.4.5 Land Use Zoning and Matrix and Section 2.6 Rosslare Harbour and Kilrane Infrastructure Assessment Report

Proposed Material Alteration

For PMA RHK.24 please refer to page 227 and Map 3 of Book 1 of the PMA documents. For PMA RHK.27 please refer to pages 232 -242 of Book 1 of the PMA documents.

Submission(s) Received on PMA:	WXF-C29-PMA-12 Irish Water

Summary of Issues:

Irish Water note the zoning PMA proposals and outline that the information provided in the capacity registers as well as the attached Table 1 and Table 2 can be utilised to assist in the determination. Irish Water note that developers and planning authorities should be aware that the feasibility of servicing of a site can be determined by submitting a PCE Enquiry to Irish Water.

Chief Executive's Response:

The most up-to-date Irish Water Capacity Registers were issued to the Council in March 2022. These registers indicate that:

- There is an available headroom of 6,857 p.e. in the Rosslare Harbour wastewater treatment plant.
- There is capacity available in the water supply to cater for 2031 population targets.

Table 1 referred to in the Irish Water submissions indicates that:

 Currently it is envisaged that capacity is available in the main networks supplying the town to cater for the population targets identified to 2027. Local network upgrades would need to be delivered to provide capacity to individual sites. These can be customer driven/funded in accordance with Irish Water's Connections Charging policy.

Table 2 referred to in the Irish Water submission indicates that:

- Currently it is envisaged that there is capacity available in the network to cater for the
 population targets identified in the Draft CDP to 2027. Local network upgrades would
 need to be delivered in some areas to provide capacity to individual sites, these can be
 customer driven/funded in accordance with the requirements of the Connections
 Charging Policy.
- The Rosslare Harbour Wastewater Treatment Plan has sufficient capacity to cater for the
 projected growth within the lifetime of the plan. This facility may also provide the
 treatment infrastructure for Tagoat under the Small Town and Village Growth Programme
 potential solution.

The Rosslare Harbour and Kilrane Settlement Plan and the associated Infrastructural Assessment Report reflects the foregoing and as such it is not necessary to modify the text relating to same.

Chief Executive's Recommendation:

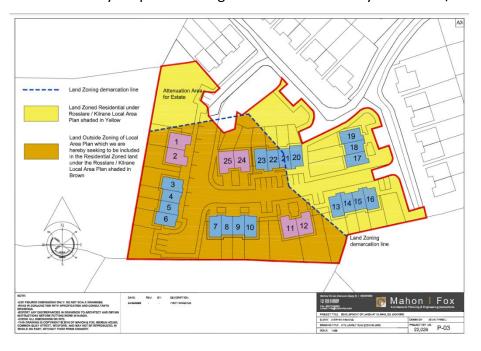
It is recommended that the Plan is made with PMA RHK.24 and PMA RHK.27.

Issues raised that do not relate to a PMA:

Submission(s) Received:	WXF-C29-PMA-23 Stephen Fanning
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Summary of Issues:

This submission relates to a 0.77ha landholding located to the southwest of Kilrane Manor. The Settlement Plan boundary transects this landholding (see blue hatched line on site layout plan below), with the section inside the boundary zoned Residential. The submission requests that the remainder of the landholding be included within the Settlement Plan boundary and that this additional land be zoned Residential. It is submitted that the lands are fully serviced and can only be accessed via Kilrane Manor. It is further submitted that the layout of Kilrane Manor was designed in a manner to logically facilitate the expansion of housing provision further south-west. The submission notes that there is a 'live' permission for a single dwelling house on part of the subject lands, which establishes the precedent for residential development but also represents a gross under-utilisation of fully serviced lands. The submission is accompanied by an indicative site layout plan showing 25 houses at a density of 35 units/hectare.



Chief Executive's Response:

PMA RHK.24 details all of the proposed material alterations relating to Map 3 Land Use Zoning. As the submission does not relate to any parcel of land identified under that PMA, it cannot be considered at this stage in the plan preparation process.

It is noted that a submission relating to this land was received at the Draft Plan stage. As outlined in the Chief Executive's Report at that time, there is a limited core strategy allocation available for distribution between the two settlements. Having regard to the location of these lands and having applied the compact growth and sequential approach, the lands were not recommended for inclusion within the Settlement Plan area.

Chief Executive's Recommendation:

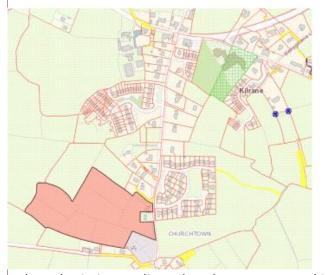
As this submission does not relate to a PMA it cannot be considered at this stage in the plan preparation process.

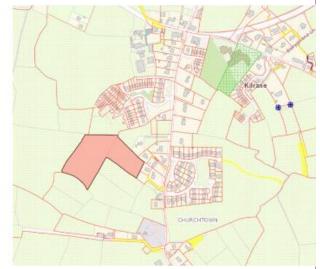
Submission(s) Received

WXF-C29-PMA-51 Forward Developments Ltd

Summary of Issues:

This submission relates to lands located in Churchtown, St. Helen's, to the south of Kilrane village centre. It is requested that these lands, which are located within the established built-up footprint of the village and were previously zoned for residential development and were the subject of planning permission for 130 dwellings houses, be zoned Residential.





The submission outlines that there are several indicators to suggest an adjustment to both the population allocation and the extent of residential zoned may be needed over the lifetime of the plan. These indicators include the increasingly important role of Rosslare Europort as an access point to the European market, together with the presence of Ireland's largest haulage companies in the county and the planned infrastructural upgrade to link the N11 to the port,

Rosslare is becoming a significant employment hub for port-related business. The purpose of the submission is to establish that the subject lands are suitable for development and should be zoned as such when additional lands are required.

It is submitted that this request can be considered under PMA RHK.24, and that the land be zoned for Residential to facilitate additional population if needed. The submission outlines that:

- The site is capable of accommodating development, is serviceable, has a viable access
 point and a pedestrian link to the village centre is viable and can be achieved through
 the existing housing estate to the north.
- In accordance with the National Planning Framework, the lands are located within the
 existing built-up footprint, are fully serviceable and ready to go and should be
 considered Tier 1.
- The site which is within the established footprint of the village is defined as backland, infill, greenfield site.

Chief Executive's Response:

PMA RHK.24 details all of the proposed material alterations to Map 3 Land Use Zoning. As the submission does not relate to any parcel of land identified under that PMA, it cannot be considered at this stage in the plan preparation process.

Chief Executive's Recommendation:

As this submission does not relate to a PMA, it cannot be considered at this stage in the plan preparation process.

4.3.3 Section 4 Rosslare Strand Specific Objectives

The following submissions were received on the PMA to the Rosslare Strand Specific Objectives

Alteration No.	PMA RS.7
Chapter/Section	Section 4.4.11 Recreation and Open Space
Proposed Material Alteration	

Amend Objective RS39 in the Recreation and Open Space Objectives on page 176 as follows:

To support the development of the Rosslare to Waterford Greenway proposal and associated spin off developments.

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.

Submission(s) Received on PMA: WXF-C29-PMA-30 South-East on Track

Summary of Issues:
The submission strongly supports this PMA.

Chief Executive's Response:
The support of this PMA is welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA RS.7.

4.4 Volume 4 - Section 28 Statement of Compliance

The following submissions were received on the PMA to Volume 4:

Alteration No.	PMA SC.1
Chapter/Section	
Proposed Material Alteration	
Please refer to pages 248-250 of Book 1 of the PMA documents.	

Summary of Issues:

Further to their submission made in relation to PMA CH8.33 (Objective TS59) in Chapter 8

Transportation Strategy, TII note that it may have the potential to be relevant to this Volume.

Chief Executive's Response:

Having considered the OPR and TII's submission on PMA CH8.33 (please refer to Section 2 of this report – Office of the Planning Regulator), the Chief Executive has recommended that PMA CH8.33 be further modified to address the issues raised in those submissions. Objective TS59 remains generally compliant with the Guidelines, and it is recommended that the Section 28 statement be amended to reflect the minor modification to PMA CH8.33.

