



Manager's Report on the Submissions and Observations received on the Draft Wexford County Development Plan 2013-2019

Report to the Members of Wexford County Council prepared in
accordance with Section 12(4) of the Planning and Development Act
2000 (as amended)



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Section 1 Introduction

1.1

This report has been prepared in accordance with the requirements of Section 12(4) of the Planning and Development Act 2000 (as amended) and is submitted to the Members of Wexford County Council for their consideration as part of the process of preparing the Wexford County Development Plan 2013-2019. The report presents a summary of the issues raised in submissions and observations on the Draft Plan and outlines the Manager's response to, and recommendations on, the issues raised therein.

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

- i. Lists the persons or bodies who made submissions or observations;
- ii. Summarises the issues raised by the Minister for the Environment, Community and Local Government; and thereafter, issues raised by other bodies or persons.
- iii. Gives the response of the Manager to the issues raised, taking account:
 - of any directions of the Members,
 - the proper planning and sustainable development of the area,
 - the statutory obligations of any local authority in the area,
 - any relevant policies or objectives of the Government, and,
 - if appropriate, any observations made by the Minister for Arts, Heritage, Gaeltacht and the Islands under subsection (3)(b)(iv),
- iv. Summarises the issues raised and recommendations made by the relevant Regional Authority in its written submission prepared in accordance with Section 27(B) of the Act and outlines the recommendations of the Manager in relation to the manner in which those issues and recommendations should be addressed in the Development Plan.

1.2 Format of the report

The report is presented in 6 sections:

- Section 1 provides an overview of the current stage of the plan preparation process, the public consultation undertaken on the Draft Plan, details of the submissions and observations received and the legislative framework for consideration of the report by the Members.
- Section 2 provides a summary of the issues raised in the submission of the Minister for the Environment, Community and Local Government and sets out the Manager's response to, and recommendations on, the issues raised in the submission
- Section 3 provides a summary of the submission and report of the South-East Regional Authority and sets out the Manager's recommendations on the issues raised therein.
- Section 4 provides a summary of the remaining submissions and observations received (other than those relating to the Record of Protected Structures), and sets out the Manager's response to, and recommendations on, the issues raised.
- Section 5 provides a summary of the submissions and observations relating to the Record of Protected Structures, and sets out the Manager's response to, and recommendations on, the issues set out in these submissions and observations.
- Section 6 sets out other recommended proposed amendments which are deemed necessary following an internal review of the Draft Plan.
- Section 7 provides an overview of the next stage, and the conclusions of the Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) screening of the Manager's recommendations.

Section 1.3 Current stage of the Plan preparation process

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

Table 1: Stages in the plan preparation process

Week	Stage
1-8	Initial public consultation and display of 'Issues Papers'
8-16	The Manager 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.
16-26	The Members have 10 weeks to consider the Manager's Report. During this period the Members may issue directions to the Manager with regard to policies to be included in the new Plan.
23-38	The Manager prepares the pre-draft Development Plan and submits it to the Members.
38-46	The Members consider the pre-draft Development Plan and make the Draft Plan which will be placed on public display.
46-48	The Draft Development Plan is prepared for public consultation.
48-58	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.
58-70	The Manager prepares a report on the submissions/observations received during the public consultation stage. This report will summarise the issues raised and outline the Manager's Response to, and recommendations on, the issues.
70-82	The Members consider the Manager's Report and may decide to amend or make the Plan***
82-85	If the Members propose to amend the Draft Plan, the amendments are prepared for public display.
85-89	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 <u>only</u> .
89-93	The Manager prepares a report on the submissions and observations received on the proposed amendments. This report will summarise the issues raised and outline the Manager's Response to and recommendations on the issues.
93-99	The Members consider the Manager's Report and make the Plan with or without the proposed amendments.
***There is provision for the Manager to order an additional period to carry out an Appropriate Assessment and/or Strategic Environmental Assessment of material amendments to the Draft Plan.	

1.3 Public consultations on the Draft Plan

1.3.1 Public display

The Draft Plan was placed on public display from Monday 11th June 2012 until Monday 20th August 2012. Notice of the publication of the Draft Plan was given in the local newspapers and on www.wexford.ie.

The Draft Plan was available to view online at www.wexford.ie and at the following locations:

- Planning Department, County Hall, Carricklawn, Wexford
- Wexford Borough Council, Spawell Road, Wexford
- Enniscorthy Area Office, Old Dublin Road, Enniscorthy
- Enniscorthy Town Council, Market Square, Enniscorthy
- New Ross Town Council, The Tholsel, New Ross
- Gorey Civic Offices
- All Public Libraries.

The Draft Plan was available to download for free from the Council's website or to purchase in either hard copy or electronic copy.

1.3.2 Prescribed Authorities, Infrastructure Providers and Stakeholders

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

1.3.3 Public Consultation Evenings

Public Consultation Evenings were held during the course of the public display period as follows:

- Tuesday 3rd July 2012 Presentation Centre, Enniscorthy Town
- Thursday 5th July 2012 Gorey Civic Offices
- Tuesday 10th July 2012 County Hall, Carricklawn, Wexford
- Thursday 12th July 2012 Brandon House Hotel, New Ross Town.

Notice of these evenings was published in the local newspapers and on the Council's website.

1.4 Submissions and Observations received

The Planning Authority received 131 submissions and observations within the statutory consultation period. A further 16 submissions and observations were received after the end of this period. Table 2 provides a breakdown of the issues raised. The majority of the submissions and observations (93) related to the Record of Protected Structures.

Table 2 Breakdown of issues raised in the submissions and observations received

Submissions and observations received within statutory consultation period	
Protected Structures	94
Transport	5
Energy and Wind Energy Strategy	6
Rural Housing	3
Flooding	3
Tourism	2
Landscape Character Assessment	2
Retail	1
Recreation	1
Quarries	1
Heritage	1
Education	1
Other/various Issues	11
Total	131
Submissions and observations received outside of the statutory consultation period	
Protected Structures	13
Wind Energy Strategy	1
Rural Development	1
Landscape Character Assessment	1
Total	16

Table 3 lists the persons and bodies who made submissions or observations. The table is colour coded as follows:



Submission or observation relating to the Record of Protected Structures



Submission or observation relating to other issues

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

Submission No	Name	Issues
1	Tom Cullen Design & Build on behalf of Cathriona Murphy & Adrian Dowling	Restrictions on development
2	John Sutton	RPS: NIAH 15701926
3	Barry Symes	RPS: NIAH 15701118
4	Health & Safety Authority	Seveso sites
5	Anne Ryan	RPS: NIAH 15704315
6	Martin Murphy	RPS: NIAH 15704401
7	Ramsgrange Trust c/o Ann Rice	RPS: NIAH 15617003
8	Simon Ryan	RPS: NIAH 15703522
9	John McCarthy	RPS: NIAH 15703231
10	Anne Doyle	RPS: WCC0943
11	Dept. of Transport, Tourism & Sport	RPS: NIAH 15619006
12	Brian Rickwood	Transport, Housing
13	Patricia Byrne	Transport
14A	Rev. Canon R. Harmsworth	RPS: NIAH 15702511, 15702512, 15702531
14B	Rev. Canon R. Harmsworth	RPS: NIAH 15702511, 15702512, 15702531
15	Mary Cosgrove	RPS: NIAH 15704536
16	Julie Breen Solicitors on behalf of Nicholas Kehoe	RPS: NIAH 15701528
17	Patricia T. Mellon	RPS: NIAH 15704873
18	Dr. Arthur O'Reilly	RPS: NIAH 15616017
19	William & Phil Austin	RPS: Kilmallock House
20	F.M. Godkin	RPS: NIAH 15601033
21	Michael Sheridan Engineering & Design Ltd. On behalf of Sinead & Rory McCarthy	RPS: Property at Killurin
22	Austin Cody	RPS: NIAH 15704819
23	Les Rothwell	RPS: NIAH 15610005

24A	Thomas Kelly	RPS: NIAH 15700723
24B	John Browne TD on behalf of Thomas Kelly	RPS: NIAH 15700723
25	Declan Lyons	RPS: NIAH 15616018
26	Sean Walsh	RPS: NIAH 15601032
27	Brian O'Neill	RPS: NIAH 15702915
28	South-East Regional Authority	Various
29	Margaret Pyne	RPS: NIAH 15704010
30	Wexford Borough Council	RPS: WCC0790 & WCC0113
31	Emer J. Anglim	RPS: NIAH 15704866
32	William Meehan	RPS: NIAH 15702939
33	Eileen Cloney-Kehoe	RPS: NIAH 15704508
34	Eilish Walsh	RPS: NIAH 15701923
35	Austin Redmond	RPS: NIAH 15704024
36	David Maher	RPS: NIAH 15704510
37	NRA	Transport, Retail
38	Bord Gáis Networks	No comment
39	Elizabeth Caulfield	RPS: NIAH 15705214
40A	John Redmond	RPS: NIAH 15704848
40B	John Redmond	RPS: NIAH 15704848
41	Eddie Cullen	RPS: NIAH 15704309
42	Allen & Kenny Ltd.	RPS: NIAH 15601073
43	Richard Byrne	RPS: NIAH 15704726
44	Pat & Olwen McGrath	RPS: NIAH 15702122
45	James O'Connor	Wind Energy Strategy
46	James Devereux	RPS: Iona House
47	Bill Kelly	RPS: NIAH 15704806
48	Bill Kelly	RPS: NIAH 15704311
49A	James P. Furlong	RPS: NIAH 15703755
49B	Doyle's Solicitors on behalf of James Furlong	RPS: NIAH 15703755
50	Dublin Airport Authority	No comment
51	John Purcell, Phyllis Purcell, Philip Purcell, Sinead Joyce	RPS: WCC0620 RPS: NIAH 15700601
52	Nick Hughes	RPS: NIAH 15701213
53A	Rosemary Owens	RPS: NIAH 15701940
53B	Rosemary Owens	RPS: NIAH 15701941
53C	Rosemary Owens	RPS: NIAH 15701942
54	Patrick Asple	RPS: NIAH 15601023
55	Brady Shipman Martin on behalf of OPW	Development Plan Strategy, Heritage, Flood Risk Management
56	Rev. Steven Foster	RPS: NIAH 15601066
57	Barbara Cotter	RPS: NIAH 15704310
58	Irene Mitchell	RPS: NIAH 15601071
59	Joseph Kehoe	RPS: NIAH 15701716
60	Kay Bent, Diane Walsh & Rosalind Kirby	RPS: NIAH 15704313

61A	Fr. David Murphy	RPS: NIAH 15704144
61B	Fr. David Murphy	RPS: NIAH 15703609
61B(i)	Fr. David Murphy	RPS: NIAH 15703609
61C	Fr. David Murphy	RPS: NIAH 15703610
61C(i)	Fr. David Murphy	RPS: NIAH 15703610
62A	Tony Fortune and Philomena Fortune	RPS: NIAH 15703751
62B	Tony Fortune and Philomena Fortune	RPS: NIAH 15703751
63	Barbara-Anne Murphy	Restrictions on development, Tourism, Transport, Energy, Landscape, Design
64	Andrew Ryan	Landscape Character Assessment
65	Bunclody Community Council	Landscape Character Assessment, Wind Energy Strategy
66	Keep Ireland Open	Various
67	Department of Environment, Community and Local Government	Various
68	William Rowe	RPS: NIAH 15701811
69	Pauline O'Grady	RPS: NIAH Adare House
70	David Gallagher	RPS: NIAH 15704302
71	Fr. Gerald O'Leary	RPS: NIAH 15703412
72	Sr. Liz Murphy	RPS: NIAH 15704316
73	John Murphy	RPS: NIAH 15701410
74	Kevin Cronin on behalf of Bree Mountain Biking	Mountain Biking
75	Prof. A.R. Manning & Dr. J.M. Manning	RPS: NIAH 15705302
76	Alan Deacon	RPS: NIAH 15700310
77	Martin Sinnott on behalf of Trevor & Caroline Ashmore	RPS: NIAH 15701518
78	Philip Stamp	RPS: NIAH 15702023
79	EPA	Various
80	Breda Redmond	RPS: NIAH 15702648
81	Raphael Gahan and Stasia Gahan	RPS: NIAH 15701617
82	Thomas Justin Cadogan	RPS: NIAH 15703527
83	Clody E. Norton	Landscape
84	Aidan & Theresa Redmond	RPS: NIAH 15702003
85	Stephen Eustace	RPS: NIAH 15704130
86	Mary T. Kearney	RPS: NIAH 15704314
87	Mary Kinsella	RPS: NIAH 15700729
88	Peter Perkins and Fionnuala Killalea	RPS: NIAH 15702607 & 15702611
89	Gorey Chamber of Commerce	Employment, Economy & Enterprise, Retail & Tourism

90A	Iarnród Éireann	RPS: NIAH 15704048
90B	Iarnród Éireann	RPS: NIAH 15702906
90C	Iarnród Éireann	RPS: NIAH 15704625
90D	Iarnród Éireann	RPS: NIAH 15601092
90E	Iarnród Éireann	RPS: NIAH 15704015
90F	Iarnród Éireann	RPS: NIAH 15703910
90G	Iarnród Éireann	RPS: NIAH 15709205
90H	Iarnród Éireann	RPS: NIAH 15601097
90I	Iarnród Éireann	RPS: NIAH 15601105
91	Patrick Nolan	RPS: NIAH 15701924
92	Patrick D'HELF	Restrictions on development
93	Fáilte Ireland	Tourism/various chapters
94	Síle Mhic Réamoinn	RPS
95	Irish Concrete Federation (ICF)	Extractive Industry
96	Alan Clarke	RPS: NIAH 15701224
97	Janice O'Connor	RPS: NIAH 15705007
98	Department of Arts, Heritage and the Gaeltacht	Nature Conservation/AA Screening
99	Theresa Somers	RPS: NIAH 15703316
100	Fergus O'Connor	Restrictions on development
101	Mary Spain	RPS: NIAH 15703309 & 15703310
102	Benjamin Chapman & John Chapman	RPS: NIAH 15701610
103	Mr. & Mrs. B.D.R. Harrison	RPS: NIAH 15703764
104	Murray & Associates on behalf of Maxbole Wind Energy Ltd. and Rathyork Wind Energy Ltd.	Wind Energy Strategy
105	Fenton Associates on behalf of Anne Ryan	RPS: NIAH 15704315
106	Department of Education & Skills	Education
107	Ed. Morrison	RPS: NIAH 15701536
108	Alison Hearne	RPS: NIAH 15704276
109	Mahon & Fox on behalf of Martin Kinsella	RPS: NIAH 15703507
110	Kevin Redmond on behalf of St. Helen's Bay Golf and Leisure Resort Ltd.	Destination Tourism
111	Michael & Orna D'arcy	Flooding
112A	Richard & Madeleine Kavanagh	Flooding
112B	Mary & Nicholas Kavanagh	Flooding
112C	Patricia Gabbett	Flooding
112D	Francis Kavanagh	Flooding
112E	Maureen Kavanagh	Flooding
113	David Skrine	RPS: Ballyrankin House
114	Richard Eustace	RPS: NIAH 15704201
115	Michael Tierney on behalf of John Donohue	RPS: NIAH 15612023

116	Michael Tierney on behalf of John Prendergast	RPS: NIAH 15701726
117	Nancy Kehoe	RPS: NIAH 15701005
118	Paul Keogh Architects on behalf of Mr. Bill Felton	RPS: 15703324
119	Ann Pery-Knox-Gore	RPS: NIAH 15704624
120	GVA Planning on behalf of Tesco Ireland Ltd.	Retail Strategy, development contributions, development standards
121	EirGrid	Electricity Grid
122	IWEA	Wind Energy Strategy
123	Cllr. Danny Forde	Guidelines for a Sustainable Energy Community
124	Joseph Joyce	RPS: NIAH 15704822
125	Joint Committee of Communities	Transport
126	Chris Harvey	RPS: NIAH 15703758
127	Richard Warren	RPS: NIAH 15701206
128	Wexford IFA	Rural development
129	An Taisce	Climate Change, Population Dispersal, Oil Price Inflation, Local Area Plan Guidelines, Implementation and Accountability
130	Cllr. Joe Ryan	Transport, RPS
131	Eamon Culleton	RPS: NIAH 15703227
Submissions and observations received outside of the statutory consultation period		
132	John Browne T.D.	Wind Energy Strategy
133	John J. Kelly	RPS: NIAH 15701124
134	Martin & Maria Colfer	RPS: NIAH 15703604
135	Alan Poole on behalf of Wexford IFA	Agriculture
136	Margaret Fitzpatrick	RPS: NIAH 15703418
137	Hannah O'Mahoney-Rath	RPS: NIAH 15704123
138	Joseph Edward Kelly	RPS: NIAH 15702019
139	Brendan Palmer and Michelle Palmer	RPS: NIAH 15616003, 15616004 & 15616005
140	John Browne T.D. on behalf of Ned Ryan	RPS: NIAH 15704315
141	Senator Michael D'Arcy on behalf of Tony and Philomena Fortune	RPS: NIAH 15703751
142	Murt Joyce	RPS: NIAH 15703739
143	Senator Michael D'Arcy on behalf of Raphael and Statia Gahan	RPS: NIAH 15701617
144	Jim Donnelly	RPS: NIAH 15703335
145	Richard and Susan Devane	RPS: NIAH 15703918

146	Eileen Bolger	Landscape Assessment	Character
147	James Kinsella	RPS: 'Homeville'	

1.5 Consideration of the Manager's Report

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

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

Following consideration of the Draft Plan and the Manager's Report, the Members may, by resolution accept or amend the Draft Plan. Where it is proposed to make material amendments to the Draft Plan, the proposed material amendments must be placed on public display for period of not less than four weeks, during which time submissions and observations may be made on the proposed amendments only.

Section 2 Submission of the Minister for the Environment, Community and Local Government (Submission No. 067)

2.1

This section summarises the issues raised by the Minister and gives the response and recommendations of the Manager with regard to the issues. Having considered the submission the Manager has recommended proposed amendments to the Draft Plan. Where it is recommended to include additional text, this text will be indicated in **bold and underlined**. Where it is proposed to delete text, it will be shown in ~~striketrough text~~.

2.2 Summary of Submission

The Department commends the Council on the production of a Draft Plan which will guide the sustainable development of the county for the next 6 years. The Draft Plan is considered to be a very well thought out, practical, readable and user friendly document which sets out a clear vision for the future development of the County. The accompanying documents are equally good and follow clearly Government policy and in particular any relevant Section 28 guidelines.

The submission recognises that the focus of the Draft Plan is very clearly on economic recovery and welcomes the indication that County Wexford is positively disposed to new development opportunities unless there are compelling grounds against such development.

The Department identifies three matters which the Council should have regard to when finalising the Draft Plan:

1. The Planning Authority, in consultation with the National Parks and Wildlife section of the Department of Arts, Heritage and the Gaeltacht, should satisfy themselves that the Draft Plan is fully compliant with the obligations in regard to Appropriate Assessment and Strategic Environmental Assessment.
2. The Council should have regard to the submission of the National Roads Authority, in particular the policies set out in the Spatial Planning and National

Roads Guidelines with regard to exemptions for access onto the National Road Network and should consult with the Authority prior to making the plan.

3. The Council should ensure that the policies and objectives in relation to telecommunications infrastructure will facilitate and not inhibit the roll out of high speed broadband access for all citizens of the County to support economic growth and competitiveness. The submission notes that the Draft Plan supports the development of high-quality telecommunications infrastructure to support the economic and social development of the County. However, it excludes a number of areas including in close proximity to residential areas, schools and community facilities. It is recommended that the policies and objectives facilitate the roll out of high speed broadband access for all citizens of the County to support economic growth and competitiveness, support developments in the education sector and generally improve the quality of life for all.

Appendix 1 of the submission provides a summary of the Department's comments in relation to other aspects of the Draft Plan.

Regional Planning Guidelines for the South-East Region

- The Department has been advised that the South-East Regional Authority considers the Draft Plan to be consistent as far as practicable with the aims and objectives of the Regional Planning Guidelines 2010-2022

Core Strategy

- The Core Strategy is clear and concise and complies fully with the requirements of the Act. It provides a settlement strategy and population targets which are consistent with the population targets in the Regional Planning Guidelines. The Core Strategy Table is consistent with the recommendations in the Department's Core Strategy Guidance Notes.

Housing Strategy

- It is noted that the Housing Strategy is an interim strategy pending the fundamental review of Part V, and if the revisions to Part V are completed in

advance of the completion of the Plan any relevant changes will be factored into the Plan. It is further noted that the Strategy aligns very clearly with the Core and Settlement Strategies for the County and contains an in-depth analysis of the overall housing needs of the County for the life of the Plan.

Design

- The chapter on design is welcomed. It is considered innovative, positive and contains much useful and valuable information for development proposals in the County. Together with the Retail Design Manual, it will ensure quality for future development proposals.

Unfinished Housing Developments

- It is noted that the Council has had regard to the Managing and Resolving of Unfinished Housing Developments-Guidance Manual (Department of Environment, Community and Local Government, 2011) and will have regard to the Manual when preparing Town Development Plans and Local Area Plans and when assessing planning applications. The submission also notes the Manual will be considered when preparing Core Strategies in Town Development Plans and zoning lands for residential developments in Local Area Plans.

Retail Strategy

- The submission notes the Retail Strategy is aligned to the Core Strategy, Settlement Strategy and Settlement Hierarchy and references the Retail Planning Guidelines for Planning Authorities and Retail Design Manual (2012).

Wind Energy Strategy

- The approach to the Wind Energy Strategy is in line with the guidance set out in the Wind Energy Guidelines 2006. The reference to the Draft Methodology for Local Authority Renewable Energy Strategies (Sustainable Energy Authority of Ireland, 2012) and the objective to prepare a Renewable Energy Strategy is noted.

Flood Risk

- The submission acknowledges that the Council has had regard to the Section 28 Flood Risk Management Guidelines and has carried out a Stage 1 Strategic Flood Risk Assessment. The submission also notes that the Council has acquired flood maps for the County which are used as a screening tool to identify sources of flood hazard in the County. The Council is advised that the OPW will comment in detail on the flood risk issues in the Draft Plan and requested to have regard to their submission when finalising the Plan.

Departmental Guidelines

- The submission notes that where appropriate the Draft Plan has taken on board Section 28 Guidelines and recommends that the Council should note the Draft Contribution Scheme Guidelines 2012 and Draft LAP Guidelines 2012.

Monitoring and Evaluation

- The monitoring regime set out in the Plan is noted. It is recommended that this monitoring could be part of the monitoring regimes required under the Strategic Environmental Assessment and Appropriate Assessment processes. Monitoring could also include periodic surveys including housing land availability, employment (or business) land availability, retail health checks, audits of open space and community facilities.

2.3 Manager's Response

The Department's commendation of the Draft Plan is welcomed.

The Council is satisfied that the Draft Plan is fully compliant with the obligations in regard to Appropriate Assessment and Strategic Environmental Assessment.

National Roads Authority

The Council has had regard to the NRA's submission-refer to Submission No. 037 which discusses the submission in detail.

Telecommunications

The Council is committed to enhancing the telecommunications network and infrastructure throughout the County. However, the Council is also mindful of the need to ensure a balance between the provision of this infrastructure in the interests of economic and social progress and protecting vulnerable persons, residential amenity and environmental quality.

Section 9.3 of the Draft Plan was drafted having regard to the Telecommunications Antennae and Support Structures-Guidelines for Planning Authorities (Department of the Environment and Local Government, 1996). The guidelines caution against the location of telecommunications installations beside schools (p7), and indicate that only as a last resort, and if other alternatives are either unavailable or unsuitable, should free-standing masts be located in a residential area or beside schools (p9).

Objective TC05, which was carried forward from the Wexford County Development Plan 2007-2013, adopts a presumption against the erection of antennae in proximity to residential areas, schools and community facilities. This is considered reasonable in the interests of striking a fair balance between the rights of individual citizens and the common good.

Draft Section 28 Guidelines

These guidelines were published after the preparation of the Draft Plan. Reference to these guidelines and also the recently published Draft Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment will be inserted in the Draft Plan. It is also considered worthwhile to include reference to the Development Plan Guidelines for the preparation of future town Development Plans in Chapter 3 Core Strategy

Monitoring

The suggestions on monitoring are welcomed. It is the intention of the Planning Authority to develop a programme of implementation which will set targets, indicators and monitoring measures. This programme will then be used by the Monitoring Committee referenced in Chapter 1.

Manager's Recommendation

Insert the following new objectives in Chapter 3 Core Strategy: Section 3.4 Settlement Strategy page 56.

To have regard to the Local Area Plan–Draft Guidelines for Planning Authorities (2012) and companion Manual and any updated version of these Guidelines when preparing Local Area Plans.

To have regard to the Development Plan–Guidelines for Planning Authorities (2007) and any updated version of these Guidelines when preparing Development Plans and Variations of Development Plans.

Insert the following text at the end of the first paragraph in Chapter 18 Development Management Standards: Section 18.3 Development Contributions and Bonds page 404.

The Council will have regard to the Development Contributions- Draft Guidelines for Planning Authorities (DECLG, 2012) and any updated version of these Guidelines when preparing Development Contribution Schemes.

Insert the following text in Chapter 18 Development Management Standards: Section 18.5 Environmental Impact Assessment page 405.

The Council will have regard to the Draft Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (DECLG, 2012) and any updated version of these Guidelines when assessing relevant cases.

Insert the following text in Appendix B of Volume 1 Written Statement- Statement prepared in accordance with Section 28 of the Planning and Development Act 2000 (as amended) page 469

Local Area Plans-Draft Guidelines for Planning Authorities (DECLG, 2012)

An objective is included in the Plan to have regard to these Guidelines and any updated version when preparing Local Area Plans in the County. The aim of the Draft Guidelines is to support Planning Authorities in preparing and

implementing Local Area Plans that will provide for the sustainable development of communities having regard to realistic assessments of need for future development informed by wider County and City plans and Regional Planning Guidelines. The Guidelines are accompanied by a non-statutory best practice Manual on the preparation of Local Area Plans.

Draft Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (DECLG, 2012)

The Plan includes a section affirming that the Council will have regard to the Draft Guidelines and any updated version when assessing relevant cases. The purpose of these Draft Guidelines is to provide practical guidance to Planning Authorities and An Bord Pleanála on procedural and technical issues arising from the requirement to carry out an Environmental Impact Assessment (EIA) in relevant cases. It is envisaged that the guidelines will result in greater consistency in the methodology adopted by consent authorities. The guidance should also assist Developers, EIA practitioners, NGOs and other participants in the planning process.

Development Contributions-Draft Guidelines for Planning Authorities (DECLG, 2012)

The purpose of these Guidelines is to provide updated guidance on the drawing up of development contributions to reflect the radical economic changes that have impacted across all sectors since guidance last issued in 2007. While it is recognised that the adoption of Development Contribution Schemes is a reserved function of the elected members of each Planning Authority, one of the outputs of the new guidance should be a greater level of consistency in Development Contribution Schemes on a National basis providing enhanced clarity to inform investment decisions across different local authority areas. The Council will have regard to the guidelines in the preparation of the Development Contribution Scheme.

Section 3 Submission of the South East Regional Authority (Submission No. 029)

3.1 Context

Pursuant to Section 27B of the Planning and Development Act 2000 (as amended) the South-East Regional Authority was required to prepare a submission on the Draft Wexford County Development Plan. This submission must contain a report which shall state whether, in the opinion of the Regional Authority, the Draft Development Plan is consistent with the relevant Regional Planning Guidelines. If, in the opinion of the Regional Authority, the Draft Plan is not consistent with the guidelines, the submission and report shall include recommendations as to what amendments, in the opinion of the Regional Authority, are required to ensure that they are consistent. The Authority was also required to submit a copy of the submission and report to the Minister for the Environment, Community and Local Government.

The section outlines the Manager's Recommendations in relation to the manner in which the issues and recommendations made in the submission should be addressed in the Draft Plan.

3.2 Summary of the Submission and Report

The South-East Regional Authority welcomes the Draft Plan and acknowledges the efforts made to co-ordinate the objectives and policies of the Plan so that they are consistent as far as practicable with the Regional Planning Guidelines for the South-East Region 2010-2022.

The Draft Plan sets out a clear vision for the future development of County Wexford in a series of policies that will deliver a more sustainable pattern of development and promote sustainable transport. It is noted that the Draft Plan has taken on board broader themes such as climate change, flooding and renewable energy and incorporated them into the centre of the ethos of sustainable development.

The Authority is satisfied with the detailed Core Strategy. It is considered to provide a concise summary of the main objectives and policies of the Draft Plan and explains in a clear manner the logical process and reasoning for the adoption of policies. The population targets for the urban settlements have been disaggregated so that the targets are compatible with the timeline of the Plan. This is acceptable, and overall the Authority is satisfied that the population figures used in the Core Strategy are aligned with the framework of principles outlined in Section 3 of the Regional Planning Guidelines.

The report sets out the Authority's comments on all chapters in the Plan. It commends in particular Chapter 4 Housing, Chapter 5 Climate Change, Chapter 6 Employment, Economy and Enterprise, Chapter 7 Tourism, Chapter 8 Transportation, Chapter 11 Energy, Chapter 12 Coastal Zone Management, Chapter 14 Heritage, Chapter 15 Recreation, Sport and Public Rights of Way, Chapter 16 Social Inclusion and Community Facilities and Chapter 17 Design.

The report recommends the following:

- Chapter 2, Section 2.3 Economic Profile should be updated to provide more accurate and up to date information on the current occupation status, and
- The Planning Authority should satisfy themselves that the Draft Plan is fully compliant with the requirements of the Regional Planning Guidelines in relation to Appropriate Assessment and Strategic Environmental Assessment, all relevant EU Directives and the Water Framework Directive and associated documents.

3.3 Manager's Response

The Authority's commendation of the Draft Plan is welcomed. Every effort was made to ensure that the Draft Plan is consistent as far as practicable with the South-East Regional Planning Guidelines 2010 – 2022, and it is considered that the implementation of the Plan will fully support and assist the achievement of the vision, policies and objectives for the South-East Region as set out in the guidelines.

It is acknowledged that some of the socio-economic information set out in Chapter 2 is out of date. However, it was the intention to update this information when the relevant results from Census 2011 became available. Since the publication of the Draft Plan, the CSO has published 'Census 2011 Profile 3 At Work - Employment, Occupations and Industry'. These results have been reviewed and it is now proposed to replace Section 2.3 in its entirety as set below.

3.4 Manager's Recommendation

Replace Section 2.3 Economic Profile of County Wexford pages 34-37 in its entirety with the following text:

2.3 Economic Profile of County Wexford

The current economic climate presents significant challenges in planning for economic growth for the County. It is recognised that the economy in Wexford has changed, and that the Plan must incorporate objectives that support and facilitate the changing economic profile of the County.

2.3.1 Principal economic status

Census 2011 recorded 51,307 persons 'at work' compared to 56,011 persons in 2006. The number of unemployed having lost or given up their previous job increased dramatically from 4,754 persons in 2006 to 14,764 persons in 2011. There has also been a notable increase in the number of students/pupils increasing from 8,314 in 2006 to 10,304 in 2011. Table No. 2 provides a comparison of the principal economic status in 2006 and 2011.

Table No. 2 Principal Economic Status of persons aged 15 years and over in the County in 2006 and 2011

<u>Principal Economic Status</u>	<u>2006</u>	<u>2011</u>
<u>Persons at work</u>	<u>56,011</u>	<u>51,307</u>
<u>Unemployed looking for first regular job</u>	<u>1,017</u>	<u>1,406</u>
<u>Unemployed having lost or given up previous job</u>	<u>4,754</u>	<u>14,764</u>
<u>Student or pupil</u>	<u>8,314</u>	<u>10,304</u>
<u>Looking after home/family</u>	<u>14,615</u>	<u>12,946</u>
<u>Retired</u>	<u>12,604</u>	<u>15,518</u>
<u>Unable to work due to permanent sickness or disability</u>	<u>4,890</u>	<u>5,698</u>
<u>Others not in labour force</u>	<u>306</u>	<u>313</u>
<u>All persons aged 15 years and over</u>	<u>102,511</u>	<u>112,256</u>

Source: CSO

2.3.2 Socio-Economic Groups

Socio-economic groups, which are comprised of persons aged 15 years or over who are at work, is determined by their occupation and employment status. Unemployed or retired persons aged 15 years or over are classified according to their former occupation and employment status.

In 2011 there were higher amounts of people in farming, agriculture, manual skilled and unskilled labour groups compared to the State averages. There were significantly lower amounts of Higher Professionals (3.6) and Lower Professionals (10.2%) than the State averages of 5.9% and 11.9% respectively. Table No. 3 details the socio-economic groups in County Wexford and the State in 2011.

Table No. 3 Socio-economic groups in the County and the State 2011

	<u>Co. Wexford</u>		<u>State</u>	
<u>Socio-economic group</u>	<u>No.</u>	<u>% Total</u>	<u>No.</u>	<u>% Total</u>
<u>Employers & Managers</u>	<u>14,403</u>	<u>12.8</u>	<u>495,057</u>	<u>13.7</u>
<u>Higher professionals</u>	<u>4,082</u>	<u>3.6</u>	<u>214,712</u>	<u>5.9</u>
<u>Lower professionals</u>	<u>11,440</u>	<u>10.2</u>	<u>428,712</u>	<u>11.9</u>
<u>Non-manual</u>	<u>22,486</u>	<u>20.0</u>	<u>732,117</u>	<u>20.3</u>
<u>Manual Skilled</u>	<u>12,018</u>	<u>10.7</u>	<u>324,023</u>	<u>9.0</u>
<u>Semi-skilled</u>	<u>10,394</u>	<u>9.3</u>	<u>300,910</u>	<u>8.3</u>
<u>Unskilled</u>	<u>5,243</u>	<u>4.7</u>	<u>131,215</u>	<u>3.6</u>
<u>Own account workers</u>	<u>6,232</u>	<u>5.6</u>	<u>164,157</u>	<u>4.5</u>
<u>Farmers</u>	<u>6,594</u>	<u>5.9</u>	<u>148,979</u>	<u>4.1</u>
<u>Agricultural Workers</u>	<u>1,501</u>	<u>1.3</u>	<u>21,133</u>	<u>0.6</u>
<u>All others</u>	<u>17,863</u>	<u>15.9</u>	<u>647,381</u>	<u>17.9</u>
<u>Total</u>	<u>112,256</u>	<u>100.0</u>	<u>3,608,662</u>	<u>100</u>

Source: CSO

2.3.3 Occupational Status

In 2006 the highest proportion of those at work were employed in construction, manufacturing industries and wholesale and retail trade. In 2011 this changed to wholesale and retail trade, manufacturing industries and health and social work.

The Census 2011 results confirm the collapse of the construction industry and associated employment in the County. In 2006 16.7% of total people at work were employed in construction. In 2011 this figure had fallen dramatically to 6.5%. Manufacturing Industries also experienced a small decline from 12% in 2006 to 10.8% in 2011.

There have been marked increases in other sectors. The numbers employed in Education increased significantly from 5.9% of the total at work in 2006 to 8.7% in 2011. There were also increases in the areas of Health and Social Work, Public Administration and Defence. Agriculture, Forestry and Fishing remain a significant employment source in the County increasing from 7.5% in 2006 to 8.5% in 2011.

Table No. 4 Occupational Status for County Wexford in 2006 and 2011

<u>Broad industrial group</u>	<u>2006</u>	<u>2011</u>	<u>Difference</u>
<u>Agriculture, forestry and fishing</u>	<u>4,216</u>	<u>4,371</u>	<u>+155</u>
<u>Mining, quarrying and turf production</u>	<u>166</u>	<u>88</u>	<u>-78</u>
<u>Manufacturing industries</u>	<u>6,892</u>	<u>5,557</u>	<u>-1,335</u>
<u>Electricity, gas and water supply</u>	<u>273</u>	<u>259</u>	<u>-14</u>
<u>Construction</u>	<u>9,369</u>	<u>3,370</u>	<u>-5,999</u>
<u>Wholesale and retail trade</u>	<u>8,347</u>	<u>8,643</u>	<u>+296</u>
<u>Hotels and restaurants</u>	<u>3,554</u>	<u>3,546</u>	<u>-8</u>
<u>Transport, storage and communications</u>	<u>2,580</u>	<u>2,422</u>	<u>-158</u>
<u>Banking and financial services</u>	<u>1,723</u>	<u>1,978</u>	<u>+255</u>
<u>Real estate, renting and business activities</u>	<u>3,337</u>	<u>3,276</u>	<u>-61</u>
<u>Public administration and defence</u>	<u>2,518</u>	<u>3,034</u>	<u>+516</u>
<u>Education</u>	<u>3,314</u>	<u>4,459</u>	<u>+1,145</u>
<u>Health and social work</u>	<u>5,050</u>	<u>5,586</u>	<u>+536</u>
<u>Other community, social and personal service activities</u>	<u>2,511</u>	<u>2,473</u>	<u>-38</u>
<u>Industry not stated</u>	<u>2,161</u>	<u>2,245</u>	<u>+84</u>
<u>Total at work</u>	<u>56,011</u>	<u>51,307</u>	<u>-4,704</u>

2.3.4 Live Register

The Live Register is not a measure of unemployment as it includes those working on reduced hours or casual workers. However, it can be used to indicate current employment trends and areas of unemployment in the County. Table No. 4 illustrates the numbers signing on the Live Register in April 2007 (when the last Development Plan was made) and April 2012. The figures in this Table present the enormity of the economic challenges now facing the County.

Table No. 5 Live Register for County Wexford

<u>Office of Registration</u>	<u>Number of People signing on the Live Register</u>	
	<u>April 2007</u>	<u>April 2012</u>
<u>Wexford</u>	<u>2,463</u>	<u>6,891</u>
<u>New Ross</u>	<u>1,189</u>	<u>3,346</u>
<u>Enniscorthy</u>	<u>1,721</u>	<u>4,782</u>
<u>Gorey</u>	<u>1,214</u>	<u>4,110</u>
<u>Total</u>	<u>6,587</u>	<u>19,129</u>

Source: CSO Live Register Additional Tables

Section 4: Summary of remaining submissions and observations and the Manager's Response

4.1

This section summarises the issues raised in the remaining submissions and observations (other than those relating to the Record of Protected Structures). The submissions and observations are summarised in bullet points, and the Manager's Response is set out in a corresponding bullet point. Some of the submissions and observations received were lengthy and raised issues outside the remit of the development plan. The summaries and responses have been limited to matters relevant to the development plan only.

Having considered the submissions and observations the Manager has in some instances recommended proposed amendments to the Draft Plan. Where it is recommended to include additional text, this text will be indicated in **bold and underlined**. Where it is proposed to delete text, it will be shown in ~~striketrough-text~~

Submission No. 001: Tom Cullen Design and Build on behalf of Cathriona Murphy and Adrian Dowling	
Summary of Submission	Manager's Response and recommendation
<ul style="list-style-type: none"> Refused planning permission under planning register no. 20110922 for reasons including the development being contrary to the current coastal zone policy. The applicants mainly agree with the content of Section 4.3 Sustainable Rural Housing. However, in the Coastal area, where their site is located, they consider that the definition of 'local rural area' should be more flexible by allowing an applicant to demonstrate significant ties or a specific need to live in that area, similar to being in an area designated 'Under Strong Urban Influence'. It is also submitted that 3km is a small radius within a specific designated area, due to the availability of suitable sites in that rural/coastal area. If the recommendation to include specific need is not considered, then it is recommended that a distance of 7km be used instead. <p>The applicants submitted suggested rewording for the Coastal Zone/NHA definition of 'Local rural area' in</p>	<ul style="list-style-type: none"> Noted. The Draft Plan proposes significant revisions to the criteria relating to one-off rural housing in the coastal zone from that set out in the current County Development Plan (2007-2013). The extent of the proposed coastal zone is greater and the previous restriction which allowed just the landowner and their immediate family to be considered has been replaced with a less restrictive set of criteria. This in turn will open up to the coastal zone to a wider group of people with links to the particular area. <p>Notwithstanding this, the coastal zone is a sensitive area which has been subject to substantial pressure for development and has limited resources to absorb this pressure. This zone must be carefully managed in the interests of protecting its exceptional visual qualities and</p>

Table No. 11:

Local rural area is defined as within the immediate vicinity of the specific designated area and a maximum of 3km radius of where the applicant has lived or was living. Where the site is of a greater distance but that applicant can demonstrate significant ties with the area, for example, immediate family or landownership, than these applications will be considered on their merits. The 'local rural area' includes the countryside only

Or

'Local rural area' is defined as within the immediate vicinity of the specific designated area and a maximum of 7km radius of where the applicant has lived or was living. The 'Local rural area' includes the countryside only.

the associated tourism product and economic value.