Chief Executive's Recommendation:

It is recommended that the text in the sixth paragraph under 12. Spatial Planning for National Roads – Guidelines for Planning Authorities be modified as follows (see blue text):

The 'Exceptional Circumstances' identified in Categories 2, 3 and 4 represent a pragmatic approach to existing circumstances on existing national roads in the County. The wording of Objective TS59, including the categories of 'Exceptional Circumstances', carries forward a similar objective (T20) from the Wexford County Development Plan 2013-2019 9as extended), which was agreed following extensive consultation with the National Roads Authority/TII at that time. It was further revised following consultation at Draft Plan stage and PMA Stage. It is reiterated that all four the categories are exceptional only and such proposals are required to be subject to an evidence base and incorporated into the Development Plan by amendment or variation in accordance with the Guidelines or in exceptional circumstances by Material Contravention under Section 34(6) of the Planning and Development Act, 2000 (as amended). The proposals will only be considered subject to compliance with the detailed criteria set out in Objective TS59 which includes the evidence base, safety, capacity and efficient operation of national roads will not be compromised.

4.5 Volume 5 – Record of Protected Structures

The following submissions were received on Volume 5:

Alteration No.	PMA RPS.7
Proposed WCC Reference No.	N/A
NIAH Reference No.	15503050
NIAH Type	Passageway
Name or NIAH Description	Passageway, extant 1840

Proposed Material Alteration

To **ADD** this structure to the Record of Protected Structures

Note: This structure was not proposed for addition in the Draft Plan.



Submission(s) Received on PMA:	WXF-C29-PMA-22 Nigel Pierce

Summary of Issues:

Mr. Pierce objects to the inclusion of his property on the RPS, which he states will devalue his property and could adversely affect the future development of same.

Chief Executive's Response:

This structure was proposed to be added to the RPS following the consideration of a submission received on the Draft Plan and following an assessment by DhB Architects (Conservation Architects) which concluded that on the basis of the Qualities of Interest (architectural and historical), the structure should be considered for addition to the Record of Protected Structures.

Having regard to the information contained in the assessment by the Council's appointed conservation consultants it is recommended that the property is added to the RPS.

Chief Executive's Recommendation:

It is recommended that the Plan is made with this PMA.

Alteration No.	PMA RPS.17
Proposed WCC Reference No.	WBC0217
NIAH Reference No.	15509007
NIAH Type	House
Name or NIAH Description	Saint Magdalene's House

Proposed Material Alteration

To **RETAIN** this structure on the Record of Protected Structures

Note: It was proposed to delete this structure from the Record of Protected Structures in the Draft Plan. It is now proposed to retain the structure on the Record of Protected Structures.



Submission(s) Received on PMA:

WXF-C29-PMA-37 Nutricia Infant Nutrition Ltd.

Summary of Issues:

The submission states that the structure has lost its original context and setting through incremental yet progressive development of the Danone Nutricia manufacturing facility. The previous notification to remove the building from the RPS was welcomed in Danone Nutricia at corporate level as this proposal facilitated the consideration of strategic plans for the development of the site. The submission states that the proposal to change this to include for retention of the building as a Protected Structure will negatively impact on the strategic development plan for the site and it is requested that the original proposal to remove the building from the RPS is retained.

Chief Executive's Response:

The comments are noted. This structure was proposed for deletion in the Draft Plan. The PMA was made following consideration of submissions received on the Draft Plan and following an assessment by DhB Architects (Conservation Architects) which concluded that on the basis of the Qualities of Interest (architectural, artistic and social), the structure should remain on the Record of Protected Structures.

The property, whilst not in use, is considered to be in reasonable condition. It forms part of the landholding of the adjoining industrial manufacturing facility. This part of the site may be suitable for ancillary uses of the facility given it close proximity to the residential area to the

north.

Having regard to the information contained in the submissions and the assessment by the Council's appointed conservation consultants, at this time, it is not considered that the property should be removed from the RPS. Recommendation retain on the RPS.

Chief Executive's Recommendation:

It is recommended that the Plan is made with this PMA (i.e. retain the structure on the RPS).

4.7 Volume 9 - Housing Strategy

The following submission was received on the PMA to Volume 9 Housing Strategy

Alteration No.	PMA HS.1
Chapter/Section	Section 3.4.1

Proposed Material Alteration

Amend the second paragraph in Section 3.4.1 on page 35 as follows:

The 2011 Census data does not distinguish between categories of vacancy and indicates that there were 15,563 unoccupied dwellings in 2011. In contrast, the 2016 data illustrates the number of temporarily absent dwellings, unoccupied holiday homes and other vacant dwellings. For comparison purposes, the total number of vacant dwellings across these three categories in 2016 is 13,974. As such, there is an overall decline in the number of vacant dwellings of 1,589 between 2011-2016. This indicates the existing vacant stock is absorbing much of the growing need for housing in the county. This would appear to indicate that existing vacant stock absorbed some of the housing need during this period. However, it should be noted that vacant units have been excluded from future housing unit targets. A summary of the information on the existing housing stock at County level is provided in Table 3.6.

Submission(s) Received on PMA:	WXF-C29-PMA-48 Construction Industry Federation (CIF)
Summary of Issues:	

CIF welcome the clarification that existing vacant housing stock was not considered when determining the future housing needs and associated additional zoned land requirements.

Chief Executive's Response:

The comments are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA HS.1.

4.8 Volume 10 – Energy Strategy:

The following submissions were received on Volume 10:

Alteration No.	PMA ES.5
Chapter/Section	Chapter 3

Proposed Material Alteration

Amend the entire Chapter 3 Energy Balance and Renewable Energy Targets from page 20-28. Please refer to pages 4 to 15 in Book 3 of the Proposed Material Alterations documents for the full text of this PMA.

Submission(s) Received on PMA:	WXF-C29-PMA-50 (DECC)
	WXF-C29-PMA-46 (FuturEnergy Ireland)
	WXF-C29-PMA-49 (WEI)

Summary of Issues:

The three submissions refer to the increased national target of 80% in the Climate Action Plan 2021.

WXF-C29-PMA-50 (DECC) notes that a significant degree of emphasis is placed on the national RES-E target of 70% and the Climate Action Plan 2021 increases the State's renewable electricity production ambition for 2030 to 80%. DECC requests the Council to consider and

demonstrate how the Draft Plan is consistent with Section 4(2) of the Interim Guidelines for Planning Authorities and Statutory Plans, Renewable Energy and Climate Change (2017) (e.g. Table 6 shows a predicted production of 1,070GWh in 2030, which is just under 70% of local demand).

WXF-C29-PMA-49 (WEI) notes that the National Development Plan 2021-2030 also increases Ireland's renewable energy target to 80% by 2030 from the previous target of 70% and earmarks a target of 5GW offshore wind and a doubling of existing onshore wind to 8GW by 2030.

WXF-C29-PMA-46 (FuturEnergy Ireland) states that the targets in Table 5 need to be increased to align with the increased national target of 80%.

WXF-C29-PMA-46 (FuturEnergy Ireland) states that there is a discrepancy in terms of when the Plan seeks to meet its 100% RE target and that the data to underpin the stated 100% target of electricity consumption from renewable sources by 2027 is required. The submission states that a technical analysis of the proposed Wind Energy Strategy Map, carried out by FuturEnergy, finds that the target increase of onshore wind from 182MW to 244MW in 2030 is not achievable in the 'preferred' or 'open to consideration' areas and by applying x4 times tip height setback of 680m from all dwellings in the County with an Eircode, there is no developable land in the acceptable in principle area and only two parcels of ca. 25 ha and 70 ha in the open to consideration area which are not considered viable as a utility scale wind farm opportunity. Therefore, the land designated will not fulfil the onshore wind energy targets in the Plan which conflicts with national RE and climate change policies and with the Plan itself to serve 100% of its needs from RE and deliver +62MW of additional onshore wind. The submission states that the Plan needs to include similar analysis of how the implementation of the Wind Energy Map will contribute to realising national targets on RE and climate change mitigation. This, it states, is a requirement under item (2) of the SPPR in the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change (2017) which the PA is obliged to comply with.