Therefore, it was necessary in the formulation of the policy to respond to this local circumstance by defining the 'local rural area' by a specific distance. The 3km radius distance is considered reasonable. If this distance is increased, it will open consideration in this zone to an even greater amount of people, which in turn will place greater pressure on a limited resource.

Having reviewed the criteria relating to the coastal zone/NHA, it is considered appropriate and herewith recommended that the criteria relating to housing for people with exceptional health and/or family circumstances building permanent residences for their own use be included in this rural area type-[*see Manager's Recommendation section for proposed wording.*](#)

On balance, the revisions put forward in the Draft Plan have been carefully devised to be fair and reasonable whilst protecting the integrity of the County's coastal areas.

<ul style="list-style-type: none"> The applicants acknowledges other requirements of the Draft Plan in Sections 4.3, 9.2.7, 13.5,13.6, 14.2, 14.4, 17.7 and 18.12 and request that they are adopted as are. 	<ul style="list-style-type: none"> Noted
<p>Manager's Recommendation</p> <p>Insert the following in the section relating to the Coastal Zone/NHA rural area type in Table No. 11 Criteria for Individual Rural Housing page 100:</p> <p><u>Permitted: Housing for people with exceptional health and/or family circumstances building permanent residences for their own use.</u></p> <p><u>Definition: Special consideration shall be given in cases of exceptional health circumstances-supported by relevant documentation from a Medical Practitioner proving that a person needs to live in particular environment or close to family support, or requires a close family member to live in close proximity to that person. In cases where an applicant needs to reside near elderly parents so as to provide security, support and care, or where elderly parent(s) need to reside near an immediate family member favourable consideration will also be given. Similar consideration will be given to a relative of an elderly person who has no children.</u></p>	

Submission No. 004: Health and Safety Authority	
Summary of Submission	Manager's Response
<ul style="list-style-type: none"> Confirms the current Upper/Lower Tier Seveso sites in County Wexford as the following: Upper Tier <ol style="list-style-type: none"> Nitrofert Ltd, Raheen Port, New Ross, Co. Wexford Endesa Ireland Ltd, Great Island Power Station, Campile, New Ross, Co. Wexford. Atlantic Industries, IDA Business and Technology Park, Rosslare Road, Drinagh, Co. Wexford. Lower Tier <ol style="list-style-type: none"> Goulding Fertilisers Ltd, Strokestown, New Ross, Co. Wexford. 	<ul style="list-style-type: none"> The changes are noted. The Upper/Lower Tier sites listed in Section 10.10 should be amended in accordance with the details provided by the HSA- <i>see Manager's Recommendation section for proposed wording.</i>
Manager's Recommendation Amend Table 23 in Section 10.10 page 235 as follows:	

Table No. 23 Major Accident/Seveso establishments ~~within or in close proximity to~~ County Wexford

Upper Tier:

- Atlantic Industries, Drinagh, Wexford
- Nitrofert Ltd., Raheen Port, New Ross, Co. Wexford
- **Endesa Ireland Ltd., Great Island Power Station, Campile, New Ross, Co. Wexford**

Lower Tier

- ~~Esso Ireland Ltd., Joint Fuels Terminal New Ross, Marshmeadows, New Ross~~
- ~~Barrow Storage Co. Ltd., T/Campus Oil, Marshmeadows, New Ross~~
- Goulding Chemicals Ltd., Strokestown, New Ross, Co. ~~Kilkenny~~ **Wexford**

Submission No: 012 Brian Rickwood

Summary of Submission	Manager's Response
<ul style="list-style-type: none"> The Draft Plan attempts to meet Central Government aims but does not meet the needs of local people. It does not take into account the on-going recession which will result in reductions in traffic levels, planning applications and predicted population levels. It is unrealistic to prepare for an upturn. The Draft Plan should prepare for a different future which is not continuing with outdated strategies for growth, where resources are finite. A better vision for the future is needed which is not dependent on building motorways and housing developments. The references to Smarter Travel are supported but are contradicted by the statement on roads. There is little evidence that roads are needed, will achieve the results claimed and projects such as the Oylegate to Rosslare proposal will not be achieved in the lifetime of the Plan. 	<ul style="list-style-type: none"> It is more pertinent now than ever that the focus at national, regional and local level should be on promoting economic development and growth in order to reverse the economic decline and unemployment trends that the Country, Region and County have suffered in recent years. The Plan sets out a strategy to promote the balanced and sustainable development of the County for a range of services, employment opportunities and residential developments which will directly or indirectly be of benefit to the local people. The Council supports the overall objective of 'Smarter Travel' to encourage the use of alternative modes of transport to the private car for journeys insofar as possible. However, it is necessary to continue to work to undertake, encourage and facilitate the maintenance and improvement of the road network in the County as it would not be feasible to accommodate all trips and freight on alternative

	<p>modes of transport.</p> <p>The Guidelines for Planning Authorities on Spatial Planning and National Roads (DECLG, 2012) set out planning policy considerations relating to development affecting national roads including motorways, national primary and secondary roads outside of 50kph and 60kph speed limits. These are Section 28 Guidelines and accordingly the Planning Authority must have regard to them. Section 8.6 of the Draft Plan, which relates to roads, was prepared having regard to the guidelines, which require amongst other things, the need to have due regard to the protection of investment in and strategic function of national roads and protect alignments for future national roads projects.</p> <p>The NRA propose to further enhance the national roads network in the County to address a number of issues including current and anticipated congestion problems, to enable businesses in the County to remain competitive, to enable Rosslare Harbour to continue to retain existing services and to grow, and to generate benefits such as</p>
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<ul style="list-style-type: none"> • What planning permissions will be permitted in areas affected by proposed roads schemes which are not shovel ready? 	<p>reducing HGV traffic in bypassed settlements which improves quality of life and facilitates safer cycling and walking for the residents of those settlements.</p> <p>Objective 15 supports the development of 4 national roads schemes which includes the N25/N11 Oylegate to Rosslare Europort scheme. The final decision regarding the need for and financing of the scheme will be made at Government level. The Council must continue to facilitate and enable such projects to take place in advance of a final decision from Government on the matter, and at all times will be conscious of the need to minimise adverse impacts, real and perceived, on people and the natural and built heritage.</p> <ul style="list-style-type: none"> • Refer to the Manager's Response to Submission No. 037 National Roads Authority where it is proposed to amend Objective T18 to have regard to the flexibility allowed for in the NRA Circular 16/2011. Circumstances where flexibility may be allowed, subject to consultation with the NRA, include: <ul style="list-style-type: none"> - where developments are proposed on the margins
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<ul style="list-style-type: none"> • The preparation of a local transport plan is a priority. Therefore the word 'will' instead of 'may' should be used in relation to its preparation. 	<p>of identified corridors and at locations within corridors which are removed from critical areas such as crossing points with the existing road network and tie-in points with existing and proposed roads. Planning applications could be facilitated in circumstances where the limited flexibility inherent in the width of the preferred corridor can be availed of to ensure that the potential to eventually identify a specific route within the corridor would not be compromised by a grant of planning permission.</p> <ul style="list-style-type: none"> - facilitate extensions to existing development such as private homes, farm buildings and commercial premises of limited scale within or adjoining identified link corridors pending the resumption of road planning work at a future date. <ul style="list-style-type: none"> • This is dependent on the availability of resources and the provision of guidance from Central Government as to how to prepare such plans. As such, the wording is considered appropriate at this point.
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<ul style="list-style-type: none"> • Public transport nodes should be considered which allow for car parking with the completion of the journey by coach or train. • There is a discrepancy between the available properties and future housing needs in the housing chapter. Supply greatly exceeds demand, and this could be managed by a five year delay on all new house building. • Concerned about the blanket use of the term 'Strong Urban Influence' as there are still rural areas in the shaded areas. Supports the idea in the Council's Biodiversity Plan that it is better to allow housing in villages and towns where Local Area Plans have already identified suitable areas for housing. 	<ul style="list-style-type: none"> • Proposals for public transport nodes would be supported by the Council and Objectives T04 and T05 relate to this. Objective T05 includes reference to the provision of car and cycle parking at these locations. • It is not considered reasonable to preclude the development of any new housing during the lifetime of the Plan. • The term 'Strong Urban Influence' refers to rural areas which exhibit characteristics such as proximity to the immediate environs or close commuting catchment of large towns, evidence of pressure for development of housing due to the proximity to such urban areas, or to major transport corridors with ready access to the urban area. The combined analysis carried out, which is explained in Section 4.3.3, identified that this 'rural area type' covers a wide area of the County. The Council recognise that without interventions to control the pace of development, some of these areas would reach a position where there
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<ul style="list-style-type: none"> • The Draft Plan does not reflect the views of the residents of County Wexford. 	<p>would be insufficient environmental capacity to accommodate future 'rural generated housing' need.</p> <p>The Settlement Strategy set out in Chapter 3 focuses strongly on directing new residential development to the towns and villages in the County at a scale appropriate to the level of the town or village in the Settlement Hierarchy.</p> <ul style="list-style-type: none"> • The preparation and adoption of the Plan has been and will be subject to an extensive public consultation process.
<p>Manager's Recommendation</p> <p>Refer to Submission No. 037 for the wording of the proposed amendment to Objective T18.</p>	

Submission No: 013 Patricia Byrne	
Summary of Submission	Manager's Response
<ul style="list-style-type: none"> The reference to the Oylegate to Rosslare motorway should be taken out of the Plan and the proposed motorway should be scrapped or at least shelved. People on the route of the scheme are very stressed, and feel that they have been ignored. There is no need for a motorway. The Draft Plan has made no provision for people affected by the route whose lives will be destroyed. There have been no guidelines in route corridor. Why is this not in the Plan. Cycle routes have not been attended to. 	<ul style="list-style-type: none"> As stated in the response to Submission No. 012 the final decision regarding the need for and financing of the scheme will be made at Government level. The Council must continue to facilitate and enable such a project to take place, and will at all times be conscious of the need to minimise adverse impacts, real and perceived, affecting Wexford people and on matters such as the County's natural and built heritage. See response under Submission No. 012 and Submission No. 037. It is proposed to amend Objective T18 to have regard to the flexibility allowed for in the NRA Circular 16/2011. Section 8.3 of the Transportation chapter sets out the Council's objectives to encourage walking and cycling in the County, which would include promoting the development of cycling facilities such as cycle lanes. Section 15.6 of the Plan also deals extensively with walking

<ul style="list-style-type: none"> • The Rosslare to Waterford railway is closed. 	<p>and cycling routes.</p> <ul style="list-style-type: none"> • It is an objective of the Council to support and encourage the re-opening of this line. The Settlement Strategy focuses on developing population centres along the County's existing transportation network so as to provide the critical mass to support the maintenance and further development of the network, and in the case of the Rosslare-Waterford railway line, provide the critical mass and demand for its re-opening in the future, which would be to the benefit of the County and Region as a whole.
<p>Manager's Recommendation</p> <p>Refer to Submission No. 037 for the wording of the proposed amendment to Objective T18.</p>	

Submission No: 037 National Roads Authority	
Summary of Submission	Manager's Response
<p><i>Chapter 8 Transport</i></p> <ul style="list-style-type: none"> • The Council will be aware of the priority to ensure adequate maintenance of the national road network in order to protect the value of previous investment as outlined by the Government in 'Infrastructure and Capital Investment 2012–2016: Medium Term Exchequer Framework'(November, 2011). • The Regional Planning Guidelines for the South East also identify the N30 as a main access route. • The Spatial Planning and National Roads Guidelines for Planning Authorities (2012) are issued by the DoECLG not by the NRA. 	<ul style="list-style-type: none"> • Noted. • Noted. It is recommended that this reference be included in Section 8.6.1 National Roads- <i>see Manager's Recommendation section for proposed wording.</i> • Noted. This is a typing error which will be corrected.

<ul style="list-style-type: none"> • With regard to Objective T20 (access points to the national road network), the NRA makes the following points: <ul style="list-style-type: none"> - particular concern is expressed with regard to the exceptions to the general presumption against access/intensification as set out in objective T20; - the Guidelines state that the policy of the Planning Authority shall be to avoid the creation of new or intensified access points where the speed limit is more than 60kph for all categories of development, including residential; - Objective T20 includes reference to exceptional circumstances where the policy to restrict new or intensified use of existing access points to national roads may not apply. <p>The NRA cannot currently support these provisions as:</p> <ul style="list-style-type: none"> - the Draft Plan does not identify the Developments of National or Strategic Importance; - the policies within the Draft Plan were not subject to consultation with the NRA; - the evidence base to provide for such exceptional 	<ul style="list-style-type: none"> • Noted. The Manager acknowledges the contents and aspirations of Guidelines but also must have regard to pragmatic considerations regarding: <ul style="list-style-type: none"> - The possibility that the need for a development of national or regional significance needing national road access may emerge during the lifetime of the Plan; - The desire of Wexford County Council to proactively encourage economic and employment development in the County, where that development is in all respects compliant with proper planning and sustainable development; - The location of existing developments and planning permissions and zoning decisions granted/made before the publication of the Guidelines. - Planned national road schemes (for example Gorey to Enniscorthy / Oylegate and the New Ross by-pass) which are currently proposed to be constructed during the lifetime of the Plan. <p>It is recommended that this section of the chapter relating to national roads is amended having regard to these points- <i>see Manager's Recommendation section for</i></p>
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<p>circumstances has not been provided.</p> <ul style="list-style-type: none"> • Reference to the need for a Road Safety Audit should be made in reference to access points within the areas where a 50-60 kph speed limit applies. • In relation to Section 8.5.5 and Objective T36 of the Draft Plan, the NRA advises that the Guidelines identify that sufficient roadside facilities currently exist on the national road network. • The NRA welcomes the provision for, and protection of the proposed national road projects in Objectives T14, T15 and T18. • With regard to the upgrade of the N80 referred to in Table 18 the NRA advises that: <ul style="list-style-type: none"> - it is beneficial for the Council to schedule work programmes that it is proposed to deliver at local level 	<p><i>proposed wording.</i></p> <ul style="list-style-type: none"> • The reference to Road Safety Audits is included within amendments to Objective T20 with regard to accesses to national roads where the speed limit is less than 60kph- <i>see Manager's Recommendation section for proposed wording.</i> • Noted. The Council will have regard to these comments if such planning applications are submitted. • Noted. • Noted.
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<p>over the term of the Development Plan</p> <ul style="list-style-type: none"> - such upgrades are not NRA schemes and may not receive NRA funding; - such schemes should be subject to consultation with and the agreement of the NRA. <ul style="list-style-type: none"> • Mobility Management Plans (MMP) are not a substitute for appropriate Traffic and Transport Assessments (TTA). <ul style="list-style-type: none"> • The Draft Plan should be clearer in respect of advice within the Guidelines and on the NRA Policy statement on the Provision of Tourist and Leisure signage in the expression of policies and objective regarding the requirement to control the proliferation of non-road traffic signage on and adjacent to national roads. 	<ul style="list-style-type: none"> • Noted. Objectives T21 and T31 refer to the inclusion Mobility Management Plans within Traffic and Transportation Assessments not as a substitute for Traffic and Transportation Assessments. No amendments proposed. <ul style="list-style-type: none"> • This point is noted. It is recommended that a statement and a specific objective be included in Section 8.5.1 National Roads regarding the control of signage on and adjoining national roads. It is also recommended that the same statement be reiterated in Section 18.22 Advertising Structures and Signs- <i>see Manager's Recommendation section for proposed wording.</i>
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- The NRA should be consulted on proposals within a Transport Plan where those proposals would have implications for the national road network

Chapter 3 Core Strategy

- The NRA respectfully requests that implications for national roads should be considered in the review of Town and Local Area Plans further to the implementation of the Core Strategy.
- The Council may consider it appropriate to review the extent and location of industry, employment and other commercial type employment land uses, further to DECLG's Guidance on Core Strategies (2010)

Chapter 4 Housing

- The Draft Plan should contain a clear statement that official policy within the Spatial Planning and National Roads Guidelines for Planning Authorities Guidelines and the Sustainable Rural Housing Guidelines states that direct access to national roads or generation of

- Noted.

- Noted.

- Noted. This will be done when reviewing and preparing Town Development Plans.

- Noted and it is recommended that in the interests of clarity a statement be included in Section 8.6.1 National Roads regarding rural housing and access to national road- ***see Manager's Recommendation section for proposed wording.***

<p>increased traffic from existing accesses on to national roads, will not be permitted for residential development outside of the 50- 60kph speed limited areas, regardless of the housing circumstances of the applicant.</p> <ul style="list-style-type: none"> • Objective regarding accesses to national roads for Rural Housing should be clearly cross-referenced across the Transport, Rural Housing and Development Management chapters of the Plan. • The NRA suggests that the Rural Area Types map be reviewed and the national road network would be acknowledged as being within a 'Rural Area Under Strong Urban Influence' having regard to the findings that such areas closely relate to the areas around the larger urban centres and the major national and secondary roads. 	<ul style="list-style-type: none"> • Noted. • The policy resulting from the analysis of rural area types identified areas of pressure associated with national roads where such patterns were evident.
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<ul style="list-style-type: none"> • Table 11 should be amended to refer to ‘national roads’ as the policy applies equally to primary and secondary national roads. • There should be more cross-referencing with Chapter 8 Transportation, regarding the issue of rural housing and access to national roads. <p><i>Chapter 6 Employment, Economy and Enterprise</i></p> <ul style="list-style-type: none"> • Objective regarding accesses to national roads for employment-type developments should be clearly cross-referenced within Chapter 6, Chapter 8 Transportation and Chapter 18 Development Management. <p><i>Retail Strategy</i></p> <ul style="list-style-type: none"> • Objective 8 of the Retail Strategy could reiterate the general presumption against large out of town retail centres, particularly those located adjacent or close existing, new or planned national roads/motorways. 	<ul style="list-style-type: none"> • Noted and it is recommended that Table 11 be amended accordingly-<i>see Manager’s Recommendation section for proposed wording.</i> • Noted. • Noted. • It is recommended that Objective 8 in the Retail Strategy, and the associated development management standard in Section 18.7 of the Plan be amended to advise that development should not adversely affect the efficiency of the national road network and key junctions and
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	interchanges and that it can be demonstrated that traffic volumes can be accommodated within the design assumptions for such roads- <i>see Manager's Recommendation section for proposed wording.</i>
Manager's Recommendation	
Amend Table No. 11 Criteria for Individual Rural Housing page 101 as follows:	
Rural Area Type	Permitted
<u>Development requiring access to the</u> National Primary Roads	<u>No individual rural housing-refer to Section 8.5.1 National Roads</u>
<p>Insert the following text after the third sentence in Section 8.6.1 National Roads on page 176</p> <p><u>The Regional Planning Guidelines for the South-East Region 2010-2022 identifies the N30 as a main access route.</u></p> <p>Amend the text in the first paragraph on page 178 as follows:</p> <p>Table No. 18 and Map No. 8 show the current status of approved and preferred National Road Schemes in County Wexford. The NRA's road enhancement proposals have been and will be designed having regard to extensive public consultation processes. The Council will continue to facilitate and enable these projects <u>schemes</u> (including those currently suspended) to take place in County Wexford, at all times being conscious of the absolute need to minimise adverse impacts, real and perceived, affecting Wexford people and on matters such as the County's natural and built heritage.</p> <p><u>The final decision on whether the proposed schemes take place rests with the Government, who of course have to regard</u></p>	

to the national interest in making such a decision. The Guidelines for Planning Authorities on Spatial Planning and National Roads (NRA-DEHLG 2012) require that the Council retain land required for future national roads projects free development and ensure that any adjacent developments for sensitive uses (for example houses, schools and nursing homes) are compatible with the construction and long term operation of the road. In the assessment of planning applications on or near the alignment of national road projects, the Council must have regard to this. The Council will also have regard to NRA Circular 16/2011 in which it is stated that the Councils may adopt a more flexible approach where extensions of a limited scale to existing development are proposed, and where developments are proposed on the margins of identified corridors and at locations within corridors that are removed from critical areas such crossing points with the existing road network (national and non-national) and tie-in points between existing and planned roads.

Amend Table No. 18 Proposed National Roads Schemes in County Wexford on page 179 as follows:

National Road Scheme	Status May 2012
M11 Gorey Enniscorthy Scheme	<ul style="list-style-type: none"> • The final route has been selected and the statutory orders have been approved. • Currently at Stage 5 of the NRA Project Management Guidelines – Advanced Works and Construction Document Preparation, Tender and Award (jointly with N25 New Ross Bypass as part of a Public Private Partnership scheme) • The procurement process has been suspended pending confirmation of future central government funding provisions.

	<ul style="list-style-type: none"> • <u>Following the announcement of the Government's Stimulus Plan it is intended to restart the tender process in 2012</u>
<i>N25 New Ross Bypass</i>	<ul style="list-style-type: none"> • Final Route has been selected and the statutory orders have been approved. • Currently at stage 5 of the NRA Project Management Guidelines – Advanced Works and Construction Document Preparation, Tender and Award. (jointly with M11 Gorey Enniscorthy Scheme as part of a Public Private Partnership scheme) • <u>Following the announcement of the Government's Stimulus Plan it is intended to restart the tender process in 2012</u>
<i>N30 Clonroche Bypass</i>	<ul style="list-style-type: none"> • <i>Final route selected</i>
<i>N11/N25 Oilgate to Rosslare Harbour</i>	<ul style="list-style-type: none"> • <i>Route selection stage -Preferred Route Corridor published July 2011</i>
<i><u>Upgrade of N80 (National Secondary Route)</u></i>	<ul style="list-style-type: none"> • No works proposed yet. Progress subject to thorough public consultation process and normal planning and sustainable development considerations.

Amend the first paragraph on page 181 as follows:

Particularly Outside of existing settlements, the Council will closely examine development proposals on lands adjacent to the existing national road network and existing junctions in order not to impede possible future upgrading and to ensure that the development proposed does not give rise to traffic movements which compromise safety and/or the free flow of traffic and function of the national road. **Where national roads pass through or directly adjoin existing settlements, an evidence based approach will be used in the assessment of the impacts of development and zoning proposals on the safety, capacity and function of the national roads.**

Amend the second paragraph on page 181 as follows:

The Council will only permit new and/or intensified use of existing access points to national roads in a very limited number of circumstances, where such proposals meet the criteria ~~as set out in the Guidelines for Planning Authorities on Spatial Planning and National Roads (NRA, 2012)~~ **set out in Objective T20. Objective T20 has been prepared having regard to:**

- **The Guidelines for Planning Authorities on Spatial Planning and National Roads (DECLG, 2012);**
- **The possibility that the need for a development of national and regional strategic importance requiring access to a non-motorway national road may emerge in the lifetime of the Plan;**
- **The desire of Wexford County Council to proactively encourage economic and employment development in the County, where that development is in all respects compliant with proper planning and sustainable development;**
- **Pragmatic considerations regarding the location of existing developments and necessary accesses to zoned lands;**
- **Planned national road schemes (for example Gorey to Enniscorthy / Oylegate and the New Ross by-pass) which are currently proposed to be constructed during the lifetime of the Plan.**

The NRA will be consulted on all proposals for new or intensified access to national roads.

Insert the following text after the second paragraph on page 181:

Individual Houses in Rural Areas

The Council must have regard to the relevant provisions of the Guidelines for Planning Authorities-Spatial Planning and National Roads (DECLG, 2012). The Guidelines indicate that the planning policy of the Planning Authority will be to avoid the creation of any additional access point from new development or the generation of increased traffic from existing accesses to national roads to which speed limits greater than 60 kph apply. This provision applies to individual houses in rural areas, regardless of the housing circumstances of the applicant.

The Council will control signage on and adjoining national roads in accordance with the Guidelines for Planning Authorities on Spatial Planning and National Roads (DECLG) and the National Roads Authority's policy statement on the Provision of Tourist and Leisure Signage on National Roads (March 2011) and any updated versions of these documents.

Amend Objective T18 on page 182 as follows:

To facilitate and enable the development of national road schemes having regard to the Guidelines for Planning Authorities on Spatial Planning and National Roads (NRA **DECLG** 2012), **NRA Circular 16/2011** and consultations with the National Roads Authority on each proposal. The Council will:

- **Generally** retain required lands free from development;
- Require that adjacent development of sensitive uses such as housing, schools and nursing homes, are compatible with the construction and long-term operation of the road;
- Ensure that development objectives, including the zoning of land, do not compromise the route selection process;
- **Adopt a more flexible approach where extensions of a limited scale to existing development are proposed, and where developments are proposed on the margins of identified corridors and at locations within corridors that are**

removed from critical areas such crossing points with the existing road network (national and non-national) and tie-in points between existing and planned roads.

Amend Objective T19 on page 182 as follows:

~~To prevent inappropriate development, land uses and zoning proposals on lands adjacent to existing national roads and national roads junctions particularly outside of settlements in order to allow for the possible future upgrade of these roads and junctions.~~

To use an evidence based approach in the assessment of the impacts of development and zoning proposals on safety, the current and future capacity, and function of national roads and to prevent inappropriate development, land uses and zoning proposals on lands adjacent to existing national roads, which would adversely affect the safety, current and future capacity and function of national roads, having regard to possible future upgrades of the national roads and junctions.

Amend Objective T20 on page 183 as follows:

To restrict all new and intensified use of existing access/egress points to the national road network, except in the following exceptional circumstances:

Speed limit of more than 60kph

On non-motorway stretches of the national roads network, for the following **exceptional** types of development **will be considered**:

1. Developments of national and regional strategic importance which by their nature are most appropriately located outside of urban areas, and where the locations concerned have specific characteristics that make them particularly suitable for the development proposed, subject to the development also meeting the following detailed criteria:
 - The relevance and appropriateness of proposed development in supporting the aims and objectives of the National Spatial Strategy and the Regional Planning Guidelines for the South-East Region 2010-2022

- The requirements of other planning guidelines issued under Section 28 of the Act including the Retail Planning Guidelines (2012), which include a general presumption against large retail centres being located adjacent or close to existing, new or planned national roads, including motorways
- The nature of proposed development and the volume of traffic to be generated by it, any implications for the safety, capacity and efficient operation of national roads
- Any plans for future upgrades of national roads and other transport
- Infrastructure/services
- The suitability of the location compared to alternative locations
- The suitability of the pattern of existing development in the area
- Satisfactory details of the proposed demand management measures
- Acceptable funding and delivery proposals for any road improvements required
- The precedent that could be created for cumulative development in the area and the potential implications for the national road network.

2. Developments relating to existing established large enterprises and employers on the national road network such as at Irish Country Meats (N11), Slaney Meats (N80), and Glanbia Clonroche (N30) **which are identified on Map X.** For this type of development, new, or intensified use of existing, access/egress points onto the national road network will only be permitted where it has been demonstrated that **the development is compliant with proper planning and sustainable development,** that there is no alternative access/egress point available and that **the envisaged usage** the access/egress point will not give rise to public safety hazards or obstruction of other national road users.

Note: The Map X referred to above, showing existing large scale enterprises on national roads, will be put on public display with

the proposed amendments.

3. Developments relating to significant enterprises and employers, existing and proposed, on lands zoned for such uses in the environs of ~~Rosslare Harbour~~, Wexford, Enniscorthy and New Ross. For this type of development, new, or intensified use of existing, access/egress points onto the national road network will only be permitted where it has been demonstrated that **the development is compliant with proper planning and sustainable development**, that there is no alternative access/egress point available and **that the envisaged usage of the** access/egress point will not give rise to public safety hazards or obstruction of other national road users. **The Council will review the speed limits in areas where existing employers or zoned land exists with the intention of reducing, where appropriate, the speed limits and subject to the appropriate statutory process.**
4. **Development for other purposes on sites where there is existing development may be considered (for example at St Senan's Hospital and the quarries at Brownswood, Enniscorthy), and on existing zoned land (for example at the south eastern edge of Bunclody). Development will be considered where it has been demonstrated that the development is compliant with proper planning and sustainable development, that there is no alternative access/egress point available and that the envisaged usage of the access/egress point will not give rise to public safety hazards or obstruction of other national road users.**

Speed limit between 50-60kph:

A limited level of access in these transition zones may be permitted which facilitates orderly urban development and which would not lead to a proliferation of such entrances, leading to a diminution in the role of these transitional zones. The Council will have

regard to the nature of proposed development and the volume of traffic to be generated by it and implications for the safety, capacity and efficient operation of the national road. **A Road Safety Audit, prepared in accordance with the Design Manual for Roads and Bridges (NRA, 2010), shall be submitted for development proposals which require a new access or significant intensification of an existing access.**

Access within 50kmh zone

Accesses will normally be permitted subject to assessment of normal road safety, traffic management and design criteria. **A Road Safety Audit, prepared in accordance with the Design Manual for Roads and Bridges (NRA, 2010), shall be submitted for development proposals which require a new access or significant intensification of an existing access.**

Insert a new objective in Section 8.6.1 National Roads page 184 as follows:

To control the signage on and adjoining national roads in accordance with the Guidelines for Planning Authorities on Spatial Planning and National Roads (DECLG) and the National Roads Authority's policy statement on the Provision of Tourist and Leisure Signage on National Roads (March 2011) and any updated versions of these documents.

Insert the following text in Section 18.22 Advertising Signs and Structures page 436:

The Council will control signage on and adjoining national roads in accordance with the Guidelines for Planning Authorities on Spatial Planning and National Roads (DECLG) and the National Roads Authority's policy statement on the Provision of Tourist and Leisure Signage on National Roads (March 2011) and any updated versions of these documents.

Insert the following bullet point in Objective 8 on page 157 of the Retail Strategy and in the Development Management

Standard set out in Section 18.17.1 of the Written Statement on page 429:

- **will not adversely affect the efficiency of the national road network and key junctions and interchanges and that it can be demonstrated that traffic volumes can be accommodated within the design assumptions for such roads;**

Submission No: 038 Bord Gáis Networks	
Summary of Submission	Manager's Response
<ul style="list-style-type: none"> • No comment at this time. 	<ul style="list-style-type: none"> • Noted

Submission No: 045 James O'Connor	
Summary of Submission	Manager's Response
<ul style="list-style-type: none"> • This submission is a request to include Mr. O'Connor's land on Forth Mountain for wind energy development. The submission includes a preliminary report prepared by EU Renewable Energy Systems Ltd. which states that the site is suitable for a wind turbine. 	<ul style="list-style-type: none"> • The Draft Wind Energy Strategy map was prepared following careful consideration of a range of criteria including location and capacity of the transmission grid network, designated sites, residential settlements and housing density, existing and permitted wind farms, tourism and landscape considerations. In order to avoid disproportionate visual impacts and considering the open, flat and often regular nature of the landscape in County

	<p>Wexford, it was decided that future wind farm developments should be confined to a specific area.</p> <p>The south of the County was ruled out due to pockets of high housing density and proximity to a number of Special Protection Areas which are recognised as some of the most important ornithological sites in the country. This area is also mainly serviced by the 110kV and 38kV lines. Further wind farm developments could potentially require larger power lines which could have the potential for significant cumulative visual impacts in terms of overhead lines and associated infrastructure. There are also a number of landscapes of greater sensitivity in this area, including Forth Mountain; the subject land.</p>
<p>Manager's Recommendation</p> <p>No amendment.</p>	

Summary of Submission	Manager's Response
<ul style="list-style-type: none"> • No comment at this time. 	<ul style="list-style-type: none"> • Noted

Submission No: 055 Office of Public Works c/o Brady Shipman Martin Planning Consultant	
Summary of Submission	Manager's Response
<ul style="list-style-type: none"> • Welcomes the vision, strategies and objectives in the Plan, the inclusion of the strategy for the architectural and archaeological heritage of the County, and the core goals, objectives and policies in relation to the natural and built heritage within the historic towns and villages of the county. • Requests the inclusion of a policy to liaise with them in relation to future development which would directly or indirectly impact any of the state properties in its custody. 	<ul style="list-style-type: none"> • The OPW's endorsement of the Plan is acknowledged and welcomed. • It is not considered necessary to include a specific objective to consult with the OPW in relation to developments affecting properties in their care. The Planning Authority will refer relevant planning applications to the Minister for Arts, Heritage and the Gaeltacht. During the preparation of Town Developments Plans and Local

<ul style="list-style-type: none"> • Welcomes the Council's commitment to adhere to the Flood Risk Management Guidelines, the inclusion of the Strategic Flood Risk Assessment, Objective SS07, the Flood Risk Management objectives FRM01-12, the Green Infrastructure objectives, in particular GI01, 02 and 04 and the Coastal Zone Management objective CZM04. • Encourages the Council to carry out Stage 2 flood risk assessments where the zoning of land is proposed in Development Plans and Local Area Plans. The OPW can provide guidance, if requested by the Local Authority, to develop the indicative flood risk maps. • Applications for all development in flood risk areas to be accompanied by a flood risk assessment. In addition, the Guidelines also require that for historically zoned 	<p>Area Plans, the Planning Authority will consult with relevant prescribed authorities and stakeholders.</p> <ul style="list-style-type: none"> • Noted. • The Council is proactive in the area of flood risk management, and as set out in the Plan, it will have regard to the Flood Risk Management Guidelines and all available and up to date flood mapping when preparing Town Development Plans and Local Area Plans and when assessing planning applications for development. • Noted
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<p>areas in the Plan that flood risk is assessed and managed appropriately.</p> <ul style="list-style-type: none"> • The OPW states that it is the responsibility of the Council to only permit appropriate development in flood risk areas. 	<ul style="list-style-type: none"> • Noted.
<p>Manager's Recommendation No amendment.</p>	

Summary of Submission	Manager's Response
<ul style="list-style-type: none"> Table 11 Criteria for individual housing-7 km extremely restrictive in rural housing context in a County like Wexford. Tourism initiatives such as walking and cycling trails should be encouraged along the Blackstairs Mountains and foothills. Hill walking is one of tourism's growth areas. 	<ul style="list-style-type: none"> This distance is referenced in the criteria relating to areas 'under strong urban influence'. The 'local rural area' is defined as 'within 7km radius of where the applicant has lived or was living'. This distance is in response to the need to control the pressure for development in these areas. It is considered fair and reasonable and will allow people to be accommodated within a specific community. To extend this distance will increase the amount of persons open for consideration thereby increasing the demand for sites and development pressure. The Blackstairs Mountains and the trails at Kilbrinish Forest are specifically mentioned in Table 16: Key Tourist Attractions in County Wexford. There are also objectives which relates to walking and cycling trails/ routes. Section 7.4.5 on rural tourism highlights that hiking was specifically referred to as one of the most popular activities with overseas visitors in 2010 (Fáilte Ireland 2010 Visitor Surveys 2010). It is recommended that hiking and

<ul style="list-style-type: none"> • The Council should be working with public bodies, community groups and individuals to create more mapped and sign posted trails. 	<p>mountain climbing be included under the heading Recreation in Table 16: Key Tourist Attractions in County Wexford- <i>see Manager's Recommendation section for proposed wording.</i> .</p> <ul style="list-style-type: none"> • Section 15.6 of the Draft Plan refers to the National Trails Register which is maintained by the National Trails Office. This register is available to view at www.irishtrails.ie and includes all waymarked trails and Sli na Slainte routes. Wexford County Council has also set up a walking trails database which is available to view on the Council's website. It is the intention of the Council to review the database on a regular basis and include maps where appropriate. A number of leaflets are also available to download from the website in relation to heritage, forest, mountain and coastal walks. Due to the evolving nature of the database it is not intended to include it in the Development Plan. However, in the interests of clarity it is recommended that the text be amended to refer readers to the website- <i>see Manager's Recommendation section for proposed wording.</i>
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- Applications for further wind turbines in the north of the County (extensions of existing wind farms) should not be entertained as the cumulative effect of wind farms granted to date is already too much for this beautiful landscape.

- The wind energy designation for County Carlow should be included on the map as it was for the other three adjoining counties.

- It is considered unreasonable to adopt a blanket approach prohibiting extensions to existing and permitted wind farms given the investment that has been made to service these sites. Applications for extensions to wind farms will be assessed on a case-by-case basis having regard to the development management standards contained in the Wind Energy Strategy and the reasons why the area was identified as 'Not Normally Permissible' in Section 4.2 of the Strategy. In the interests of clarity, it is recommended that the wording be amended in Table 4 of the Draft Wind Energy Strategy to emphasis this point- *see Manager's Recommendation section for proposed wording.*

- Map No. 6 of the Draft Wind Energy Strategy shows the wind farm designations of adjoining counties, including County Carlow. Map No. 1 shows the location of existing and permitted wind farms in County Wexford and those up to 15km from the county boundary in the adjoining counties of Wicklow, Waterford and Kilkenny. At the time of preparing the Draft Strategy this information was not

<ul style="list-style-type: none"> • The borders with Waterford and Wicklow are vulnerable to overdevelopment by wind farms as both counties have deemed the shared border as ‘preferred area’ or ‘most favoured’ for wind farms. • Map 11 Landscape Character Units and Features appears to provide protection to a number of smaller hills ridges without providing at least equal protection to the mountains and upland areas of the County. • Objective L05 ‘to prohibit developments which are likely 	<p>available for County Carlow. It is proposed to include this information in the adopted Strategy.</p> <ul style="list-style-type: none"> • The preferred areas and location of existing and permitted wind farms in adjoining counties was a key consideration in the preparation of the Draft Wind Energy Strategy. • There are four landscape character units: Uplands, Lowlands, River Valleys and Coastal. The ‘landscapes of greater sensitivity’ are features which are dotted across the County, and as they are not a continuous area it is not possible to assign them to a particular landscape character unit. Instead, they were identified as ‘Landscapes of greater sensitivity’ within their parent landscape character unit. Objectives LO3, LO5, L06, L08, L10, L11 gives Upland areas the same status as Landscapes of Greater Sensitivity in the Council’s considerations on landscape issues. • Developments will be assessed on a case-by-case basis
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<p>to have significant adverse visual impacts, either individually or cumulatively, on the character of the Uplands, River Valley... and where there is no overriding need for the development to be in that particular location... If Wexford County Council upholds this objective, then there will be no further wind turbines erected in the north of the County along the sensitive Blackstairs Mountains landscape.</p> <ul style="list-style-type: none"> • The northwest of the County, the area of the County north of the N30 and west of the N11 appears to have been ignored not only in the framing of the document, but also in where the four public consultation meetings regarding the Draft Plan were held. Must recognise the difference of the north west of the County with its unique landscape to Co. Wexford which provides both challenges and opportunities for the future. • No upgrade works are proposed to the N80 but the 	<p>and will be required to demonstrate an overriding need to be in that particular location. An extension to an existing wind farm may represent an overriding need due to its fixed location adjoining a wind farm. However, such development would be subject to Table 4 of, and the development management standards in, the Wind Energy Strategy.</p> <ul style="list-style-type: none"> • It was decided to hold a public consultation evening in each of the electoral district areas. The main town in each district was considered most appropriate in terms of accessibility. The opinion that certain areas of the north of the County have been largely ignored in the Plan is not accepted. There are large areas of the County not specifically referenced in the plan; however, this in no way means that they have been ignored. The area of the County referred to is intrinsic in the Plan, in particular the chapters relating to rural housing, economy, employment and enterprise, transport, tourism, heritage and recreation. • The comments regarding road surfaces in Bunclody have
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<p>resurfacing work which commenced in 2004-5 should be completed as a matter of urgency. The road surface from the Cemetery to Bunclody Town in unacceptable at present.</p> <ul style="list-style-type: none"> Chapter 17 Design-omit the pedestrian links map on page 381-this new plan has not been properly presented to or accepted by the people of Bunclody. 	<p>been brought to the attention of the Director of Roads. The upgrade of the N80 national secondary route is referred to in Table 18 and would be addressed by Objective T14 to support, facilitate and enable the sustainable development of, and improvements to, the national roads network in the County, as guided by the NRA's National Roads Programme.</p> <ul style="list-style-type: none"> This illustration was only intended to offer an example of how the urban design principle of connectivity could work. The illustration can be removed and replaced with an alternative example- <i>see Manager's Recommendation</i>
<p>Manager's Recommendation</p> <p>Insert the following text under the heading Recreation in Table 16 Key Tourist Attractions in County Wexford page 150:</p> <ul style="list-style-type: none"> <u>Hiking and mountain climbing</u> <p>Amend text in first paragraph on page 348 as follows:</p> <p>This database <u>is available to view on the Council's website under the Community and Enterprise Section 'Sports Active Wexford' and</u> will continue to be updated as new trails emerge.</p> <p>Omit the illustration relating to Bunclody Town on page 381.</p> <p>Amend text in Table 4 (Not Normally Permissible) on page 36 of the Draft Wind Energy Strategy as follows:</p>	

Applications for repowering (by replacing of existing turbines) and extension of existing **and permitted** wind farms will ~~each be~~ considered on their merits **be assessed on a case-by-case basis and will be subject to the development management standards contained in Section 5. When assessing planning applications for extensions against the development management standards, the Planning Authority will have particular regard to the reasons why the area was identified as 'Not Normally Permissible' in Section 4.2. In this regard, it is considered that the north of the County will reach capacity if all permitted wind farms are built.**

Submission No: 064 Andrew Ryan	
Summary of Submission	Manager's Response
<ul style="list-style-type: none"> The Landscape of Greater Sensitivity area around Ask Hill should be redrawn to retain the upper slopes of the Hill but to exclude the lower slopes, particularly that on the western side of the Hill towards the M11. This would better reflect the way in which other Landscapes of Greater Sensitivity have been defined in other parts of the County. A map is enclosed indicating a possible revised area which has regard to the criteria used on 	<ul style="list-style-type: none"> The boundaries of the Landscapes of Greater Sensitivity as drawn on Map 11 are indicative only, and the landscape objectives pertaining to these landscapes in the Plan allow for the assessment of development proposals on a case-by-case and site-by-site basis. Development on the lower slopes of the Hill is likely to have a lesser visual impact.

other sites, notably Tara Hill nearby.	
Manager's Recommendation No amendment.	