The submission further requests that the Wind Energy Map be re-considered from first principles to ensure the County appropriately assesses its resources to contribute to the national stated 80% RE target and can achieve the Council's own 100% target by 2027. This, it states, will require the areas of acceptable in principle and open to consideration to be extended significantly including into Upland areas. In this regard the submission also notes there are differing policy designations between the neighbouring counties of Wicklow and Wexford based on the current Wind Energy Strategies for those counties.

Chief Executive's Response:

The references to the increased 80% national RE target in the Climate Action Plan (CAP) 2021 are acknowledged and noted. The PMA were prepared in 2021 and made by the Members at their meetings in June and September of 2021 (it was determined that a further period was required to carry out SEA and AA of the PMA). The PMA included updates to the Energy Balance to increase the reference to the national RE target from 55% to 70% in accordance with the CAP 2019 and the National Energy and Climate Plan 2021-2030 (NECP) which were in place at that time The introduction of 80% at this stage would require revision of the Energy Balance which would be complex and is not possible to complete within the available timeframe. However, the Planning Authority will review the Energy Strategy following the adoption of any relevant national guidelines and update the Energy Balance as part of that review where appropriate. It is recommended that a footnote be inserted in the final Plan to reference the updated 80% national target in the CAP 2021.

Tables 5 and 6 of PMA ES.5 show projected RE generation up to 2030 following the trajectories used in the NECP with a number of assumptions listed. The target, as clearly stated on page 27 of the Draft ES and page 14 of Book 3 of the PMA, aims to go beyond this and achieve 100% of electricity consumption in the County from RE sources by 2027. It is stated that this will be met through a combination of renewable energy sources. As outlined in Chapter 3/PMA ES.5 planning permissions for approximately 475MW of solar energy have been granted up to September 2021 and it is not yet known how many of these will be developed or receive a grid connection offer during the life of the Plan. A number of wind farms may also look to extend or repower and there is further progression in terms of developing offshore wind energy. The

Planning Authority will continue to monitor developments during the plan period and as part of the two-year review and SEA monitoring processes and will review the Energy Strategy following the adoption of any relevant national guidelines and review the RE target as part of that review process.

Section 4(2) of the Interim Guidelines for Planning Authorities and Statutory Plans, Renewable Energy and Climate Change (2017) contains a Specific Planning Policy Requirement (SPPR) to "indicate how the implementation of the relevant development plan or local area plan over its effective period will contribute to realising overall national targets on renewable energy and climate change mitigation, and in particular wind energy production and the potential wind energy resource (in megawatts)".

It is considered that Chapter 3/ PMA ES.5 adequately sets out how the development plan will contribute to realising overall national targets on RE. While tables 5 and 6 demonstrate what would be required to achieve County Wexford's share of the national 70% target by 2030 (albeit the national target is now 80%) the objective is to meet 100% (1,536 GWh) by 2027 through a combination of renewable energy developments.

With particular reference to wind, the Energy Balance shows that installed onshore wind farms in County Wexford currently provide 182MW with the projected installed capacity as 244MW in 2030, to reach 70% at county scale following the trajectory in the NECP. Chapter 5 identifies the areas 'acceptable in principle' and 'open for consideration' for new wind farm developments and sets out the policy for extending and/or repowering of existing wind farms in all areas.

The suggestion from FuturEnergy Ireland to carry out an analysis of mapped areas is noted. However, the SPPR in the Interim guidelines does not require an in-depth analysis of the mapped areas. It should also be noted that the Wind Energy Strategy allows for the consideration of extensions and repowering of existing wind farms outside of the acceptable in principle and open for consideration areas in appropriate circumstances which could potentially increase capacity output. Furthermore, the stated 4x tip height setback of 680 metres is based on the highest turbines available, while the average tip height of installed wind farms in County

Wexford (excluding Cantore Point) is currently 114 metres, which equates to a 456 metre setback using 4x tip height.

The request from FuturEnergy Ireland that the Wind Energy Map be re-considered from first principles is also noted. This cannot be carried out at this stage in the development plan process and is also not considered necessary. The policy designations of neighbouring counties were considered as part of the sieve analysis undertaken for the preparation of the Wind Energy Strategy in the County Development Plan 2013 (and are shown on Map 13 of Volume 10 of the Draft CDP). The strategy is considered most appropriate for County Wexford having regard to the methodology used and was informed by SEA.

Chief Executive's Recommendation:

It is recommended that the plan is made with this amendment as further modified....

1. Add footnote to paragraph 5 of PMA ES.5 (before Table 5) as follows:

The energy balance for County Wexford has been developed based on Scenario 2, as an increase in oil price is expected in the future and as this is considered the most likely of the four two scenarios to meet national and EU policy and targets for renewable energy. Based on this scenario, renewable energy installed capacity and energy production for additional energy measures and high low oil prices were analysed up to 2030. Installed capacity in 2017 2021 and future projects installation up to 2030 in County Wexford are outlined in Table No. 5. Table No. 6 shows the renewable energy generated in County Wexford in 2017 2021 and the projection up to 2030. The last column shows the renewable energy production limited to 53.8-70% RES-E in 2030 at county scale. Based on this analysis, the generation of renewable energy will increase by 84 200% up to 2030.

¹ The Climate Action Plan 2021 increased the national target to 80%. The 70% was taken from the Climate Action Plan 2019 and National Energy and Climate Plan 2021-2030 which were in place at the time of preparing and making the Proposed Material Amendments to the Draft Wexford County Development in 2021.

Alteration No.	PMA ES.7, PMA ES.8, PMA ES.9, PMA ES.14
Chapter/Section	Section 4.2.2 Methodology
	Section 4.3.1 Objectives
Proposed Material Alteration	

Proposed Material Alteration

PMA ES.7

Amend the third paragraph on page 33 in Section 4.2.2 Methodology as follows:

Settlements

Ground mounted solar PV developments (solar farms) are generally not considered an efficient use of land within the built up areas of towns and villages and should be avoided in these areas. A minimum exclusion zone around towns and villages is also considered appropriate to allow for the future expansion of these settlements in a compact and sequential manner. Therefore, an exclusion zone of 1km has been applied around the four main towns while an exclusion zone of 250 metres has been applied around villages. Only key towns, large towns, level 3(a) service settlements, level 3(b) strategic settlements and Level 4 Large Villages included in the Settlement Hierarchy in the Pre-Draft County Development Plan were included 11. The exclusion zones are shown on Map 5. For applications for ground mounted solar PV developments in proximity to a town or village, the views from the settlement should be considered as part of the design process.

PMA ES.8

Amend the footnote on page 33 as follows:

^[1] The development plan and local area plan boundaries were used for Wexford, Enniscorthy, New Ross, Gorey, Taghmon, Clonroche and Courtown and Riverchapel. For all other settlements the Small Area Population Maps {SAPMAPs} from the CSO were used, with the exception of Wellingtonbridge and Ramsgrange <u>Ramsgrange</u>, <u>Ballywilliam</u>, <u>Ballindaggin and</u> Craanford.

PMA ES.9

Amend Map 5 Exclusion Zones around Settlements – see revised Map 5 below.



PMA ES.14

Insert a new Solar Energy objective on page 48 as follows:

Facilitate, where appropriate, small scale solar energy development projects in urban areas, industrial estates, business parks and small community-based proposals, subject to compliance with normal planning and environmental criteria and the development management standards contained in Section 4.2.5.

Submission(s) Received on PMA:	WXF-C29-PMA-53 (OPR)
	WXF-C29-PMA-50 (DECC)

Summary of Issues:

The issues raised in relation to this PMA are summarised in Section 2 of this report.

Chief Executive's Response and Recommendation:

Please refer to the Chief Executive's Response and Recommendation relating to the issues raised in Section 2 of this report.

Alteration No.	PMA ES.15 and ES.16
Chapter/Section	Section 5.3 Wind Energy Methodology
Proposed Material Alteration	

PMA ES.15

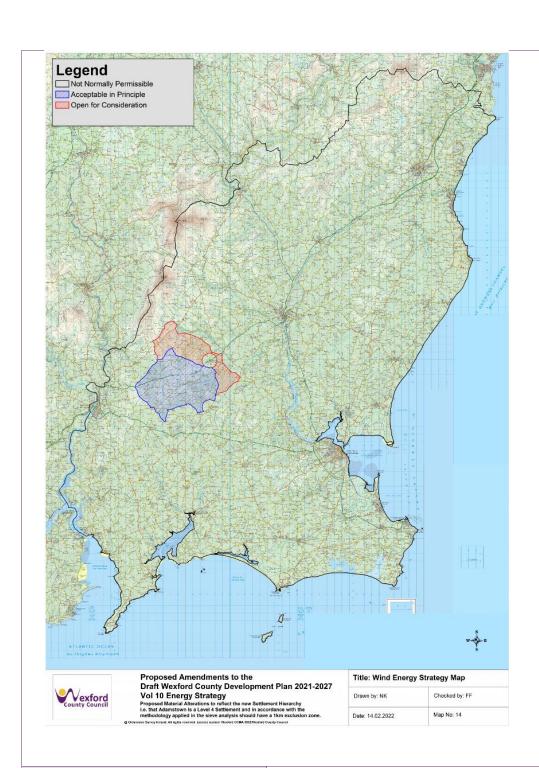
Amend the first paragraph on page 54 in Section 5.3 Methodology as follows:

Residential Areas

Wexford is a predominantly rural county with a strong pattern of independent towns and villages connected by the national and regional roads network. The areas identified for wind energy development avoid the larger settlements of Wexford, Enniscorthy, New Ross and Gorey. In addition, a minimum exclusion zone of 1000 metres has been applied to all District Towns and Strong Villages Level 3(a) service settlements, Level 3(b) strategic settlements and Level 4 settlements identified in the Settlement Strategy of the Wexford County Development Plan. These exclusion zones will facilitate the continued growth, development and investment into these existing settlements.

PMA ES.16

Amend Map 14 Wind Energy Strategy Map – see revised Map 14 below.



Submission(s) Received on PMA: WXF-C29-PMA-18 (Southern Regional Authority)
WXF-C29-PMA-50 (DECC)

WXF-C29-PMA-46 (FuturEnergy Ireland)

WXF-C29-PMA-49 (WEI)

WXF-C29-PMA-52 (Der, Joan and Jenny Murphy)

Summary of Issues:

The SRA state that the Planning Authority should ensure that the PMA in relation to Wind Energy including PMA ES.16 to Map 14 meets the requirements of the 'Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change' (DHPC, July 2017), and in particular, Section 4 relating to the SPPR under Section 28(1)(c) of the Act when making, varying or amending a development plan, or local area plan, with policies or objectives that relate to wind energy developments.

WXF-C29-PMA-50 (DECC) notes that given the extremely limited area provided for wind energy in the Draft Plan, relative to the size of the County, it is considered inconsistent with the increased renewable energy generation ambitions as expressed in the Climate Action Plan 2021 to further limit the available area for wind energy production and requests that the Council consider omitting this amendment.

WXF-C29-PMA-46 (FuturEnergy Ireland) notes that the PMA has the effect of reducing the acceptable in principle area. It states that no sound scientific data or evidence is provided for the application of a 1km setback from settlements and these restrictions have no basis elsewhere in national or regional policy, it conflicts with item (3) of the SPPR in the Interim Guidelines and is contrary to obligations of the Council under the Climate Action Plan/ Climate Action and Low Carbon Development (Amendment) Act 2021. It also does not appear to have been considered in the SEA.

WXF-C29-PMA-49 (WEI) refers to the OPR's submission on the Draft Plan in this regard and requests that, should the CDP proceed with the minimum exclusion zone for wind developments, the area identified as the "exclusion zone" be clarified as the distance to the boundary of the viable area of the wind farm or the distance to a specified turbine. WEI also notes that any reduction on available land for the development of wind farms will have serious impact on the development of new wind energy projects in the county.

WXF-C29-PMA-52 (Der, Joan and Jenny Murphy) state that a minimum exclusion zone for rural dwellers should apply as for towns and villages.

Chief Executive's Response:

In response to the SRA comments with regard to whether PMA ES.16/Map 14 (and the Energy Strategy) meets the requirements of the SPPR in Section 4 of the Interim Guidelines, the Planning Authority consider, for the same reasons as set out in response to PMA ES.5 of this section and Recommendation No. 7 of Section 2, that this SPPR is adequately addressed in the Strategy.

This amendment provides for a 1000m setback to the northwest of Adamstown (taken from a centre point in the village) which has the effect of removing a very small area from the acceptable in principle area close to the populated settlement. This amendment was included to be consistent with amendments to the Settlement Hierarchy and to be consistent with the approach used for solar energy developments. The setback is considered appropriate and will allow for the future expansion of the settlement. It will have a minimal effect on the available area for wind energy production.

The exclusion of this area from the 'Acceptable in Principle' area was considered as part of the SEA Screening of the PMA, and it was determined that it would not have likely significant effects on SEOs.

The comments from WEI are noted. The exclusion zone is taken as 1000m from a centre point in the settlement as mapped and wind farms may be considered outside of this exclusion zone. This includes the boundary of the wind farm and it is not considered necessary to amend the text in this regard.

WXF-C29-PMA-52 (Der, Joan and Jenny Murphy) is also noted and in this regard it should be noted that the setback distance for wind turbines from dwellings, as set out in Section 5.7 of the Draft ES (Siting, Layout and Design), as 4 x tip height between the nearest point of the curtilage of the residential property subject to a mandatory minimum setback of 500 metres, is in accordance with the Draft Wind Energy Development Guidelines 2021 as is considered appropriate.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA ES.15 and PMA ES.16.

Alteration No.	PMA ES.17 and ES.20
Chapter/Section	Section 5.3 Wind Energy Methodology
	Section 5.7 Wind Farm Development Management
	Standards – Siting, Layout and Design

Proposed Material Alteration

PMA ES.17

Amend the last line of the third paragraph on page 54 as follows:

Similarly, turbines shall not be permitted within 250metres 300m of the boundary of an adjacent landholding (including residential and agricultural landholdings), unless the written consent of the owner is given.

PMA ES.20

Insert an additional bullet point in Section 5.7 Siting, Layout and Design after bullet point 2 on page 74 as follows:

Wind turbines will not be permitted within 300 metres of the boundary of an adjacent landholding (including residential and agricultural landholdings), unless the written consent of the owner is given.

Submission(s) Received on PMA:	WXF-C29-PMA-50 (DECC)
	WXF-C29-PMA-53 (OPR)
	WXF-C29-PMA-46 (FuturEnergy Ireland)
	WXF-C29-PMA-49 (WEI)
	WXF-C29-PMA-56 (John Fleming)
	WXF-C29-PMA-13 (Marie Redmond)
	WXF-C29-PMA-14 (Marie Redmond)
	WXF-C29-PMA-15 (John O'Brien)

Summary of Issues:

The issues raised in relation to this PMA are summarised in Section 2 of this report.

Chief Executive's Response and Recommendation:

Please refer to the Chief Executive's Response and Recommendation relating to the issues raised in Section 2 of this report.

Alteration No.	PMA ES.19 and ES.21
Chapter/Section	Section 5.7 Wind Farm Development Management
	Standards – Duration of Permission
	Section 5.7 Wind Farm Development Management
	Standards – Decommissioning
Proposed Material Alteration	

PMA ES.19

Amend the text in the second paragraph (Duration of Permission) on page 73 as follows:

The Planning Authority may grant permission for a duration longer than five years in certain circumstances, for example, to ensure that the permission does not expire before a grid connection is granted. It is, however, the responsibility of the applicants in the first instance to request such longer durations in appropriate circumstances.

Where applications are approved for a temporary wind farm development, planning consent will be limited by condition to that temporary period. Planning permission shall be limited to a period of five years, unless granted by an extension of duration under Section 42 of the Planning and Development Act 2000 (as amended). The lifetime of the development shall also be restricted to a maximum of 25 years, to start from the date as detailed in the commencement notice for construction works to commence in accordance with Building Regulations requirements, due to the temporary nature of the development and the potential deterioration of the infrastructure.