Submission No: 065 Bunclody Community Council

Summary of Submission	Manager's Response
<ul style="list-style-type: none">• Welcomes the reduction in character units from eleven to 4 as this does provide more clarity.• Welcomes the designation of the Landscapes of Greater Sensitivity. However, in the Upland Areas, there are no designated 'Landscapes of Greater Sensitivity', and this is ambiguous. Either the entirety of the Upland area should be clearly defined as a 'Landscape of Greater Sensitivity' or individual features should be defined as in other parts of the County.• Designated scenic routes should be included in the Plan. These routes would help inform the tourism strategy of the County and are included within the Plans of other counties.	<ul style="list-style-type: none">• Noted• Refer to response under Submission No. 063. Objectives LO3, LO5, L06, L08, L10 and L11 give Upland areas the same status as the Landscapes of Greater Sensitivity in the Council's considerations on landscape issues.• The objectives in the Landscape Section of the Draft Plan will allow for the full consideration of landscape issues in the assessment of development proposals throughout the County. The designation of what would and would not constitute a 'scenic route' in County Wexford would be a highly subjective matter and as such may not achieve the objective of protecting the more sensitive landscapes from inappropriate development.

<ul style="list-style-type: none"> • Welcomes the comprehensive and detailed Wind Energy Strategy which meets the needs of the County, its people and the wind energy industry. • The Council should adopt a 'no-go area' in SPAs and SACs. 	<ul style="list-style-type: none"> • Noted. • The SPAs and SACs have been excluded from the 'Acceptable in Principle' and 'Open for Consideration' zones. Section 4.2 of the Draft Wind Energy Strategy also includes a proviso that if any part of the 'Acceptable in Principle' or 'Open for Consideration' area is designated or proposed for designation as a Natura 2000 site, this area shall no longer be deemed suitable for wind farm development. <p>Applications for re-powering or extension of existing or permitted wind farms or for individual, small scale turbines in the Not Normally Permissible area will be considered having regard to the development management standards and the reasons why the area was identified as 'Not Normally Permissible' in Section 4.2 of the Strategy (see amendment recommended under</p>
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<ul style="list-style-type: none"> • The Wind Energy Strategy should set out procedures which will be adopted by Wexford County Council when evaluating the environmental effects of proposed plans in compliance with Articles 3, 6 and 10A of the EIA Directive. • Requests that an assessment is made for all dwellings within a distance of 10 times the base to tip height of any proposed turbine location. 	<p>Submission No.63). In accordance with the Habitats Directive, permission will not be granted for developments which would adversely affect the integrity of a Natura 2000 site, unless there are no alternative solutions and there are imperative reasons of overriding public interest.</p> <ul style="list-style-type: none"> • The Council is aware of its obligations under the EIA Directive and the requirement to carry out an independent Environmental Impact Assessment for applications for wind farm developments over a certain threshold or for those which would be likely to have significant effects on the environment. Such assessments are carried out by various sections of the Council and are summarised in the planner's report. It is not considered necessary to set out such procedures in the Wind Energy Strategy. • The Draft Wind Energy Strategy requires a shadow flicker assessment to be carried out for existing and permitted dwellings within a distance of 10 times the rotor diameter of any proposed turbine location. The Guidelines for Planning Authorities on Wind Energy Development (2006)
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	<p>state that “at distances greater than 10 rotor diameters from a turbine, the potential for shadow flicker is very low.” An Update of UK Shadow Flicker Evidence Base prepared for the Department of Energy and Climate Change states that the 10 rotor diameter rule has been widely accepted across different European countries, and is deemed to be an appropriate assessment area. This is also the distance recommended in Best Practice Guidelines for the Irish Wind Energy Industry produced by IWEA in March 2012.</p> <p>The distance of 10 times the rotor diameter for noise assessments is considered reasonable. Noise levels at noise sensitive properties within this area will be required to meet noise limits specified in the Wind Energy Strategy. It is unlikely that these limits will be exceeded as the distance increases. The Draft Strategy also includes a requirement to carry out cumulative noise and shadow flicker assessments where there are existing or permitted wind farms within 2km of the proposed development.</p>
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<ul style="list-style-type: none"> • Requests that the Strategy contains a formal procedure for consulting local residents about any proposed changes to the number or type of turbines operating at existing and permitted wind farms. • Notes that the Strategy identifies the Hook Peninsula and other coastal areas as areas sensitive to wind farm development by virtue of their high scenic value, recreational/tourist functions, natural heritage designations or archaeological resources but does not identify Mount Leinster. 	<ul style="list-style-type: none"> • Applications for re-powering of a wind farm, extension of a wind farm or changes to the site layout will be subject to the normal statutory consultations under the planning and appeals processes. Variations to permitted developments shall be in accordance with the Guidelines for Planning Authorities on Wind Energy Development, Department of Environment, Heritage and Local Government, (2006). • Section 2.7 (Tourism and Recreation) of the Wind Energy Strategy does not specifically refer to Mount Leinster as an area sensitive to wind farm development. However, this area is included in the Uplands landscape which, it is stated in Table 3, may be inappropriate for wind energy development for reasons of natural heritage and the fact that some of these landscapes are of rare scenic quality. For the purposes of clarity, it is recommended that Section 2.7 be amended to include specific reference to Mount Leinster- <i>see Manager's Recommendation section for proposed wording.</i>
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assessments.

- The preferred option to consolidate wind energy development in a single area will protect the residential and visual amenity of some residents in the County but will further exacerbate the landscape and environmental impact of wind farm development in certain areas.
- Requests that the designation of areas which now have a distinct concentration of wind farm developments are changed from 'Not Normally Permissible' to 'No Longer Permissible'.

- Section 3 of the Draft Wind Energy Strategy outlines the alternatives considered and the preferred alternative which is to consolidate future wind energy development in one area of the County. It is acknowledged in Section 3.3 that this approach could potentially lead to localised effects in a particular location rather than dispersed effects throughout the County. Mitigation measures have been put forward in the way of development management standards. Any application for a wind farm development will be assessed having regard to the development management standards, including those relating to cumulative impacts on the landscape.
- There are a number of existing and permitted wind farms in the north-west of the County which are located in the 'Not Normally Permissible' area. Applications for new wind farms will not be favoured in this area. However, it is considered unreasonable to adopt a blanket approach prohibiting extensions to existing and permitted wind

<ul style="list-style-type: none"> • Requests that the statement in Table 4 “applications for re-powering (by replacing existing wind turbines) and extension of existing wind farms will each be considered on their merits” is revised to take account of the potential impact any such changes would have on residents living in close proximity to these wind farms. • Welcomes the requirement for developers to engage in active consultation and dialogue with the local community at an early stage in the planning process. 	<p>farms in this area given the investment that has been made to service these sites. Any applications for extensions to wind farms will be assessed on a case-by-case basis having regard to the development management standards contained in the Wind Energy Strategy and the reasons why the area was identified as ‘Not Normally Permissible’ in Section 4.2 of the Strategy.</p> <ul style="list-style-type: none"> • Refer to the Manager’s Response and recommendation under Submission no. 63 regarding this issue where it is recommended that the wording in Table 4 be amended. Applications for re-powering or extension of wind farms will be assessed having regard to the development management standards in the Wind Energy Strategy and the reasons why the area was identified as ‘Not Normally Permissible’ in Section 4.2 of the Strategy. • Noted.
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<ul style="list-style-type: none"> • Requests that the Strategy outlines specific procedures to be used to communicate the findings of the Council's own independent environmental assessment of planned wind energy projects in compliance with Articles 3 and 10A of the EIA Directive. • Requests a clear and unambiguous statement of the procedures to be employed by the Council where the development control standards are breached by developers. • Requests that the Strategy includes a requirement that all estimations of shadow flicker submitted as part of the EIS reflect an accurate and credible estimation of the potential shadow flicker from wind turbines in compliance with the EPA EIS Guidelines (2002). 	<ul style="list-style-type: none"> • As per previous response regarding obligations under the EIA Directive, all reports form part of the public planning file. The Planning Authority will continue to comply with the statutory notification requirements for planning applications accompanied by EIS, that is, publish notice of decision. • Planning permissions for wind farms will be subject to the normal planning enforcement process in accordance with the Planning and Development Act 2000 (as amended) where conditions of permission are breached. • The Guidelines on the information to be contained in Environmental Impact Statements (EPA, 2002) state that it is a statutory requirement of EIA that the applicant presents an assessment of the likely impacts of the proposed development. The guidelines state that "the description of the impacts which are expected to occur should be as accurate and complete as possible. The method employed should be explained and justified with reference to the project and environment under
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<ul style="list-style-type: none"> • Requests that the maximum permitted noise levels at noise sensitive properties at night time is reduced to 40dB(A) having regard to the World Health Organisation Report on Night Noise (2009). 	<p>consideration. Such methods should be judicious, accurate, complete and replicable. They should be carried out in accordance with established practice whenever this is applicable.” The Planning Authority, in carrying out the Environmental Impact Assessment, shall consider whether the information in the EIS is an accurate and credible estimation of likely impacts having regard to a number of criteria including the methodology used. It is not considered necessary to include a statement to this effect in the Wind Energy Strategy.</p> <ul style="list-style-type: none"> • The Draft Wind Energy Strategy states that in general, permitted maximum noise levels at noise sensitive properties shall be 45dB(A) or 5dB(A) above background noise during the hours of 0800 and 2000 and 43bB(A) at all other times. This standard is in accordance with the Wind Energy Development Guidelines (DEHLG, 2006) which state that “a fixed limit of 43dB(A) will protect sleep inside properties during the night.” These guidelines also state that “in general, noise is unlikely to be a significant problem where the distance from the nearest turbine to
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<ul style="list-style-type: none"> • Requests that the Strategy outlines the procedures for identifying and measuring Amplitude Modulation and Low Frequency Noise in circumstances where complaints are received. 	<p>any noise sensitive property is more than 500 metres.”</p> <p>Section 5.2.4 of the Draft Wind Energy Strategy states that wind turbines will not be permitted to locate within 500 metres of any noise sensitive property except where the written consent of the owner is given. It also states that a distance greater than 500 metres may be required depending on the height of the turbines proposed and the potential for increased noise and shadow flicker.</p> <ul style="list-style-type: none"> • When assessing planning applications and investigating complaints, the Planning Authority will ensure that noise is measured in accordance with the most up-to-date ISO standards for noise measurement or other best practice standards, as appropriate. It is recommended that a bullet point to this effect be inserted in Section 5.2.9 Noise of the Wind Energy Strategy – <i>see Manager’s Recommendation section for proposed wording.</i>
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<ul style="list-style-type: none"> • Requests that the selection for viewshed¹ reference points required for Landscape Impact Assessments include: <ul style="list-style-type: none"> ○ A sample of dwellings in direct view of a proposed development ○ The most visible views of the proposed development from the closest town or village ○ Views from designated scenic/amenity areas ○ Views of adjacent or other visible wind turbines taken from a designated elevated site/view. • Requests that the following additional standard is included in the Wind Energy Strategy: “Within 12 months of the coming into operation of the wind farm, the developer will undertake a review with local residents and representative community groups of the project. The purpose of this review is to identify any issues of concern to the local community regarding the operation of the 	<ul style="list-style-type: none"> • Section 5.2.13 of the Draft Wind Energy Strategy requires wind farm applications to be accompanied by a Landscape Impact Assessment (LIA) which includes the selection of viewshed reference points and an assessment of the sensitivity of landscape from each of these points. It is considered reasonable to insert additional text in relation to the selection of viewshed points to include the most prominent views of the proposed development from the closest town or villages and elevated points- <i>see Manager’s Recommendation section for proposed wording.</i> . • It is not considered appropriate to include this standard in the Wind Energy Strategy. The Planning Authority will initiate enforcement proceedings if appropriate, where limits specified in the planning application or the conditions of permission are breached. Standards for monitoring during the construction and operational phases of the development are included in Sections
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¹ Viewshed is an area from where the proposed wind farm will be visible or partially visible.

<p>wind farm and to ensure that the project continues to progress for the benefit of all.</p>	<p>5.2.9, 5.2.20, 5.2.21, 5.2.27 and 5.2.28 of the Draft Wind Energy Strategy.</p>
<p>Manager's Recommendation</p> <p>Amend text on page 21 of the Draft Wind Energy Strategy as follows:</p> <p>Consideration was also given to areas that are of significant importance for recreation or tourism. In particular, established tourism and recreational areas such as <u>the Blackstairs Mountains, Mount Leinster</u>, the Hook Peninsula and other coastal areas were considered to be more sensitive to wind farm developments by virtue of their high scenic value, recreational/ tourist functions, natural heritage designations or archaeological resources.</p> <p>Insert the following bullet point at the end of Section 5.2.9 of the Draft Wind Energy Strategy on page 44 as follows:</p> <p><u>Noise shall be measured in accordance with the most up-to-date ISO standards for noise measurement or other best practice standards, as appropriate.</u></p> <p>Amend first bullet point on page 46 of the Draft Wind Energy Strategy as follows:</p> <ul style="list-style-type: none"> ▪ All wind farm applications should be accompanied by a Landscape Impact Assessment (LIA), either as part of the Environmental Impact Statement (EIS) where appropriate or as a separate report. The LIA should include the following: <ul style="list-style-type: none"> - Description of proposed development, including alternatives considered during design process; - Description of geographic location and landscape context; - Selection of viewshed reference points from where the proposal is examined in detail, <u>to include the most prominent views of the proposed development from the closest town or villages, surrounding roads and</u> 	

elevated points;

- Assessment of the sensitivity of landscape from each viewshed reference point;
- Preparation of photomontages;
- Estimation of likely degree of impact on landscape; and
- Recommendation of mitigation measures

Submission No. 066 Keep Ireland Open	
Summary of Submission	Manager's Response
This is a comprehensive submission which recognises that there are many excellent provisions in the Plan. The submission sets out many suggestions which are taken from other development plans and seek to add to the Plan.	This submission is welcomed and contains many suggestions, which stem from the group's campaign to give recreational users the right to access the countryside. In the interests of brevity, the summary of this submission and response focuses on issues relevant to the Development Plan only.
<i>General</i> <ul style="list-style-type: none">• The Plan should include an index and cross-referencing between chapters to allow for a reader-friendly document.	<ul style="list-style-type: none">• Comments are noted and this will be considered once the Plan is finalised.
<i>Chapter 1 Introduction</i> <ul style="list-style-type: none">• Section 1.6: Recommends the inclusion of an additional	<ul style="list-style-type: none">• This is referred to throughout the Plan. The Plan is

<p>paragraph stating the Plan has been drawn up to be consistent with the NSS as far as practicable. In some respects the Draft fails to comply with this requirement.</p> <ul style="list-style-type: none"> • Paragraph relating to Section 28 Guidelines should state that the Plan ‘has been drawn up to take account of the DECLG guidelines. Should there be any amendments thereof or new guidelines, the Council will consider the possibility of making new Variations of this Plan. It is submitted that the ‘to have regard to’ is open to misinterpretation. • Include an additional section in this chapter entitled ‘Adjoining counties: This Plan has been drawn up to take account of plans of adjoining counties (includes names).As it stands the Draft does not appear to have taken sufficient account of some provisions in adjoining counties. 	<p>consistent as far as possible with the National Spatial Strategy and the Regional Planning Guidelines for the South-East Region; the latter being confirmed in the Submission No. 029 South-East Regional Authority</p> <ul style="list-style-type: none"> • Section 28 of the Planning and Development Act 2000 (as amended) states that Planning Authorities shall have regard to those guidelines in the performance of their functions. This is the specific legal reason why the wording ‘have regard to’ is used. • As required the Planning Authority had regard to the Development Plans of adjoining counties when preparing the Draft Plan.
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<p><i>Chapter 6 Employment, Economy and Enterprise</i></p> <p><i>Agriculture:</i></p> <ul style="list-style-type: none"> • Suggests the inclusion of an additional point “to encourage, promote and support on-farm activities including agric, eco, geo, green tourism, farmhouse accommodation, open farms, pet farms and horse trekking centres” <p><i>Forestry:</i></p> <ul style="list-style-type: none"> • Suggests the inclusion of a number of objectives: <ul style="list-style-type: none"> - Facilitate access to private and public forests - Forests and civil rights of way - Visual impacts of forestry • To discourage new forestry development, except for broadleaf, in conservation areas, designated sensitive rural landscapes, visually vulnerable areas and along 	<ul style="list-style-type: none"> • The diversification of agricultural economy is encouraged and facilitated in objective ED19. Similarly, TM19 promotes and facilitates the expansion of resource based rural tourism. It is not considered necessary to list every possible change in agricultural practice but rather facilitate change through appropriate general objectives. • The issue of impinging on a public right of way or an access point is a civil issue and cannot be dealt with under planning law. <p>Objective ED21 relates to the sustainable development of forestry. This objective deals adequately with the visual impacts of forestry on local landscapes.</p> <ul style="list-style-type: none"> • Objective ED21 states that forestry development will be facilitated provided that it is in harmony with the surrounding landscape, natural waters, wildlife habitats
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<p>designated scenic routes.</p> <ul style="list-style-type: none"> • Recommends that a list of recreational forests should be included in the Plan and that an Indicative Forestry Strategy, which will provide for the maintenance of public rights of way and traditional walking routes, also be included. 	<p>and conservation areas. It is considered that this objective would benefit from being amended to include for protection against significant adverse impacts -<i>see Manager's Recommendation section for proposed wording.</i></p> <ul style="list-style-type: none"> • Some of the County's recreational forests are listed in Table No. 16: Key Attractions in County Wexford. However, it is not considered necessary in a planning policy document to list all the recreational forests within the County. A note will be made in relation to this table that the list of Wexford's tourist attractions is not exhaustive--<i>see Manager's Recommendation section for proposed wording.</i> <p>There are no plans to prepare an Indicative Forestry Strategy. Planning applications for forestry developments will be assessed against the objectives in this Plan and in association with the Forest Service and associated guidelines.</p>
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<p><i>Chapter 7 Tourism</i></p> <ul style="list-style-type: none"> • Tourism and Recreation should be combined in the one chapter. • Outlines a number of activities that could be included in Table 16 Key Tourist Attractions and states that motorcross, karting, quad biking and paintballing should be excluded. • Replace TM15 which relates to protecting views and vistas from waterways from inappropriate development with a more detailed objective which addresses issues such as maintaining waterway corridors free from inappropriate development and buffer zones with 	<ul style="list-style-type: none"> • Tourism is aligned with a number of chapters within the Plan and the fact that it is identified as a specific ‘pillar for growth’ for economic development, it was decided that it warranted a stand-alone chapter. • Table No. 16: Key Tourist Attractions in County Wexford is by no means exhaustive. However, in light of this submission a number of additions will be made. Motorcross, karting, quad biking and paintballing are all recreational activities, which when appropriately located, contribute to the diverse tourism product on offer in Wexford, and there is no justifiable reason to remove them--<i>see Manager’s Recommendation section for proposed wording.</i> . • Objective TM15 relates to the protection of views and vistas from waterways. This objective, in conjunction with other objectives such as TM13, TM14 and NH01(habitat protection), RS11, RS12, RS24(use of natural amenity areas) and FRM10 (riparian strips along
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culverting and realignment.	river channels) will address the issues raised in this point.
<p><i>Public Rights of Way (PROW)</i></p> <ul style="list-style-type: none"> The submission makes a number of suggestions in relation to objectives on public rights of way, including <ul style="list-style-type: none"> PROW should be mapped and listed as part of the Plan and not during the life time of the Plan. protect and improve the network of public rights of way and to create additional rights of way. 	<ul style="list-style-type: none"> The identification, mapping and listing of public rights of way is a complex project which will require significant resources and time to carry out. The Council will endeavour to do this during the lifetime of the Plan, and Objective RS34 sets out the proposed methodology. <p>Inhibiting access along rights of way is a civil issue and is outside the remit of the Council. However, as per Objective RS33 it is an objective of the Council to preserve public rights of way which will be mapped and listed under this objective in the Plan.</p>
<p><i>Chapter 8 Transportation</i></p> <ul style="list-style-type: none"> Suggests the inclusion of additional detailed objectives on walking and cycling including to provide, improve and extend the network of cycle lanes and pedestrian routes on existing roads and all new regional, local distributor and local collector roads, and roads being upgraded to provide facilities. 	<ul style="list-style-type: none"> The points raised are sufficiently addressed within Section 8.3 of the Transportation Chapter, Chapter 7 Tourism and Chapter 15 Recreation.

<p><i>Chapter 9: Infrastructure</i></p> <ul style="list-style-type: none"> • Recommends replacing TC06 with a more detailed objective which addresses many points including: respecting the landscape, avoiding hilltops, avoiding locations in the direct line of listed views/prospects and major tourist routes. • Objective TC07 should be amended to include reference <i>to traditional walking routes (which should be identified prior to developments) and public access to the countryside.</i> 	<ul style="list-style-type: none"> • The wording of TC06, together with the landscape objectives L03, L04, L05, L09, L10, sufficiently address the issues raised. • TC07 refers to public rights of way. It is not considered appropriate to include reference to traditional walking routes and public access to the countryside. As stated on page 352 of the Plan, the Council recognises the legal rights of landowners and that rights of access to their lands may only be obtained with their permission where an existing public right of way does not exist.
<p><i>Chapter 11 Energy</i></p> <ul style="list-style-type: none"> • Recommends that an additional objective be included to identify existing rights of way prior to new wind energy developments and to prohibit such developments where they would impact on these routes. 	<ul style="list-style-type: none"> • Section 2.7 of the Wind Energy Strategy recognises that wind farm developments can be compatible with tourism and leisure interests if appropriately sited. It states that consideration needs to be given to the extent which recreational pursuits and facilities, such as walkways, can be accommodated and facilitated either within or adjacent

<ul style="list-style-type: none"> • Submits that Policy Inf. 32 from the Wexford County Development Plan 2007-2013 should be re-instated and the proviso extended to include all projects not just small scale ones. 	<p>to wind energy developments. Section 15.6 of the Draft Plan includes an objective (Objective RS36) to ensure that development does not impinge on public walking routes and public rights of way.</p> <ul style="list-style-type: none"> • Policy Inf. 32 in the County Development Plan 2007-2013 supported the development of small scale hydroelectric projects. This objective has been carried forward in the Draft Plan (Objective EN18). Although it has been limited to small scale projects, it is considered that the objectives in the Draft Plan would not preclude a large scale development which would be assessed on their merits.
<p><i>Chapter 13 Coastal Zone Management</i></p> <ul style="list-style-type: none"> • New objective that <i>protection works will minimise disruption to access routes to the coast, the coastal path and beach walks.</i> • Amend Objective CZM21 which relates to the coastal path as follows: the path should be waymarked and use 	<ul style="list-style-type: none"> • Noted but it is not considered necessary to include a new objective. Objective CZM22 will ensure that new development does not have a significant adverse impact on public access to beaches. • Objective CZM21 is taken verbatim from the RPGs for the South-East Region, and it is therefore not considered

<p>of the path should, where feasible, facilitate use by cyclists and pony trekkers, its status should be upgraded to that of a public right of way and new/improved access points should be provided and maintained.</p> <ul style="list-style-type: none"> • Replace Objective CZM22 with an objective to support and promote coastal walkways by identifying existing and/or potential coastal routes which can be developed as tourist attractions. • Replace CZM24 with a new objective to provide, maintain and protect public access to all beaches and appropriate places on the seashore. • New objectives to permit development only where it will not have a significant adverse impact on public access to beaches and to preserve public access to the islands 	<p>appropriate or necessary to amend it. Notwithstanding this, it is considered that objectives RS33 and RS34 sufficiently address the issue regarding public rights of way.</p> <ul style="list-style-type: none"> • Objective CZM22 relates to provision of appropriate public access to the coast including the provision of coastal walkways and cycle ways. The suggested changes to it relate to its use. There is merit in the wording set out in the submission and it would be considered appropriate to include a new objective regarding same- <i>see Manager's Recommendation section for proposed wording.</i> • The wording of Objective CZM24 is considered appropriate. • Objective CZM22 will ensure that new development does not have a significant adverse impact on public access to beaches.
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<p>(including uninhabited ones) for recreational users.</p> <ul style="list-style-type: none"> • New objective to be included to manage and control car parking and vehicular movements at beaches; develop soft green areas that can be used as overflow areas in peak periods; exclude land and marine based sporting activities from beaches. 	<ul style="list-style-type: none"> • Objective CZM33 is considered adequate to address the issue of car parking at beaches.
<p><i>Chapter 14 Heritage</i></p> <ul style="list-style-type: none"> • The preparation of the Heritage Plan should be done with the assistance of a Heritage Officer and it should be adopted by the Council within one year of the adoption of this Plan. • Requests that Objective AH06 be replaced with an objective to: provide public access to archaeological sites and National Monuments; designate traditional access routes as public rights of way; acquire other routes; include appropriate signage and; include information on the Council's website. 	<ul style="list-style-type: none"> • The preparation of a Heritage Plan will be subject to available resources and as such it is not considered appropriate to include a preparation time-frame. • Objectives AH06 and AH09 promote access to archaeological sites and seek to secure public access where appropriate, in consultation with landowners. Objective RS34 provides for the identification and designation of public rights of way.

<ul style="list-style-type: none"> • Include additional sub-sections on geology, national parks, special area amenity orders and world heritage sites. 	<ul style="list-style-type: none"> • Noted but not considered necessary.
<p><i>Chapter 15 Recreation, Sport and Public Rights of Way</i></p> <ul style="list-style-type: none"> • Requests that Objective RS12 be reworded to recognise the role of natural amenities as part of our heritage and to promote public access to heritage sites and features of archaeological interest, mountains, commonage and other hill land, moorlands and to the countryside and forests, rivers, lakes and valleys • Requests that Objective RS21 be replaced with an objective to show National Trails Network, Sli na Slainte and other defined walking trails and cycle routes in an additional volume with accompanying maps. • Submits that Policy WR4 from the Wexford County Development Plan 2007-2013 should be re-instated. 	<ul style="list-style-type: none"> • Objective RS12 encourages provision of access to amenity areas such as beaches, inland waterways, forests and heritage sites in co-operation with landowners. This objective is considered adequate. • See response under Submission no. 063. • Policy WR4 in the County Development Plan 2007-2013 seeks to develop a new walking route along the River Slaney between Wexford and Enniscorthy and Enniscorthy and Bunclody. Objective RS24 of the Draft

<ul style="list-style-type: none"> • Requests that Objective RS25, with regard to disused railways, is amended to state that: <ul style="list-style-type: none"> a) where the track is intact, to consider opening a walkway/cycleway on land adjacent to the railway b) where the track has been taken up, to include a list of these and promote and facilitate their development as walkways/cycleways and bridleways within two years of adoption of the Plan. • Requests that Objectives RS26 and RS27 be replaced by one objective to develop clearly visible cycleways which are segregated from carriage ways and footpaths. 	<p>Plan promotes the development of riverside walking routes, subject to compliance with the Water Framework and Habitats Directives.</p> <ul style="list-style-type: none"> • Objective RS25 states that it is the objective of the Council to facilitate the development of disused railways for amenity purposes provided that the development does not interfere with the re-opening of the line. This would include walkways, cycleways and bridleways. In the interests of clarity it is recommended that this objective be amended- <i>see Manager's Recommendation section for proposed wording.</i> • Objective RS26 states that it is the policy of the Council to improve cycle routes with better signposting, better road surfaces and greater safety for the cyclist and to ensure that new urban road infrastructure and traffic management measures are designed to be cyclist friendly. The provision of segregated cycleways, carriage ways and footpaths will be dependent on a number of
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<ul style="list-style-type: none"> • Suggests that an extensive amount of additional objectives are included in relation to cycling and cycling routes, walking and walking routes, trails and improving access to the countryside 	<p>factors including the design, width and gradient of the road. Objective RS27 supports the development of a National Cycle Network. This forms part of Government policy and is included in the National Cycle Policy Framework.</p> <ul style="list-style-type: none"> • It is considered that adequate provision has been made in Section 15.6 of the Draft Plan for the promotion of walking and cycling and the development and extensions of trails and walking/cycling routes. Section 8.3 of the Draft Plan relates to walking and cycling as alternative forms of transport and includes an objective (Objective T09) to encourage walking and cycling by all sections of the community. Objective RS02 states that it is an objective of the Council to implement the strategic objectives contained in the County Wexford Recreation Strategy. This Strategy, published by the County Development Board in 2011, recognises the popularity of walking and cycling in County Wexford. It outlines a number of actions to promote awareness of, and increase accessibility to, recreational facilities, which includes walking and cycling
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	routes.
<p><i>Chapter 18 Development Management</i></p> <ul style="list-style-type: none"> • Include an additional point on Extractive Industries; should not impinge on existing public rights of way or walking routes. • Include sub-section on golf courses; including a standard that proposals for these developments must not impinge on any right of way or walking route. • Include a sub-section on Planning Enforcement 	<ul style="list-style-type: none"> • It is considered appropriate to insert a reference to public rights of way- <i>refer to Manager's Recommendation section in Submission No. 095 Irish Concrete Federation.</i> • Golf courses have not been included in this section. The issue of protecting public rights of way regardless of the type of development has been dealt with extensively in the Plan. • It is considered appropriate to include a section on planning enforcement- <i>see Manager's Recommendation section for proposed wording.</i>
<p>Manager's Recommendations:</p> <p>Amend Objective ED21 on 136 as follows:</p> <ul style="list-style-type: none"> • To facilitate the sustainable development of forestry in Wexford provided that it is in harmony with the surrounding landscape, that no undue injury is <u>that no significant adverse impacts are</u> caused to natural waters, wildlife habitats, or conservation areas <u>or have a significant adverse visual impact on the local landscape</u> and subject to compliance with 	

normal planning and environmental criteria and the development management standards contained in Chapter 18.

Insert the following under the heading Recreation in Table No. 16: Key Tourist Attractions in County Wexford page 150:

- **Whale and dolphin watching**
- **Hand-gliding and paragliding**
- **Canoeing**
- **Different types of cycling**

Insert the following footnote at the end of Table No. 16 Key Tourist Attractions in County Wexford page 150

- **Note: This list is not exhaustive.**

Insert new objective in Section 13.7 Tourism and Recreation in the Coastal Zone page 289.

- **To support and promote the development of coastal routes as tourism attractions and local amenities, in co-operation with statutory and relevant organisations, for recreational activities including walking, cycling, pony trekking, whale/dolphin watching and bird-watching. These routes should provide links to other activities and facilities where feasible and practicable and are subject to compliance with normal planning and environmental criteria and the development management standards contained in Chapter 18.**

Amend Objective RS25 on page 350 as follows:

To facilitate the development of disused railways for amenity purposes, **including the development of walkways, cycleways or bridleways**, provided that the use does not interfere with the re-opening of lines **and** subject to normal planning and environmental

criteria and the development management standards contained in Chapter 18.

Insert new section in Chapter 18 Development Management as follows:

Enforcement

In order to ensure that the integrity of the planning system is maintained and that it operates for the benefit of the whole community, the Council will take enforcement action in cases of unauthorised development, where it is appropriate to do so, consistent with the provisions of the Planning and Development Act 2000 (as amended). Under planning legislation any development which is not specifically exempt development requires planning permission and development which does not have that permission is unauthorised development, as is development which has been or is being carried out in breach of conditions specified in a planning permission.

Submission No. 074 Kevin Cronin on behalf of Bree Mountain Biking	
Summary of Submission	Manager's Response
<ul style="list-style-type: none">The submission highlights the importance of mountain biking in terms of health and fitness, respect for the environment, tourism, and supporting local business. The submission requests support in the Plan for the specific development of mountain biking. This, in turn, would help in the attainment and enhancement of a number of the objectives already contained in the recreation section of the Plan.	<ul style="list-style-type: none">The Council recognises the benefits that cycling presents in terms of health, reducing traffic and associated greenhouse gas emissions and cycling tourism which provides opportunities for the local economy. Section 15.6 of the Draft Plan includes a number of objectives to support the development of cycling routes. This includes both on-road and off-road cycling routes. The Council supports and encourage sustainable sports and recreational activities.

<ul style="list-style-type: none"> • The submission references the document titled ‘Coillte Outdoors – Off-Road Cycling Strategy’ June 2012 in which Forth Mountain has been indicated as a potential site for an off-road centre of regional scale. Similarly, Bree Hill and Deerpark/Kilrannish are identified as 	<p>Objective TM02 will facilitate the development of a diversified tourism industry which would include cycling.</p> <p>It is envisaged that the term cycling incorporates all types of cycling including on-road, off-road and BMX. In the interests of clarity the term off-road cycling will be explained in Section 15.6-<i>see Manager’s Recommendation section for proposed wording.</i></p> <p>It is also recommended that cycling and its different types be included in Table 16: Key Tourist Attractions in County Wexford. Bree Hill will also be mentioned under trails. Kilrannish and Forth Mountain are already referred to under the heading on natural asset- <i>see Manager’s Recommendation section for proposed wording.</i></p> <ul style="list-style-type: none"> • It is recommended that an objective be included in Section 15.6 of the Draft Plan to engage with Coillte in investigating the suitability of developing these trails -<i>see Manager’s Recommendation section for proposed wording.</i>
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possible sites for club trails.	
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Manager's Recommendation

Insert the following text in Section 15.6 after the last paragraph on page 348:

Off-road cycling in the form of mountain biking is also growing in popularity. Coillte's Off-Road Cycling Strategy (2012) recognises that the development of a high-quality, off-road cycle trail network would support rural tourism, increase active participation in sport for citizens and potentially develop a revenue stream to fund management and maintenance of trails. The Strategy identifies potential locations for development of off-road cycle trails over the next ten years on lands which are in the ownership of Coillte. In County Wexford, Forth Mountain is identified as a potential location for an off-road cycling centre of regional scale¹ while Bree Hill and Deerpark/Kilrannish are identified as potential club trails.² The Strategy also recognises the potential for community or family trails, which could be developed in partnership with local development companies, community groups or local authorities, to provide for local and community recreation.

Footnotes:

1. An off road cycling centre is generally 20-30km of waymarked trails with a minimum of two independent waymarked loops. These centres are primarily day-visit destinations for domestic markets with basic visitor facilities and the possibility for add-on developments such as bike hire and provision of light refreshments
2. Club trails are areas where some level of user-built trails have been constructed or where local clubs actively use the forests for activities or events.

Insert the following new objective on page 350:

- **To engage with Coillte in the investigation of the suitability of developing off-road cycling trails at Forth Mountain, Bree Hill and Deerpark/Kilbranish in accordance with Coillte's Off-Road Cycling Strategy (2012), provided that they do not negatively impact on residential amenity, landscape, heritage or the environment and subject to compliance with normal planning and environmental criteria and the development management standards contained in Chapter 18.**

Amend the Natural section of Table No. 16 Key Tourist Attractions in County Wexford to include Bree Hill as a trail and amend the Recreation section to include different types of cycling.

Submission No. 079: Environmental Protection Agency	
Summary of Submission	Manager's Response
<ul style="list-style-type: none">• It is acknowledged in the submission that environmental constraints identified in both the SEA and the updated County Landscape Character Assessment have been used to inform the development of the Wind Energy Strategy. It is also acknowledged that the SEA has been well integrated into the Plan, particularly through the inclusion of the recommended SEA mitigation measures in the policies/objectives of the Plan.	<ul style="list-style-type: none">• Noted.

<ul style="list-style-type: none"> • The Plan should include a requirement for lower level plans (Local Area Plans (LAPs)/Town Development Plans (TDPs) etc.) to be assessed in accordance with the requirements of the SEA and Habitats Directives and as per <i>The Planning System and Flood Risk Management</i> (DEHLG/OPW, 2009), where relevant. • Consideration should be given to including a policy/objective to ensure that adequate and appropriate wastewater and drinking water services are put in place prior to further development in areas with capacity or treatment/management issues. The EPA notes that in 2010, nine waste water treatment plants (WWTPs) in County Wexford failed to achieve the overall requirements of the Urban Waste Water Treatment Regulations (2001), an additional four WWTPs had primary treatment only, and an additional two WWTPs had no treatment. The EPA also notes that the Sow Regional Drinking Water Supply is currently listed on the EPA's Remedial Action List, due to 	<ul style="list-style-type: none"> • The comments are noted, and it is considered appropriate to include a requirement for lower level plans to be assessed in accordance with the requirements of the SEA and Habitats Directives and as per <i>The Planning System and Flood Risk Management</i> (DEHLG/OPW, 2009), where relevant- <i>see Manager's Recommendation section for proposed wording.</i> • Wexford County Council is currently at an advanced stage of procuring major upgrades to two of the largest Waste Water treatment Plants in the County at Enniscorthy and Gorey/Courtown. In addition Preliminary Reports have been prepared for the provision of waste water treatment plants at seven of the larger villages throughout the county. It is anticipated that these project will move to construction in the lifetime of the plan. <p>The Local Authority have also been engaged in an extensive and on-going programme of improvement</p>
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<p>“<i>excessive levels of aluminium in the treated water</i>”. It should be ensured that the issues associated with non-compliances with the Urban Waste Water Treatment Regulations and the Drinking Water Regulations are resolved on a priority basis.</p> <ul style="list-style-type: none"> • Section 18.30 <i>Undergrounding of Services</i>, which stipulates that all services shall be placed underground, should fully take into account the requirements of the Habitats and EIA Directives, where relevant. It should be clarified whether this refers to services in both urban and rural areas, and whether all grid services will also be undergrounded. 	<p>works to waste water treatment plants in small villages throughout the county under the Small Schemes section of the Water Services Investment Programme</p> <p>The comments are noted, and it is considered appropriate to include a policy /objective to ensure that adequate and appropriate wastewater and drinking water services are in place prior to further development in areas with capacity or treatment/management issues- <i>see Manager’s Recommendation section for proposed wording.</i></p> <ul style="list-style-type: none"> • It should be noted that there is an objective in the Plan NH03 to ensure that any plan or project and any associated works individually or in combination with other plans or projects, are subject to Appropriate Assessment Screening and the provisions of the Habitats Directive. There is also a development management standard in Section 18.5 which outlines the requirements for EIA. Section 18.30 refers to a development control standard for proposed
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- The Council is reminded of legislative requirement including:
 - future proposed amendments should be screened for SEA
 - an SEA statement must be produced as required by Article 131 of the Planning and Development Regulations as amended by Article 7 of the SEA Regulations.
 - the Plan should be set in the context,

Section 1: Development Plan

- *Chapter 3 Core Strategy – Objectives SS08, SS11, SS14 and SS19 should be amended as follows ‘to encourage new residential developmentin accordance with the Core Strategy and Settlement Strategy subject to normal planning and environmental criteria, including the availability of adequate waste water treatment capacity and drinking water capacity, and the development management standards contained in Chapter 18.*

development, and it is not a requirement for all existing grid services to be undergrounded.

- The Council is aware of its legislative requirements and these have been complied with.

- The comments are noted, and it is considered appropriate to include reference to availability of adequate waste water treatment capacity and drinking water capacity. Amend wording of Objectives SS08, SS11, SS14 and SS19- *see Manager's Recommendation section for proposed wording.*

<p><i>Chapter 5 Climate Change</i></p> <ul style="list-style-type: none"> • Consideration should be given to the inclusion of a policy/objective for the preparation and implementation of an Energy Conservation Strategy and associated awareness campaign within the Plan area. • The Plan should also consider the preparation of a Sustainable Urban Drainage Strategy for the County, or promote the establishment of local SUD's Strategies for each LAP/DP area within the County. <p><i>Chapter 7: Tourism</i></p> <ul style="list-style-type: none"> • Objective TM07 should be amended as follows: 'To maintain and improve tourist routes, access to the County and infrastructure through the provision of attractive, useful, informative signage methods <i>with consideration of visual impacts on the landscape</i>, and by carrying out environmental improvements along tourist routes subject to compliance with normal planning and environmental criteria and the development management standards contained in Chapter 18.' 	<ul style="list-style-type: none"> • Objective EN09 includes a commitment to prepare a renewable Energy Strategy during the lifetime of the Plan. • The point in relation to preparing a Sustainable Urban Drainage Strategy for the County is noted. There are objectives and development control standards within the Plan that require the use of SUDs for new developments. • The comments are noted, and it is considered appropriate to amend Objective TM 07- <i>see Manager's Recommendation section for proposed wording.</i>
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<p><i>Chapter 8: Transportation</i></p> <ul style="list-style-type: none"> Objective T11 should be amended as follows: ‘To support the development of port related services and industries on lands adjacent to the ports of Rosslare Europort and New Ross, <i>subject to the requirements of the Habitats, Floods and EIA Directives.</i>’ <p><i>Chapter 9 Infrastructure</i></p> <ul style="list-style-type: none"> Consideration should be given to including policies/objectives for the development of leak detection programmes for wastewater and drinking systems. The use of strategic metering systems to aid in leak detection should be considered. <p><i>Chapter 10: Environmental Management -</i></p> <ul style="list-style-type: none"> Objective WQ01 should be amended to refer to the <i>Bathing Water Directive (2006/7/EC)</i> and to improving bathing water Quality in the County. 	<ul style="list-style-type: none"> The comments are noted, and it is considered appropriate to amend Objective T11- <i>see Manager’s Recommendation section for proposed wording.</i> The comments are noted and it is considered appropriate to include an objective for leakage reduction in wastewater and drinking systems- <i>see Manager’s Recommendation section for proposed wording.</i> The comments are noted, and it is considered appropriate to amend Objective WQ01- <i>see Manager’s Recommendation section for proposed wording.</i>
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<p><i>Chapter 14: Heritage</i></p> <ul style="list-style-type: none"> The intention to prepare a Green infrastructure Strategy is noted and acknowledged. Objective GI02 should be amended as follows: ‘To develop and implement a Green infrastructure Strategy for the County <i>within the lifetime of the Plan</i> in consultation with...’ <p><i>Chapter 18: Development Management Standards –</i></p> <ul style="list-style-type: none"> <i>Section 18.14 Infill and Backland Sites in Towns and Villages</i> should make reference to the Flood Risk Management Guidelines for Planning Authorities (DEHLG/OPW, 2009), which should be taken into account in the development of backland and infill sites. <p>Section 2: SEA Environmental Report</p> <ul style="list-style-type: none"> Non Technical Summary – Include a summary of the existing environmental problems, any likely significant effects on the environment, the evolution of the environment in the absence of the Plan, and a list of relevant Plans/Programmes which have been taken into account. 	<ul style="list-style-type: none"> The comments are noted, and it is considered appropriate to amend Objective GI02- <i>see Manager’s Recommendation section for proposed wording.</i> The comments are noted and it is considered that screening and management of flood risk is sufficiently covered under Chapter 12 Flood Risk Management. The Flood Risk Management Guidelines for Planning Authorities (DEHLG/OPW, 2009) will be taken into account in all types of application for development. <p>Section 2: SEA Environmental Report</p> <ul style="list-style-type: none"> The comments are noted. However, there is merit in keeping the non-technical summary short and to the point. Notwithstanding this, consideration will be given to including in the final SEA a short summary, within the non Technical Summary, of the existing environmental problems, any likely significant effects on the
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<p><i>Section 1: SEA introduction and Background</i></p> <ul style="list-style-type: none"> • Consideration should be given to including in Table 2 ‘Legislation, Plans Policies and Programmes’ a reference to the Birds and Natural Habitats Regulations (S.I. No. 477 of 2011) and the recently published <i>Our Sustainable Future, a Framework for Sustainable Development for Ireland</i> (DECLG, 2012) <p><i>Section 4: Environmental Baseline of County Wexford</i></p> <ul style="list-style-type: none"> • It should be ensured that the maps in this Section are suitably scaled and that each map is accompanied by a relevant and legible key/legend. • Consideration should be given to the use of environmental sensitivity mapping to highlight areas of high vulnerability throughout the County to ensure those areas are afforded 	<p>environment, the evolution of the environment in absence of the Plan and a list of relevant Plans/Programmes which have been taken into account</p> <ul style="list-style-type: none"> • The comment is noted and it is considered appropriate to include a reference to the Birds and Natural Habitats Regulations (S.I. No. 477 of 2011) and the recently published <i>Our Sustainable Future, a Framework for Sustainable Development for Ireland</i> (DECLG, 2012). <i>see Manager’s Recommendation section for proposed wording.</i> • Where possible and subject to resources it will be ensured that the maps in this Section are suitably scaled and that each map is accompanied by a relevant and legible key/legend when final report is being published. • Consideration was given to the use of weighted environmental sensitivity mapping. However, due to GIS/IT resources a sieve analysis was conducted
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<p>significant protection. This map could be used to justify the selection of the proposed wind energy cluster and could be included in the Wind Energy Strategy, the Non Technical Summary and the Plan.</p> <ul style="list-style-type: none"> • The colour coding used in Table 18 Waste Water Treatment Plants of Section 4.7 Material Assets should be explained in the text of the section. • Consideration should be given to include in Section 4.7 Material Assets maps of the proposed roads, proposed and existing wind farms, and other services such as grid network, broadband network, etc. <p><i>Strategic Environmental Objectives</i></p> <ul style="list-style-type: none"> • Consideration should be given to merging SEO W1 ‘to ensure the protection and/or improvement of all drinking water, surface water and groundwater quality throughout the county’ and W2 ‘to prevent pollution and contamination of 	<p>instead which layered designated sites, settlement densities, wind speeds, landscape character sensitive areas etc. This map was used to justify the selection of the proposed wind energy cluster.</p> <ul style="list-style-type: none"> • It is considered appropriate to explain the colour coding used in Table 18 Waste Water Treatment in the text of Section 4.7 Material Assets. This will be amended in the final report when published. • Maps of the proposed roads, proposed and existing wind farms, and other services such as grid network, broadband network, etc will be included in Section 4.7 Material Assets in the final report when published. • The SEOs should be merged- <i>see Manager’s Recommendation section for proposed wording.</i>
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groundwater’.

Section 6: Alternatives

- Consideration should be given to a more detailed assessment of the Plan alternatives against the SEOs in order to justify the selection of the preferred alternative.
- It is noted that the preferred Wind Energy Strategy alternative (a combination of Option 6 and Option 7) appears to avoid the sensitive habitats and landscapes. However, there would be merits in including a section outlining the reasons for choosing this alternative, in order to clarify the selection of the preferred alternative. This section could also be reflected in the Wind Energy Strategy and Plan.
- A detailed assessment was given in advance of selection of alternatives. Consideration will be given to providing a more descriptive detailed assessment of the Plan alternatives against the SEOs in the final report when published.
- It is considered that the reasons for choosing the preferred Wind Strategy alternative are outlined clearly within this section and are also included within the Wind Energy Strategy. The combination of the two options is one from a ‘Strategic Option’ and one from a ‘Spatial Option’, which gives the preferred option. Together these options form the basis for this Strategy, allowing for the strategic development of wind in areas where there are high wind speeds and grid connections while seeking to avoid or reduce impacts on the environment and ensuring the protection of residential and visual amenity.

<p><i>Section 8: Mitigation Measures</i></p> <ul style="list-style-type: none"> It is acknowledged that the Objectives/Policies of the Plan which act as mitigation measures are clearly identified in this section. There would be merits in directly linking these mitigation measures to the relevant likely significant effects identified in Section 7 <i>Likely Significant Effects of implementing the Plan</i>. <p><i>Section 9: Monitoring Programme</i></p> <ul style="list-style-type: none"> There would be merits in including in Table 30 <i>Strategic Environmental Objectives indicators and Targets</i> the frequency of monitoring, the department within Wexford County Council responsible for collating data, and the threshold levels at which corrective action will be taken. It is noted that Objective B1 relates to the conservation of habitat and species diversity within the County, but not specifically within designated sites (designated sites are dealt with by Objectives B2 and B30). It should be ensured 	<ul style="list-style-type: none"> The comments regarding mitigation measures are noted. There is merit in linking mitigation measures to the relevant likely significant effects identified in Section 7 <i>Likely Significant Effects of implementing the Plan</i>. Include where relevant in the final report when published. There would be merits in including in Table 30 <i>Strategic Environmental Objectives indicators and Targets</i> the frequency of monitoring, along with the department within Wexford County Council responsible for collating data, and the threshold levels at which corrective action will be taken. This can be finalised and can evolve as the Plan progresses in its implementation. Amend Target for B1-<i>see Manager's Recommendation section for proposed wording.</i>
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that the target for Objective B1 reflects this.

- The target and indicator for Objective MA1 '*Ensure that zoned land within town plans will not be developed if such development will lead to overcapacity of Wastewater Treatment Plants...*' should be more closely linked to the objective, e.g. the target could be 'no permissions granted where capacity is unavailable' and the indicator could be 'number of permissions granted without available WWTP capacity'.
- The target and indicator for Objective L1 '*to avoid adverse impacts on the landscape...*' should also be more closely linked e.g. the indicator could be the number of permission granted in sensitive landscapes, and the target could be none. This approach would also allow cumulative effects to be monitored more effectively.

Wind Energy Strategy

- It is noted that the Table 2 Permitted Wind Farms in County Wexford shows that a number of permitted wind farms were

- Amend MA1 Target and Indicator- *see Manager's Recommendation section for proposed wording.*

- Amend L1 Target and Indicator-*see Manager's Recommendation section for proposed wording.*

- At present none of the permitted wind farms listed in Table 2 are completed. This table will be updated in the

<p>due to be completed and connected in early 2012.</p> <p>Consideration should be given to updating this table where possible to indicate which wind farms are now complete.</p> <ul style="list-style-type: none"> • The alternatives for wind energy could be compared against the SEOs of the SEA, in order to provide additional justification for the selection of the combination of preferred alternatives. 	<p>final Plan, where relevant.</p> <ul style="list-style-type: none"> • A detailed assessment was given in advance of selection of alternatives. Consideration will be given to providing a more descriptive detailed assessment of the Plan alternatives against the SEOs in the final report when published.
<p>Manager's Recommendation</p>	
<p>Chapter 3 Core Strategy</p> <p>Insert the following new objective in Section 3.4 after Objective SS02 page 55:</p> <p><u>All Local Area Plans and Development Plans shall be screened and/or assessed in accordance with the requirements of the SEA and Habitats Directive and The Planning System and Flood Risk Management Guidelines (DEHLG and OPW 2009).</u></p> <p>Amend Objectives SS08, SS11, SS14 and SS19 in Section 3.4 as follows:</p> <p>'to encourage new residential developmentin accordance with the Core Strategy and Settlement Strategy subject to normal planning and environmental criteria, <u>including the availability of adequate waste water treatment capacity and drinking water capacity, and the development management standards contained in Chapter 18.</u></p>	

Chapter 7 Tourism

Amend Objective TM07 on page 153 as follows:

To maintain and improve tourist routes, accesses to the County and infrastructure through the provision of attractive, useful, informative signage methods **with consideration of visual impacts on the landscape**, and by carrying out environmental improvements along tourist routes subject to compliance with normal planning and environmental criteria and the development management standards contained in Chapter 18.

Chapter 8 Transportation

Amend Objective T11 on page 175 as follows:

To support the development of port related services and industries on lands adjacent to the ports of Rosslare Europort and New Ross, **subject to normal planning and environmental criteria and the development management standards contained in Chapter 18.**

Chapter 9 Infrastructure

Insert a new objective in Section 9.2.3 Water Supply on page 198 as follows:

It is an objective:

- a) To provide water treatment facilities in accordance with statutory obligations as set out by EU and National policy;**
- b) To facilitate future development while protecting the environment.**
- c) To maintain and provide adequate potable water supply in settlements to the extent that finances permit, having regard to the requirement to align water services investment with the settlement strategy and areas where serious deficiencies are evident;**

d) To facilitate Wexford County Council's *Water Services Investment Programme* and *Water Services Assessment of Needs* to provide sufficient storage, supply and pressure of potable water to serve all lands zoned for development and in accordance with the priorities as set out in the settlement hierarchy.

Insert a new objective in Section 9.2.4 Water Conservation page 199 as follows:

To continue the commitment to water conservation and leakage reduction for drinking water systems within the County area, and promote awareness of water conservation measures and techniques.

Insert a new objective in Section 9.2.5 Wastewater Infrastructure on page 205 as follows:

It is an objective to;

- a) To facilitate the provision and improvement of adequate wastewater services in order to serve the existing and future needs of the populations of towns, villages and settlements as identified in the settlement hierarchy and Core Strategy and as determined by the *Water Services Assessment of Needs* and as finances permit and in accordance with the *Water Framework Directive 2000* and the *EU Urban Wastewater Directive* and *Habitats Directive*;**
- b) To develop, where necessary, and in line with the Core Strategy and Settlement Strategy, additional capacity of existing treatment plants to meet the requirements of future development proposals;**
- c) To ensure that all foul water generated is collected and discharged after treatment in a safe and sustainable manner, having regard to the standards and requirements set out in EU and national legislation.**

Chapter 10: Environmental Management

Amend Objective WQ01 on page 219 as follows:

To protect existing and potential water resources for the County, in accordance with the EU Water Framework Directive (2000/60/EC), **Bathing Water Directive (2006/7/EC)** the South-East River Basin Management Plan 2009-2015 and any updated version, the Pollution Reduction Programmes for designated shellfish waters, the provisions of Groundwater Protection Scheme for the County any other protection plans for water supply sources, **with an aim to improving all water quality.**

Chapter 14: Heritage

Amend Objective GI02 on page 314 as follows:

To develop and implement a Green infrastructure Strategy for the County **within the lifetime of the plan** in consultation with adjoining Local Authorities, key stakeholders and the public, subject to compliance with Articles 6 and 10 of the Habitats Directive. The Strategy will integrate policies and objectives under a number of headings including; natural heritage, parks and open spaces, built heritage and archaeology, water management, flooding and climate change allowing for a strategic approach to green space planning in the County.

SEA Environmental Report

The following changes are not considered material and will be included within the final SEA Environmental Report when published.

Non Technical Summary

Include in the final SEA Non Technical Summary a short summary of the existing environmental problems, any likely significant effects on the environment, the evolution of the environment in absence of the plan and a list of relevant Plans/Programmes which have been taken into account.

Section 1: SEA introduction and Background

Include in Table 2 Legislation, Plans, Policies and programmes of the final SEA Environmental Report a reference to the Birds and Natural Habitats Regulations (S.I. No. 477 of 2011) and the recently published “Our Sustainable Future, a Framework for Sustainable Development for Ireland” (DECLG, 2012).

Section 4: Environmental Baseline of County Wexford

- Explain in the text of Section 4.7 Material Assets of the final SEA Environmental Report the colour coding used in Table 18 Waste Water Treatment.
- Include in Section 4.7 Material Assets of the final SEA Environmental Report, maps of the proposed roads, proposed and existing wind farms, and other services such as grid network, broadband network, where available.

Strategic Environmental Objectives

- Merge W1 & W2, Amend wording of SEO W1 as follows; *‘to ensure the protection **from pollution/contamination** and/or improvement of all drinking water, surface water and groundwater quality throughout the County’.*
- Renumber W3 as W2

Section 6: Alternatives

- Include a more descriptive detailed assessment of the plan alternatives against the SEOs to demonstrate more clearly the justification of the selection of the preferred alternative.
- Include in the final SEA Environmental Report a comparison of the alternatives for wind energy against the SEOs of the SEA.

Section 8: Mitigation Measures

In the final SEA Environmental Report where possible the mitigation measures linked to the relevant likely significant effects identified in Section 7.

Section 9: Monitoring Programme:

- Include in the final SEA Environmental Report, Table 30 *Strategic Environmental Objectives indicators and Targets* the frequency of monitoring, the department within Wexford County Council responsible for collating data, and the threshold levels at which corrective action will be taken.
- In the final SEA Environmental Report amend the following;
Objective B1 Target as follows: 'No reduction in habitat diversity or loss of species in non-designated sites'.
Objective MA1 target and indicator as follows; Target – 'New development should be served by a public wastewater treatment system or an approved on site wastewater treatment plant designed, constructed and managed in accordance with EPA Guidelines' Indicator - 'Number of permissions granted without connection to a public wastewater treatment system or an approved on site wastewater treatment plant designed, constructed and managed in accordance with EPA Guidelines'.
Objective L1 target and indicator as follows; Indicator – 'the number of permission granted in sensitive landscapes', and the Target – 'no diminution in the quality of important landscapes'.

Submission No: 083 Clody Norton	
Summary of Submission	Manager's Response
<ul style="list-style-type: none"> Bunclody is a special town which has many built and natural attractions, including historic houses and gardens, a quality golf course and mountain walks of immense beauty. None of the hills and woods around Bunclody have been protected, and in general more protection is needed than that afforded by 'Upland' designation. The mountain areas around Bunclody and in other upland areas should be protected against future visual attacks and attacks against its protected species of fauna. 	<ul style="list-style-type: none"> The Bunclody has many valuable natural and built tourist attractions, and the efforts made in developing Newtownbarry House and Gardens as a key tourist attraction in north County Wexford is acknowledged. Objectives L03, L05, L06, L08, L10, L11 give Upland areas the same status as the Landscapes of Greater Sensitivity in the Council's considerations on landscape issues. Other sections of the Plan relating to Natural Heritage (Chapter 14), Tourism (Chapter 7) and Recreation (Chapter 15) address the issues of the protection of flora and fauna and the promotion of hill walking as a recreational/tourist activity.
Manager's Recommendation No amendment.	

Submission No. 089 Dick White, CEO Gorey Chamber

Summary of Submission	Manager's Response
<ul style="list-style-type: none"> • The Chamber wants to ensure that Gorey receives infrastructural improvements as a matter of urgency given the substantial increase in its population. • Welcomes the support of economic activity in the Plan, but see Gorey as competing with Wexford Town rather than having a supporting role. • The social and economic impact of the town's proximity to Dublin, particularly in terms of retail and tourism, did 	<ul style="list-style-type: none"> • Gorey has benefitted from significant investment in infrastructure, including the M11, three new schools at Creagh and the new Gorey Civic Offices which include a Library, Court House and Local Authority office. The planned upgrade of the town's wastewater treatment plant is also imminent. • The role and function of the County's main towns is set out in the National Spatial Strategy 2002-2020 and the Regional Planning Guidelines for the South-East Region 2010-2022. Wexford Town is the designated as the Hub town which is to be supported by the other Larger towns of Enniscorthy and New Ross. The Council recognises the importance of Gorey in the north of the County and has included it on the same tier as a Larger Town; and consequently its role is to support the Hub. • The health check assessment of Gorey in the Retail Strategy makes reference to Gorey's proximity to Dublin

<p>not receive sufficient attention in the Plan.</p> <ul style="list-style-type: none"> County Wexford is one of Ireland's five nationally recognised 'Family Friendly destinations'. This should be further developed, while taking into account the population impact on north Wexford in the summer, in particular Courtown and Riverchapel. 	<p>and the fact that it is a residential base for commuters to Dublin. The Strategy also highlights opportunity sites for retail development in the town. It is considered that both the retail and tourism objectives in Plan will promote and facilitate the continued development of each sector in Gorey and north Wexford.</p> <ul style="list-style-type: none"> Tourism is identified as a 'pillar of growth', and the Sustainable Tourism Development Strategy seeks to further develop the County's existing tourism assets and further diversify the tourism product across the county.
<p>Manager's Recommendation</p> <p>No amendment.</p>	

Submission No. 092 Patrick D'HELF

Summary of Submission	Manager's Response
<ul style="list-style-type: none">The submission formally objects to the indication in the Plan that the area where their property is located (Bolgerstown, Barntown) is now suddenly classified as an area where not all developments are allowed. <p>The County Council found the area was ideal for hosting the Holmestown Waste Management Facility, including an open dump (which is worse than an industrial activity).</p> <p>All limitations regarding the use of their land adjoining this facility should be lifted and, for example, windmills should be allowed as well as housing and even industrial activities.</p>	<ul style="list-style-type: none">The Plan sets out a strategy for the proper planning and sustainable development of the County. It is necessary to set out objectives with regard to particular types of development in particular areas in order to achieve this. Where restrictions on the location of developments have been identified it is for reasons including protecting the character of rural areas, residential amenity and visual amenity. <p>One-off rural housing in this area will be considered in accordance with the criteria set out in the Sustainable Rural Housing Strategy.</p> <p>Lands are zoned in the County's main towns for industrial activity which are considered in general to be the most appropriate locations for type of development.</p>

	The Draft Wind Energy Strategy sets out the reasoning as to why wind farms developments will not be considered in this area.
Manager's Recommendation No amendment.	

Submission No. 093 Fáilte Ireland	
Summary of Submission	Manager's Response
This is a comprehensive submission in which Fáilte Ireland set out many supportive comments in relation to the Draft Plan, its strategies and objectives, and includes many suggestions to further strengthen the Plan.	This submission is welcomed as is Fáilte Ireland's endorsement of the Plan. Given the extensive nature of the submission, and in the interests of brevity, the summary and response relates only to issue relevant to the Plan.
<i>Chapter 1 Introduction</i> <ul style="list-style-type: none"> • Recommends the inclusion of an additional bullet point in Section 1.1: 'A framework for the developing tourism in the County'. 	<ul style="list-style-type: none"> • Noted. The inclusion of this bullet point will reinforce the Council's commitment to maximising the County's tourism development potential- <i>see Manager's Recommendation section for proposed wording.</i>

<ul style="list-style-type: none"> • The Plan contains a number of themes. It is suggested that a fourth theme on the subject of 'Partnerships' be added. It would discuss the public and private sector organisations and community groups that will be involved in the development of the County. • It is recommended that the monitoring committee could include a representative from the Destination Steering Group to ensure strategic alignment. • It is recommended that Section 1.6 could include reference to the Destination South East and Destination Wexford development strategies. 	<ul style="list-style-type: none"> • Although not a stated underlying theme, there are references throughout the Plan to work in partnership with various prescribed authorities, stakeholders and interests groups to ensure the delivery of objectives and implementation of the Plan. This is considered sufficient for the purposes of a Development Plan. • The monitoring committee is an in-house team. Bodies, such as Fáilte Ireland will play an important role for the committee by providing data to assess the success or otherwise of set targets. • The Destination Strategies are working documents not currently in the public forum. It is not considered appropriate to refer to documents which have yet to be published. However, the Council fully supports Fáilte Ireland in the preparation of these strategies.
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<p><i>Chapter 3 Core Strategy</i></p> <ul style="list-style-type: none"> • Recommends that the Vision for County include an additional bullet point: <i>Which offers visitors a range of high quality experiences.</i> 	<ul style="list-style-type: none"> • This proposal would reaffirm the Councils' commitment to maximise the County's tourism development potential- <i>see Manager's Recommendation section for proposed wording.</i>
<p><i>Chapter 4 Housing</i></p> <ul style="list-style-type: none"> • Policy on individual holiday homes is well drafted and a significant development. Could be cross-referenced with further detail in Chapter 13 regarding holiday home developments in the coastal zone. 	<ul style="list-style-type: none"> • Noted. Cross-referencing will be considered once the Plan is finalised.

<p><i>Chapter 6 Employment, Economy and Enterprise</i></p> <ul style="list-style-type: none"> • Commends this chapter, in particular the detailed reference to tourism and the role tourism can play in economic development. Welcomes objectives which support this role namely; agriculture, retail development, fisheries and aquaculture. • Policy context section which refers to the ‘South East Tourism Development Plan 2008-2010’; should refer instead to the Destination South East: A Fáilte Ireland Strategic Plan and Work Programme 2011/2013 and Destination Wexford: A Strategic Plan and Work Programme 2011/2013. 	<ul style="list-style-type: none"> • Noted • The Destination Strategies are working documents not currently in the public forum. It not considered appropriate to refer to documents which have yet to be published.
<p><i>Chapter 7 Tourism</i></p> <ul style="list-style-type: none"> • Tourism chapter is very comprehensive and well drafted and could be seen as a best practice model for other counties. 	<ul style="list-style-type: none"> • Noted.

<ul style="list-style-type: none"> • The chapter, in parts, could align more closely with Destination South-East and Destination Wexford strategies, namely in respect of tourist statistics on bed numbers, flagship products, destination development strategies. • Suggest a sub section to be headed ‘Destination Development’, which could discuss the Unique Selling Points (USP) of the County, Partnerships and Collaboration and the Tourism Towns programme. • It is excellent to see a Sustainable Tourism Development Strategy at the heart of the tourism chapter. It is recommended that an objective that “policy and planning decisions promote a sustainable environment for tourism” be included. • Requests the inclusion of a subsection on festivals, on activity and adventure tourism, trails and retail tourism. 	<ul style="list-style-type: none"> • The Destination Strategies are working documents not currently in the public forum. It is not considered appropriate to refer to documents which have yet to be published. Furthermore, it is not considered necessary to go into such detail for a planning and development document. • This is considered to be beyond the remit of the Plan. • One of the underlying themes of the Plan is to promote a sustainable environment not just for tourism but for all of society and for future generations. This is reiterated throughout the Plan. • Many of the festivals that take place in the County are mentioned under the heading ‘Events’ in the Table 16: Key Tourist Attractions in County Wexford. Similarly,
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	activities and trails are also listed. Shopping will be added under the heading recreation in this table- <i>see Manager's Recommendation section for proposed wording.</i>
<p><i>Chapter 8 Transportation</i></p> <ul style="list-style-type: none"> • The Plan should include reference to tourism transport initiatives, such as public services linking attractions to increase usage of alternatives to the private car. • The section on walking and cycling is well drafted and should be cross-referenced with the suggested sub-section on Activity and adventure tourism in Chapter 7. • Section 8.6 should also refer to coach friendly parking initiatives. 	<ul style="list-style-type: none"> • It is recommended that the Plan include an objective to encourage public transport usage for tourist related journeys- <i>see Manager's Recommendation section for proposed wording.</i> • Noted. • It is considered that this is adequately covered by Objectives T37 and T38.
<p><i>Chapter 9 Infrastructure</i></p> <ul style="list-style-type: none"> • Could add reference to <i>the need to protect, maintain and enhance the water quality of the watercourses and rivers in the County to conserve biodiversity and in order to maintain and enhance the development of special interest tourism activities such as angling.</i> 	<ul style="list-style-type: none"> • This is considered adequately covered by WQ05 in Chapter 10 Environmental Management and Objectives TM13 and TM14 relating to inland waterways in Chapter 7 Tourism.

<p><i>Chapter 10 Environment Management</i></p> <ul style="list-style-type: none"> No reference to the need to protect waters for tourism-reference regarding angling could be added here. Could consider whether the development of an inshore commercial fishing no-take zone might contribute to the development of its reputation as a sea-fishing centre. 	<ul style="list-style-type: none"> Note previous comment.
<p><i>Chapter 11 Energy</i></p> <ul style="list-style-type: none"> Tourism related enterprises should be encouraged to reduce their impact upon the environment by reducing their energy demand, increased recycling and utilising best practice procurement policy. Sample objective proposed. 	<ul style="list-style-type: none"> The climate change objectives CC07, CC08 and CC09 relate to the general issue of reducing greenhouse gas emissions, energy efficiency and raising awareness of climate change across all sectors, including tourism. These objectives, alongside the objectives in the energy and environmental management chapters, are considered sufficient.
<p><i>Chapter 13: Coastal Zone Management</i></p> <ul style="list-style-type: none"> CZM25 could include reference to the provision of coach parking in addition to car parking. 	<ul style="list-style-type: none"> Support the inclusion of coach-parking in Objective CZM25 and a development management standard regarding same-<i>see Manager's Recommendation section for proposed wording.</i>

<p>Chapter 14: Heritage</p> <ul style="list-style-type: none"> • This section could refer to the value of arts and cultural heritage to tourism and to the objectives contained in the Destination Wexford Development Strategy such as the Cultural Co-operative regional initiative. 	<ul style="list-style-type: none"> • Arts and Cultural Tourism is dealt with in Section 7.4.6 of the Draft Plan.
<p>Chapter 15: Recreation, Sports and Public Rights of Way</p> <ul style="list-style-type: none"> • Objective RS04 and Objectives RS11-RS18 have positive implications for tourism. • Section 15.6 regarding walking and cycling routes could benefit from the inclusion of a map of all of the existing and proposed walking and cycling routes in the County. 	<ul style="list-style-type: none"> • Noted. • Wexford County Council has set up a walking trails database which is available to view on the Council's website. It is the intention of the Council to review the database on a regular basis and include maps where appropriate. A number of leaflets are also available to download from the website in relation to heritage, forest, mountain and coastal walks. Due to the evolving nature of the database it is not intended to include it in the Development Plan. However, in the interests of clarity it is recommended that the text be amended to refer readers to the website--<i>see Manager's Recommendation</i>

<ul style="list-style-type: none"> • This section should refer to the Destination Wexford Development Strategy objectives with regard the development of trails. 	<p><i>section for proposed wording. .</i></p> <ul style="list-style-type: none"> • As previously stated it is not appropriate to reference this document in the Development Plan.
<p><i>Chapter 17 Design</i></p> <ul style="list-style-type: none"> • While this chapter contains an excellent section on urban design, more emphasis could be given to rural design including the production a ‘Rural Design Guide for the County Wexford’. 	<ul style="list-style-type: none"> • Noted. It is the intention to produce a Rural Housing Design Guide subject to available resources.
<p>Manager’s Recommendation</p> <p>Insert an additional bullet point in Section 1.1 Introduction, page 1 as follows:</p> <ul style="list-style-type: none"> • <u>A framework for the developing tourism in the County.</u> <p>Insert an additional bullet point in Section 3.2 A Vision for County Wexford, page 40 as follows:</p> <ul style="list-style-type: none"> • <u>Which offers visitors a range of high quality experiences.</u> <p>Insert an additional objective in Section 8.2 Public Transport, page 169 as follows:</p> <ul style="list-style-type: none"> • <u>To support and facilitate public transport initiatives which reduce reliance on the private car for tourist and recreational journeys within the County.</u> 	

Insert the following under the heading Recreation in Table No. 16 titled Key Tourist Attractions in County Wexford page 150:

- **Shopping**

Amended text in first paragraph on page 348 as follows:

This database **is available to view on the Council's website under the Community and Enterprise Section 'Sports Active Wexford' and** will continue to be updated as new trails emerge.

Amend Objective CZM25 page 288 as follows:

- To maintain and upgrade facilities in coastal areas through the provision of appropriate support facilities such as car parking, **coach parking**, cycle parking, public toilets and refuse disposal facilities, subject to compliance with normal planning and environmental criteria and the development management standards contained in Chapter 18.

Insert the following in Section 18.29.7 Car parking standards page 446:

- **The Council will require that convenient, safe and secure parking facilities be provided for coaches and buses where developments are likely to generate significant demand for coach parking. The Council will advise applicants on the required design and position on a case-by-case basis having regard to the nature of the development proposed and its location.**

Submission No. 095 Irish Concrete Federation	
Summary of Submission	Manager's Response
<ul style="list-style-type: none"> Acknowledges the recognition given to the extractive industry in the Draft Plan, specifically Section 6.45 and objectives ED09-15. In the absence of a National Aggregate Policy, there is a clear need for Development Plans to include supportive policies to protect and promote this sector. This is particularly important for County Wexford as it has a rich abundance of natural resources. The extractive industry is a significant source of rural employment, this should be acknowledged in the Plan; The ICF would welcome a strong commitment in the Plan to planning enforcement with regard to unauthorised sites, which give the industry a bad name and provide unfair competition to professional operators meeting the costs of planning condition compliance. 	<ul style="list-style-type: none"> Noted. The role of the extractive industry in creating direct and indirect employment opportunities is referred to in Section 6.4.5, page 130. The Council will continue to maintain a vigilant approach to unauthorised quarrying activities.

<ul style="list-style-type: none"> • It welcomes the incorporation of both the GSI Aggregates and Gravel maps for the County. • Each rural development site should be reviewed to ensure that it does not sterilise substantial resources. The ICF would welcome the specific acknowledgement of the potential impact of rural housing on the exploitation of natural resources. An Bord Pleanála decision is quoted in which planning permission was refused for a dwelling in close proximity to a quarry (26.215662, Donegal County Council, 2006) • Development management policies could explicitly refer to the following documents in relation to the environmental management of potential emissions: <ul style="list-style-type: none"> - Quarries and Ancillary Activities, Guidelines for Planning Authorities (DEHLG, 2004) - Environmental Code (ICF, 2006) - Environmental Management in the Extractive Industry (EPA, 2006). 	<ul style="list-style-type: none"> • Noted. • The issue of whether non-extractive industry related rural development should be prevented to allow for future access to potential aggregate resources is potentially very complex and will be addressed within Supplementary Guidance and/or a variation of this Plan as referred to in Objective ED14. This will be prepared when the aggregate potential mapping for County Wexford is available and has been subject to analysis and scrutiny. • It is considered appropriate to amend the wording of Objective ED11 to include these documents -<i>see Manager's Recommendation section for proposed wording.</i>
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<ul style="list-style-type: none"> • The ICF has worked closely with the GSI and NPWS in the Development of Guidelines relating to Geological Heritage and Bio-Diversity and the extractive industry can contribute to the understanding of geological heritage and enhancement of bio-diversity. The ICF employs an archaeologist and has prepared an Archaeological Code of Practice with the National Monuments division of the Government. This document should be referenced in the Archaeological Heritage and Development Management sections of the Plan • Common sense should be applied to the assessment of the impact of quarries on architectural heritage. Generally there is little superficial and zero structural damage within 300m of blasting sites where a vibration limit of 12mm/second is applied. • The extractive industry can work within the general Landscape Assessment policy, developments should include landscaping and restoration plans and 	<ul style="list-style-type: none"> • It is considered appropriate to to amend the wording of Objective ED11 to include these documents -<i>see Manager's Recommendation section for proposed wording.</i> • Noted. • Noted.
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enforcement action should be undertaken where unauthorised exploitation is taking place.

- Would welcome a statement in the Plan to issue permissions commensurate with the operator's extraction proposals in respect of the life of the resources, subject to evaluation of impacts. To operate a quarry in an environmentally and economically sustainable manner, as envisaged in Sustainable Development in the Extractive Industry (Non-energy Sector) (European Union, 2000), requires a very substantial investment in plant and infrastructure, such investment cannot be justified with a short term permission. Longer permissions would support the investment decision and subsequent employment.
- Would support a proposal to link conditions on emissions to non-planning guidelines such as Environmental Management in the Extractive Industry (EPA, 2006). By linking with such documents, the relevant standards to be achieved can be changed over

- The comments with regard to the length of extractive planning permissions are noted. The Council has had regard to information submitted with applications regarding the lifespan of the resources available in determining applications and setting conditions. The lifespan of quarrying activity must also be taken into account in the assessment of the impacts of the activity on the local environment. Reference is made to this issue in the proposed amendment to Section 18.16- *see Manager's Recommendation section for proposed wording.*
- This point is noted. However, it is considered appropriate to set conditions which relate to the relevant standards and such matters in place at the time when the decision is made.

<p>time, if those guidelines consider that changes to current standards are necessary.</p> <ul style="list-style-type: none"> • Considers that levies for road improvements as applied to the extractive industry are too high in County Wexford and apply disproportionately on authorised operators. Strong enforcement action is necessary on unauthorised operators who enjoy a competitive advantage from having a lower cost base. • The ICF considers that EIS preparation and reporting can be improved and suggests that the Plan include a more detailed template of criteria to be used in the consideration of an extractive development application, to ensure that applications are prepared by professionals with relevant experience. The Limerick and Mayo County Plans currently include this. • Acknowledges that poor quality applications have resulted in planning authorities being reluctant to grant permission to extract below the water table. This 	<ul style="list-style-type: none"> • This is considered outside the remit of the Plan. The Development Contribution Scheme is currently being reviewed and these comments will be considered during the preparation of the new Development Contributions Scheme. • The Council will review EIA requirements when the Section 28 EIA Guidelines for Planning Authorities and An Bord Pleanála, which are currently at draft stage, are approved with a view to preparing supplementary guidance to developers. • Comments are noted. High quality submissions enable the Council and other interested parties to fully understand the nature and potential impacts of extractive industry
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<p>sterilises significant quantities of resources. The ICF is working with the Institute of Geologists of Ireland to enhance the quality of reporting on this issue.</p> <ul style="list-style-type: none"> • The ICF welcome objectives regarding the reuse of extractive sites as locations for C+D waste facilities. Planning and waste permit conditions allows for Planning Authorities to achieve effective control of environmental impacts. 	<p>proposals. This applies to all proposals for extractive industry, not just when such proposals required detailed assessment under the Habitats Directive and/or Environmental Impact Assessment. Reference is made to this issue in the proposed amendment to Section 18.16- <i>see Manager's Recommendation section for proposed wording.</i></p> <ul style="list-style-type: none"> • Noted.
<p>Manager's Recommendation</p> <p>Amend Objective ED11 in Section 6.4.5 Aggregates Resources and Extractive Industry page 132 as follows:</p> <p>To ensure that permitted extractive industry developments are in accordance with the guidelines on Environmental Management in the Extractive Industry (EPA, 2006), the Wildlife, Habitats and the Extractive Industry (Notice Nature/ Irish Concrete Federation/ NPWS 2010) and the Environmental Code (ICF, 2006).</p> <p><u>To ensure that extractive industry developments are sited, designed and operated in accordance with best practice.</u></p> <p><u>Cognisance should be paid to the following guideline documents (as may be superseded and/or updated)are of particular</u></p>	

relevance:

- **Environmental Management in the Extractive Industry (EPA, 2006);**
- **Quarries and Ancillary Activities: Guidelines for Planning Authorities (DEHLG, 2004);**
- **Wildlife, Habitats and the Extractive Industry (Notice Nature/ Irish Concrete Federation / NPWS 2010);**
- **The Environmental Code (ICF, 2006);**
- **Geological Heritage Guidelines for the Extractive Industry (ICF and GSI, 2008);**
- **Archaeological Code of Practice (ICF and DEHLG, 2009)**

Amend Section 18.16 Extractive Industries page 429 as follows:

The objectives relating to Extractive Industry are contained in Chapter 6. Proposals for extractive activities, including processing, will be required to ~~meet a range of criteria including:~~ **satisfactorily address the following issues:**

- The activity should not result in potential significant adverse impacts on designated sites of natural and/or built heritage, whether or not a significant resource exists at such locations. **All planning applications will be assessed having regard to the Habitats Directive to determine if the project has the potential to impact on the integrity or the conservation objectives of any Natura 2000 site.**
- The activity can be satisfactorily accessed without causing public safety hazards, from a local roads network which can cater for the type and volume of traffic likely to be generated.
- The potential impacts of the activity on ~~environmental~~ **the environment (including ground and surface waters),** agricultural, tourist, recreational **(including rights of way),** landscape and residential amenities can be prevented and /or mitigated to an acceptable degree through careful siting and design and on-going considerate management and compliance with planning conditions. **The time period required to complete the proposed extraction and restoration will be taken**

into account in the assessment of these issues.