PMA ES.21

Amend the text of the first bullet point under Decommissioning on page 88 as follows:

 The wind energy development shall generally be decommissioned and removed 30 25 years after the date of commissioning commencement of development of the wind energy development unless, prior to the end of this period, planning permission has been granted for the continuation of the use of the land as a wind energy development for a further period in accordance with prevailing legislation.

Submission(s) Received on PMA:	WXF-C29-PMA-50 (DECC)
	WXF-C29-PMA-46 (FuturEnergy Ireland)
	WXF-C29-PMA-49 (WEI)

Summary of Issues:

WXF-C29-PMA-50 (DECC) states that the Council is requested to amend this proposal to limit the lifetime of wind farm developments from 25 years to 30 years, to reflect emerging technologies, as suggested in the Draft Wind Energy Development Guidelines, 2019.

WXF-C29-PMA-46 (FuturEnergy Ireland) states that modern turbine lifespans are now exceeding 35 years and the determination of time limits is appropriately considered on a project-by-project basis in accordance with the Wind Energy Guidelines. The submission states that proposing such a time limit policy as part of the CDP is contrary to the Wind Energy Guidelines, inappropriate, unsustainable and must be removed.

WXF-C29-PMA-49 (WEI) welcomes the clarification surrounding the extension to the duration of a wind farm under Section 42 and acknowledges that the performance and deterioration of the infrastructure will be likely after 25 years, however it states that clarification around the inception date would be useful. In this regard WEI requests that the lifespan be 25 years from the date of grid connection.

Chief Executive's Response:

The comments from DECC and FuturEnergy are acknowledged. While is it noted that Section 7.2 of the Draft Wind Energy Guidelines suggests a time limit of approximately 30 years, it also

states that "the discretion on the particular time limit for an individual application will rest with the planning authority, taking into account the specific technology being used."

The 25 year lifetime is considered appropriate and will be reviewed following the adoption of

The 25 year lifetime is considered appropriate and will be reviewed following the adoption of the guidelines.

It is acknowledged that there may be delays in terms of grid connection etc. and in this regard it is considered appropriate to amend the PMAs so that the 25 year lifetime commences from the date of grid connection (as per Draft Plan).

Chief Executive's Recommendation:

It is recommended that the plan is made with PMA ES.19 as further modified....

PMA ES.19

Amend the text in the second paragraph (Duration of Permission) on page 73 as follows:

The Planning Authority may grant permission for a duration longer than five years in certain circumstances, for example, to ensure that the permission does not expire before a grid connection is granted. It is, however, the responsibility of the applicants in the first instance to request such longer durations in appropriate circumstances.

Where applications are approved for a temporary wind farm development, planning consent will be limited by condition to that temporary period. Planning permission shall be limited to a period of five years, unless granted by an extension of duration under Section 42 of the Planning and Development Act 2000 (as amended). The lifetime of the development shall also be restricted to a maximum of 25 years, to start from the date as detailed in the commencement notice for construction works to commence in accordance with Building Regulations requirements, of grid connection, due to the temporary nature of the development and the potential deterioration of the infrastructure.

It is recommended that the plan is made with PMA ES.21 as further modified....

PMA ES.21

Amend the text of the first bullet point under Decommissioning on page 88 as follows:

The wind energy development shall generally be decommissioned and
 removed 30 25 years after the date of commissioning commencement of development of

the wind energy development grid connection unless, prior to the end of this period, planning permission has been granted for the continuation of the use of the land as a wind energy development for a further period in accordance with prevailing legislation.

Alteration No.	PMA ES.22
Chapter/Section	Section 7.1.2 Marine Spatial Planning

Proposed Material Alteration

Amend the text in Section 7.1.2 Marine Spatial Planning on pages 106-107 as follows:

The Framework Directive for Maritime Spatial Planning (Directive 2014/89/EU) was transposed into Irish Law through Part 5 of the Planning and Development (Amendment) Act 2018 and requires that a Maritime Spatial Plan for Ireland must be in place by 31 March 2021. The Minister may prepare one overall marine spatial plan or different marine spatial plans for different parts of the maritime area, which will be known collectively as the National Marine Planning Framework.

The National Marine Planning Framework Baseline Report, published by the Department of Housing, Planning and Local Government in 2018, states that the development of our offshore resource will be critical to the achievement of our 2030 renewable energy obligations. Investment in the electricity grid will be required to reinforce the onshore grid, ensuring that the overall power system is capable of handling potentially large volumes of variable renewable offshore generation. A Marine Planning Policy Statement (consultation draft) has also been published which sets out core principles to inform the evolving marine planning and development management process.

This plan, known as the National Marine Planning Framework (NMPF) in Ireland, is a 20-year plan for the country's maritime areas. It provides the over-arching framework for marine decision-making that is consistent, evidenced based and secures a sustainable future for our country's marine area. It contains a series of overarching policies over environmental, social

and economic themes, and provides sectoral policies for 16 sectors ranging from renewable energy, aquaculture, port, harbours and shipping to tourism and defence.

The NMPF is a parallel document to the National Planning Framework, which guides terrestrial planning and development.

The Maritime Area Planning Bill 2021 also seeks to establish a coherent and comprehensive marine planning system to manage development and activities in Ireland's seas. It will establish in law a new planning regime for the maritime area. It will replace existing State and development consent regimes and streamline arrangements on the basis of a single consent principle, i.e. one State consent (Maritime Area Consent) to enable occupation of the Maritime Area and one development consent (planning permission), with a single environmental assessment. This legislation is designed to work for all types of development – from the smallest structures to the largest offshore windfarm proposal and will be critical to ensuring Ireland meets its ambitious offshore renewable targets. [3]

[3] https://www.gov.ie/en/press-release/eef3c-taoiseach-and-ministers-launch-national-marine-planning-framework-and-publish-maritime-area-planning-bill/

Submission(s) Received on PMA: WXF-C29-PMA-50 (DECC)

Summary of Issues:

WXF-C29-PMA-50 (DECC) states that the inclusion of references to offshore energy in the Draft Plan is noted and the Council's ambitions in this regard are broadly welcomed. However, the Maritime Area Planning Act, 2021 has passed into law and the appropriate amendments should be made to Proposed Alteration ES.22 to reflect same.

Chief Executive's Response:

The comments from DECC are acknowledged and it is considered appropriate to update references to the Maritime Area Planning Act, 2021.

Chief Executive's Recommendation:

It is recommended that the plan is made with this amendment as further modified....

Amend paragraph 5 as follows:

The Maritime Area Planning Bill Act, 2021 also seeks to establish a coherent and comprehensive marine planning system to manage development and activities in Ireland's seas. It will and establishes in law a new planning regime for the maritime area. It will replaces existing State and development consent regimes and streamlines arrangements on the basis of a single consent principle, i.e. one State consent (Maritime Area Consent) to enable occupation of the Maritime Area and one development consent (planning permission), with a single environmental assessment. [3] This legislation is designed to work for all types of development — from the smallest structures to the largest offshore windfarm proposal and will be critical to ensuring Ireland meets its ambitious offshore renewable targets. [4]

https://www.gov.ie/en/press-release/eef3c-taoiseach-and-ministers-launch-national-marine-planning-framework-and-publish-maritime-area-planning-bill/

https://www.gov.ie/en/press-release/d13b0-maritime-area-planning-bill-2021-passes-through-all-stages-of-the-oireachtas/

Alteration No.	PMA ES.23
Chapter/Section	Section 7.1.3 Offshore Wind Farms
Proposed Material Alteration	
Insert additional text at end of third paragraph on page 107 as follows:	
Seabird Sensitivity mapping shall be used as part of the preparation and assessment of marine	
energy developments.	
Submission(s) Received on PMA:	WXF-C29-PMA-50 (DECC)
Summary of Issues:	

WXF-C29-PMA-50 (DECC) requests the Council to consider how Proposed Alteration ES.23 is consistent with the provisions of the Maritime Area Planning Act, 2021.