- Satisfactory proposals are submitted and undertaken in relation to site security.
- Satisfactory proposals are submitted for the on-going and long term restoration of the site, which has a particular emphasis on protecting and facilitating bio-diversity.
- Having regard to the potential for adverse impacts from extractive industry activity, the Council will require that information of the highest quality, prepared by appropriately qualified and competent persons, is submitted in support of planning applications for extractive industry, whether or not a formal Environmental Impact Assessment is required to be undertaken. Submissions should be prepared having regard to guidance documents on best practice in such matters such as:
 - Guidelines on the Information to be contained in Environmental Impact Statements; Advice Notes on Current Practice (EPA,2002;2003);
 - Assessment of Plans and projects significantly affecting Natura 2000 sites ; EC Guidance on Non-energy Mineral Extraction and Natura 2000; (European Commission, 2002; 2011);
 - (Further documents may be produced over the lifetime of the Plan which add to/supersede the above documents)
- The above criteria will also apply in the assessment of proposals for alternative uses of extractive industry sites, including concrete and tarmac manufacture and the deposit of inert waste material.

Submission No. 098 Department of Arts, Heritage and the Gaeltacht

Summary of Submission	Manager's Response
<ul style="list-style-type: none"> • The Department welcomes the policies and objectives to protect natural heritage including designated sites, sites proposed for designation, protected species and biodiversity in general including a green network and Article 10 of the Habitats Directive. • Table No. 30 of the Draft Plan needs to be amended to include Carnsore Point Special Area of Conservation (SAC-site code 002269). • With regard to AA screening, the Department notes that Table 4.1 lists the conservation status of habitats and species as that quoted in the Natura 2000 forms. It should be noted however that this information is over a decade old and may not be reliable. 	<ul style="list-style-type: none"> • Noted. • It is recommended that Table No. 30 be amended as requested-<i>see Manager's Recommendation section for proposed wording.</i> • It is noted that the conservation status which came from the Natura Forms is quite dated. However, they are the only forms that have site specific data on conservation status of habitats for individual SACs/SPAs. If this data is updated by the NPWS before the finalisation of the Plan, the status will be updated. <p>The Status of EU Protected Habitats and Species in Ireland (NPWS 2009) also reports on habitat status but this</p>

<ul style="list-style-type: none"> Architectural heritage observations, if any, will follow in due course. 	<p>refers to the status for Ireland and is not SAC specific and therefore would not be an accurate reflection at this County level plan.</p> <p>It is also considered that information on status is more relevant at Project Level AA and NIS rather than at this strategic AA Screening level for a County Plan.</p> <ul style="list-style-type: none"> No further observations were received from the Department.
<p>Manager's Recommendation</p> <p>Insert the following text in Table No. 30 Natura 2000 Sites in County Wexford (Section 14.2.1 page 298):</p> <p><u>Carnsore Point SAC Site No. 002269</u></p>	

Submission No. 100 Fergus O' Connor	
Summary of Submission	Manager's Response
<ul style="list-style-type: none"> The landowner notes that his land in Oulart is included in Area 1. It is requested that this land be excluded from this area as it is within walking distance of Oulart village. The landowner does not understand the logic of why these lands have been included. 	<ul style="list-style-type: none"> Clarification was sought in writing from Mr. O' Connor regarding what the term 'Area 1' refers to as no such wording is used in the Plan. No clarification has been received to date. In the absence of clarification to say otherwise, it has been assumed that 'Area 1' refers to the rural area type 'under strong urban influence' as the rural area of Oulart is now included in this rural area type. The combined analysis carried out (which is explained in Section 4.3.3 of the Plan) identified this area as being under pressure from rural generated housing and urban generated housing, and as such in order to ensure that there is sufficient environment capacity to accommodate future 'rural generated housing need', one-off rural housing will be controlled in accordance with the Objective RH01. <p>It is also noted that these lands are not considered to fall within the natural development envelope of Oulart village.</p>
Manager's Recommendation No amendment.	

Submission No. 104 Murray & Associates on behalf of Maxbole Wind Energy Ltd. and Rathyork Wind Energy Ltd.	
Summary of Submission	Manager's Response
<ul style="list-style-type: none"> The Wind Energy Strategy reduces the possibilities for wind farm development significantly in comparison with the previous Development Plan. The Draft Plan is not consistent with the National Renewable Energy Action Plan (NREAP) which aims to generate 40% of the electricity from renewable sources by 2020; the County has an obligation to produce as much energy as possible from renewable sources because it is privileged in terms of wind energy resources. 	<ul style="list-style-type: none"> Noted. A number of wind farms have been permitted under the previous Development Plans. The Draft Wind Energy Strategy has taken account of existing and permitted wind farms. Section 1.8 of the Draft Wind Energy Strategy outlines how the Council had regard to the NREAP. The installed wind capacity in County Wexford is 122 MW with eight permitted wind farms accounting for a further 79 MW. If all eight permitted wind farms are built, electricity consumption from renewable sources will account for approximately 55% of total electricity consumption in County Wexford in 2020. The 255 MW target (see Manager's Response under submission no. 122 below) will enable County Wexford to generate the equivalent of 70% of its electricity needs from wind energy by 2019² and significantly exceed its proportional share of the national RES-E target.

² Based on SEAI's Energy Forecasts for Ireland to 2020: 2010 Report and utilising a capacity factor of 30%.

<ul style="list-style-type: none"> • Favouring wind energy development in one area is not compliant with national planning guidelines; this will result in an accumulation of wind farms which looks like a large oversized development. The overall impact on the landscape would be reduced if wind turbines were dispersed in small groups over a wider area. • The Council is requested to delete the clause “turbines shall not be permitted within 250 metres of the boundary of an adjacent landholding, unless the written consent of the owner is given.” National guidelines state that a distance of not less than two rotor blades from adjoining property boundaries will generally be acceptable, unless by written agreement of adjoining landowners. The 250 metre distance required in the Wind Energy Strategy is more than three times this distance. • The proposed wind energy zone does not contain existing or permitted wind farms; extensions of existing wind farms will not be permissible in the future. 	<ul style="list-style-type: none"> • Section 3 of the Draft Wind Energy Strategy outlines the alternatives considered and the preferred alternative which is to consolidate future wind energy development in one area of the County. The 255 MW target, if achieved, will result in approximately 18 turbines in this area. • The distance of not less than two rotor blades from adjoining property boundaries recommended in national guidelines relates to wind take and the potential of adjacent sites to accommodate similar developments. The guidelines state the minimum distances between wind turbines will generally be three times the rotor diameter in the crosswind direction and seven times the rotor diameter in the prevailing downwind direction. The standard of 250 metres is considered acceptable. • Table 4 in the Draft Wind Energy Strategy states that in the ‘Not Normally Permissible’ area, applications for re-powering and extension of existing wind farms will be
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<ul style="list-style-type: none"> • Developers relied on the three zoned areas in the previous Development Plan and started investment and preparations for development. • The proposed wind energy zone is located in an area with lower mean wind speed than the zones near the coast in the previous Development Plan; the energy yield will be lower and the area is less attractive for investment. 	<p>considered (see Manager's Recommendation under submission no. 122 below).</p> <ul style="list-style-type: none"> • It is noted that developers had regard to the three areas identified as 'Open for Consideration' in the previous Development Plan. A number of wind farms have been constructed or permitted in those three areas since the preparation of that Plan. New considerations arise for this Plan in terms of the location and capacity of the transmission grid network, designated sites, residential settlements and housing density, existing and permitted wind farms, tourism, landscape and the cumulative impacts of wind farms. • It is acknowledged that the 'Acceptable in Principle' and 'Open for Consideration' areas identified in the Draft Wind Energy Strategy have average wind speeds below those in the coastal areas identified as 'Open for Consideration' in the previous Plan. However, a number of other constraints must be considered in the preparation of the Wind Energy Strategy as outlined in the Manager's Response under
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<ul style="list-style-type: none"> • This Strategy reduces the potential of wind energy development to a minimum and does not take into account that Ireland could become an electricity exporting country or become independent from fossil fuels given that energy storage technologies will be developed to marketability on a bigger scale in the near future. 	<p>submission no. 45 above. Wind speeds above 7.5 metres per second at 75 metres above ground level are considered to be viable for wind farm development.</p> <ul style="list-style-type: none"> • It is not accepted that the Strategy reduces wind energy to a minimum. In fact, the targets will enable County Wexford to generate the equivalent of 70% of its electricity needs from wind energy by 2019³ and significantly exceed its proportional share of the national RES-E target. Section 1.2 of the Draft Wind Energy Strategy outlines government policy to develop Ireland's offshore renewable energy sources which offer export potential. This includes the development of offshore wind farms as well as wave and tidal energy. Section 1.8 of the Draft Wind Energy Strategy acknowledges that other renewable energy options, such as tidal energy, could potentially enable the County to become a net exporter of electricity. This is discussed further in Section 11.3 of the Draft County Development Plan, with particular emphasis on developing the tidal resource off Tuskar Rock and Carnsore Point.
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³ Based on SEAI's Energy Forecasts for Ireland to 2020: 2010 Report and utilising a capacity factor of 30%.

- The Maxbolely and Rathyark sites should be included in the wind zone to allow a wind farm where permission for a meteorological measuring mast was granted.

- It is noted that a meteorological measuring mast was granted permission in 2010 for a period of 2 years at Maxbolely (planning register 20100677). Prior to this a pre-planning meeting took place. The applicants were advised that the area is outside of the wind zone areas where wind farms are permitted but that the Wind Strategy would be reviewed as part of the County Development Plan in the following year and the applicants could make a submission to have the area included in any future Wind Strategy. Permission was also granted in 2011 for a mast at Rathyark for a period of 2 years (planning register 20110914). The granting of permission for these masts does not guarantee that permission will subsequently be granted for a wind farm, nor does it mean that these sites are suitable for wind farm development. The role of the Development Plan is to identify strategic areas where wind farm development would be acceptable in principle or open for consideration having regard to a number of criteria.

<ul style="list-style-type: none"> It is requested that the southern wind zone is reinstated and extended to include Maxbole. The submission includes an overview of the proposed Rathyark and Maxbole wind farm sites and a Winter Bird Survey (Draft Report) carried out by Natura Environmental Consultants for the Maxbole site. 	<ul style="list-style-type: none"> The south area of the County was ruled out for wind farm development for reasons outlined in the Manager's Response under Submission no. 45 above. The overview of the Maxbole and Rathyark sites outlined in the submission includes details in relation to location, layout and visual appraisal. It is not the role of the Development Plan to identify or approve individual sites for wind farm development but rather to identify strategic areas where such development would be acceptable in principle or open for consideration subject to compliance with development management standards. <p>It should be noted that neither the Maxbole nor Rathyark sites have a grid connection offer from EirGrid or the ESB.</p>
<p>Manager's Recommendation</p> <p>No amendment.</p>	

Submission No: 106 Department of Education and Skills	
Summary of Submission	Manager's Response
<ul style="list-style-type: none"> Includes an outline of information used to calculate educational infrastructural requirements and information in relation to site suitability for new schools. Identifies additional educational infrastructural requirements for the four towns and five District Towns based on the population allocation provided in Table 8 of the Draft County Development Plan. It may be prudent to reserve a site in Wexford Town for a primary school of up to 24 classrooms and a permanent site for Wexford Educate Together NS which is currently located in temporary accommodation. It may be prudent to reserve a site in New Ross Town for a primary school of up to 24 classrooms and a site for post-primary provision (c. 12 acres). 	<ul style="list-style-type: none"> The Council welcomes the Department's submission and the identification of future educational infrastructural requirements for the County. The Council will seek to reserve suitable school sites in the review of the Wexford Town and Environs Development Plan, which is due to commence by March 2013 In New Ross, permission has been granted for two primary schools each consisting of 18 classrooms and a special needs unit at Castlemoyle. Construction is expected to commence on these schools shortly. The New Ross Town and Environs Development Plan 2011-2017 identifies an additional site of approximately 5 ha. (12 acres) as a

<ul style="list-style-type: none"> • It may be prudent to refer to the ongoing school building projects taking place in the Gorey area in the Development Plan. 	<p>potential site for future educational facilities.</p> <ul style="list-style-type: none"> • In Gorey, the following schools have recently been constructed at Creagh Demesne: <ul style="list-style-type: none"> ○ An eight classroom primary school (Gaelscoil Mhoshiolog) ○ A 16 classroom primary school with a special needs unit (Gorey Educate Together) ○ A 16 classroom school with six specialist teaching rooms (temporarily used as a post-primary school) <p>The Gorey Local Area Plan 2010 includes adequate provision for educational needs during the lifetime of that Plan.</p> <p>No reference is made in the submission to reserving sites in Enniscorthy. However, it should be noted that a 16 classroom primary school (Gaelscoil) is currently under construction to replace temporary school accommodation at the Ross Road and an extension to the Vocational College has recently been completed. Permission has also been granted for an extension to St. Aidan's primary</p>
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<ul style="list-style-type: none"> • It is the intention of the Department to request the local authority, at the appropriate time, to take the lead in relation to the identification/acquisition of suitable schools sites. • Lands adjacent to existing schools should be protected where possible to allow for expansion of these schools. 	<p>school. The review of the Enniscorthy Town and Environs Development Plan is underway.</p> <ul style="list-style-type: none"> • The Council will be happy to take the lead in the identification/acquisition of suitable school sites if requested by the Department and subject to available resources. • The Council recognises the benefit of protecting lands adjacent to existing and planned schools to allow for future expansion. The Draft County Development Plan contains an objective in this regard (Objective CF14). This will also be considered during the review of the relevant Town Development Plans and Local Area Plans.
<p>Manager's Recommendation</p> <p>No amendment.</p>	

Submission No: 110 Kevin Redmond on behalf of St. Helen's Bay Golf and Leisure Resort Ltd.	
Summary of Submission	Manager's Response
<ul style="list-style-type: none"> The submission includes a suggested Development Strategy for the future development of the existing complex and facilities at St. Helen's Bay as a Destination Resort. It sets out a masterplan and envisaged uses within the overall resort area. A stronger policy statement should be included in respect of areas such as St. Helen's Bay which are already established but where there is potential for further limited sustainable development which is plan led and which will provide significant planning gain for the local area and wider County. It is submitted that the Plan should identify such areas and set out planning guidelines and policies for future development. There are a limited number of these areas in the County with the range of facilities and infrastructure and in single ownership suitable for development as Destination Resorts. 	<ul style="list-style-type: none"> The Development Strategy is noted, as is the contribution that St. Helen's Bay has made to the local economy. Comments noted and it is considered that objective TM27 can be strengthened to include reference to existing tourist related resorts- <i>see Manager's Recommendation section for proposed wording.</i> The tourism chapter promotes and facilities a wide range of tourism options. It is not considered appropriate for the County Development Plan to identify sites for the development of tourist related resorts. These applications can be assessed on their merits through the development management process. The relevant objectives in tandem

	with the development managements standards contained in the Plan will guide the sustainable development of tourism related development.
Manager's Recommendation Amend Objective TM27 on page 161 as follows: To consider the development <u>and the extension of existing</u> of tourist-related resorts and amenities <u>and the development of new resorts and amenities</u> outside of settlements where it is demonstrated that the development is dependent on an existing local resource or a unique site characteristic or where an overriding need is demonstrated, subject to compliance with normal planning and environmental criteria and the development management standards contained in Chapter 18.	

Submission No. 111 Michael and Orna D'arcy	
Summary of Submission	Manager's Response
<ul style="list-style-type: none"> This submission relates to the flood risk maps contained in Volume 7 Strategic Flood Risk Assessment. It refers to particular lands at Knockangall, Piercestown. <p>It is stated that these lands have not flooded in the time that the Darcys have lived in the area (50 years). The stream is fast flowing with 12ft high banks on either</p>	<ul style="list-style-type: none"> This set of indicative flood extent maps were prepared by the OPW as part of the National Preliminary Flood Risk Assessment (PFRA). It indicates that the area of concern is at risk of fluvial flooding from the river and is located in Flood Zone A. The Flood Risk Management Guidelines define Flood Zone A as areas where the probability of flooding from rivers is highest, that is, greater than 1% or "1

Manager's Recommendation

No amendment.

Submission No. 112 A, 112B, 112c, 112D and 112E

Richard and Madeline Kavanagh, Mary and Nicholas Kavanagh, Patricia Gabbett, Francis Kavanagh and Maureen Kavanagh

Summary of Submission	Manager's Response
<ul style="list-style-type: none">These 5 submissions relate to lands at Loughgunnen Little, Loughgunnen Great and Roseland (Mayglass) and the indication on the flood risk maps that these areas are at risk of pluvial flooding. <p>The submissions state that these areas have never flooded, even in this year's weather and there is no record in Wexford County Council of these areas flooding.</p> <p>Submission 112D refers to planning register no. 20072937 (erection of a dwelling house at Loughgunnen Little, Mayglass. It is stated that a Surveyor and</p>	<ul style="list-style-type: none">These flood maps, prepared by the OPW as part of the national Preliminary Flood Risk Assessment, indicate that the identified areas are at risk of pluvial flooding. This type of flooding is caused when rainfall cannot be absorbed by the ground or drainage system, most usually the result of high-intensity or prolonged periods of rainfall and is characterised by overland flow and ponding. <p>The Council has met with landowners in the area regarding water ponding on the roads in heavy rainfall. This evidence and local experience is consistent with the indicative OPW</p>

<p>Engineer did a survey of Loughgunnen Little and indicated that it would take a tsunami to flood the area. It is further stated that if any surface water is on the road after heavy rain, it is as a consequence of inadequate piping under gateways. This has been brought to the attention of Wexford County Council and remedial works have commenced.</p>	<p>flood extent map results.</p> <p>The Council is currently installing larger pipe work along some of the entrances in an effort to stop this ponding. However, an improvement to the situation will be dependent on local landowners keeping drains free of debris/vegetation to allow any sudden surge of surface water to flow freely away.</p> <p>As previously stated, the Planning Authority uses all available flood mapping and data to screen for flood risk. Where a risk of flooding is presented, this will trigger a detailed site-specific flood risk assessment (FRA) which will further investigate the level and degree of flood risk.</p>
<p>Manager's Recommendation</p> <p>No amendment.</p>	

Submission No. 120 GVA Planning on behalf of Tesco Ireland LTD

Summary of Submission	Manager's Response
<p>Retail Strategy:</p> <ul style="list-style-type: none"> There are concerns about the methodology and data used to calculate existing and future floor space requirements given that a significant weighting is attached to capacity assessments particularly by An Bord Pleanála. The submission is also concerned with the lack of catchment analysis for the individual towns and the data used to compile figures. 	<ul style="list-style-type: none"> The capacity assessment has been revised to provide indicative floor space requirements for convenience and comparison for the catchments of the four main towns of the County. Given the complexity of this revision, it was deemed appropriate to reproduce Section 6 of the Retail Strategy: Capacity Assessment in its entirety. The relevant changes are outlined in yellow. <p>As outlined in the Draft Retail Strategy, the Planning Authority will have regard to the findings of the capacity assessment in assessing planning applications. However, when considering any individual planning proposal in any town the applicant will be required to demonstrate in the Retail Impact Assessment (RIA) that the floor space is appropriate having regard to the quantum of floor space required in that town. The RIA shall take account of the particular catchment, extant permissions and their likelihood of being implemented</p>

	<p>and vacancies in the individual towns. The quantitative need for the quantum of floor space will not be the only deciding factor, the Council will also consider whether any given planning application will be better located sequentially than permitted developments or whether it would be required for qualitative reasons such as strengthening the County's retail profile.</p> <p>The data used to compile the figures, is the most up to date data available comprising of the following; the Annual Services Inquiry 2009, (September 2011); County Incomes and Regional GDP 2009, (February 2012); Medium Term Fiscal Statement – (November 2011); and the ESRI Mid-Term Review 2008 - 2015, (May 2008). The 2011 Census of population data was also used. The assessment, therefore, incorporates latest data which reflect/respond to the very changed economic conditions that prevailed at the beginning of 2012.</p>
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<ul style="list-style-type: none"> • The approach taken regarding vacant retail floor space in the capacity assessment is queried. It is noted that with regard to vacancy, vacant floor space has been deducted from the capacity assessment. The submission cautions against this approach which is not provided for in the retail assessment methodology outlined in the Retail Planning Guidelines, 2012 (RPGs). Indeed, the RPGs state that “vacancies can arise even in the strongest town centres, and this indicator must be used with care”. It is unclear why a proportion of vacant floor space has been deducted from the available capacity. Given that a significant proportion of the vacant convenience units will be of a small scale, they would not accommodate a large format food store. In this regard, the inclusion of vacant floor space artificially reduces capacity and undermines the delivery of retail investment where localised demand 	<p>2019 and 2022 respectively. During the life of the retail strategy the issue of the extant permissions can be revisited if it can be proven that 50% of permissions have not been implemented.</p> <ul style="list-style-type: none"> • The submission refers to vacancy rates and the Retail Planning Guidelines (RPGs). The reference used in the submission is taken from Annex 2 of the RPGs, the purpose of which is to outline ‘some information that may be of use in assessing the viability and vitality of City and Town Centres in preparing retail strategies, in planning for the retail sector, and in assessing development applications’. In total, twelve vitality and viability health check indicators are used in Annex 2. Nowhere is it specified in Annex 2 that vacancy rates cannot be used in a capacity assessment (contrary to the connection the submission makes). Therefore, it is unclear the relevance of a retail assessment methodology has for a capacity assessment.
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<p>exists and it is requested that this be amended.'</p> <ul style="list-style-type: none"> • The submission also questions the approach using the entire County as one retail catchment. 	<p>The RPGs are not prescriptive on whether vacant floor space is to be taken into account. Though it is noted that section A3.3 of the RPGs state in relation to joint/multi-authority retail strategies that they should contain inter alia:-</p> <p>'An overall analysis of the retail sector in the relevant area, including the retail hierarchy, level of retail floor space, extant but undeveloped permissions, vacant premises, vitality of retail centres and related planning and other policy objectives relevant to the retail sector; (emphasis added).</p> <ul style="list-style-type: none"> • As stated in the response to Point 1, the capacity assessment has been revised to provide indicative floor space requirements for additional convenience and comparison for the catchments of the four main towns of the County.
<ul style="list-style-type: none"> • The opportunity sites identified in Section 7 have not been examined as to whether they can accommodate the 	<ul style="list-style-type: none"> • The opportunity sites identified can provide a wide range of retail formats, and the RPGs indicate that retailers

<p>operational needs of a large food store operator. It is indicated that the town of Enniscorthy has no available and suitably zoned sites to meet the requirements of a large food store. They recommend that an additional Neighbourhood Centre be designated in Enniscorthy.</p>	<p>should be flexible in appraising potential sites and buildings and should be prepared to make reasonable compromises and, if possible, adapt standard retail formats to accommodate retail schemes on sites which are well located in the context of the sequential approach to retail development. The sequential approach can be applied when retailers cannot find suitable and viable sites within the Town Centres.</p>
<ul style="list-style-type: none"> Stringently opposed to a special financial contribution for retail developments on the edge of centre or out of centre sites. It is considered wholly inappropriate that a development levy would be applied to retail operators with operational needs, which cannot always be accommodated in the Town Centre. 	<ul style="list-style-type: none"> This point is accepted and it is therefore recommended that Objective 10 in the Retail Strategy be deleted-see <i>Manager's Recommendation</i>
<ul style="list-style-type: none"> Concerns are expressed regarding the proposed parking standards: <ul style="list-style-type: none"> The standards are based on areas 'open to the public' rather than the accepted Gross Floor Area. There is no separate standard for food stores, and it is noted that the accepted standard is 1 space 	<ul style="list-style-type: none"> The Retail Planning Guidelines do not make recommendations on car parking standards and as such it is up to the individual local authorities to provide standards. Gross Floor Area and net retail floor space are both commonly used; indeed some of our neighbouring Councils use the net retail floor space.

per 14 sq.m.	The Draft Plan proposes 1 space per 20sq.m (open to the public) and this is considered appropriate. The standards provided for in the Plan are minimum standards and any provision above the minimum requirement will be assessed on their merits.
<ul style="list-style-type: none"> The objective under Section 18.22 of the Draft Plan be removed, which states that no signage/advertisement or supporting structure for signage/advertisement, including flag poles, should exceed a height of 5.2m above ground level. It is requested that applications be considered on a case by case basis 	<ul style="list-style-type: none"> The request is noted. However, it is considered important to restrict the height of signage in the interests of visual amenity.
<p><u>Manager's Recommendation</u></p> <p>See Appendix B of this report for the revisions to Section 6 of the Retail Strategy: Capacity Assessment</p> <p>Delete Objective 10 on page 148 Draft Retail Strategy:</p> <p>A special financial contribution will may be applied to retail developments on edge of centre or out of centre sites. This contribution will be used by the Council to carry out town centre improvements and/or to enhance access arrangements from the town centre to the subject site. Provisions in this regard will be set out in the respective Development Contribution Scheme</p>	

Submission No. 121 Eirgrid	
Summary of Submission	Manager's Response
<ul style="list-style-type: none"> The submission refers to Grid 25 - EirGrid's strategy for the development of the transmission infrastructure to support Ireland's renewable electricity target and provide a more sustainable electricity supply. It identifies that the 220kV network will need to be significantly increased between now and 2025 in order to meet anticipated increasing power flows on the network. The 110kV network also needs to be substantially upgraded. <p>EirGrid envisages that it will progress the following projects in County Wexford:</p> <ul style="list-style-type: none"> - Great Island Redevelopment – Construction of a new Gas Insulated Switchgear - The 'Grid Link' Project – Construction of a 400kV Alternating Current (AC) overhead circuit linking Knockraha in Cork and Dunstown in Kildare via Great Island in Wexford. The project is currently in the early stages of consultation with the public and stakeholders. 	<ul style="list-style-type: none"> The Council welcomes EirGrid's submission which outlines planned projects and infrastructure developments in County Wexford. The Council supports the implementation of Grid 25 and the reinforcement of the electricity transmission grid to facilitate the necessary increase in renewable electricity generation and to ensure a sustainable electricity supply. Wexford County Council commits to engage with Eirgrid in the examination, and where appropriate, the implementation of these projects.

<ul style="list-style-type: none"> Local Authorities and An Bord Pleanála have to have regard to the Government Policy Statement on Strategic Importance of Transmission and Other Energy Infrastructure published on 18th July 2012. This states that the Government endorses, supports and promotes the strategic programmes of the energy infrastructure provides, particularly Grid 25. EirGrid welcomes the inclusion of Objective EN03 to facilitate the provision of energy networks in principle. Also welcomes the inclusion of a policy statement in Section 11.2.1 which states that the Council will safeguard strategic route corridors. EirGrid will keep the Council informed of the progress of the Grid Link project and at such time when a preferred corridor is available, provide the relevant information to the Council in order to develop a strategic corridor. The Government Policy Statement on Strategic Importance of Transmission and Other Energy Infrastructure states that strategic infrastructure 	<ul style="list-style-type: none"> Noted Noted The reasoning put forward with respect to amending the wording of Section 11.2.1 is accepted, and should be amended as suggested- <i>see Manager's</i>
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<p>investment programmes should be delivered in the most cost efficient and timely way possible, on the basis of best available knowledge and informed engagement on the impacts and the costs of different engineering solutions. EirGrid's own project development process also requires it to consider available technical alternatives including undergrounding. EirGrid therefore suggests that the policy statement in Section 11.2.1 be amended as follows: <i>'Where proposed high voltage lines traverse existing or proposed residential areas they should be located underground where appropriate, in the interest of residential amenity.'</i></p>	<p><i>Recommendation section for proposed wording.</i></p>
<p>Manager's Recommendation</p> <p>Amend text in Section 11.2.1 page 239 as follows:</p> <p>Where proposed high voltage lines traverse existing or proposed residential areas they should be located underground <u>where appropriate</u>, in the interest of residential amenity.</p>	

Submission No: 122 Irish Wind Energy Association (IWEA)	
Summary of Submission	Manager's Response
<ul style="list-style-type: none"> Renewable energy is a vital part of Ireland's strategy to ensure a secure energy supply and combat climate change. Ireland's target is 40% of electricity to be from renewable energy sources (RES-E) by 2020. Another 3,250 MW of additional onshore wind capacity will need to be installed within the next eight years to meet the RES-E target. The IWEA states that the target of 300 MW in the Draft Wind Energy Strategy is overly conservative and will not maximise the potential from renewable energy sources. 	<ul style="list-style-type: none"> The Council recognises the contribution that wind energy makes to securing energy supply, combating climate change, meeting renewable energy targets and providing benefits to the local and national economy in the form of grid security and stability, job creation and lower energy prices. This is outlined in Section 1 of the Draft Wind Energy Strategy. Noted. This does not allow for offshore wind farms and other forms of renewable energy which are also expected to contribute to this target.⁴ The installed wind capacity in County Wexford is 122 MW which represents almost 6% of the total installed wind capacity in Ireland. This compares to less than 1% in the

⁴ The *NEEAP/NREAP scenario* in SEAI's Energy Forecasts for Ireland to 2020: 2010 Report predicts that 88.2% of the renewable energy target will be provided by wind.

It provides for an additional 99 MW of wind capacity in the County (after existing and permitted wind farms are accounted for). This would accommodate approximately 33 additional turbines which could easily be clustered in a singular wind farm in the west of the County.

adjoining counties of Waterford, Carlow and Kilkenny and 1.9% in County Wicklow. Permission has been granted for a further eight wind farms in County Wexford with an anticipated combined output of 79 MW. If constructed, this will bring the total output to 201 MW, allowing County Wexford to exceed its proportionate share of the national RES-E target (approximately 55%).

It is acknowledged that an additional 99 MW, if achieved, could result in approximately 33 turbines in the area identified as acceptable in principle or open for consideration and this could have potential negative impacts on the landscape. The preferred option is to consolidate wind energy development in a single area of the County. It is not considered appropriate to extend the 'Acceptable in Principle' and 'Open for Consideration' areas due to wind speed, housing density, landscape sensitivity and the potential for cumulative visual impacts. However, it is considered reasonable to reduce the target to 255 MW which will reduce the number of additional turbines from 33 to approximately 18. This will enable County Wexford to

<ul style="list-style-type: none"> • The IWEA requests that the Wind Energy Strategy Map be reconsidered, bearing in mind that the optimum siting of wind farm developments is in an area where there is a sufficient theoretical and technically viable wind resource. 	<p>generate the equivalent of 70% of its electricity needs from wind energy by 2019⁵ and significantly exceed its proportional share of the national RES-E target- see <i>Manager's Recommendation section for proposed wording.</i></p> <ul style="list-style-type: none"> • The IWEA's request to reconsider the Wind Energy Strategy Map having regard to the theoretical and technically viable wind resource is noted. However, there are a number of other considerations which must be taken into account to ensure that future wind energy developments do not negatively impact on the environment and/or human health. This includes the location and capacity of the transmission grid network, designated sites, residential settlements and housing density, existing and permitted wind farms, tourism and landscape considerations. The Wind Energy Strategy Map was prepared following careful consideration of each of these criteria.
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⁵ Based on SEAI's Energy Forecasts for Ireland to 2020: 2010 Report and utilising a capacity factor of 30%.

Manager's Recommendation

Amend third bullet point on page 2 of the Draft Wind Energy Strategy as follows:

Work towards a target of ~~300~~ **255** MW of wind energy, to enable County Wexford to make the initial steps toward a low carbon economy by 2020 and generate the equivalent of ~~over 80~~ **70**% of its electricity needs from wind energy;

Amend text on page 15 of the Draft Wind Energy Strategy as follows:

According to the Wind Atlas, County Wexford has significantly more wind availability (i.e. higher wind speeds over a larger geographical area) than the other four counties in the South East Region. Having regard to this resource, electricity demand forecasts and subject to the delivery of necessary transmission infrastructure, County Wexford has the potential to absorb additional wind energy developments and make a significant contribution to the de-carbonising of Ireland's energy supply. This Strategy ~~therefore,~~ works towards a target of ~~300~~ **255** MW of wind energy by 2019 which will enable County Wexford to generate the equivalent of ~~over 80~~ **70**% of its electricity needs from wind energy.

Amend text on page 32 of the Draft Wind Energy Strategy as follows:

Option 5: Alternative Targets and Alternative Timeframes

This scenario would assess different renewable energy targets and timeframes as a means of achieving the 2020 renewable energy target of 40% electricity production from renewable energy resources. The target of ~~300~~ **255** MW in this Wind Energy Strategy will enable County Wexford to generate the equivalent of ~~over 80~~ **70**% of its electricity needs from wind energy by 2019. The target of ~~80~~ **70**% has been chosen as the County has significantly more wind availability (i.e. higher wind speeds over a larger geographical area) than the other four counties in the South East Region. Having regard to this resource, electricity demand forecasts and subject to the delivery of necessary transmission infrastructure, County Wexford has the potential to absorb additional wind energy

developments and make a significant contribution to the national target of 40%.

Amend Objective WE02 on page 37 of the Draft Wind Energy Strategy as follows:

~~Maximise the potential from renewable energy resources and~~ aim to achieve a target of ~~300~~ **255** MW of wind energy, to enable County Wexford to make the initial steps toward a low carbon economy.

Amend text on pages 243-244 of Draft County Development Plan as follows:

11.3.1 Wind Energy

The Wind Energy Strategy for County Wexford 2013-2019 identifies areas for wind energy development having regard to a number of factors including wind speed, proximity to national grid and environmental constraints. The Strategy works towards a target of ~~300~~ **255** MW of wind energy by 2019 which will enable County Wexford to generate the equivalent of over ~~80~~ **70**% of its electricity needs from wind energy and make a significant contribution to the national target of 40% electricity consumption from renewable sources by 2020.

The target of ~~80~~ **70**% has been chosen as the County has significantly more wind availability (i.e. higher wind speeds over a larger geographical area) than the other four counties in the South-East Region. Having regard to this resource, electricity demand forecasts and subject to the delivery of necessary transmission infrastructure, County Wexford has the potential to absorb additional wind energy developments and make a significant contribution to the national target of 40%.

Submission No: 123 Cllr. Danny Forde

Summary of Submission	Manager's Response
<ul style="list-style-type: none">• Welcomes a comprehensive Draft County Development Plan and acknowledges the foresight in its preparation particularly in the areas of biodiversity and sustainability. The Plan should have regard to the SEAI document 'Guidelines for a Sustainable Energy Community'.	<ul style="list-style-type: none">• It is recommended that reference to the Guidelines for a Sustainable Energy Community be included in the Renewable Energy Section of the Plan to reinforce the Council's objectives to develop Sustainable Energy Zones at key locations around the County- <i>see Manager's Recommendation section for proposed wording.</i>
<p>Manager's Recommendation</p> <p>Include additional text in Section 11. 3 on page 242 as follows:</p> <p><u>The Guidelines for a Sustainable Energy Community (SEAI, 2011) provide local authorities and community leaders with information and a structure to help them to develop a Sustainable Energy Community (SEC). An SEC is a community in which everyone works together to develop a sustainable energy system. To do so, they aim as far as possible to be energy-efficient, to use renewable energy where feasible, and to develop decentralised energy supplies. It applies to all buildings including residential, public and commercial buildings. The SEC concentrates initial efforts in a defined geographic area called a Sustainable Energy Zone (SEZ) but the benefits can later be expanded into and replicated in the broader community and the region. All sectors of the community work towards the same goal: implement energy-efficient measures first and then use renewable energy sources.</u></p>	

Amend Objective EN08 on page 243 as follows:

To support the development of Sustainable Energy Zones initially at Johnstown Castle, Drinagh and Rosslare Europort with other zones to follow throughout the County in accordance with **Guidelines for a Sustainable Energy Community (SEAI, 2011) and** the Council's document Job Creation from the Generation and Utilisation of Energy from Renewable Energy Resources (Wexford County Council, 2010).

Submission No. 125 Joint Committee of Communities	
Summary of Submission	Manager's Response
<ul style="list-style-type: none">• The promotion of sustainable transport through Smarter Travel and the construction of motorways, which the Draft Plan refers to, are mutually exclusive objectives and the Council's position is ridiculous.• The Plan should mention the concerns outlined below regarding the construction of the Oylegate-Rosslare motorway:<ul style="list-style-type: none">- it would be a waste of public money;- it would not reduce reliance on car-based transport;- it would not encourage the use of bus services;- it would not promote services at Waterford Airport;	<ul style="list-style-type: none">• Noted. Refer to response under Submission No. 012.• The national road network is an integral part of the transport system, which alongside the development of public and private rail and bus infrastructure, will promote sustainable settlement patterns, improve County Wexford's accessibility, improve its economic competitiveness and the well being of its citizens.

<ul style="list-style-type: none"> - it would not enhance the economic well-being and competitiveness of the County and may in fact be detrimental. It should be noted that retailers in Wexford Town do not support the proposal; - it cannot be justified on the grounds of addressing a current or future congestion problem; - it would facilitate the removal of important tourists from the County; - it would not necessarily enable Rosslare Europort to retain and grow its business; and - it would be a vanity project <ul style="list-style-type: none"> • The Draft Plan makes inadequate reference to the issues faced by individuals and businesses situated on the preferred route of the Oylegate – Rosslare motorway. These people are now in planning limbo for potentially the rest of their lives. Transport Minister, Mr Varadkar, has advised that cases will be addressed on a one-to-one basis by planners and this is not happening. 	<ul style="list-style-type: none"> • Refer to response under Submission No. 012.
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<ul style="list-style-type: none"> • The Rosslare Harbour – Waterford railway line has been closed down and it's reopening is conjecture which has no place in the County Development Plan. • The promotion of cycling has an important place in the Plan and there should be clear commitment to upgrading the many roads in County Wexford which are dangerous and unsuitable for cyclists. It should be noted that cyclists do not use motorways. • There are no confirmed plans to develop the infrastructure at Rosslare Harbour. To do so would be very expensive. As such, the Development Plan should not refer to conjecture on this issue 	<ul style="list-style-type: none"> • Refer to response under Submission No. 013. • Objective T09 of the Draft Plan sets out the Council's objectives to encourage and promote cycling in the County, and the objective has reference to the promotion of, and requirement for, enhanced infrastructure such as cycle lanes. It is also noted that the proposed national road schemes in the County are intended to cater for transport demand between the main centres of population and employment, and to enhance inter-regional access and linkages with international gateways. The removal of this transport demand, including HGVs, from local roads and settlements will make walking and cycling safer and more attractive on such roads and settlements. • All Development Plans must seek to prepare the Council for a variety of future development scenarios. This may be viewed by some people as an exercise in conjecture, but it would be negligent of the Council not to seek to prepare
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	and plan for developments which are anticipated and/or aspired to. The Development Plan covers a period of up to 2019.
Manager's Recommendation No amendment.	

Submission No: 128 Wexford IFA	
Summary of Submission	Manager's Response
<ul style="list-style-type: none"> The contribution and importance of agriculture to national wealth and viability of rural areas is of significant importance and cannot be undermined. Wexford County Council should promote the quality and excellence of Wexford produce and Wexford Farmers' Markets. 	<ul style="list-style-type: none"> The Council recognises the important role agriculture plays in the economy of Wexford and, hence it was incorporated into the Economic Development Strategy in Chapter 6. The strategy and objectives support and promote the development of agriculture. 'Food' is now considered a 'Pillar of growth' for the Wexford economy and the Plan supports food production in the Economic Development Strategy. Section 8.3.13 refers to Casual Trading which includes farmers' markets and the Council recognise that they have an important impact on the ambiance of retail centres.

<ul style="list-style-type: none"> • It puts forward a number of views on a range of topics including; the continued derogation of agricultural development charges, the Council should encourage the re-establishment of local abattoirs and support the expansion in fish farming. • Farm family members should be given access to sustainable planning on the family farm. • Should not restrict the erection of wind turbines on non-intrusive and wind viable sites. 	<ul style="list-style-type: none"> • The Development Contribution Scheme is currently under review and this issue will be considered as part of that process. The Council through objective ED20 supports the fisheries and aquaculture. The Council through objective ED17 promotes the continued development of food production and food processing. • Applications for rural housing will be assessed in accordance with the Sustainable Rural Housing Strategy set out in Section 4.3 of the Plan. The strategy will consider individual housing for local rural people who are building permanent residences for their own use, who have a definable housing need and are building in their local rural. • The Draft Wind Energy Strategy sets out in detail the reasoning why wind farms developments will not be considered outside the areas 'open for consideration' The strategy proposed recommends clustering wind farms in a particular location to minimise visual impacts and maximise benefits from infrastructural investment.
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<ul style="list-style-type: none"> Due to Nitrates Directive, the Council should enter into Management Agreements with landowners if they wish to continue sourcing water supply from private land. 	<ul style="list-style-type: none"> Noted.
Manager's Recommendation No amendment.	

Submission No: 129 An Taisce	
Summary of Submission	Manager's Response
<ul style="list-style-type: none"> Welcomes many of the policy measures included in the Draft Plan which represents the gradual integration of many of the necessary policies which they have advocated for decades. In the interests of brevity, their comments have been confined to areas of concern or where An Taisce believes the Draft Plan can be strengthened. 	<ul style="list-style-type: none"> Noted
Climate Change <ul style="list-style-type: none"> Welcomes the recognition given in the Draft Plan to adaptation and mitigation of climate change, and notes that Wexford County Council is the only Planning 	<ul style="list-style-type: none"> See response under Submission No. 125.

<p>Authority in Ireland to have a dedicated chapter on this subject. The submission welcomes the recognition of the role that a holistic Green Infrastructure approach can play in delivering an adaptation strategy. However, it is submitted that there is a fundamental contradiction between mitigating greenhouse gases and planning for the development of motorways (Objective T15). It is recommended that a reappraisal of these projects in the light of current Government policy on Smarter Travel, oil dependency, cost to the Exchequer and greenhouse gas emissions should be undertaken before being included in the Draft Plan.</p>	
<p>Population dispersal</p> <ul style="list-style-type: none"> • A total population of 3,351 (1,874 units) is allocated to unzoned unserviced rural areas. It is submitted that this allocation will be detrimental to the achievement of other policy objectives of the Draft Plan such as Smarter Travel and compact settlement as, due to financing constraints 'one-off' housing development is likely to be the predominant form of new housing demand for the 	<ul style="list-style-type: none"> • This population allocation is the combined allocation to the Strong Villages, Smaller Villages and Rural Areas; many of which are serviced. The Settlement Strategy and Sustainable Rural Housing Strategy seek to achieve a balance between the need to promote sustainable rural development while accommodating rural generated housing in rural areas. The Sustainable Rural Housing

<p>foreseeable future.</p> <ul style="list-style-type: none"> • Must ensure that proactive measures are included in the Draft CDP to provide nucleation and protect rural areas from a proliferation of car-dependent dispersed urban-generated settlement. It is also important to note that Ireland's rural areas will be a critical resource within the new energy constrained era and the prudent protection and sustainable exploitation of natural resources for agriculture, forestry and renewable energy will be important. <p>Supports the development of the village/small town cluster which is considered to be the only sustainable form of rural housing development. The Planning Authority is referred to Limerick County Council's policy statement on promoting nucleated settlements and serviced-sites in villages, and encouraged to adopt a similar approach in the finalising of the Draft Plan. This</p>	<p>Strategy has been prepared in accordance with the 'Sustainable Rural Housing Guidelines for Planning Authorities' (DEHLG, 2005).</p> <ul style="list-style-type: none"> • The Draft Plan promotes nucleation and the protection of rural areas from a proliferation of car-dependent dispersed urban-generated settlement. The Settlement Strategy contains strong objectives to promote and facilitate the provision of serviced residential sites in Smaller Villages and Rural Settlements (Objectives SS25 and SS29 refer) and Objective SS28 encourages '....cluster developments in rural settlements where there is a basic nucleus of community facilities and services...'.
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<p>approach would promote the revitalisation of rural villages but will require the proactive and targeted use of integrated fiscal, CPO and planning powers rather than laissez faire policy presumptions currently included in the Draft Plan.</p> <ul style="list-style-type: none"> • The recommendations of recent report prepared by the Environmental Protection Agency-Sustainable Rural Development: Managing Housing in the Countryside 2010 should be incorporated directly into the Draft Plan. 	<ul style="list-style-type: none"> • The background to this report is the increasing difficulty being experienced by policy-makers and planning officials in addressing the issue of housing development in rural areas and its impact on the environment, landscape, rural communities and public finances. It sets out various recommendations to provide a suite of principles to inform policy-making, to explore alternative policy instruments and to identify areas of further research. <p>It is considered that the Settlement Strategy and the Sustainable Rural Housing Strategy (which has been prepared in accordance with the Sustainable Rural Housing: Guidelines for Planning Authorities (DEHLG, 2005) in the Draft Plan sufficiently addresses the issues raised.</p>
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<p>Oil Price Inflation</p> <ul style="list-style-type: none"> While implicit in many of the policy measures, there is limited specific recognition in the Draft Plan of energy price inflation, particularly oil price inflation. Recent projections suggest the near doubling of oil prices over the next decade. ‘Peak oil’ will have profound implications and the effects are already being felt by many Irish families, particularly due to the settlement patterns which have been allowed to develop. Ireland is also increasingly dependent on oil for transportation. The Draft Plan should make an explicit reference to the likely future trends in oil price inflation 	<ul style="list-style-type: none"> The comments are noted, and it is considered appropriate to include reference to peak oil and oil price inflation in the Chapter 11 Energy- <i>see Manager’s Recommendation section for proposed wording.</i>
<p>Local Area Plans Guidelines</p> <ul style="list-style-type: none"> The Planning Authority should review these guidelines which includes many prescient policy measures including the ‘Sustainability Tool Kit’. It submitted that the use of this kit should be mandatory in the assessment of all planning applications for development. 	<ul style="list-style-type: none"> The Draft Local Area Plan Guidelines were published after the preparation of the Draft Plan. Reference to these guidelines will be included in the Plan, and the Planning Authority will have regard to them in the preparation of future Local Area Plans-<i>see Manager’s Recommendation in Submission No. 067-Minister for the Environment, Community and Local Government)</i>

<p>Implementation</p> <ul style="list-style-type: none"> • The submission discusses how implementation is more important than ever, how it is necessary for sustainable development and proper land use planning and therefore should be the focus of the Draft CDP. It is submitted that the implementation measures included in the Draft Plan are weak. It is not possible to monitor the effectiveness of the policies and objectives in the Plan without the inclusion of quantifiable targets. The submission includes a sample schedule of Targets, Indicators and Monitoring measures and recommends that a similar schedule be included in the CDP. It is suggested that the monitoring measures in the SEA could easily be transferred to the Plan. The Draft Plan must include a detailed implementation and monitoring schedule. A designated implementation officer must be appointed to oversee the implementation to ensure joined up thinking between different sections. 	<ul style="list-style-type: none"> • The suggestions on monitoring are welcomed. Once the content of the Plan is finalised the Planning Authority will develop a programme of implementation which will include set targets, indicators and monitoring measures and will be used in conjunction with the monitoring measures in the SEA. This programme will then be used by the Monitoring Committee.
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<ul style="list-style-type: none"> • The submission recommends that the Draft Plan include a 'Sustainability Matrix', which would set out the range of sustainability criteria which should be intrinsic to all planning applications for development. This would distil the core sustainability, community and social infrastructure requirements of the CDP into a schedule of assessment criteria. It is also recommended that there be a requirement to submit a 'Sustainability Statement' with all planning applications. 	<ul style="list-style-type: none"> • The suggestions with regard to the Sustainability Matrix and Sustainability Statements are welcome. The Planning Authority will work towards implementing such measures in due course.
<p>Accountability</p> <ul style="list-style-type: none"> • The Manager and Elected Members are requested to have full regard to their legal obligations in the consideration of the Draft CDP. 	<ul style="list-style-type: none"> • The Manager and the Members are aware of their legal obligations when making the Development Plan.
<p>Manager's Recommendation</p> <p>Insert a new paragraph in Section 11.2 Energy page 238 as follows:</p> <p><u>The consumption of fossil fuels is now close to the rate of production, characterised in the expression "Peak Oil".</u></p> <p><u>Alongside rising oil prices, the Council recognises that the dependence on fossil fuels cannot continue as it is a diminishing resource. A solution to this problem is the development of a low carbon economy, which is based around the use of renewable energy resources such as wind, tidal, wind and energy crops, which can be harnessed to meet the energy needs of the County. The Council will strive to develop a low carbon economy in County Wexford.</u></p>	

Insert a new objective in Section 11.2 page 238 as follows:

To raise awareness of the need to reverse fossil fuel dependency, to mitigate the effects of peak oil and reduce carbon emissions, to mitigate the effects of climate change.

Submission No: 130 Cllr. Joe Ryan	
Summary of Submission	Manager's Response
<ul style="list-style-type: none"> The Plan should contain a policy to promote a direct bus service between Wexford, Enniscorthy and Carlow along the N80 as Wexford and Carlow are designated hubs and as there are educational links between the 2 counties. The wording of the Plan should be amended to refer to the Rosslare Europort – Limerick railway line as being unused and not closed. A small number of stock movements have used the line since passenger services were suspended. 	<ul style="list-style-type: none"> Objective T04 aims to support and facilitate proposals, including infrastructure developments, which enhance the quality, frequency and speed of existing train and bus public transport services in the County. It is considered appropriate to insert “and to/from the County” as well- <i>see Manager's Recommendation section for proposed wording.</i> It is considered appropriate to refer to the fact that the line is still being used- <i>see Manager's Recommendation section for proposed wording.</i>

<ul style="list-style-type: none"> • There is a forthcoming EU policy on rail freight which: <ul style="list-style-type: none"> - contains a target that 30% of freight travelling over 300km must go by rail; - allows for opening of access to operators other than Iarnród Éireann on Irish railways; <p>This will result in the need for the extension of sidings and cranes at Rosslare Europort which the Plan should allow for.</p> <p>All railway lands in the County, including station buildings, sidings, freight facilities, lands and car parks, should be zoned for transport. The intention should be secure into the future lands which are of benefit to local and national railway infrastructure especially in relation to freight.</p> • The Barrow Bridge at Great Island, Kilmokea, should be on the list of Protected Structures. It is the largest rail bridge in Ireland and is a fully operational swing bridge, one of renowned UK Railway Engineer Robert McAlpine's few Irish structures. 	<ul style="list-style-type: none"> • Objectives T07 and T10 and objectives ED24–ED26 outline the Council's support for the development of rail freight services and associated infrastructure at the County's ports. It is recommended that reference to New Ross Port be inserted in Objective 10, and that Objective T12 be deleted as it overlaps with Objective T10- <i>see Manager's Recommendation section for proposed wording</i>. • The Draft Plan included this bridge as a proposed protected structure: NIAH reference no is 15703910.
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Manager's Recommendation

Amend text in Section 8.2 page 167 as follows:

The Council is disappointed that passenger services on the Rosslare **Europort** – Waterford railway line ceased in 2010 **(although a small number of freight services have continued)** and will continue to support and encourage the development of passenger and freight services on this line, which links a number of settlements in South Wexford. The Council will also encourage and facilitate the re-opening of the New Ross - Waterford railway line for passengers and freight.

Amend Objective T04 page 168 as follows:

To support and facilitate proposals, including infrastructure developments, which enhance the quality, frequency and speed of existing train and bus public transport services in **and to/from the County** and to support and facilitate the provision of new services, such as on the Rosslare Europort – Waterford and New Ross–Waterford railway lines.

Amend Objective T10 page 175 as follows:

To support and facilitate the development of enhanced transport infrastructure at Rosslare Europort **and New Ross Port** including the development of rail freight handling facilities, the development of facilities to handle more load-on load-off cargo, and the development of facilities to enable usage of **Rosslare Europort** by more container ships subject to compliance with normal planning and environmental criteria, the development management standards in Chapter 18 of the Plan, and any other relevant Plans and guidance documents.

Delete Objective T12 page 175:

~~To support and facilitate the development of enhanced transport infrastructure at Rosslare Europort and New Ross Port subject to compliance with normal planning and environmental criteria, the development management standards contained in Chapter 18 and~~

~~other relevant Plans and guidance documents.~~

Submission No: 132 John Browne T.D

Summary of Submission	Manager's Response
<ul style="list-style-type: none">• The submission includes a copy of Submission No. 104.• There seems to be an issue of concentration of wind farms in the North of the County. If the Development Plan goes ahead in its current format, then the whole South of the County will not benefit from wind farms into the future.	<ul style="list-style-type: none">• Noted.• The County as a whole will benefit from the renewable energy generated from wind farms. The reasons why this area has been ruled is detailed in Section 4.2 Wind Energy Strategy.
Manager's Recommendation No amendment.	

Submission No: 135 Alan Poole Wexford IFA

Summary of Submission	Manager's Response
<ul style="list-style-type: none">• The submission states that agriculture is worthy of greater mention, in particular mainstream farming activities warrants a mention rather than just having an emphasis on diversification. Ireland has the best carbon	<ul style="list-style-type: none">• The Council recognises the important role agriculture plays in the economy and it is a key part of the Economic Development Strategy. However, as per the submission a specific objective will be included in the Plan to

<p>footprint in the EU for milk, pork and poultry meat.</p> <ul style="list-style-type: none"> • The Oilgate to Rosslare Harbour roadway route corridor should be narrowed to remove landowners from a state of limbo. • Encourage and support the bio-energy sector. • The landscape of Wexford is a key tourist attraction. • With regard to community services it is important to highlight the isolation that some farmers live in. 	<p>encourage and support the continued development of mainstream agriculture; this objective will also support the concern in relation to the development of farm buildings- <i>see Manager's Recommendation section for proposed wording.</i></p> <ul style="list-style-type: none"> • Refer to response under Submissions 012 and 037. • As stated on page 130 the Council recognises that a range of opportunities exist in energy crop production for farmers and supporting objectives are included in the Plan. • Table 16: Key Tourist Attractions in County Wexford incorporates the landscape under the heading of 'natural attractions'. • Although not explicitly referred to, the issue of isolation is considered in Chapter 16 Social Inclusion and
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<ul style="list-style-type: none"> • To facilitate the requirements of farmers with regard to farm buildings. 	<p>Community Facilities.</p> <ul style="list-style-type: none"> • Noted. However, it is also important that efforts are made in the design and siting of agricultural buildings to ensure they blend into the landscape.
<p>Manager's Recommendation</p> <p>Insert the following new objective in Section 6.4.6 Agriculture page 134:</p> <p><u>To facilitate and support the development of sustainable agriculture practices and facilities within the County subject to complying with normal planning and environmental criteria and the development management standards in Chapter 18.</u></p>	

Submission No: 146 Eileen Bolger	
Summary of Submission	Manager's Response
<ul style="list-style-type: none"> Requests that 'Lacken Hill', New Ross, be included within the 'Landscapes of Greater Sensitivity', having regard to its historical and visual significance. 	<ul style="list-style-type: none"> The comments are noted and it is considered appropriate to include Lacken Hill within the 'Landscapes of Greater Sensitivity' -<i>see Manager's Recommendation section for proposed amendments.</i>
<p>Manager's Recommendation</p> <p>Insert reference in Section 1.3.1 on Page 6 of the Landscape Character Assessment to include <u>Lacken Hill</u> as a Landscape of Greater Sensitivity.</p> <p>Amend Map No. 11 'Landscape Units and Features' in the Landscape Character Assessment and Map No. 5 'Landscape Character Assessment' in the Wind Energy Strategy to include Lacken Hill as a Landscape of Greater Sensitivity.</p>	

Section 5: Summary of Submissions and observations relating to the Record of Protected Structures and the Manager's Response.

5.1

This section summarises the issues raised in the submissions and observations relating to the Record of Protected Structures and the Manager's response to, and recommendations on, the issues raised therein. The first column in the table provides details of the structure's reference number on the National Inventory of Architectural Heritage, or where relevant the structure's existing number on the Record of Protected Structures.

Submission No. 002 John Sutton		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15701926	<ul style="list-style-type: none"> The submissions requests the building not be placed on the RPS as the house is not habitable as it is in a very poor condition with severe foundation and damp problems. 	The structure has definite structural problems and is not in good condition. However, it is older than it first appears and has some very fine farm buildings complete with belfry. The owner could be assisted through protected structure status. It is recommended that this building be added to the record of protected structures.
Manager's Recommendation: Add to Record of Protected Structures.		

Submission No. 003 Barry Symes		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 1570118	<ul style="list-style-type: none"> The property was split some time ago and over the last number of years extensive modernisation of the property has taken place. While the work was carried out in a sympathetic manner it has perhaps negatively impacted on the architectural value of the property. The submission questions the value of its inclusion under any of the special interests categories noting the works undertaken. 	The structure has lost much of its heritage value. The form of the house and the walled garden remain. It is therefore recommended that this property is not added to the Record of Protected Structures.
Manager's Recommendation: Do not add to Record of Protected Structures.		

Submission No. 005 Anne Ryan		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15704315	<ul style="list-style-type: none"> The submission states Ms Ryan has never lived at the postal address to which the letter informing her of the RPS status. A copy of the minutes of the meeting of Wexford County Council on 25th May 2012 and the Ministerial recommendation is requested. 	<p>The minutes of the meeting were forwarded to Ms. Ryan. Further submission No. 105 was received.</p> <p>The house is of special interest with much historic fabric remaining. Dated as pre-1840. The property would be a good candidate for future grants. It is recommended that this building be added to the Record of Protected Structures.</p>
Manager's Recommendation: Add to Record of Protected Structures.		

Submission No. 006 Martin Murphy		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15704401	<ul style="list-style-type: none"> • Objects to the dwelling being placed on RPS as the property does not qualify for inclusion as a protected structure. • The submission states no consultation or permission was given for any photographs or details of the family home to be disclosed. • Concerned about any restrictions being placed with regard to the up-keep of the dwelling and outbuildings. • Requested that the dwelling not be included on the RPS. 	<p>There have been alterations carried out to the property which have had a negative impact on the character of the building. Whilst there are original elements of the dwelling remaining it is not recommended that the building is added to the record of protected structures.</p>
Manager's Recommendation: Do not add to Record of Protected Structures.		

Submission No. 007 Ramsgrange Trust c/o Ann Rice		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15617003	<ul style="list-style-type: none"> Acknowledges the letter from Wexford County Council and informs that Chairperson Fr. Michael Mernagh will be in contact shortly regarding same. 	The property forms part of a grouping of religious and community buildings in Ramsgrange Village. It is an imposing building of significant character adjoining the Catholic Church. The conversion of the building to other uses such as community use can still be easily accommodated if the building is protected. It is recommended that this building be added to the Record of Protected Structures.
Manager's Recommendation: Add to Record of Protected Structures.		

Submission No. 008 Simon Ryan		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15703522	<ul style="list-style-type: none"> Before a submission or observation is made regarding the inclusion of Newbawn House on the RPS, the owner wishes to be advised how Wexford County Council has a photograph of the house as the owner does not recall giving permission to anyone from Wexford Co. Co to enter on his property to take a photograph of the house. 	The house and outbuildings are of very high architectural special interest; with the house dated to pre-1840. The photograph used by the Council was taken from the NIAH web site Buildings of Ireland. The photograph was likely taken by agents employed by the Heritage Section of the Department of the Environment, now the Department of Arts, Heritage and the Gaeltacht. It is recommended that this building be added to the Record of Protected Structures.
Manager's Recommendation: Add to Record of Protected Structures		

Submission No. 009 John McCarty		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15703231	<ul style="list-style-type: none"> The property has been extensively renovated and no longer resembles the photo shown on the letter received from Wexford County Council and therefore asks to have the property removed from the RPS. 	The property has been recently modified in accordance with planning permission 20101332. Much of the original character has been altered internally and externally. It is recommended that the property should not be included in the list of protected structures.
Manager's Recommendation: Do not add to Record of Protected Structures		

Submission No. 010 Anne Doyle		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
WCC0943 NIAH 15704856	<ul style="list-style-type: none"> • Requests that the property be delisted. • The owner understands and supports the importance of maintaining craft and heritage. However, there are increasing challenges to living in a thatched property including the impacts of weather on a thatched roof, cost of continual maintenance of the thatch, risk of roof fires and high insurance rates. There are also issues in relation to vermin and birds. During a time of economic recession, the owners cannot afford the privilege of having a thatched roof and the effect it is having on their health. 	<p>This thatched cottage is currently a protected structure. The Senior Planner has visited the owners and discussed the problems that they are facing. The property is an important local land mark and adds to the character of the village of Broadway. It is recommended that the property remain on the record of protected structures but that consideration will be given to the owner's plans to carry out changes to the dwelling.</p>
Manager's Recommendation: Retain on the Record of Protected Structure.		

Submission No. 011 Dept of Transport, Tourism and Sport		
NIAH and/or RPS No.	Summary of Submission	Manager's response
NIAH 15619006	<ul style="list-style-type: none"> Acknowledges the letter from Wexford County Council and informs that the Irish Coast Guard buildings referred to are managed by the OPW. 	The comments are noted that the building is in the care of the OPW and it is recommended that this building be added to the Record of Protected Structures.
Manager's Recommendation: Add to Record of Protected Structure.		

Submission No. 014A Rev. Canon R Harmsworth		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15702511 15702512 15702531	<ul style="list-style-type: none"> The properties in question should be removed from the RPS as proper notice to the owners has not been given. 	A Notice has been served via a pinned up sign. The buildings (school, school master's house and church) are of special architectural and historic interest. It is recommended that this building be added to the Record of Protected Structures.
Manager's Recommendation: Add to Record of Protected Structures.		

Submission No. 014B: Rev. Canon R Harmsworth		
NIAH and/or RPS No.	Summary of Submission	Manager's response
NIAH 15702511	<ul style="list-style-type: none"> The rules and regulations of the Church of Ireland pertaining to churches and rectories means that there 	The buildings (school, school master's house and church) are of special architectural and historic interest. It is

15702512 15702531	<p>is no need to place these buildings on the RPS. Every 5 years the buildings are inspected by a qualified Conservation Architect, with follow up annual inspections by the Rural Deans to insure the recommended work has been carried out.</p> <ul style="list-style-type: none"> • Wexford County Council do not have the resources to help owners maintain all these buildings to the very stringent regulations that relate to a structure once it is listed. • It would be better to select a small number of churches, schools and dwellings that are of significant interest and maintain them rather than just adding old buildings to a growing list. 	recommended that this building be added to the Record of Protected Structures.
Manager's Recommendation: Add to Record of Protected Structure.		

Submission No. 015 Mary Cosgrove		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15704536	<ul style="list-style-type: none"> • Requests that this property should not be included on the list of protected structures. • There are several factual inaccuracies in the appraisal of the building including: <ul style="list-style-type: none"> • The property was not built on the site of the old farmhouse and it was most likely built in the 1930s rather than 1902; • The original farmhouse is the house facing the 'limewashed buildings'. It was renovated in the 1960s. • The timber sash windows have been replaced with PVC and the cast iron rainwater goods have been replaced with plastic. There were never any timber panel shutters on the windows. 	<p>The owner's corrections are accepted and welcomed. However, the house itself and the outbuildings, which are older than it, are of special architectural and historic interest. It is recommended that this building be added to the Record of Protected Structures.</p>

Manager's Recommendation: Add to Record of Protected Structures.

Submission No. 016 Julie Breen Solicitors on behalf of Nicholas Kehoe		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15701528	<p>Request the property be removed from the RPS.</p> <p>Notice has not been given under Section 59 (Notice to require works to be carried out in relation to endangerment of protected structures).</p> <ul style="list-style-type: none"> • The property if protected would involve unreasonable expense as referred to in Section 61 (appeals against notices). • Funding cannot be secured to carry out substantial repairs required or any future damage that may occur due to poor weather conditions. • The property may pose a health and safety risk unless the repairs are carried out and there may be structure damage to the property. 	<p>The Senior Planner has visited this property which was refused demolition under Planning Register No. 20100983. The owner was advised that the Planning Authority would seek that the building be retained. It is recommended that this building be added to the Record of Protected Structures.</p>

Manager's Recommendation: Add to Record of Protected Structures.

Submission No. 017 Patricia T. Mellon		
NIAH and/or RPS No.	Summary of submission	Manager's Response
NIAH 15704873	<ul style="list-style-type: none"> The property has been completely re-built, there is little left of the original fabric and the footprint is not on the same as the original building, and therefore including the property on the RPS would be inappropriate. 	The owner is correct, as there is very little of the original fabric remaining. It is therefore recommended that this property is not added to the Record of Protected Structures.
Manager's Recommendation: Do not add to Record of Protected Structures.		

Submission No. 018 Dr Arthur O'Reilly		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15616017	<ul style="list-style-type: none"> The appraisal implies that this building is one of a terrace of houses built between 1920 and 1925. This is not the case; this building formed part of a much larger building which was subsequently converted into three houses. Had the original building been preserved it might well have represented "an interesting component of the early 20th century architectural legacy of Arthurstown"; however the three houses which the original building was converted to could hardly not be so regarded. To now protect a portion of the radically altered building is misleading and only serves to highlight the failure to protect the original building. 	<p>The owner is correct that the structure was originally part of one larger building. However it is still of special interest and the three separate buildings form an important group and visual and architectural anchor in the village.</p> <p>If in the future an ACA is considered for the village the protection of this group could be reviewed. It is recommended that this building be added to the record of protected structures.</p>
Manager's Recommendation: Add to Record of Protected Structures.		

Submission No. 019 William and Phil Austin, Kilmallock House		
NIAH and/or RPS No.	Summary of Submission	Manager's response
NIAH 15703250	<ul style="list-style-type: none"> The property is of questionable architectural merit having a pastiche, part plain farmhouse with fake turrets, part quasiVictorian addition. It is currently vacant and in decline and there are no financial means to maintain the property to the required standards. 	<p>This property is detached four- or five-bay two-storey part double-pile farmhouse, begun 1714, originally four- or five-bay two-storey single-pile. "Improved", post-1841.</p> <p>This is a very fine Country House, currently vacant, with attendant outbuildings. It is recommended that this building be added to the Record of Protected Structures.</p>
Manager's Recommendation: Add to Record of Protected Structures.		

Submission No. 020 F.M. Godkin		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15601033	<ul style="list-style-type: none"> The submission requests clarification of how much of the building is to be protected. 	The Conversation Officer met with the owner and clarified how much of the building would be considered to be protected. A Section 57 Declaration was recommended should written clarification be required to confirm how much of the building is to be protected or to carry out works. It is recommended that this building be added to the Record of Protected Structures.
Manager's Recommendation: Add to Record of Protected Structures.		

Submission No. 021 Michael Sheridan Engineering & Design Ltd on behalf of Sinead & Rory McCarthy		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15703703	<ul style="list-style-type: none"> The submission contains a structural report which concludes the building should be classified as a dangerous structure. It is considered beyond repair and should be taken down. 	<p>The Senior Planner had previously visited this property prior to 2008 and found the dwelling in a state of decline. Under Planning Register no. 20081028, the applicant was requested not to demolish this property and permission was granted for a new dwelling on the adjoining lands. Whilst the retention of this property was sought in 2008 it has continued to decline to such an extent that much of the original fabric has been lost or cannot be retained. It is therefore recommended that this property is not added to the Record of Protected Structures.</p>
Manager's Recommendation: Do not add to Record of Protected Structures.		

Submission No. 022 Austin Cody		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15704819	<ul style="list-style-type: none"> Churchtown House should not be included on the RPS. The Churchtown House of today was created using the shell of the original house which had fallen into decay and was uninhabitable. The walls, some of the roof, first floor floors, the front door and 6 windows were saved. This is a modern 16 bedroom en suite guesthouse but with the facade of an 18th century farm house. The interior décor, antique and reproduction furniture complete the impressions of a older house but with modern conveniences. Floor plan of the house submitted showing the extent of the original house. 	<p>The Senior Planner has visited Mr. Cody on site and discussed the proposed protection of the property. Whilst the building has been altered and extended to the rear, including the conversion of outbuildings for Guest House use, much of the original character and setting remains. It is recommended that the rear yard and converted out building should not be included in the protection but that the main house and the landscape setting be included in the Record of Protected Structures.</p>
Manager's Recommendation: Add Main House to Record of Protected Structures.		

Submission No. 023 Les Rothwell		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15610005	<ul style="list-style-type: none"> • The property has no architectural values and was reconditioned in the 1980s to modern building standards including new roof, chimney, plaster on walls, windows, gutters, fascia and soffit. • The property has no historical or archaeological values as the building isn't old enough, nor does it have any artistic values as it is an ordinary modern dwelling. • It is noted that the building was listed for demolition by the Council to ease the bend on the R741 for traffic safety purposes but this didn't proceed due to cost. • There is no sense to listing this building. 	The house is of special architectural and historic interest and its individual importance is increased by its location in the village and its contribution to the streetscape of the village and its historic core. It is recommended that this building be added to the Record of Protected Structures.
Manager's Recommendation: Add to Record of Protected Structures.		

Submission No. 024A Thomas Kelly		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15700723	<ul style="list-style-type: none"> The property is in very poor repair and it doesn't seem possible for anyone to bring the house back to the standard of the photo. The owner certainly doesn't have the funds to repair it. The submission questions whether the inclusion of the property on the RPS will hamper future planning applications on the site? If this is the case, it is requested that the structure not be included. The submission also enquires about the financial cost of the up-keeping of the property. 	<p>The house and its attendant outbuildings, two of which are thatched under tin, form an important historic group in this seaside settlement; the house has been dated to pre-1840. They are of special architectural interest based on their vernacular character. They are not in such bad condition and their maintenance should be manageable. Discussion with the family should be held as to the best location of any for a new house on this site. It is recommended that this building be added to the Record of Protected Structures.</p>
Manager's Recommendation: Add to Record of Protected Structures.		

Submission No. 024B John Browne TD on behalf of Thomas Kelly		
NIAH and/or RPS No.	Summary of Submission	Manager's response
NIAH 15700723	<ul style="list-style-type: none"> Requests the property be removed from the RPS as the property is in very bad repair and is beyond restoring to its former status. 	See comment above (No. 024A). There is no requirement to restore this structure to any former status. The emphasis should be on maintenance and timely repair, and, with permission and if appropriate, development. It is recommended that this building be added to the Record of Protected Structures.
Manager's Recommendation: Add to Record of Protected Structures.		

Submission No. 025 Declan Lyons		
NIAH and/or RPS No.	Summary of Submission	Manager's response
NIAH 15616018	<ul style="list-style-type: none"> • The description/appraisal of the property is incorrect and the reason for listing the house is therefore incorrect. • The appraisal describes it as being part of a terrace of three houses. This is incorrect as it was originally a large merchant's house which was subsequently divided into three houses in the mid 1990s. Most of the frontage was the merchant's garage and store until it was renovated. • The submission states permission was not given to enter the property to carry out the appraisal. • It is suggested that the property be removed from the list and information on the website should be corrected. 	<p>The owner is correct that the structure was originally part of one larger building. However, it is still of special interest and the three separate buildings form an important group and visual and architectural anchor in the village.</p> <p>If in the future an ACA is considered for the village, the protection of this group could be reviewed. It is recommended that this building be added to the Record of Protected Structures.</p>

Manager's Recommendation: Add to Record of Protected Structures.

Submission No. 026 Sean Walsh		
NIAH and/or RPS No.	Summary of Submission	Manager's response
NIAH 15601032	<ul style="list-style-type: none"> Wishes that the property not be included on the RPS. It is also noted that the photograph then and now differs considerably. 	<p>The only difference between the NIAH photograph and the building now is that the windows have been replaced. The historic shopfront is intact. The structure is not contained within the ACA for the town but if the boundaries were extended in the future, the protection of this building could be reviewed. It is recommended that this building be added to the Record of Protected Structures.</p>
<p>Manager's Recommendation: Add to Record of Protected Structures.</p>		

Submission No. 027 Brian O'Neill		
NIAH and/or RPS No.	Summary of Submission	Manager's response
NIAH 15702915	<ul style="list-style-type: none"> • Objects to the inclusion of the property on the RPS as much of the property is no longer original. • The details on the 'Buildings of Ireland' website are entirely out-of-date and inaccurate and examples of this are set out in the submission. • Permission was not given to enter onto the property, carry out the survey or photograph the property. This is a gross invasion of privacy and a security risk. • How can a building be preserved based on an inaccurate survey and an out-of-date photograph which were obtained unlawfully. • A current photograph of the property was submitted, and requests that the photograph and true condition of the property as set out in the letter be included on the website. 	<p>The owner has provided a detailed breakdown of the works carried out to the property in the past. The works have had a significant impact on the character of the dwelling. It is therefore recommended that this property is not added to the record of protected structures.</p> <p>The Senior Planner has contacted the owner to explain that the property was surveyed by agents working on behalf of the DEHLG, who may not have notified the owner at the time of the survey.</p>

Manager's Recommendation: Do not add to the Record of Protected Structures

Submission No. 029 Margaret Pyne		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15704010	<ul style="list-style-type: none"> Objects to the property being included on the RPS. The house was built in the 1930s, it is of mass concrete construction and is not an example of later nineteenth-century domestic built heritage. 	The Senior Planner has visited the owners on 14-8-12 to discuss the implications of the protection. The owners stated that the property was constructed in the 1930s and not 1900. The house is very modest but its design is very interesting and not replicated in the area. It is recommended that this building be added to the Record of Protected Structures.
Manager's Recommendation: Add to Record of Protected Structures.		

Submission No. 030 Wexford Borough Council		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
WCC0790 WCC0113	<ul style="list-style-type: none"> The two properties referred to in a letter from Wexford Co. Co dated 7th June 2012 Atramon Castle and Drinagh Graveyard are not in the ownership of Wexford Borough Council. 	The properties are registered in the ownership of the Borough Council. The notice was served to remove these structures from the record as they are already protected as Monuments. It is recommended that the properties are removed from the Record of the Protected Structures given their existing protection as Recorded Monuments.
Manager's Recommendation: Remove from the Record of Protected Structures.		

Submission No. 031 Emer J. Anglim		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH: 15704866	<ul style="list-style-type: none"> Submission states they do not want the property to be included on the RPS list as the numerous alterations which have been made to the original house over the years are significant and the present house does not resemble the original house. 	<p>The owner is correct in that many alterations have been made to the building, many of which are sympathetic to its character including new timber sash windows. This does not detract from the fact that the house is still of special interest as there is a large amount of original and historic fabric remaining. There is generally no problem with adding ensuite bathrooms nor re-wiring nor adding heating to protected structures and their owners are not expected to live without these facilities. It is recommended that this building be added to the Record of Protected Structures.</p>
Manager's Recommendation: Add to Record of Protected Structures.		

Submission No. 032 William Meehan		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH: 15702939	<ul style="list-style-type: none"> Objects to the inclusion of the property on the RPS. The owner has always maintained this property to the highest of standards to a great cost. As a family they have made every effort to maintain the building in its original form and this has always been done on a tight budget. If the house is listed the associated insurance cost (a 200% rise in premium) will take away from the budget available for maintenance and repair. This is the short and long lead to a lower standard of maintenance and refurbishment. 	Insurance costs may not necessarily change, especially where a farm or business is also included on the insurance. The house is of architectural special interest. It is recommended that this building be added to the Record of Protected Structures.
Manager's Recommendation: Add to Record of Protected Structures.		

Submission No. 033 Eileen Cloney-Kehoe		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15704508	<ul style="list-style-type: none"> The property has been maintained as living quarters by the family since 1917. The owner has no particular desire to have the property listed on the grounds that it could hinder modifications to the building in the future. However, if it is to be, it is to be. 	The house/castle are of high heritage value, with architectural, archaeological and historic special interest, and dates back, at least in part, to 1560-80. It is recommended that this building be added to the Record of Protected Structures.
Manager's Recommendation: Add to Record of Protected Structures.		

Submission No. 034 Eilish Walsh		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15701923	<ul style="list-style-type: none"> As this property has been altered it is not suitable to be included on RPS. 	The Senior Planner has visited the owner on 13-7-12 to discuss the implications of the protection. On the site

	<ul style="list-style-type: none"> The submission requests that Conservation report requested by the Planning Department and completed by Martin Fitzgerald in relation to Planning Application Reference Number 20110668 be referred to. 	<p>visit Mrs. Walsh advised that the property had been altered and extended in the past, some of which had been regularised by a recent permission Planning Register No. 20110668. It is considered that the alterations carried out in the past have altered significantly the character of the original building. It is therefore recommended that this property is not added to the Record of Protected Structures.</p>
Manager's Recommendation: Do not add to Record of Protected Structures.		

Submission No. 035 Austin Redmond		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15704024	<ul style="list-style-type: none"> Following the death of the owner the property title is in the process of being legally transferred. Requests that the property be omitted from the RPS due to the 	<p>The house was a mill-owner's house built in 1859. It is of special architectural interest and is very well maintained. In addition it contributes significantly to the lovely grouping of buildings in the village of Foulkesmill. It is</p>

	sensitivity of this matter.	recommended that this building be added to the Record of Protected Structures.
Manager's Recommendation: Add to Record of Protected Structures.		

Submission No. 036 David Maher		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15704510	<ul style="list-style-type: none"> Requests that the property is not placed on the RPS as works have been carried out to the property. The roof is not the original slate roof, over 50% of the guttering is PVC, there are no timber panel shutters to the windows, the timberwork in the house is in need of repair and there is a modern extension to the side with PVC fascia and gutters. Given this and the poor state of the mass concrete structure the building should not be included on the list. 	The Senior Planner has visited the owner on 12-7-12 to discuss the implications of the protection. The owner allowed an internal inspection of the property which has been vacant for some time having recently been bought by Mr. Maher. The dwelling has been altered and extended a number of times and major works will again be required to bring into use as a dwelling house. Much of the original character of the dwelling has been lost with the dwelling suffering from decline as a result of the dwelling not being occupied. It is therefore recommended that this property is not added to the

		Record of Protected Structures.
Manager's Recommendation: Do not add to Record of Protected Structures.		

Submission No. 039 Elizabeth Caulfield		
NIAH and/or RPS No.	Summary of submission	Manager's Response
NIAH 15705214	<ul style="list-style-type: none"> Requests that the property not be listed as it is not suitable as a protected structure. The house was totally derelict when the owners purchased it. It had no doors, windows, floors, staircase nor fireplaces and half the roof had fallen it. Everything was replaced but sadly not in period as funds did not allow. The roof was replaced in 2006 and all the doors and windows are PVC. 	The owner is correct – much of the fabric has been replaced and its character lost. However it has a very unusual form, indicating great age, and has been dated to 1680-1720 by NIAH. It is recommended that this building be added to the Record of Protected Structures.
Manager's Recommendation: Add to Record of Protected Structures.		

Submission No. 040A John Redmond		
NIAH and/or RPS No.	Summary of submission	Manager's Response
NIAH 15704848	<ul style="list-style-type: none"> The owner passed away in June 2012 and the three beneficiaries who are all elderly are not in a physical or financial position to carry out any necessary remedial works to the property in order to protect or preserve it. 	Mr. Redmond is acting on behalf of the estate of his late aunt. The Senior Planner has visited the owner on the 27-7-12 to discuss the implications of the protection and was shown around the building by Mr. Redmond. The property is beginning to decline and there is damage to the roof of the main house. However the dwelling, its setting and its outbuildings has a significant contribution to the character of the area. The property is at an important juncture in its history and will benefit from being added to the register of protected structures. It is recommended that this building be added to the Record of Protected Structures.
Manager's Recommendation: Add to Record of Protected Structures.		

Submission No. 040B John Redmond		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15704848 PPS 438	<ul style="list-style-type: none"> Proposes that the property be deleted from the RPS as the building is not of special interest as detailed in the Draft County Development Plan Section 14.6.1. The house contains approximately 12,000 sq. ft and its redevelopment would be unsustainable from an energy and cost point of view. It is noted that the Council proposes to delete numbers WCC0501 & 0945 from the RPS. The reasons given could also be applied to Ballycronigan House 	See above response to Submission No. 040A.
Manager's Recommendation: Add to Record of Protected Structures.		

Submission No. 041 Eddie Cullen		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15704309	<ul style="list-style-type: none"> Requests the property not be included on the RPS as numerous alterations have been made to it over the years (i.e. replaced windows, roof, extension to the rear, etc). 	The Senior Planner has visited the owner on 27-7-12 to discuss the implications of the protection. The owner provided the opportunity to review the inside of the property. It was noted that much of the character of the dwelling had been altered over a period of time. It is therefore recommended that this property is not added to the Record of Protected Structures.
Manager's Recommendation: Do not add to Record of Protected Structures.		