Chief Executive's Response:

It is considered appropriate to use seabird sensitivity mapping in the assessment of potential risks posed by marine renewable energy developments.

Chief Executive's Recommendation:

It is recommended that the Plan is made with this PMA.

Alteration No.	PMA ES.25 and ES.26
Chapter/Section	Section 8.4 Energy Storage

Proposed Material Alteration

PMA ES.25

Insert additional text at the end of paragraph 1 in Section 8.4 Energy Storage on page 118 as follows:

Recent advances in Battery Energy Storage (BES) mean that output from renewable energy developments can be maximised. Batteries can store energy from intermittent energy sources (e.g., sun and wind) and release it when it is more needed, thus increasing the renewables contribution to the energy mix. It also helps to maintain grid stability and flexibility by providing a more constant supply. BES systems allow the owners of solar PV or wind generators to store the energy produced – when it is inexpensive and when it would be uneconomic to supply it to the grid – and then to release it when prices are higher. Similarly, batteries can store the energy produced with renewables that would otherwise have been curtailed (e.g., when wind turbines are shut down due to high wind speeds). This increases the contribution of renewables to the energy mix and also maintains grid stability. There are additional energy storage technologies such as liquid air storage and synchronous condensers that can also play a role in grid stability.

PMA ES.26

Amend the Objective on page 119 as follows:

To facilitate the development of Battery Energy Storage Systems <u>and other energy storage</u> <u>technologies such as air storage and synchronous condensers</u> at appropriate locations to ensure a reliable and secure energy supply, subject to normal planning and environmental criteria, including residential and visual impacts.

Submission(s) Received on PMA:	WXF-C29-PMA-50 (DECC)
	WXF-C29-PMA-46 (FuturEnergy Ireland)

Summary of Issues:

WXF-C29-PMA-50 (DECC) welcomes and supports this amendment.

WXF-C29-PMA-46 (FuturEnergy Ireland) requests a new policy is added to the final Plan to generally promote the use of efficient energy storage systems and infrastructure and support energy efficiency and reusable energy system optimisation, subject to compliance with proper planning and environmental considerations.

Chief Executive's Response:

Noted. It is considered that adequate text and objectives are included in the Draft Plan and PMA ES.25 and ES.26.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA ES.25 and PMA ES.26.

Issues raised that do not relate to a PMA:

Submission(s) Received:	WXF-C29-PMA-4 (Brigid Martin)
	WXF-C29-PMA-5 (Carmel O'Brien)
	WXF-C29-PMA-6 (Rachel O'Brien)
	WXF-C29-PMA-7 (Paddy Wallace)
	WXF-C29-PMA-8 (Aiden O'Brien)
	WXF-C29-PMA-10 (Mary Doyle)
	WXF-C29-PMA-16 (April O'Brien)
	WXF-C29-PMA-21 (Lisa Somers)
	WXF-C29-PMA-24 (Paula English)
	WXF-C29-PMA-25 (Eimear Ryan)
	WXF-C29-PMA-26 (Jeremy English)
	WXF-C29-PMA-27 (Liam O'Brien)
	WXF-C29-PMA-28 (Lisa O'Brien)
	WXF-C29-PMA-29 (Elizabeth Doran)
	WXF-C29-PMA-31 (Saundra Buckley)
	WXF-C29-PMA-32 (Thomas English)
	WXF-C29-PMA-33 (Breda & William Kennedy)
	WXF-C29-PMA-35 (James Rochford)
	WXF-C29-PMA-38 (Bernard Doran)
	WXF-C29-PMA-40 (Audie Murphy)
	WXF-C29-PMA-42 (Enda and Margaret Kiely)
	WXF-C29-PMA-43 (Crea English)
	WXF-C29-PMA-49 (WEI)
Summary of Issues:	

A number of submissions were received in relation to wind energy development which did not relate to any of the PMA (many of these submissions referenced PMA ES.16 but did not relate to that PMA).

WXF-C29-PMA-49 (WEI) recommends that WCC re-examine the approach they used to designate the zoning lands.

WXF-C29-PMA-4 (Brigid Martin) and WXF-C29-PMA-32 (Thomas English) state that wind turbines should not be allowed in areas of high sensitivity and areas of high sensitivity should not be downgraded without public consultation. The later also states that putting wind turbines in this area would unnecessarily spoil the viewing areas and any future tourism developments.

14 submissions specifically request that the areas of Raheen, Ballybrennan, Chapel and Kellystown (maps included with some submissions) be removed from the open for consideration area in Map 14:

WXF-C29-PMA-5 (Carmel O'Brien)

WXF-C29-PMA-6 (Rachel O'Brien)

WXF-C29-PMA-8 (Aiden O'Brien)

WXF-C29-PMA-10 (Mary Doyle)

WXF-C29-PMA-16 (April O'Brien)

WXF-C29-PMA-21 (Lisa Somers)

WXF-C29-PMA-24 (Paula English)

WXF-C29-PMA-25 (Eimear Ryan)

WXF-C29-PMA-27 (Liam O'Brien)

WXF-C29-PMA-28 (Lisa O'Brien)

WXF-C29-PMA-31 (Saundra Buckley)

WXF-C29-PMA-33 (Breda & William Kennedy)

WXF-C29-PMA-35 (James Rochford)

WXF-C29-PMA-38 (Bernard Doran)

WXF-C29-PMA-5 (Carmel O'Brien), WXF-C29-PMA-10 (Mary Doyle) and WXF-C29-PMA-28 (Lisa O'Brien) state that the area is highly scenic and viewable from many points throughout the county and scenic views from Raheennahoon Hill and Bree will be dramatically affected. Wind turbines would also be visible from Clonroche and would interfere with map 3 in the Clonroche Local Area Plan 2009-2015 (Protected Views). WXF-C29-PMA-38 (Bernard Doran) notes that the area under consideration is directly within the view that is protected under the Clonroche LAP. WXF-C29-PMA-31 (Saundra Buckley) also states that the proposed height will have a negative effect on the landscape.WXF-C29-PMA-25 (Eimear Ryan) states that there are alternative locations for wind farms within the County rather than this lowland, scenic, agricultural and residential area and states that a coordinated, informed strategy to develop effective renewable energy sources should be pursued instead of haphazard development by private landowners and companies.

WXF-C29-PMA-6 (Rachel O'Brien), WXF-C29-PMA-10 (Mary Doyle), WXF-C29-PMA-16 (April O'Brien), WXF-C29-PMA-21 (Lisa Somers), WXF-C29-PMA-28 (Lisa O'Brien) and WXF-C29-PMA-33 (Breda & William Kennedy) state that there is extensive coastline where offshore wind farms should be pursued. WXF-C29-PMA-43 (Crea English) opposes the construction of huge wind turbines within close proximity to their family home and farm and states that offshore energy is a much more viable option for quality of living and health and welfare.

WXF-C29-PMA-6 (Rachel O'Brien), WXF-C29-PMA-10 (Mary Doyle), WXF-C29-PMA-16 (April O'Brien) and WXF-C29-PMA-21 (Lisa Somers) state that the area maybe considered a 'quiet zone' with existing background noise levels approximately 25db SPL and a conservation 20 db increase due to construction and running turbines would equate to approximately 4 X increase in perceived noise levels, thus having a dramatic negative effect on the quality of life for local residents. WXF-C29-PMA-24 (Paula English), WXF-C29-PMA-25 (Eimear Ryan), WXF-C29-PMA-28 (Lisa O'Brien) and WXF-C29-PMA-31 (Breda & William Kennedy) also note that installation of wind turbines in this area will dramatically increase noise pollution which poses mental and physical risks to local residents and will affect quality of life. WXF-C29-PMA-27 (Liam O'Brien) and WXF-C29-PMA-31 (Saundra Buckley) note their concerns about the additional noise levels and flickering that wind turbines will bring. WXF-C29-PMA-29 (Elizabeth Doran) notes that the

construction and running of turbines in the Clonroche area would destroy this peaceful rural area and its associated benefits on mental and physical health. WXF-C29-PMA-8 (Aiden O'Brien) refers to the WHO guidelines on environmental noise released in 2018 and states that wind turbines have been included in the list of noise pollutions and has a huge effect on physical and mental health and wellbeing. A couple of the submissions cite medical conditions within their households.