Submission No. 042 Allen & Kenny Ltd		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15601073	<ul style="list-style-type: none"> • Appeal to have the premises excluded from the RPS as over the years works have been carried out to the property and it is felt the property is not of such historic nature to be included on the list. • The property was purchased in 1954 and a cattle mart was built to the rear of the property, which is now closed down. • An extension was built with an asbestos roof and the entire roof was placed in 2011. • Three chimneys have been removed and the windows, doors and gutters replaced. 	<p>The Senior Planner has visited the owner 17-7-12 to discuss the implications of the protection. The owner provided the opportunity to review the inside of the property. It was clear from the inspection that significant works had been carried out to the building in the past. These works have altered the original character of the building. It is therefore recommended that this property is not added to the Record of Protected Structures.</p>
Manager's Recommendation: Do not add to Record of Protected Structures.		

Submission No. 043 Richard Byrne		
NIAH and/or RPS No.	Summary of submission	Manager's Response
NIAH 15704726	<ul style="list-style-type: none"> • Hopes that the property will be removed from the RPS due to the present condition of the building. • Outlines a brief history and condition of the building • Cites financial difficulties associated with the upkeep/insurance of the building and that the property has experienced a number of break-ins. 	The owner has submitted a photographic record of the property as part of the submission. The property has experienced significant decline and would appear to no have structural issues. It is therefore recommended that this property is not added to the Record of Protected Structures.
Manager's Recommendation: Do not add to the Record of Protected Structures		

Submission No. 044 Pat and Olwen McGrath		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15702122	<ul style="list-style-type: none"> Requests that the property is not included on the RPS. 	In principle many glebe houses or rectories are protected because they exhibit a range of special interest values – architectural, historic, cultural etc. This house would be no different; in addition its contribution to the historic fabric of the village of Monamolin is significant. It is recommended that this building be added to the Record of Protected Structures.
Manager's Recommendation: Add to Record of Protected Structures.		

Submission No. 046 James Devereux		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15703318	<ul style="list-style-type: none"> • Not in favour of the property being included on the RPS. • The house would not have been purchased 8 years ago had it been a Protected Structure. • The house is not unique. • The building has been altered and needs a lot of work. • Intends to carry out as much work as possible to keep the house original. There are huge costs involved. 	<p>The Senior Planner has visited the owner on 19-7-12 to discuss the implications of the protection. The owner provided the opportunity to review the inside of the property. From this inspection it was clear that the property had been altered in the past and much of the character had been lost. Whilst the owner intends to restore many of these elements it is recommended that this property is not added to the Record of Protected Structures.</p>
Manager's Recommendation: Do not add to Record of Protected Structures.		

Submission No. 047 Bill Kelly		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15704806	<ul style="list-style-type: none"> Mr. Kelly is annoyed that a picture was taken of Rathdowne House which was included on the Council website and in the submission to him. He did not give permission for a photograph to be taken. Can appreciate why the property may be included on the RPS although many changes have been made to the property in the post Jacob era and by the current owners (i.e. front porch, side glasshouse/conservatory and side extension were replaced and dormer windows were included). 	<p>The Senior Planner has visited the owner on 5-7-12 to discuss the implications of the protection. The owner provided the opportunity to review the inside of the property. The photograph of the dwelling was taken from the NIAH web site, and at the owners request will not be used in any Council publications. The dwelling has been well maintained and extensions have been carried out in a sympathetic manner. It is recommended that this building be added to the Record of Protected Structures</p>
Manager's Recommendation: Add to Record of Protected Structures.		

Submission No. 048 Bill Kelly		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15704311	<ul style="list-style-type: none"> Submission states that the property would not merit inclusion on the RPS as it has been altered from the original design with the addition of a conservatory, kitchen room and three extra bedrooms all ensuite. 	<p>The Senior Planner visited the owner on 5-7-12 to discuss the implications of the protection. The owner provided the opportunity to review the inside of the property. From this inspection it was clear that improvements to the dwelling over a period of time have significantly changed the character of the building. It is therefore recommended that this property is not added to the Record of Protected Structures.</p>
Manager's Recommendation: Do not add to Record of Protected Structures.		

Submission No. 049A James P. Furlong		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15703755	<ul style="list-style-type: none"> • Pleased to learn that the family home is of historical interest. However, the record (appraisal) of the property is not accurate. • The submission outlines an extensive history for the site and surrounding lands. • The property is not worthy of inclusion on the RPS as there is no relevance within the categories of Architectural, Artistic, Historical or Social. 	<p>The owner's history of the house is most welcome and its changing occupancy increases the historic interest of the house.</p> <p>Its comparative architectural modesty is representative of the nineteenth-century domestic built heritage of rural County Wexford and for such reason it is considered to be of architectural special interest. It is recommended that this building be added to the Record of Protected Structures.</p>
Manager's Recommendation: Add to Record of Protected Structures.		

Submission No. 049B Doyles Solicitors on behalf of James Furlong		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15703755	<ul style="list-style-type: none"> Confirms that Mr Furlong is the Executor of the estate of Marian Furlong and that he has extracted a Grant of Probate and is in the process of administering the estate. 	See above response to Submission No. 024A.
Manager's Recommendation: Add to Record of Protected Structures.		

Submission No. 051: John Purcell, Phyllis Purcell, Philip Purcell, Sinead Joyce		
NIAH and/or RPS No.	Summary of submission	Manager's Response
NIAH 15700601 WCC0602	<ul style="list-style-type: none"> The lodges are part of local heritage and are built of stone and are in good condition. Records of the history of Sweeps Twin Lodge are 	NIAH 15700601 relates to Buckstown House The house has historic connections with the Swan, the Blaney, the Smith, the Hall, and the Rath families, and

	<p>available in London and they believe the history of the Sweeps dates back to a settlement by the River Slaney.</p> <ul style="list-style-type: none"> • They fail to understand why Sweeps Twin Lodges are picked for deletion. • There has already been too much of the heritage of our country destroyed. 	<p>the Doyle family including Patrick Doyle (b. 1858), 'Farmer' (NA 1911), and Séamus (James) Doyle (b. 1886?), a leader of the 1916 Rising in Enniscorthy and later member of the second and third Dála (sat 1921-3): meanwhile, the farmhouse remains of additional interest for the period of occupation 'as a barracks' in the aftermath of the 1798 Insurrection in County Wexford (Lewis 1837, 553).</p> <p>WCC0620 – Gates Pillars and Twin Lodges were not included in the Ministerial Recommendations. Having regard to the submission from the owners, it is proposed to retain these properties on the Record of Protected Structures.</p>
<p>Manager's Recommendation: a. Add to Record of Protected Structures NIAH 15700601 relates to Buckstown House</p> <p>b. Do not delete WCC0620 from the record of protected structures (Gates Pillars and Twin Lodges)</p>		

Submission No. 052 Nick Hughes		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15701213	<ul style="list-style-type: none"> • Objects to the listing of this property. • There is no architectural merit to the building which has been stripped of its interior original features, divided and has evolved over years rather than been planned. • The property represents a period in history which most people in the area would not wish to celebrate. • There is no artistic or cultural, scientific, social or technical association with the building. • Takes exception to the enforcing of a standard of repair and maintenance that may exceed levels of available finances. • Existing business plans for the property may not be able to proceed thereby causing serious loss and damage. 	<p>In principle many glebe houses or rectories are protected because they exhibit a range of special interest values – architectural, historic, cultural etc. Kiltennel Rectory has a lot of historic fabric remaining including some very nice rare historic glass in the sash windows and some historic joinery and plasterwork in the interior. That a building has evolved organically over the years can have as much heritage value as if it were all original or 'planned'.</p> <p>Usually a property can continue to develop if good design and good conservation advice is brought to bear. It is recommended that this building be added to the Record of Protected Structures.</p>

Manager's Recommendation: Add to Record of Protected Structures.

Submission No. 053A Rosemary Owens		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15701940	<ul style="list-style-type: none">• Submits that she is the executor of the Will of the late Dorothy Owens and the beneficiary of the Will.• The property is in probate at the moment and will be soon placed on the market for sale.• Objects to the proposal to place the structure onto the RPS.• The pottery chimney has not been maintained structurally over the years and is in a state of disrepair.• Repair works would place an unreasonable demand of any future purchaser.	<p>The Senior Planner visited the owner on 5-7-12 to discuss the implications of the protection.</p> <p>The house was altered in the past with much of the original character being lost as a result. It is therefore recommended that this property is not added to the Record of Protected Structures</p>

Manager's Recommendation: Do not add to Record of Protected Structures.

Submission No. 053B Rosemary Owens		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15701941	<ul style="list-style-type: none"> Submits that she is the executor of the Will of the late Dorothy Owens and the beneficiary of the Will. The property is in probate at the moment and will be soon placed on the market for sale. Objects to the proposal to place the structure onto the RPS. The Kiln has been substantially changed in recent years, and has been changed from coal-burning to oil fired altering the appearance of the kiln. 	<p>The Senior Planner visited the owner on 5-7-12 to discuss the implications of the protection.</p> <p>Whilst the Kiln has altered in the past the structure remains an important feature of the industrial development of Enniscorthy. It is recommended that this structure be added to the Record of Protected Structures</p>
Manager's Recommendation: Add to the Record of Protected Structures		

Submission No. 053C Rosemary Owens		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15701942	<ul style="list-style-type: none"> Submits that she is the executor of the Will of the late Dorothy Owens and the beneficiary of the Will. The property is in probate at the moment and will be soon placed on the market for sale. Objects to the proposal to place the property onto the RPS. Part of the building was demolished in the 1970s and various alterations have been made to the property over the past 20 years (i.e. replacement of windows, false dropped ceiling installed, dividing wall removed from the kitchen, replacement of chimney stacks and pots). 	<p>The Senior Planner visited the owner on 5-7-12 to discuss the implications of the protection.</p> <p>The stack is an important landmark and remains an important feature of the industrial landscape of the area. It is recommended that this structure be added to the Record of Protected Structures.</p>
Manager's Recommendation: Add to the Record of Protected Structures		

Submission No. 054 Patrick Asple		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15601023	<ul style="list-style-type: none"> • No objection to the principle of protection but it should only apply to the roof, facade and front walls. • The submission makes a number of points in relation to the appraisal of the property. • The house dates from c1902 not 1875. • The front window sills are concrete not granite. • No interior window shutters are present. • Significant alterations have been carried out since 1987 to the interior and exterior. • A parking ticket machine has been installed on the pavement to the front of the house, despite his objection, perhaps some influence could be brought to bear on the issues in the light of this proposal. 	<p>The corrections to the record by the owner are noted and welcomed. The house is not contained within the ACA for Gorey town. A Section 57 Declaration might help clarify the extent of the protection. The matter of the location of the parking meter will be investigated. It is recommended that this building be added to the Record of Protected Structures.</p>
Manager's Recommendation: Add to Record of Protected Structures.		

Submission No. 056 Rev. Steven Foster

NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15601066	<ul style="list-style-type: none"> • No objection to the addition of the property to the RPS. • Understands the protection is for the exterior and fabric of the main building. • Does not regard the interior pews or other Church furnishings as protected. • Would be reluctant to have the newer hall at the rear of the Church protected in the event of future expansion. 	<p>Generally items of furniture which are not 'fixtures or fittings' do not fall within the scope of the protection of a protected structure, whether or not they form part of the character of the structure. Owners are permitted to move their furniture with them. Occasionally fitted bookshelves may be considered to be protected if they contribute to the character of the structure and items such as pulpits may be actually fixed to the floor; many pews are not. We can go through each item with the owner and give him an opinion on them. Often newer extensions are not considered to be part of the protected structure if they are of no heritage value. It is recommended that this building be added to the Record of Protected Structures.</p>
Manager's Recommendation: Add to Record of Protected Structures.		

Submission No. 057 Barbara Cotter		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15704310	<ul style="list-style-type: none"> The house is unworthy of protection as a number of alterations have taken place over the last number of years (i.e. replacement of windows, removal of internal wall, addition of an extension and installation of a second bathroom). 	The owner is correct in that a number of changes have been carried out to the building that has had a negative impact on the original character. It is therefore recommended that the dwelling is not added to the Record of Protected Structures.
Manager's Recommendation: Do not add to the Record of Protected Structures.		

Submission No. 058: Irene Mitchell		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15601071	<ul style="list-style-type: none"> • Requests that the property be removed from the RPS. • The property is a retail unit and not a residential unit. • When the property was purchased in the 1980s, it was subdivided into 3 no. residential units and then into a doctors surgery and offices, before being used as a solicitors office between 2006 and 2009. In 2011 permission was granted for a retail unit (20110899). • The structure has had significant changes over the years • It is not of special interest from an architectural, historical, archaeological, artistic, cultural, scientific, social or technical point of view. • Due to alterations the streetscape does not merit protection. 	<p>As the owner states, the building is in use as a retail unit. However, the site visit revealed a lot of original and historic internal fabric surviving, including decorative plaster cornices and centrepieces and joinery such as door architraves, doors and the staircase.</p> <p>The building is not within the ACA for Gorey town. If the boundaries were to be extended in the future the protection of this building could be reviewed. It is recommended that this building be added to the Record of Protected Structures.</p>

Manager's Recommendation: Add to Record of Protected Structures.

Submission No. 059 Joseph Kehoe		
NIAH and/or RPS No.	Summary of submission	Manager's Response
NIAH 15701716	<ul style="list-style-type: none"> The house should not be included on the RPS as it has had alterations carried out to it and a lot of the old features have been lost due to dry rot and rising damp. The property is located within a commercial farm where future progression and development is key to the success of that business. 	<p>The owner stated in subsequent phone call of 30/7/12 he was happy to be included on the RPS if the conditions were not overbearing. A good candidate for a Section 57 Declaration to clarify what works could be carried out without planning permission.</p> <p>The house is an attractive historic house from c. 1850/60 with an intact form and some original features to façade. It is recommended that this building be added to the Record of Protected Structures.</p>
Manager's Recommendation: Add to Record of Protected Structures.		

Submission No. 060 Kay Bent, Diane Walsh & Rosalind Kirby		
NIAH and/or RPS No.	Summary of submission	Manager's Response
NIAH 15704313	<ul style="list-style-type: none"> • Outlines a detailed history of the property. • States that as result of remedial work, additions and alterations over the years the property does not conform with criteria as outlined in the notice served by Wexford Co. Co dated 6th June 2012. • Outlines a detailed history of the deterioration of the property. • Raises concerns about insurance costs, should the property be listed. 	The owners are correct in that a number of changes have been carried out to the building that has had a negative impact on the original character. It is therefore recommended that the dwelling is not added to the Record of Protected Structures.
Manager's Recommendation: Do not add to the Record of Protected Structures.		

Submission No. 061A Fr. David Murphy		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15704144	<ul style="list-style-type: none"> The letter from Wexford County Council was brought to the attention of the parishioners. It would be preferred if the Church remain as it is with no protection as the people of the locality feel they would no longer own the property which they currently maintain. 	<p>In principle, churches are repositories of social and cultural significance, often being the most important building in centuries of people's lives. This Church has been dated originally to 1838 from a time of huge historic significance for Catholics.</p> <p>The input of the current parishioners in caring for the Church is recognised. It is considered that protected structure status will help their work by making conservation advice available to them. A Section 57 Declaration would allow them to proceed with works of maintenance and repair. It is recommended that this building be added to the Record of Protected Structures.</p>
Manager's Recommendation: Add to Record of Protected Structures.		

Submission No. 061B Fr. David Murphy		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15703609	<ul style="list-style-type: none"> The letter from Wexford County Council was brought to the attention of the parishioners. It would be preferred if the Church remain as it is with no protection as the people of the locality feel they would no longer own the property which they currently maintain. Note the spelling should be CAROREIGH 	<p>In principle, churches are repositories of social and cultural significance, often being the most important building in centuries of people's lives. This Church has been dated originally to 1838 from a time of huge historic significance for Catholics.</p> <p>The input of the current parishioners in caring for the Church is recognised. It is considered that protected structure status will help their work by making conservation advice available to them. A Section 57 Declaration would allow them to proceed with works of maintenance and repair. It is recommended that this building be added to the Record of Protected Structures.</p>
Manager's Recommendation: Add to Record of Protected Structures.		

Submission No. 061B (i) Fr. David Murphy		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15703609	<ul style="list-style-type: none"> Fr. Murphy outlines concerns with regard to progress of maintenance work and financial costs that may have the opposite effect of protecting the building. The Church has always been kept in order by the people and they see no reason why it will not be kept the same in the future without outside interference. 	The input of the current parishioners in caring for the church is recognised. It is considered that protected structure status will help their work by making conservation advice available to them. A Section 57 Declaration would allow them to proceed with works of maintenance and repair. Local tradesmen can continue to carry out such works. It is recommended that this building be added to the Record of Protected Structures.
Manager's Recommendation: Add to Record of Protected Structures.		

Submission No. 061C Fr. David Murphy		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15703610	<ul style="list-style-type: none"> The school was built in 1858 and remained a school until 1949, and since 1949 has been used by many community groups. The school is in good repair and the people of the locality feel that if a protected structure order is placed on it they would no longer own the property which they currently maintain. 	<p>The school is located to the rear of the Church within the curtilage of the Church. It is considered of value in itself but the heritage value consists of the exterior only. Many works can be done to this building without the need for planning permission. A Section 57 Declaration would allow the people to proceed with these as well as with works of maintenance and repair. It is recommended that this building be added to the Record of Protected Structures.</p>
Manager's Recommendation: Add to Record of Protected Structures.		

Submission No. 061C (i) Fr. David Murphy		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15703610	<ul style="list-style-type: none"> Fr. Murphy outlines concerns with regard to progress of maintenance work and financial costs that may have the opposite effect of protecting the building. The Old School has always been kept in order by the people and they see no reason why it will not be kept the same in the future without outside interference. 	<p>The school is located to the rear of the Church within the curtilage of the Church. It is considered of value in itself but the heritage value consists of the exterior only. Many works can be done to this building without the need for planning permission. A Section 57 Declaration would allow the people to proceed with these as well as with works of maintenance and repair. No extra costs are envisaged here. It is recommended that this building be added to the Record of Protected Structures.</p>
Manager's Recommendation: Add to Record of Protected Structures.		

Submission No. 062A Tony Fortune & Philomena Fortune		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15703751	<ul style="list-style-type: none"> Mr. & Mrs. Fortune do not want the property to be placed on the RPS and believe their constitutional rights with regard to the home are now gone. No consents were given to take photographs of the property or to place these photographs on the World Wide Web and such information could have serious implications for potential break-in's and robbery for example. The value of their property will decrease if protected. The owners have carried out extensive refurbishment at their own expense. They were not consulted by either the NIAH or Wexford County Council and were not given the opportunity to voice their opinion. They cite insurance and financial reasons for not wishing the property to be listed. 	<p>The owners confirmed in a meeting with the Senior Planner that the property has been significantly altered. When the property was purchased by the current owners, it was in an advanced state of decline and major works had to be undertaken. These works significantly altered the character of the building. It is therefore recommended that this property is not added to the Record of Protected Structures.</p>

Manager's Recommendation: Do not add to Record of Protected Structures.

Submission No. 062B Tony Fortune & Philomena Fortune		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15703751	<ul style="list-style-type: none">Requests that all reports and data collected to date, which state or recommends why the property should be listed, be forwarded to them so that they can make a detailed submission.	The Senior Planner has discussed these issues with the owners-See Submission No. 062.
Manager's Recommendation: Do not add to Record of Protected Structures.		

Submission No. 068 William Rowe		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15701811	<ul style="list-style-type: none"> • Objects to the proposal to include his house on the RPS as the property is currently in need of repair which will place a major financial burden on him. • Substantial alterations have been made to the house since construction (i.e. extensions and modernisation, replacement of guttering and downpipes, windows and roof). 	<p>The Senior Planner visited the owner on 14-6-12 to discuss the implications of the protection. From the visit it was clear that a number of alterations had taken place to the property including replacement windows to the rear and a rear extension. There are some older windows to the front of the house but these are in need of replacement. Having regard to the changes which have impacted on the character of the building it is recommended that this property is not added to the Record of Protected Structures.</p>
Manager's Recommendation: Do not add to Record of Protected Structures.		

Submission No. 069 Pauline O'Grady		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15700724	<ul style="list-style-type: none"> Ahare House should not become a listed building as the property has been extended and altered from its original condition (e.g. outside walls were pebble dashed and doors replaced). 	This is a significant house dated to pre-1840. The alterations referred to do not obliterate its character. It is recommended that this building be added to the Record of Protected Structures.
Manager's Recommendation: Add to Record of Protected Structures.		

Submission No. 070 David Gallagher		
NIAH and/or RPS No.	Summary of submission	Manager's Response
NIAH 15704302	<ul style="list-style-type: none"> Objects to the inclusion of the property on the RPS as the building has no historical or architectural or other merit. 	The pump house is an important feature on the landscape of the south slob. The Planning Authority wish to support its retention, noting the previous use as

	<ul style="list-style-type: none"> • The building has fallen into disuse and disrepair and the windows will have to be replaced with modern glass over time. • Requests a copy of the assessment carried out and the qualification of those who carried out the assessment. 	residential accommodation. It is recommended that this building be added to the Record of Protected Structures.
Manager's Recommendation: Add to Record of Protected Structures		

Submission No. 071 Fr Gerald O'Leary		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15703412	<ul style="list-style-type: none"> • Requests the Church be deleted from the RPS citing financial reasons. 	NIAH states the Church was erected in the early nineteenth century as 'a neat chapel' (Lewis 1837, 715) succeeding an eighteenth-century thatched mass house (1743; lost pre-1840) at nearby Dunganstown, thereby continuing a comparatively long-standing ecclesiastical presence in the environs of Ballykelly.

		<p>The Church is an important feature of the surrounding rural landscape and should be retained. Buildings of this age do require care and maintenance. The Council can provide free advice to the owners of protected structures to ensure that proposed works would not damage the building or the character of the building. It is recommended that this building be added to the Record of Protected Structures.</p>
<p>Manager's Recommendation: Add to record of Protected Structures</p>		

Submission No. 072 Sr. Liz Murphy		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15704316	<ul style="list-style-type: none"> Objects to the building being placed on the RPS, citing the need to carry out works to create modernised living accommodation for the existing five sisters living at the property and current negotiations 	<p>House was originally a marine villa type from c. 1829, converted into a convent in 1911. Has already been upgraded and could continue to be adapted. It is recommended that this building be added to the Record of Protected Structures.</p>

	with the Parish of Rosslare regarding the future use of the property.	
Manager's Recommendation: Add to Record of Protected Structures		

Submission No. 073 John Murphy		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15701410	<ul style="list-style-type: none"> Requests that the property not be placed on the RPS and cites costs of maintenance as the reason 	This is a very attractive house with date-stone of 1886. Some nice ironwork around and extensive historic farm buildings. In general, maintenance should not cost more for this type of protected structure. It is recommended that this building be added to the Record of Protected Structures.
Manager's Recommendation: Add to Record of Protected Structures.		

Submission No. 075 Prof. A.R. Manning & Dr J.M. Manning		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15705302	<ul style="list-style-type: none"> • Strongly object to the home being listed citing restrictions placed upon them in relation to the ability to make changes or repairs. • The owners were not consulted regarding the listing of their property. • The owners refurbished the property over the last 20 years with little or no help from any outside agency. • The property has been continuously modified over the centuries. 	The dwelling has been altered and the character of the original dwelling has been changed. It is therefore recommended that the dwelling is not added to the Record of Protected Structures.
Manager's Recommendation Do not add to Record of Protected Structures		

Submission No. 076 Alan Deacon		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15700310	<ul style="list-style-type: none"> Requests that the property be deleted from the RPS citing financial and maintenance reasons. The owner has maintained the dwelling for the past 21 years at his own expense. 	The owner has sympathetically maintained the house which has been dated to 1763 and is a good example of 18 th -century architecture of the middle size with much intact fabric. It is recommended that this building be added to the Record of Protected Structures.
Manager's Recommendation: Add to Record of Protected Structures.		

Submission No. 077 Martin Sinnott on behalf of Trevor & Caroline Ashmore		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15701518	<ul style="list-style-type: none"> The owners do not wish for the property to be included on the RPS 	The Senior Planner visited the owner on 26-6-12 to discuss the implications of the protection. The property

	<ul style="list-style-type: none"> The submission details works that have been carried out to the property and point out a planning application for retention of the works was submitted on 16/7/12 	<p>has declined with structural problems to the southern elevation and roof. Works had commenced to the property and new windows have also been ordered to replace existing windows which are in poor condition. It is also noted that the property was altered in the past, with the works having been carried out for the owners grandfather (circa 1960-70s)</p> <p>I am satisfied that the works commenced on site prior to the serving of the notice and that development works have stopped on the property. Planning permission has now been granted to regularise the works. Having regard to the changes which have impacted on the character of the building it is recommended that this property is not added to the Record of Protected Structures</p>
<p>Manager's Recommendation: Do not add to Record of Protected Structures.</p>		

Submission No. 078 Philip Stamp		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15702023	<ul style="list-style-type: none"> • Requests to be furnished with the exact description of the particulars of the property it is intended to include on the RPS and full details of the reasons why the property is to be included. • Lists a number of alterations that have been carried out to the property (i.e. replacement of roof with asbestos slates, replacement of front door, construction of a porch and construction of an extension which is not in keeping with the Georgian tradition). • The NIAH appraisal makes reference to the fact the property was constructed to maximise the scenic views overlooking the Slaney. This is now irrelevant as the NRA and Wexford County Council have issued a CPO on a portion of lands immediately to the front west and south side of the property and the views will 	<p>It is recognised that the alterations listed by the owner are not of any heritage value. Their replacement in time would however attract comment and possible conditions if the structure became protected. Their overall impact on the character of the structure at the moment is minor. The house itself is very fine and intact, dating to pre-1840, while requiring some maintenance.</p> <p>It is of architectural special interest because of its form and features; it has also been accorded historic and social special interest by the NIAH because it represents a component of the early nineteenth-century domestic built heritage of the rural environs of Enniscorthy. I would also accord it technical special interest because of the slate-hung elevations. It is recommended that this building be added to the Record</p>

	<p>be diminished.</p> <ul style="list-style-type: none"> Financial reasons mean he is not in a position to undertake any remedial works and if protected will place a severe financial burden on him. 	of Protected Structures.
Manager's Recommendation: Add to Record of Protected Structures.		

Submission No. 080 Breda Redmond		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15702648	<ul style="list-style-type: none"> Does not want property to be included on the RPS and cites financial reasons and the need to carry out expensive works on the property. 	<p>The Senior Planner visited the owner on 9-8-12 to discuss the implications of the protection. During the visit it was noted that improvement works had been carried out to the cottage including new uPVC windows and door. Having regard to the changes which have impacted on the character of the building it is recommended that this property is not added to the Record of Protected Structures.</p>

Manager's Recommendation: Do not add to Record of Protected Structures.

Submission No. 081 Raphael Gahan & Stasia Gahan		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15701617	<ul style="list-style-type: none">Requests that the property not be included on the RPS as the original house is not intact and has been modernised completely since construction (e.g. windows have been replaced, back of house demolished and rebuilt, internal walls have been changed, doors replaced, house altered from four floors to three).	While the house is still of local heritage value the changes made have diminished the degree of architectural special interest it contains. In time more changes could restore this special interest. It is therefore recommended that this property is not added to the Record of Protected Structures.
Manager's Recommendation: Do not add to Record of Protected Structures.		

Submission No. 082 Thomas Justin Cadogan		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15703527	<ul style="list-style-type: none"> Strenuously objects to the inclusion of this structure on the RPS. The structure is adjacent to an existing operational farm and to include the property would severely hamper the ongoing operation and day to day activities of the farm. The structure is in poor condition and has been vacant since the early 1980's and the level of repair and upgrade would impose unreasonable financial burdens. 	<p>The house has been dated to 1686 and carries a date-stone of 1700. Its associations with a leader of the 1798 rebellion render it of special historic interest. Although the structure is not in good condition it is not expected to be rendered habitable but to be maintained to stop it deteriorating. It is recommended that this building be added to the Record of Protected Structures.</p>
Manager's Recommendation: Add to Record of Protected Structures.		

Submission No. 084 Aidan & Theresa Redmond		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15702003	<ul style="list-style-type: none"> Object to the inclusion of the building as parts of the building are not in original state and significant works need to be carried out which would be fine if the Department funds the work but they should decide how and who completes the work. The house does not have any great historical interest other than its age and massive amounts would have to be spent to bring it into habitual standard. Roof and chimney on pub were replaced last year and hall door and pub window were replaced with uPVC. 	<p>This is a very special building composed of house and pub. It has been included in a book on rural architecture by Shaffrey and Shaffrey of 1985. It is of architectural and historic special interest. The owners have been maintaining it well. It would be a good candidate for a grant in the future. It is recommended that this building be added to the Record of Protected Structures.</p>
Manager's Recommendation: Add to Record of Protected Structures.		

Submission No. 085 Stephen Eustace		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15704130	<ul style="list-style-type: none"> • Requests that the property not be included on the RPS as it has changed significantly with every generation with its appearance having no resemblance to the original. • The house was extended in the 1970s. • Alterations that have been carried out include replacement of thatch with corrugated roof, replacement of windows, addition of partitions upstairs and alterations to the entrance. Some mud walls have collapsed and need to be replaced with brick. 	While this structure is architecturally modest, it has been given a date of 1653 which the owner does not dispute; this would make it of historic special interest. It is recommended that this building be added to the Record of Protected Structures.
Manager's Recommendation: Add to Record of Protected Structures.		

Submission No. 086 Mary T. Kearney		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15704314	<ul style="list-style-type: none"> • Objects to the house being listed on the RPS. • The original house has been changed since 1932 up to 2006. This included converting a bedroom to a bathroom, the addition of a two storey extension, conversion of two bedrooms to one, relocation of back door, addition of new window openings, addition of a sunroom and replacement of roof slates. • The house is in need of repair and they cannot afford to carry out the works. 	The Senior Planner visited the owner on 18-8-12 to discuss the implications of the protection. Mary Kearney has lived at the property since 1919 the house having been built by her grandfather. The property has been altered in the past both externally and internally which has impacted on the character of the dwelling. It is recommended that this property is not added to the Record of Protected Structures.
Manager's Recommendation: Do not add to the Record of Protected Structures		

Submission No. 087: Mary Kinsella		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15700729	<ul style="list-style-type: none"> • Wishes to appeal the inclusion of the property on RPS. • The house has always been maintained in the old style. • There is no downstairs WC which is needed. • The only alternative is leave the house until it falls and a danger. • The Council have not preserved their old two up two down cottages. 	<p>The house is a good example of early twentieth-century architecture which follows the established idiom while updating it slightly. A downstairs WC could be added without planning permission.</p> <p>The comment on the labourers' cottages is welcome as the heritage value of these is becoming recognised. It is recommended that this building be added to the Record of Protected Structures.</p>
Manager's Recommendation: Add to Record of Protected Structures.		

Submission No. 088 Peter Perkins & Fionnuala Killalea		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15702607 15702611	<ul style="list-style-type: none"> • Object to the proposal to add the buildings to the RPS. • State that the description for 15702607 is incorrect as the building is not detached. • Have lived at the property since 1990. • There is no reference to the property being protected and the mill is and has not been listed before. • Objects to the listing on the grounds that it would be prejudicial to the rescue of the structure. • The matter is too complex to negotiate and would become a burden to them. • Highlight the onerous conditions attached to a listed building. • The proposal to add the building 15702607 to the RPS should be abandoned. 	<p>This is a very significant site that forms the wonderful setting of Kilcarbry Bridge. It consists of mills, warehouses and associated house and cottages as well as various water features. It is a fine survivor of our industrial history. The owner has been maintaining it well but protected structure status should only help in this regard.</p> <p>The comments in relation to correcting the Record are welcome. It is recommended that this building be added to the Record of Protected Structures.</p>

Manager's Recommendation: Add to Record of Protected Structures.

Submission No. 90A Iarnród Éireann		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15704048	<ul style="list-style-type: none">• Object to the listing of the structure• The structure is no longer in use and the listing imposes an unreasonable maintenance requirement on IÉ.• The listing interferes with IÉ's obligations to maintain the bridge by inhibiting prompt repair• The listing is likely to obstruct and prevent re-use of the bridge elsewhere on the railway system increasing the likelihood that it will not re-enter into public use again.• The bridge is not unique and is similar to footbridges found all over the network.	<p>The iron railway footbridge was installed 1906 in Wellingtonbridge railway station, and is an important survivor of our industrial/railway heritage.</p> <p>An advance Section 57 Declaration or a letter for urgent emergency works may facilitate prompt repair.</p> <p>Occasionally permission is granted for such a bridge to be re-located. It is recommended that this building be added to the Record of Protected Structures.</p>

	<ul style="list-style-type: none"> • The inclusion in this proposal of the ‘land lying within the curtilage of the structure’ may prevent other maintenance and improvement of the station. • Future proposals from utility operators for public infrastructure may be considered as being incompatible with the protected status of the footbridge and IÉ reserves the right to reject any such proposals and this may include Council proposals for road improvements and that may affect the structure. 	
Manager’s Recommendation: Add to the Record of Protected Structures.		

Submission No. 90B Iarnród Éireann		
NIAH and/or RPS No.	Summary of Submission	Manager’s Response
NIAH 15702906	<ul style="list-style-type: none"> • Object to the listing of the structure. • There are no scheduled services presently on this line and the listing imposes an unreasonable 	The iron railway viaduct over River Barrow, was opened 1887, and is an important survivor of our industrial/railway heritage.

	<p>maintenance requirement on IÉ.</p> <ul style="list-style-type: none"> • The listing interferes with IÉ's obligations to maintain the bridge by inhibiting prompt repair. • The listing may hinder the re-opening of this line in due course. • Future proposals from utility operators for public infrastructure may be considered as being incompatible with the protected status of the footbridge and IÉ reserves the right to reject any such proposals and this may include Council proposals for road improvements that may affect the structure. 	<p>An advance Section 57 Declaration or a letter for urgent emergency works may facilitate prompt repair. It is recommended that this building be added to the Record of Protected Structures.</p>
<p>Manager's Recommendation: Add to the Record of Protected Structures.</p>		

Submission No. 90C Iarnród Éireann		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15704625	<ul style="list-style-type: none"> • Object to the listing of the structure. • There are no scheduled services presently on this line and the listing imposes an unreasonable maintenance requirement on IÉ. • The listing interferes with IÉ's obligations to maintain the bridge by inhibiting prompt repair. • The listing may hinder the re-opening of this line in due course. • Future proposals from utility operators for public infrastructure may be considered as being incompatible with the protected status of the footbridge and IÉ reserves the right to reject any such proposals and this may include Council proposals for road improvements that may affect the structure. 	<p>The brick-clad concrete railway viaduct was opened 1906, and is an important survivor of our industrial/railway heritage.</p> <p>An advance Section 57 Declaration or a letter for urgent emergency works may facilitate prompt repair. It is recommended that this building be added to the Record of Protected Structures.</p>

Manager's Recommendation: Add to the Record of Protected Structures.

Submission No. 90D Iarnród Éireann		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15601092	<ul style="list-style-type: none">• Object to the listing of the structure• The structure is still in use and the listing imposes an unreasonable maintenance requirement on IÉ• The listing interferes with IÉ's obligations to maintain the bridge by inhibiting prompt repair• The bridge is not unique and is similar to footbridges found all over the network.• The inclusion in this proposal of the 'land lying within the curtilage of the structure' may prevent other maintenance and improvement of the station.• Future proposals from utility operators for public infrastructure may be considered as being	<p>The iron railway footbridge dated 1881, located in Gorey railway station. It is an attractive survivor of our industrial/railway heritage and part of an ensemble at Gorey railway station.</p> <p>An advance Section 57 Declaration or a letter for urgent emergency works may facilitate prompt repair. It is recommended that this building be added to the Record of Protected Structures.</p>

	incompatible with the protected status of the footbridge and IÉ reserves the right to reject any such proposals and this may include Council proposals for road improvements that may affect the structure.	
Manager's Recommendation: Add to the Record of Protected Structures.		

Submission No. 90E Iarnród Éireann		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15704015	<ul style="list-style-type: none"> Object to the listing of the structure. There are no scheduled services presently on this line and the listing imposes an unreasonable maintenance requirement on IÉ particularly where emergency repairs need to take place following a vehicle collision. The listing may hinder the re-opening of this line in due course. 	<p>The brick-clad concrete railway viaduct was opened 1906, and is an important survivor of our industrial/railway heritage and a very impressive structure. Site of an interesting historical episode from the wars of 1919-23.</p> <p>An advance Section 57 Declaration or a letter for urgent emergency works may facilitate prompt repair. It is recommended that this building be added to the Record of Protected Structures.</p>

	<ul style="list-style-type: none"> Future proposals from utility operators for public infrastructure may be considered as being incompatible with the protected status of the footbridge and IÉ reserves the right to reject any such proposals and this may include Council proposals for road improvements that may affect the structure. 	
Manager's Recommendation: Add to the Record of Protected Structures.		

Submission No. 90F Iarnród Éireann		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15703910	<ul style="list-style-type: none"> Object to the listing of the structure. There are no scheduled services presently on this line and the listing imposes an unreasonable maintenance requirement on IÉ particularly where emergency repairs need to take place following a vehicle collision. 	<p>The railway viaduct over River Barrow was opened 1906, and is an important survivor of our industrial/railway heritage and is an impressive structure.</p> <p>An advance Section 57 Declaration or a letter for urgent emergency works may facilitate prompt repair. It is</p>

	<ul style="list-style-type: none"> • The listing may hinder the re-opening of this line in due course. • Future proposals from utility operators for public infrastructure may be considered as being incompatible with the protected status of the footbridge and IÉ reserves the right to reject any such proposals and this may include Council proposals for road improvements that may affect the structure. 	recommended that this building be added to the Record of Protected Structures.
Manager's Recommendation: Add to the Record of Protected Structures.		

Submission No. 90G Iarnród Éireann		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15702905	<ul style="list-style-type: none"> • The structure was sold to a local landowner a number of years ago. • Suggest the landowner be informed of the notification. 	<p>The railway tunnel was opened in 1887, and is an important survivor of our industrial/railway heritage.</p> <p>However, it has changed ownership and the private owner was not served notice of the proposed protection.</p>

		Therefore. it cannot be recommended for addition at the moment.
Manager's Recommendation: Do not add to the Record of Protected Structures.		

Submission No. 90H Iarnród Éireann		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15601097	<ul style="list-style-type: none"> Iarnród Éireann do not own this building. Suggest the landowner be informed of the notification. 	Former Convent in Gorey, which has been redeveloped. The owner was not correctly served notice of the proposed protection. Therefore, it cannot be recommended for addition at the moment.
Manager's Recommendation: Do not add to the Record of Protected Structures.		

Submission No. 090I Iarnród Éireann		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15601105	<ul style="list-style-type: none"> Iarnród Éireann do not own this building. Suggest the landowner be informed of the notification. 	<p>The house dates from c. 1825. The owner was not correctly served notice of the proposed protection. Therefore, it cannot be recommended for addition at the moment.</p>
Manager's Recommendation: Do not add to the Record of Protected Structures.		

Submission No. 091 Patrick Nolan		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15701924	<ul style="list-style-type: none"> Objects to the inclusion of Marley House on the RPS as the proposed works that would need to be carried out to the house would place a financial burden on him. 	A very attractive house dated 1892 with lovely collection of ironwork and outbuildings. It is recommended that this building be added to the record of protected structures.
Manager's Recommendation: Add to Record of Protected Structures.		