WXF-C29-PMA-10 (Mary Doyle) refers to the 2006 Wind Energy Guidelines which stipulate a minimum setback distance of 500m be maintained from a wind turbine to any property and states that this guideline, which is 16 years old and based on 2006 wind turbine technology, is outdated and should not be used, and that a setback distance of 1500m should be considered similar to the Donegal Development Plan 2018-2024. WXF-C29-PMA-26 (Jeremy English) notes that flicker, noise and spinning motion of turbines can have a dramatic effect on people with autism and that the setback distances (500 metres or 4 X tip height) should be substantially increased. WXF-C29-PMA-27 (Liam O'Brien) also notes that the law is out of date for the current scale and height of wind turbines.

WXF-C29-PMA-7 (Paddy Wallace) states that noise from the wind farms will greatly damage the productivity of bees, which will cause further damage to the local environment and wildlife including a population of rare birds such as kingfishers and woodpeckers, and bats. He states that noise pollution and disturbances will be fatal to the biodiversity and migration patterns of the local birds. WXF-C29-PMA-24 (Paula English) also notes that a wind farm in this area would affect the widely diverse wildlife which inhabits this area, both directly via collision and indirectly due to noise pollution and habitat loss.

WXF-C29-PMA-42 (Enda and Margaret Kiely) state their concerns around the height of the proposed new wind turbines and shadow and flicker during evening and low winter sunset as their dwelling is situated within the area of consideration. Also the siting of wind energy development in lowlands areas, wind turbines of exceeding heights would visually dominate dwelling in elevated areas and photomontage is necessary to complete a visual impact assessment.

WXF-C29-PMA-6 (Rachel O'Brien) and WXF-C29-PMA-10 (Mary Doyle) state that Raheennahoon Hill is currently used by several telecommunications operators covering a substantial sector of the county and consideration should be made as to what effect construction of large wind turbines will have upon these services and the knock-on effect on local residents many of which now work remotely. WXF-C29-PMA-25 (Eimear Ryan) also notes that Wi-Fi and mobile data is likely to be impacted by the construction of large wind turbines.

WXF-C29-PMA-10 (Mary Doyle), WXF-C29-PMA-35 (James Rochford) and WXF-C29-PMA-38 (Bernard Doran) refer to recent extensive local flooding which caused damage to a number of bridges and caused massive disruption to local residents, and state that further mass construction in this area will increase flood risk and the area should not be considered for the erection of wind turbines. They request that consideration be given to the condition of local roads as unsuitable for heavy construction which will have a detrimental effect on local residents. WXF-C29-PMA-35 (James Rochford) states that the development of a wind farm and the use of the road network for grid connection would adversely impact upon the infrastructure, maintenance and safety of the roads near Clonroche village and south of the N30 and requests that this area be removed. WXF-C29-PMA-40 (Audie Murphy) also notes the recent flood damage caused to infrastructure in this area caused by intense rainfall and notes that a wind farm development could impact on the Boro River.

WXF-C29-PMA-10 (Mary Doyle) refers to pollution risk as several local tributaries directly into the Boro River which is considered a Special Area of Conservation.

Chief Executive's Response:

The areas identified as 'open for consideration' and 'acceptable in principle' cannot be further amended at this stage in the development plan process, in accordance with the provisions of the Planning and Development Act 2000 (as amended).

The Wind Energy Strategy was prepared as part of the preparation of the Wexford County

Development Plan 2013-2019 (as extended) and included a sieve analysis to determine the

most suitable areas for consideration of wind farms in the County having regard to a number of

criteria. This was carried forward in the Energy Strategy in the Draft Wexford County

Development 2021-2027 with some amendments made to the development management standards to accord with emerging draft policy and best practice.

The Draft Plan was subject to a public consultation period of 10 weeks in 2020 and following consideration of the submissions received on the Draft Plan a Chief Executive's Report was prepared and submitted to the Members for their consideration. A number of PMA were made by the Members which were placed on public display. The only PMA (PMA ES.16) in relation to the Wind Energy Map (Map No. 14) was to exclude an area around Adamstown village from the acceptable in principle area, to align with the amendments to the Settlement Hierarchy.

In accordance with the Planning and Development Act 2000 (as amended) the Members may, following consideration of the Chief Executive's Report and the submissions received on the PMA, make the Plan without or without the PMA. A further modification to the PMA may only be made where it is minor in nature [s.12(10)(c)]. As such, as these are not related to the PMA, it is not possible to make any other amendments at this stage in the development plan process.

The Planning Authority will review the Energy Strategy as part of the two-year review of the Plan and SEA monitoring and also following the adoption of any national guidelines, where relevant.

The comments in relation to areas of high sensitivity are noted, however no amendments were made in this regard.

Consideration of offshore wind farms will progress in line with national legislation and policy and will not be affected by the Energy Strategy.

The comments in relation to potential noise increases and shadow flicker are noted. No amendments were proposed in this regard and the development management standards for noise and shadow flicker in the Draft Plan are consistent with emerging national policy. These standards will be reviewed following the adoption of the Wind Energy Development Guidelines.

It should also be noted that individual applications for wind farms will be assessed at the project level and will be subject to a noise impact assessment and shadow flicker study in accordance with the development management standards.

The setback from residential dwellings of 4 x tip height or 500 metres is also consistent with national policy and no amendment was proposed in this regard. This standard will be reviewed following the adoption of the Wind Energy Development Guidelines.

The comments in relation to impact on wildlife are noted. Any proposal for a wind farm in this area will be subject to the appropriate assessments in accordance with the development management standards and the EIA, Habitats and Water Framework Directives. The impact on the surrounding road network, flood risk and water quality will also be assessed as part of any planning application. All applications will be screened for Appropriate Assessment in accordance with the relevant legislation.

The development management standards also require consultation with relevant bodies in relation to any potential electromagnetic interference and for applications to include measures to monitor and remedy any effects on such infrastructure.

4.9 Volume 11 - Strategic Flood Risk Assessment

The following submission was received on Volume 11:

Alteration No.	PMA SFRA .1
Chapter/Section	N/A
Proposed Material Alteration	
Please refer to Volume 11 for the full text of this PMA.	

Summary of Issues:

The OPW welcome this PMA which amends the SFRA to reference the Ounavarra Drainage Scheme and NIFM, which clarifies the usage of Irish Coastal Protection Strategy Study mapping (ICPSS), incorporates flood risk assessments (FRAs) for Carne, Courtnacuddy, Carrowreagh and Killinick and updates flood zone mapping for Bunclody and Rosslare Harbour and Kilrane.

The OPW's commentary on the Draft Plan notes that for a number of settlements, the only data sources listed for flood zone mapping were indicative datasets. This has been noted and acknowledged in the Chief Executive's Report response to the OPW commentary, and National Indicative Fluvial Mapping datasets have been added for several settlements. While these maps are an improvement on PFRA mapping, they are still indicative maps and the same cautions and limitations as outlined in Circular PL2/2014 for PFRA should be following.

Chief Executive's Response:

The comments are noted and welcomed. In the interests of clarity, it is re-iterated that the National Indicative Fluvial Mapping (NIFM) were not incorporated into the settlement floor risk assessments in the SFRA. As stated in the PMA to the SFRA and PMA CH9.21 in Chapter 9 Infrastructure, the Council will use all available sources of flood mapping information, including NIFM, when screening for flood risk.

Chief Executive's Recommendation:

It is recommended that the Plan is made with PMA SFRA.1.

4.10 Volume 12 - Strategic Environmental Assessment Environmental Report and Volume 13 Appropriate Assessment Determination and Natura Impact Report and Natura Impact Report

The following submissions were received on Volume 12 and Volume 13:

Alteration No.	N/A
Chapter/Section	Volume 12 Strategic Environmental Assessment Environmental Report
Proposed Material Alteration	
Please refer to Volume 12.	
Submission(s) Received on PMA:	WXF-C29-PMA-2 Environmental Protection Agency (EPA)
C of leaves.	

Summary of Issues:

The EPA acknowledge the environmental assessments carried out in respect of the PMA which have been determined to have the potential for environmental effects, and which require SEA. The EPA further note the conclusion that full implementation of the Plan, including the PMA, 'will not result in a significant negative or adverse impact on the environmental resources within the county'.

The EPA outline that the Council should:

- Ensure that the Plan, as amended, is consistent with the need for the proper planning and sustainable development. Adequate and appropriate critical service infrastructure should be place, or required to be put in place, to service any development proposed and authorised during the lifetime of the plan.
- Consider the need to align with national commitments on climate change mitigation and adaptation, as well as incorporating any relevant recommendations in sectoral, regional and local climate adaptation plans.
- Ensure that the Plan is consistent with key relevant higher-level plans and programmes.

The EPA also remind the Council of the requirement to screen any further modifications proposed and to prepare an SEA Statement once the Plan is made.

An SEA pack - SEA of Local Authority Land-Use Plans – EPA Recommendations and Resources, 2022 V1.15 is included with the submission.

Chief Executive's Response:

The comments from the EPA are noted. The SEA has been carried out in accordance with the regulations and any further modifications will be subject to SEA screening. The SEA is an iterative process and the final ER will include references to updated guidance, where relevant. An SEA Statement will also be prepared, which will accompany the adopted plan.

Critical infrastructure required to service development proposed and authorised during the plan period has informed the Core Strategy and Settlement Plans and is addressed in those sections. The ER displayed with the PMA included a new section 7.3.5 on the 'Selected Alternative' as the basis of the preparation of the Core Strategy and this included reference to the capacity assessment. It is stated that this approach (preferred alternative 3: Balanced, planned growth) works with existing and planned delivery of services infrastructure, (and having regard to the capacity assessment - see Appendix A8.5) and presents the best option towards sustainable transport. As such Alternative 3 has been selected as the basis of the preparation of the Core Strategy in the Draft Wexford CDP 2021- 2027. This is based on the following:

- consistent with the requirements of the NPF and RSES;
- Supports the existing urban centres;
- maintains and enhances existing development, whilst protecting the rural environment;
- prioritises growth in strategic well-serviced areas capable of delivering appropriate and sustainable development; and
- promotes smarter travel policies, reduction in commuting, with increased walking and cycling.

The Plan is aligned with national commitments on climate change mitigation and adaptation, and this is embedded throughout the Plan.

Chief Executive's Recommendation: N/A

Alteration No.	N/A
Chapter/Section	Volume 12 Strategic Environmental Assessment
	Environmental Report and Volume 13 Natura Impact
	Report
Proposed Material Alteration	
Please refer to Volume 12 and Volume 13.	
Submission(s) Received on PMA:	WXF-C29-PMA-18 Southern Regional Assembly (SRA)

Summary of Issues:

The SRA note that the updated SEA responds to SRA Observation 3.0, which considered that 'the SEA should be strengthened to include more detailed consideration of the preferred Plan Scenario'. The SEA published with the Proposed Material Alterations includes a new section 7.3.5 on the 'Selected Alternative' as the basis of the preparation of the Core Strategy in the Draft Wexford CDP. This section sets out in greater detail the basis and rationale for the Selected Alternative'.

The SRA refers to the environmental assessments which informed the RSES and which looked at environmental sensitivities for all parts of the Region and recommends that Wexford County Council review these documents to inform the Council's own environmental assessments of proposed material alterations and to ensure that mitigation measures identified to address environmental sensitivities and constraints are included in the Final Plan where relevant.

Chief Executive's Response:

The comment from the SRA in relation to the additional information provided in the ER on the preferred alternative is noted.

With regard to the environmental sensitivities which informed the RSES, these documents have been reviewed. As with the CDP, the SEA Statement for the Southern Region RSES also sets out

a programme for environmental monitoring of the plan. Given its higher-level position, scope over the region and earlier publication, it may be useful for monitoring of the CDP to liaise with the Southern Regional Assembly in terms of the findings of its monitoring programme, especially in terms of sources of information, findings of the reviews, and any requirements for remedial actions or remedial actions taken.

Chief Executive's Recommendation:

N/A

Alteration No.	N/A
Chapter/Section	Volume 12 Strategic Environmental Assessment Environmental Report
Proposed Material Alteration	
Please refer to Volume 12.	
Submission(s) Received on PMA:	WXF-C29-PMA-19 (Department of Agriculture, Food and the Marine)(Environmental Co-Ordination Unit)
Summary of Issues:	

Summary of Issues:

The DAFM welcomes the support in the plan for the fishing industry but states that evaluation of potential impacts on any commercial sea fishing activities needs to be given consideration as part of any planning /proposal process and during the development process itself and that early engagement with the fishing industry and other relevant stakeholders is imperative to discuss any changes that may affect them.

The DAFM note that the plan supports the construction of offshore windfarms and in the event that offshore renewable energy installations are proposed, the evaluation and consideration of potential impacts on any commercial sea fishing activities needs to be given consideration and stakeholders consulted as early as possible and throughout the process.

The DAFM request the inclusion of the Common Fisheries Policy in the section in the SEA

Environmental Report detailing legislation, plans and policies referred to by the DAFM in their stakeholder submission made in June 2020 (page 69 of the SEA). This policy is important as it provides the framework for the management of fishing in Ireland's exclusive economic zone.

Chief Executive's Response:

The comments are noted. Objectives ED67 and ED72 in Chapter 6 relating to the Blue Economy (including fisheries) and Objectives ES23 -ES28 in the Energy Strategy were assessed as part of the SEA and AA and are considered appropriate and sufficient. Consultation with the public and stakeholders was also carried out at the Draft Plan and PMA stages and all submissions received have been considered. Individual applications will be assessed on a case by case basis.

It is recommended appropriate to add the policy document (Common Fisheries Policy) to Table 4-1 of the SEA ER which details the relevant International/European policies. This will be included in the final ER.

Chief Executive's Recommendation:

It is recommended that the Commons Fisheries Policy be added to Table 4.1 International/European Legislative Frameworks, Plans and Policies in the final ER.

Alteration No.	PMA ES.15 and ES.16
Chapter/Section	Volume 10 Energy Strategy - Section 5.3 Wind Energy Methodology and Volume 12 Strategic Environmental Assessment Environmental Report
Proposed Material Alteration	
Please refer to Section 4.8.	

Submission(s) Received on PMA:	WXF-C29-PMA-18 (Southern Regional Authority)
	WXF-C29-PMA-50 (DECC)
	WXF-C29-PMA-46 (FuturEnergy Ireland)
	WXF-C29-PMA-49 (WEI)
	WXF-C29-PMA-52 (Der, Joan and Jenny Murphy)

Summary of Issues:

The issues raised in relation to this PMA are summarised in Section 4.8 of this report.

Chief Executive's Response:

Please refer to the Chief Executive's Response and Recommendation relating to the issues raised in Section 4.8

Alteration No.	PMA ES.17 and PMA ES.20
Chapter/Section	Volume 10 Energy Strategy - Section 5.3 Wind Energy
	Methodology and Section 5.7 Wind Farm Development
	Management Standards – Siting, Layout and Design
	Volume 12 Strategic Environmental Assessment
	Environmental Report
Proposed Material Alteration	
The issues raised in relation to this P	MA are summarised in Section 2 of this report.
Submission(s) Received on PMA:	WXF-C29-PMA-50 (DECC)
	WXF-C29-PMA-53 (OPR)
	WXF-C29-PMA-46 (FuturEnergy Ireland)
	WXF-C29-PMA-49 (WEI)
	WXF-C29-PMA-56 (John Fleming)
	WXF-C29-PMA-13 (Marie Redmond)
	WXF-C29-PMA-14 (Marie Redmond)

Summary of Issues:

The issues raised in relation to this PMA are summarised in Section 2 (Recommendation 7) of this report.

Chief Executive's Response and Recommendation:

Please refer to the Chief Executive's Response and Recommendation relating to the issues raised in Section 2.