Submission No. 094 Sile Mhic Réamoinn		
NIAH and/or RPS No.	Summary of submission	Manager's response
	<ul style="list-style-type: none"> Requests that a stone structure, setback from the road approximately two miles from the turn of the Gorey Road at Castlebridge, be protected. 	Submission relates to a small stone enclosure on the R741, previously used as a Council store. The structure is worthy of retention but it is not possible to add to the

		<p>Record of Protected Structures at this stage in the process.</p> <p>Outside of the Development Plan Review, an addition to the Record of Protected Structures can be made under Section 55 of the Planning and Development Acts (as amended) should the members chose to do so. It is recommended that this property is not added to the Record of Protected Structures at this time.</p>
Manager's Recommendation Do not add to the Record of Protected Structures		

Submission No. 096 Alan Clarke		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15701224	<ul style="list-style-type: none"> Objects to the property being included on the RPS and cites health and safety as the reason. The structure is in poor condition and at present is a 	The NIAH record correctly identifies the site as an important locus of nineteenth-twentieth-century industrial activity. The manufacture of ceramic products such as bricks, tiles and pipes was an important and

	<p>danger to the public.</p> <ul style="list-style-type: none"> • The cost of fixing the structure is prohibitive as the family has no means to pay for the maintenance and upkeep of it. 	<p>essential activity of the Industrial Revolution period. It is of great interest that this site near Courtown was selected for this activity – presumably because of the suitability of local clay as a raw material. Local people would have worked at the factory and developed specialist skills over generations. It is likely that the products of this factory were dispatched through the small port at Courtown. The site therefore has considerable historical and social interest for the people of North Wexford. The elegant chimney and the exemplary use of finely-made bricks in its construction as well as their use in the factory buildings are evidence of sophisticated technical and architectural skills.</p> <p>It is recommended that the chimney alone be added to the RPS but that a full record be made of the factory and site by an industrial historian.</p>
<p>Manager's Recommendation: Add chimney to Record of Protected Structures.</p>		

Submission No. 097 Janice O'Connor		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15705007	<ul style="list-style-type: none"> Request the structure not be placed on the RPS. When many departments get involved it makes it very difficult to restore and maintain a property of that nature costs effectively and efficiently. 	A Section 57 Declaration has been carried out for works to the roof and a letter permitting works to the windows has been issued. The new owner is proceeding with renovating the cottage to live in. As a component of our thatched built heritage it is important to protect examples that have a chance of being looked after. It is recommended that this building be added to the Record of Protected Structures.
Manager's Recommendation: Add to Record of Protected Structures.		

Submission No. 099 Theresa Somers		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15703316	<ul style="list-style-type: none"> • Objects to the proposed listing of house on the RPS on the grounds of financial burden including the costs of insurance, repairs and maintenance. • There is a sizeable plot of land within the curtilage and the protected status may eliminate the possibility of obtaining planning permission. • Alterations have been carried out to the house and the windows are not likely original. 	<p>The notice for this property was served on the adjoining dwelling. The Senior Planner had arranged a meeting with the owners of the adjoining dwelling when the error was identified. The owners were contacted on the same day. It is noted that there has been significant work carried out to the dwelling which has impacted on the character of the building. Having regard to the changes to the character, the error in the serving of the notice, it is recommended that this property is not added to the Record of Protected Structures.</p>
Manager's Recommendation: Do not add to Record of Protected Structures.		

Submission No. 101 Mary Spain		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15703309 15703310	<ul style="list-style-type: none"> Does not wish to be included in the RPS as the house & lodge have had extensions and windows changed. Would not have bought the house if it was protected. 	Despite some alterations the two structures retain a lot of their character and special interest. The lodge is a very unusual type having a 'Primitive' façade with what are called Doric columns 'in antis' and a Diocletian window over. It is recommended that this building be added to the Record of Protected Structures.
Manager's Recommendation: Add to Record of Protected Structures.		

Submission No. 102 Benjamin Chapman & John Chapman		
NIAH and/or RPS No.	Summary of submission	Manager's Response
NIAH 15701610	<ul style="list-style-type: none"> Request that the building not be placed on the RPS as the submission gives a commitment that their objective is to retain this property. 	The Senior Planner visited the owner on 19-7-12 to discuss the implications of the protection. The property has been extended and altered in the past which has had an impact on the character of the building. It is recommended that this property is not added to the Record of Protected Structures
Manager's Recommendation: Do not add to Record of Protected Structures.		

Submission No. 103 Mr & Mrs B.D.R Harrison		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15703764	<ul style="list-style-type: none"> • Submit they are the owners of the property since June 2001. • They do not believe the description of the property is correct as it is a five bay house dating from earlier than 1815. • They have no objection to the inclusion but consider they should have a reduction in future property tax as there is a lot of maintenance expenses in keeping the property in good repair. 	The correction of the Record is welcome. It is recommended that this building be added to the Record of Protected Structures.
Manager's Recommendation: Add to Record of Protected Structures.		

Submission No. 105: Fenton Associates on behalf of Anne Ryan		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15704315	<ul style="list-style-type: none"> • Outlines a brief description of the property and its condition. • State that the listing of the property will not help to maintain it in an orderly manner due to the intrusion of the regulations under Part IV of the Planning and Development Act. • The money and time required to deal with the administrative aspects of its protected status would exceed the cost of works needed to be carried out. • Express concern with the lack of rigour carried out to include the building in the NIAH which has led to the current proposal to list the dwelling. • In the UK there is a grade of listing but in Ireland all buildings identified as Protected Structures have the same status. Neither finance nor the expertise is available to the Local Authority to monitor and deal 	<p>Submission No. 5 relates to the same building.</p> <p>The house is of special interest with much historic fabric remaining. Dated as pre-1840 and would be good candidate for future grants.</p> <p>There should be no extra money involved in dealing with the administrative aspects of this building if it becomes a protected structure.</p> <p>The advantage of the Irish system is that there is greater flexibility within the one protection to deal with the individuality of each building; this flexibility can take account of its condition, the works which need doing, the works that have been done, the owners wishes etc.</p> <p>The NIAH had a specific brief and a series of guidelines and was underpinned by many years experience which led to bespoke legislation called the Architectural Heritage (National Inventory) and Historic Monuments</p>

	<p>with matters relating to all the buildings listed in the NIAH.</p> <ul style="list-style-type: none"> • Buildings have been lost to the state because of their designation as Protected Structures. The only way to endure this is to exclude buildings such as Rosslare Cottage from the RPS and allow the owner to maintain and protect the property in a manner consistent with the needs of the building. • An NIAH carried out with no specific brief or guidelines should not be used to seek Protected Structure listings of all buildings identified. • The Council members should be made aware that the listing of hundreds of buildings in a Development Plan will do nothing to maintain the architectural heritage of the County. 	<p>(Miscellaneous Provisions) Act, 1999.</p> <p>The Protected Structure designation is the main statutory mechanism to protect the architectural heritage of the country on an individual building level at the moment. It is recommended that this building be added to the Record of Protected Structures.</p>
<p>Manager's Recommendation: Add to Record of Protected Structures</p>		

Submission No. 107 Ed. Morrison		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15701536	<ul style="list-style-type: none"> • Requests that the building not be listed. • Over the years, improvements have been made to the house and many original features have changed. • Concerned that restrictions will be imposed if the house is listed as a Protected Structure. 	<p>The property is an attractive Country house which may date back as far as 1700. Although modified, the building has an important contribution to the architectural heritage of the Countryside close to Ferns. The property has been well maintained and its inclusion as a protected structure would not restrict the owner if he continues to carry out improvements has he has done so to date. It is recommended that this building be added to the Record of Protected Structures.</p>
Manager's Recommendation: Add to Record of Protected Structures		

Submission No. 108 Alison Hearne		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15704276	<ul style="list-style-type: none"> • Requests that the outbuildings be excluded from the RPS as they are in a state of significant disrepair. • Renovating those buildings in accordance with best practice from a Protected Structure point of view would be prohibitive both practically and financially 	The owner has stated that she agrees that the main dwelling should be included. It is recommended that this building be added to the Record of Protected Structures. There are various out buildings close to the house but these are not recommended for inclusion.
Manager's Recommendation: Add to Record of Protected Structures		

Submission No. 109 Mahon & Fox on behalf of Martin Kinsella		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15703507	<ul style="list-style-type: none"> The family have owned the property since 1955. Over the last few decades the house has been substantially modernised (e.g. addition of PVC porch to front and replacement of slates, outer plaster/render, rainwater goods, soffit board, windows, ceilings and floorboards and entrance gateway). The Protected Structure status extends to the exterior and interior of the structure and other structures within the curtilage together with their fixtures and fittings. This is impractical in a working farmstead situation where there are several modern, working farm buildings of no particular architectural, historical archaeological, artistic, cultural, scientific, social or technical interest. The property holds no special historical or social 	The property has been altered including new roof and windows. Having regard to the changes to the character, it is recommended that this property is not added to the Record of Protected Structures.

	<p>merit.</p> <ul style="list-style-type: none"> • They cite financial implications and the financial burden the listing would place on the owners/occupiers in relation to preparing planning application and the cap of grant aid. • They list a number of buildings which are comparable in scale, architectural form, age and/or general appearance, that are on the NIAH but are not put forward for listing on the RPS. 	
<p>Manager's Recommendation: Do not add to Record of Protected Structures.</p>		

Submission No. 113 David Skrine		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15700925	<ul style="list-style-type: none"> • Writes on behalf of his mother who is unwell and not in a position to sign up to doing anything in connection with her home being placed on the RPS. 	It is agreed to review this property at another time.

	<ul style="list-style-type: none"> Requests that the issue could be laced on hold until she is able to discuss. 	
Manager's Recommendation: Do not add to Record of Protected Structures		

Submission No. 114 Richard Eustace		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15704201	<ul style="list-style-type: none"> Strongly objects to the farm house being included on the RPS. While the house has been maintained and for well over 100 years the farm house does not merit being recorded as a Protected Structure as there are older and more historical buildings in the area which are not proposed to be on the list. There will be unfair and excessive costs placed upon the owners of listed homes. Concerned that the comprehensive list and photos of 	<p>The dwelling has been extended and altered in the past. This has had an impact on the character of the building. It is not recommended to add this building to the Record of Protected Structures.</p>

	<p>dwellings in the countryside would be a check list for thieves and burglars, as most of these homes are well kept and give a false presumption of wealth.</p> <ul style="list-style-type: none"> • The existing and proposed long and exhaustive list will lose significance with the inclusion of so many dwellings. • The property does not hold any great architectural, historical or social interest. 	
Manager's Recommendation: Do not add to the Record of Protected Structures.		

Submission No. 115 Michael Tierney on behalf of John Donohue		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15612023	<ul style="list-style-type: none"> • Submits a comprehensive assessment of the condition of the building. • The thatched roof part of the property collapsed and was removed in 2009. 	<p>As the thatched dwelling was demolished in 2009 there is limited architectural value to the remaining structure. It is recommended that this property is not added to the Record of Protected Structures.</p>

	<ul style="list-style-type: none"> • The remaining house is in poor condition, is vacant and is not a significant example of this form of building. • The original outbuildings have been substantially altered and modernised. 	
Manager's Recommendation: Do not add to Record of Protected Structures.		

Submission No. 116 Michael Tierney on behalf of John Prendergast		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15701726	<ul style="list-style-type: none"> • Submits a comprehensive assessment of the condition of the building. • Lists works carried out to the building (e.g. replacement of roof, rainwater goods, ground floors, windows and replastering of external walls). • Notes that the windows to front are all original with the exception of one, the timber doorcase and internal 	Detailed report outlines that there is a lot of original and historic fabric remaining and that the building is of architectural special interest. It is recommended that this building be added to the Record of Protected Structures.

	<p>window linings/shutters on the upper floor are intact and the wing to the rear predates the main part of the house.</p> <ul style="list-style-type: none"> Concludes that although the property is well maintained, improvement works using cement based products have resulted in a building lacking breathability and as a consequence the building is damp. 	
Manager's Recommendation: Add to Record of Protected Structures.		

Submission No. 117 Nancy Kehoe		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15701005	<ul style="list-style-type: none"> Does not wish the property to be included on the RPS as it is in very bad repair and has a bad iron-roofed extension. The house has been uninhabited for a number of 	<p>House does not appear to be in bad condition. Usually a sewerage system can be constructed. There are other houses nearby.</p>

	<p>years and measures to install a sewage system have failed due to the house being built on rock.</p> <ul style="list-style-type: none"> Without WC and bathroom facilities it is impossible to salvage the property and they are not in a financial position to renovate or put in new windows. 	<p>If it becomes protected there is no necessity to renovate it or to change the windows. The principle of maintenance should be followed instead. It is recommended that this building be added to the Record of Protected Structures.</p>
<p>Manager's Recommendation: Add to Record of Protected Structures.</p>		

Submission No. 118 Paul Keogh Architects on behalf of Bill Felton		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15703324	<ul style="list-style-type: none"> The house is not worthy of protection as it is of no special historical or architectural interest, and the fabric of the original building no longer existing as a result of restoration work carried out by the owner. Lists all the works that have been carried out (e.g. re-roofing, re-plastering, replacement of windows, floors, 	<p>Extensive alterations have taken place as the owner states and the building has lost much of its special interest. The only historic fabric that appears to remain are the walls. While it is still of local heritage value, it is not recommended for protection at this point in time.</p>

	staircase, ceilings, fireplace, joinery and outbuilding).	
Manager's Recommendation: Do not add to Record of Protected Structures.		

Submission No. 119: Ann Perry-Knox-Gore		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15704624	<ul style="list-style-type: none"> Does not agree with the proposed inclusion of Ambrosetown House on the RPS as the house has been significantly altered over the years along with a modern rear extension. In 1992 the house was almost destroyed by fire and further alterations were made (re-roofed and windows and door replaced). The house no longer retains its original character and appearance and does not merit inclusion. 	<p>A lot of alterations have taken place as the owner states and the building has lost much of its special interest.</p> <p>While it is still of local heritage value, it is not recommended for protection at this point in time.</p>

Manager's Recommendation: Do not add to Record of Protected Structures.

Submission No. 124: Joseph Joyce

NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15704822	<ul style="list-style-type: none"> • Requests that the structure is not added to the RPS. • The building is derelict and has not been inhabited for around 30 years. • The structure is not of any architectural, historical, archaeological, artistic, cultural, scientific, or social interest. 	<p>The property has historic connections with the Murphy family including John James Murphy (1822-1909), later of Presidente Uriburu, Argentina.</p> <p>Given the buildings connection to the Murphy family and this family's involvement in Argentinean history, it is recommended that this property is added to the Record of Protected Structures.</p>

Manager's Recommendation Add to Record of Protected Structures

Submission No. 126 Chris Harvey		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15703758	<ul style="list-style-type: none"> Objects to the listing of the property on the RPS as it does not represent any specific qualities as a whole due to its construction and reconstruction over the years. The listing will interfere with any future development of the building. 	<p>The owner correctly states that the structure has gone through many changes. However it has at its origins a house which was built as part of the development of the Kyle estate in the beginning of the nineteenth-century being a new 'cottage residence' and having its own lodge and outbuildings. It has historic and architectural special interest. It is recommended that this building be added to the Record of Protected Structures.</p>
Manager's Recommendation: Add to Record of Protected Structures.		

Submission No. 127 Richard Warren		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15701206	<ul style="list-style-type: none"> • Requests that the building not be placed on the RPS. • A complete redesign of the interiors and adjoining grounds was carried out in the mid 1970s. • Lists a number of alterations carried out to the property (removal of stone and brickwork, re-rendering of walls, re-roofing, replacement of doors and windows etc). • The adjoining farm, fencing and buildings have been demolished and replaced with new. • Having consulted with a Conservation Architect, he believes the building no longer has the authenticity of the original structure or layout referred to by Wexford County Council. 	The building has been significantly altered and is not recommended for inclusion as a Protected Structure.
Manager's Recommendation: Do not add to Record of Protected Structures		

Submission No. 130 Cllr. Joe Ryan		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15703910	<ul style="list-style-type: none"> The Barrow Bridge at Great Island, Kilmokea should be on the list of protected structures. It is the longest railbridge in Ireland and is a fully operational swingbridge, one of renowned UK railway engineer Robert McAlpine's few Irish structures. 	See submission 90F: Iarnród Éireann- this bridge has already been recommended for inclusion in the Record of Protected Structures in the Draft Plan.
Manager's Recommendation: Add to Record of Protected Structures		

Submission No. 131 Eamon Culleton		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15703227	<ul style="list-style-type: none"> Submits an extensive schedule of works carried out to the property (e.g. replacement of chimney stacks, windows, render, roof, flooring, stairway and fireplaces and addition of an extension/conservatory). 	<p>Despite the owner's statement there is a lot of original fabric remaining in this house which was reputedly built as a dowager house c. 1825, with elaborate plaster cornices and centrepieces and decorative joinery inside. Generally basement conversions and the addition of rear conservatories do not detract from the heritage value of a structure. It is recommended that this building be added to the Record of Protected Structures.</p>
Manager's Recommendation: Add to Record of Protected Structures.		

Submission No. 133 John J. Kelly		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15701124	<ul style="list-style-type: none"> Asks if the removal of a Preservation Order be considered on his property as the original property has been considerably altered since 1960's (e.g. addition of front porch, flat roofed alterations to side and rear). Understands the necessity to make renovations in keeping with the general character and ambience of the property and will always do his best to keep the character of the residence with good taste and workmanship. 	<p>Whilst a written submission was received beyond the closing date, the Senior Planner visited the owner on 9-8-12, within the submissions period, to discuss the implications of the protection and carried out an inspection of the property. A verbal submission was made at this meeting by the owner that the building should not be protected. The dwelling has been significantly altered with a flat roof two storey extension to the rear and a veranda/balcony extension to the front and side. It is recommended that this property is not added to the Record of Protected Structures.</p>
Manager's Recommendation: Do not add to Record of Protected Structures.		

Submission No. 134 Martin & Maria Colfer		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15703604	<ul style="list-style-type: none"> • Prefers that the structure not be listed as it is of much more recent construction than indicated in the description. • It is a very basic structure without running water or WC's. • Concerns about the financial/planning implications of being listed. 	<p>The house may be later than the NIAH record but exists on the OS map of 1911 and is associated with a forge which is located on the front site. The forge is mapped on the OS map of 1837-42. The house itself is intact with a lot of original fabric remaining and contributes a lot to the character of the village of Camaross.</p> <p>Running water and wcs may be installed. It is recommended that this building be added to the Record of Protected Structures.</p>
Manager's Recommendation: Add to Record of Protected Structures.		

Submission No. 136 Margaret Fitzpatrick		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15703418	<ul style="list-style-type: none"> Objects to the property being listed on RPS as it will affect insurance and impose restrictions on the maintenance of the house. Maintains the property according to its original period. 	There have been alterations to the property including new windows, porch and new roof. Having regard to these changes, it is not recommended that this dwelling is added to the Record of Protected Structures.
Manager's Recommendation Do not add to Record of Protected Structures		

Submission No. 137 Hannah O'Mahoney-Rath		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15704123	<ul style="list-style-type: none"> Does not wish to have the property listed. The house has had many alterations and additions over time (e.g. addition of annex and front porch, replacement of ceilings, rainwater goods, plaster on front wall and roof). It is not a true reflection of the original structure and does not merit listing. 	<p>Despite some alterations the house is very intact and has a lot of original fabric remaining. It has been dated to 1795. The owner has been visited by the Conservation Officer and given a lot of advice on the proposed renovation; this assistance will continue. It is recommended that this building be added to the Record of Protected Structures.</p>
Manager's Recommendation: Add to Record of Protected Structures.		

Submission No. 138 Joseph Edward Kelly		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15702019	<ul style="list-style-type: none"> Does not wish to have the property listed as it will place restrictions on him and could have repercussions in insuring the property. It is unjust and unfair for a committee to step in now when this property has been brought back from almost oblivion. In 1981 the lodge was almost a ruin and it was hugely expensive to save the building. Roof is in need of serious repair. 	The Senior Planner has visited the owner on 3-7-12 to discuss the implications of the protection. The property has been extended and altered in the past which has had an impact on the character of the building. It is recommended that this property is not added to the Record of Protected Structures.
Manager's Recommendation: Do not add to Record of Protected Structures.		

Submission No. 139 Brendan Palmer and Michelle Palmer		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15616003 15616004 15616005	<ul style="list-style-type: none"> • The structure is in need of significant maintenance and repair. • The property has experienced flooding due to old pipes. • A total refurbishment of terraced house is required. • Significant internal structural changes are required to make the house and business functional. 	<p>From the site inspection it was seen that the heritage value and special interest of this premises rested largely in the exterior shell, the yard, some outbuildings and boundary walls. The interior could accommodate all the refurbishment the owner stated they required without materially affecting the character of the building(s). A Section 57 Declaration might be able to accommodate all these works without having to apply for planning permission.</p> <p>However notwithstanding this these premises, along with the group of three buildings nearly opposite form an important group and a visual and architectural anchor in the village.</p>

		If in the future an ACA is considered for the village the protection of this entire group could be reviewed. It is recommended that this building be added to the Record of Protected Structures.
Manager's Recommendation: Add to Record of Protected Structures.		

Submission No. 140 John Browne T.D on behalf of Ned Ryan		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15704315	<ul style="list-style-type: none"> Mr Ryan feels that the property is of no special significance and the listing should be removed. 	See above response to Submission No. 05.
Manager's Recommendation: Add to Record of Protected Structures		

Submission No. 141 Senator Michael D'Arcy on behalf of Tony and Philomena Fortune		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15703751	<ul style="list-style-type: none"> Wishes to be informed as to why the property has been included on the RPS and asks if Wexford County Council will consider taking it off the list. 	See above response to Submission No. 062A & No. 062B.
Manager's Recommendation Do not add to Record of Protected Structures.		

Submission No. 142 Murt Joyce		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15703739	<ul style="list-style-type: none"> Objects to property being placed in RPS as he intends to renovate and live in it however the plans may not be any use if limitations were laced on the 	The property is vacant and in need of repair. There are extensions, built in the 1970-80's, which need attention and could be removed or replaced. The owner has

	house.	outlined some of the works which he hopes to carry out to the Senior Planner. These works are not likely to change the character of the building and could be covered under the declaration process. It is recommended that this building be added to the Record of Protected Structures.
Manager's Recommendation: Add to Record of Protected Structures.		

Submission No. 143 Senator Michael D'Arcy on behalf of Raphael and Statia Gahan		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15701617	<ul style="list-style-type: none"> They do not wish for their home to be on the RPS as the house has been modernised and structural alterations have been made (e.g. replacement of windows and fireplace, major reconstruction work at the rear of the house, removal of internal walls and reduction from four floors to three). 	See above response to Submission No. 081.

	<ul style="list-style-type: none"> The house at present does not resemble the original. 	
Manager's Recommendation: Do not add to Record of Protected Structures.		

Submission No. 144 Jim Donnelly		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15703335	<ul style="list-style-type: none"> It is his preference that the building is not added to the RPS Until recently the building had fallen into disrepair with none of the original features still intact bar the external walls and roof structure and therefore the only notable attribute is that the structure itself dates from the 19th century Lists the works carried out to the building including, roof coverings, linings to internal walls, new joinery throughout, replacement windows and doors. 	<p>The structure has been altered and updated and while it is still of local heritage value it has lost much of its special interest. It is not recommended for protection at this point in time.</p>

	<ul style="list-style-type: none"> • The building is not a generally agreed exemplar of its type, plan-form or style of the period. • It has no specific architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest. 	
Manager's Recommendation: Do not add to Record of Protected Structures.		

Submission No. 145 Richard and Susan Devane		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15703918	<ul style="list-style-type: none"> • Have outlined possible corrections and raised a number comments in relation to the NIAH appraisal of the property. 	<p>This submission relates to information on the property. The owners have invested significant amounts of resources to restore this building and have met with the Senior Planner prior to the written submission. There is no objection to the protection of the property. It is therefore recommended that this building be added to the record of protected structures.</p>

Manager's Recommendation: Add to Record of Protected Structures

Submission No. 147 James Kinsella Homeville		
NIAH and/or RPS No.	Summary of Submission	Manager's Response
NIAH 15601041	<ul style="list-style-type: none"> Does not want his property listed as a protected structure. 	<p>The Senior Planner had previously visited this property at the request of the owner. The setting of the building has been altered by the development of the adjoining site. The building has been altered in the past and much of the original features have been removed. It is recommended that this property is not added to the Record of Protected Structures.</p>
Manager's Recommendation: Do not add to Record of Protected Structures.		

Section 6: Other Recommended Changes

Following an internal review of the Plan it is proposed to make the following proposed amendments:

Chapter 4 Housing

Section 4.2.2 Housing Strategy

The Housing Strategy contained in Volume 6 identifies that 3,334 3,026 households will be in need of housing support over the period of the Plan.

Chapter 6 Economy, Employment and Enterprise

Section 6.4.5 Extractive Industry

It is recommended that there should be a reference and an objective relating to the issue of site security and health and safety. It also became evident that there is some overlap between objectives, that is, ED12, ED13 and ED15 which should be addressed-

Amend Section 6.4.5 on page 130 as follows:

Notwithstanding the recent downturn, extractive enterprises can make a significant contribution to the long-term economic well-being of County Wexford, through providing direct employment opportunities and as a local source of raw materials, particularly for the construction industry. The Council will therefore facilitate appropriately sited, designed and well managed extractive enterprises. At the same time, having regard to the potential significant harm which can affect environmental, agricultural, residential, tourist, recreational, landscape and heritage interests, the Council must also seek to prevent and take action against poorly sited, designed and inconsiderately managed extractive sites. **The Council will also seek to ensure that site security and health and safety is given high priority through the imposition and enforcement of conditions with regard to site security and**

warning signs. The Council will also report apparent dangerous situations or practices to the appropriate authorities.

Amend Objective ED09 page 131 as follows:

To prohibit quarrying ~~extractive industry development~~ which could significantly impact on the areas designated as being of European and National importance (such as SACs, cSACs, and SPAs, NHAs and pNHAs) where significant detrimental impacts cannot be satisfactorily mitigated, even if significant aggregate resources are identified in such areas by the GSI. A strict precautionary approach will be taken where designated sites will be affected.

Amend Objective ED10 on page 131 as follows:

Extractive industry sites can themselves create important new habitats, and further to the key objective of this Plan to protect and enhance the County's unique natural heritage and biodiversity, while promoting and developing its cultural, educational and eco-tourism potential in a sustainable manner, the Council will require that the operators of all proposed quarry extractive industry developments maximise the bio-diversity potential of their site by including proposals which promote bio-diversity throughout the working life and restoration of the quarry in their application.

Amend Objective ED12 on page 132 as follows:

~~To ensure facilities for the manufacture of concrete and tarmac, where applicable, are located within existing quarries, to take advantage of a convenient supply of materials, subject to such facilities being appropriately sited, on-going management and controls over the generation of emissions, the access and local roads network being acceptable for the traffic generated and compliance with normal planning and environmental criteria and the development management standards contained in Chapter 18.~~

To ensure facilities for the manufacture of concrete and tarmac, where applicable, are located within existing extractive industry sites, to take advantage of a convenient supply of materials, subject to:

- **such facilities being appropriately sited having regard to visual amenities;**

- such facilities being subject to on-going management and controls over the generation of emissions;
- the access and local roads network being acceptable for the traffic generated;
- compliance with normal planning and environmental criteria and the development management standards in Chapter 18.

Amend Objective ED13 on page 132 as follows:

To consider the use of worked out sites for the deposit and recycling of inert waste material, subject to complying with the necessary environmental and traffic safeguards, particularly when such proposals result in the creation and protection of habitats and subject to compliance with the development management standards contained in Chapter 18.

Delete Objective ED15 on page 133 as follows:

~~To facilitate the use of the worked out parts of extractive industry sites for other purposes such as concrete and tarmac manufacture and the deposit of inert waste material, provided that such activity can take place without generating adverse traffic and other adverse impacts (which cannot be adequately mitigated through sensitive siting and design and on-going compliance with planning conditions) and subject to compliance with normal planning and environmental criteria and the development standards contained in Chapter 18.~~

Insert the following new objective on page 133 as follows:

To seek to ensure that site security and health and safety is given high priority through the imposition and enforcement of conditions with regard to site security and warning signs. The Council will also report apparent dangerous situations or practices to the appropriate authorities.

Section 6.4.6 Agriculture

Insert the following text at the end of the last paragraph on page 133:

This is evident from the 2011 Census which shows that 8.5% of those at work in the County are involved in agriculture, forestry and fishing.

Section 6.4.11 Retail Development

Given that the retail catchments have now been allocated population, it is recommended that the wording of Objective ED33 be amended to reflect this.

Amend Objective ED33 on page 140 as follows:

To have regard to the findings of the capacity assessment contained in the County Retail Strategy in assessing planning applications. However, when considering any individual planning proposal in any town, the applicant will be required to demonstrate in the Retail Impact Assessment that the floor space is appropriate having regard to the quantum of floor space required in that town. The Retail Impact Assessment shall take account of the particular population of the catchment, extant permissions and their likelihood of being implemented and vacancies in the individual towns. Information with regard to extant permissions can be provided by the Council. The quantitative need for the quantum of floor space will not be the only deciding factor; the Council will also consider whether any given planning application will be better located sequentially than permitted developments or whether it would be required for qualitative reasons such as strengthening the County's retail profile.

Chapter 10 Environmental Management

Section 10.8 Historic Landfills

Amend the third sentence on page 232 as follows:

The Council has identified 44 12 such historic unlicensed landfills in the County.

Insert the following text at the end of page 232:

Historic landfills will be mapped and will be available for viewing on the Council's website.

Chapter 18 Development Management Standards

Amend the first paragraph of Section 18.7.1 Retail Developments page 429 as follows:

Proposals for retail development will be required to **favourably considered when they:**

- ~~be accessible by public and private transport;~~
- provide safe and easy access for motorists, pedestrians, cyclists and disabled persons **people with specific design needs;**
- **will not adversely affect the efficiency of the national road network and key junctions and interchanges and that it can be demonstrated that traffic volumes can be accommodated within the design assumptions for such roads;**
- ~~be~~ **are of a high design standard and satisfactorily integrate with the surrounding built environment;**
- do not negatively impact on the flow of vehicular traffic either in the immediate vicinity or the wider area of development;
- ~~be~~ are of a scale appropriate to its location.

Volume 4 Retail Strategy

Given that the retail catchments have now been allocated population, it is recommended that the wording of Objective 4 be amended to reflect this.

Amend Objective 4 on page 146 as follows:

The Planning Authority will have regard to the findings of the capacity assessment contained in the County Retail Strategy in assessing planning applications. However, when considering any individual planning proposal in any town, the applicant will be required to demonstrate in the Retail Impact Assessment that the floor space is appropriate having regard to the quantum of floor space required in that town. The Retail Impact Assessment shall take account of the particular **population of** the catchment, extant permissions and their likelihood of being implemented and

vacancies in the individual towns. Information with regard to extant permissions can be provided by the Council. The quantitative need for the quantum of floor space will not be the only deciding factor; the Council will also consider whether any given planning application will be better located sequentially than permitted developments or whether it would be required for qualitative reasons such as strengthening the County's retail profile.

Amend Objective 8 on page 147 as follows:

It is an objective of the Council that proposals for large scale retail development will be favourably considered where they:

- ~~are accessible by public and private transport;~~
- provide safe and easy access for motorists, pedestrians, cyclists and disabled persons people with specific design needs;
- will not adversely affect the efficiency of the national road network and key junctions and interchanges and that it can be demonstrated that traffic volumes can be accommodated within the design assumptions for such roads;
- ~~be~~ are of a high design standard and satisfactorily integrate with the surrounding built environment;
- do not negatively impact on the flow of vehicular traffic either in the immediate vicinity or the wider area of development;
- ~~be~~ are of a scale appropriate to its location.

Volume 5 Housing Strategy

It is recommended that the Housing Strategy be amended as follows to further emphasise the Councils' commitment that accessibility is integral to housing policy:

Insert the following text at the end of Section 2.2.6, page 21:

Future agreements with private landlords (or voluntary bodies) will have regard to the adaptability/accessibility of the accommodation to enable the Council to accommodate the elderly and persons with a disability in accordance with the Council's identified requirements.

Insert the following text at the end of second paragraph in Section 2.3 page 23:

Adaptability and accessibility of accommodation will also be important considerations in the design of new units.

Insert the following text as a footnote to Table 12 page 29:

Table 18 in Appendix 2 details the ‘open’ housing applications for persons whose reason for application was categorised as persons with disability, medical or compassionate reasons.

Insert the following text in the first paragraph in Section 3.1.2 page 30:

This is followed by people potentially requiring adaptable housing specific to their needs and possibly linked to a specific location in order to retain/obtain supports. These include persons in the categories for medical or compassionate reasons (6.6%), leaving institutions (2.7%) elderly (4.2%) and persons with disabilities (0.9%), overall as a grouping 14.4%.

Amend Objective HS19 page 51 as follows:

Pursue a range of options for housing provision including for adaptable and accessible housing, including direct new stock acquisition or build, leasing, RAS and the utilisation of RAS commitments.

Insert the following table in Appendix 2:

Table 18 ‘Open’ Housing Applications for persons whose reason for application was ‘Person with disability, Medical or Compassionate’.

<u>Council</u>	<u>Open applications</u>
<u>Wexford County Council</u>	<u>180</u>
<u>Wexford Borough Council</u>	<u>67</u>
<u>New Ross Town Council</u>	<u>6</u>
<u>Enniscorthy Town Council</u>	<u>To be inputted when available</u>

Insert the following statement at the bottom of page 27 for clarity:

However, as this figure is considered an underestimate due to the introduction of the Social Housing Assessment Regulations 2011, the former figure of 2,603 is used as a basis for calculation.

Amend the following figures and Table 17 on pages 46 and 47 as follows (due to typographical errors):

Paragraph two on page 46

First line: delete 2,916 insert **2,603**

Fourth line: delete 7,873 insert **7,028**

Eighth line: delete 8,502 insert **7,717**

Table 17 page 46

Table 17 Demand for Social Housing 2011-2019

	Units
Net Social Housing Need	3,334 , <u>3,026</u>
Less construction/purchase of social housing	5 p/a
Less provision of RAS Houses	140 p/a
Less Leases	20 p/a
Voluntary	5 p/a
Net Demand	2,314 , <u>2,006</u>

First paragraph on page 47

Second line: delete 2314 insert **2,006**

Fourth line: delete 35% insert **30%**.

Volume 7 Strategic Flood Risk Assessment

A number of mapping errors have been identified on both sets of flood maps:

- A small number of areas were omitted from the original maps sets, and
- The legend on the OPW maps identified Fluvial Flood Zone A as Flood Zone B and vice versa.

It is therefore recommended that the flood maps be amended as necessary and placed on public display.

Section 7 Conclusion

In accordance with Section 12 (5) of the Act, the Members shall consider the Draft Plan and the report of the Manager and this consideration shall be completed within 12 weeks of the submission of the Manager's Report to the Members. It should be noted that where the Planning Authority, after considering a submission of, or observation or recommendation from the Minister or the Regional Authority, decides not to comply with any recommendation made in the Draft Plan and report, it shall so inform the Minister or Regional Authority, as the case may be, as soon as practicable by notice in writing and the notice shall contain reasons for the decision. Following consideration of the Draft Plan and the Manager's Report, the Members may, by resolution accept or amend the Draft Plan. Where it is proposed to make material amendments to the Draft Plan, the proposed material amendments must be placed on public display for period of not less than four weeks, during which time submissions and observations may be made on the proposed amendments only.

7.1 Strategic Environmental Assessment and Appropriate Assessment

The Manager's recommendations as set out in this report have been assessed to determine whether they would have any significant impact on the environment and/or any Natura 2000 site. It was considered that the proposed amendments would not have any likely significant effects on the environment/Natura 2000 sites other than those identified in the Environmental Report and Appropriate Assessment which form part of the Draft Wexford County Development Plan 2013-2019. In the event that the proposed amendments are placed on public display, the public notice must state that the information on the likely significant effects on the environment/Natura 2000 sites of implementing the proposed amendments will also be available for inspection and that a submission or observation in relation to this information will also be taken into consideration before the making of the Plan.

Signed: _____

E. Breen



Appendix A

List of Prescribed Authorities,
Infrastructure Providers and Stakeholders
consulted

List of Prescribed Authorities

1.	Minister for the Environment, Community and Local Government
2.	Minister for Agriculture, Food and the Marine
3.	Minister for Arts, Heritage and the Gaeltacht
4.	Minister for Justice, Equality and Defence
5.	Minister for Education and Skills
6.	Minister for Communications, Energy and Natural Resources
7.	Minister for Transport, Tourism and Sport
8.	An Chomhairle Ealaíon
9.	Office of Public Works
10.	Dublin Airport Authority
11.	Eirgrid
12.	Environmental Protection Agency
13.	ESB Head Office
14.	Forfás
15.	Fáilte Ireland
16.	Health Service Executive
17.	The Heritage Council
18.	Health and Safety Authority
19.	Inland Fisheries
20.	National Roads Authority
21.	An Taisce-The National Trust for Ireland
22.	Carlow County Council
23.	Wicklow County Council
24.	Kilkenny County Council
25.	Waterford County Council
26.	Wexford County Development Board
27.	New Ross Town Council
28.	Gorey Town Council
29.	Enniscorthy Town Council
30.	Wexford Borough Council
31.	South- East Regional Authority
32.	Mid-East Regional Authority
33.	Mid-West Regional Authority
34.	South-West Regional Authority
35.	Midland Regional Authority

List of Infrastructure Providers

1.	Bord Gais Headquarters
2.	National Transport Authority
3.	Iarnrod Éireann
4.	Bus Éireann Head Office
5.	ESB Networks
6.	Vodafone
7.	o2
8.	Eircom
9.	Three
10.	Meteor Mobile Communications Ltd

List of Stakeholders

1.	Wexford Chamber of Commerce
2.	Enniscorthy Chamber of Commerce
3.	Gorey Chamber of Commerce
4.	New Ross Chamber of Commerce
5.	Sports Active Wexford
6.	Wexford Childcare Committee
7.	Karin Dubsky Coastwatch
8.	FÁS Head Office
9.	Offices of South-East Fishermans Co-operative Society
10.	IDA South-East Office
11.	Coillte
12.	Construction Industry Federation (CIF)
13.	Enterprise Ireland
14.	South East River Basin District Project Co-ordinator
15.	County Wexford Tourism
16.	GAA
17.	FAI
18.	Bord Iascaigh Mara
19.	IFA
20.	Teagasc
21.	Wexford County Enterprise Board
22.	Wexford Campus Carlow I.T
23.	Sustainable Energy Authority of Ireland
24.	Geological Survey Ireland
25.	Irish Rural Dwellers Association
26.	Tourism Ireland
27.	BIM
28.	Irish Maritime Development Officer
29.	ESB International
30.	Planning Strategic Policy Committee (SPC)
31.	Transportation Strategic Policy Committee (SPC)
32.	Economic and Social Development Strategic Policy Committee (SPC)
33.	Environment, Water and Emergency Strategic Policy Committee (SPC)

List of Stakeholders (continued)	
34.	Housing Strategic Policy Committee (SPC)
35.	South-Tipperary County Council
36.	Waterford City Council
37.	County Wexford Partnership LES
38.	John P Lynch (Rosslare Europort)



Appendix B

Proposed Amendments to Section 6: Capacity Assessment of the Draft Retail Strategy

Section 6 Capacity Assessment

6.0 Introduction

This section of the Retail Strategy has been carried out by RPS Planning & Environment who were commissioned by Wexford County Council to undertake the capacity assessment for the County Retail Strategy. The assessment is set out under the following sections; baseline information and methodology, broad capacity assessment and conclusion.

6.1 Baseline Information and Methodology

As part of the review of the 2005 Retail Strategy and 2007 review (herein referred to as previous Retail Strategy) and preparation of the 2013 Draft Retail Strategy, the following baseline information was examined:-

- Existing population and population growth trends as provided;
- Existing and emerging retail floorspace as provided; and
- Statistical sources used to inform the future retail capacity within the County.

6.1.1 Existing Population and Population Growth Trends

Since the previous Retail Strategy was prepared, more up-to-date statistics have become available. These include:

- Preliminary Results of the 2011 Census;
- National and Regional population targets.

The population growth allocations included within the Retail Strategy were prepared by the Planning Department. The County was divided up according to the retail catchments of Wexford Town, Enniscorthy, New Ross and Gorey. The catchments were based on the trends observed from both the household and shopper surveys and local knowledge on shopping patterns. The catchment analysis demonstrated that Wexford Town maintains its position as the hub and the primary retail centre in the County with 38% of the County population falling within its catchment. New

Ross, Enniscorthy and Gorey accounted for 17%, 23% and 22% respectively, confirming their position at level two in the County retail hierarchy.

The future allocation of population for the four towns and the District Towns within each of the four catchments were based on the population allocations within the core strategy for the period 2013-2022. The future population of areas outside those listed in the core strategy was assumed to grow equally at the growth rate for the remainder of the County for the period 2011-2019.

6.1.2 Existing and Emerging Retail Floorspace

In order to establish the quantum of existing and emerging floorspace with planning consent in the County, a review of existing retail applications was undertaken by the Planning Department. Floorspace data has been compiled through an extensive survey carried out by the Planning Department at the end of 2011/beginning of 2012.

All floorspace indicated in the capacity assessment is net retail floorspace unless otherwise stated.

6.1.3 Statistical Sources Used to Inform Existing and Future Retail Capacity within the County

The following statistical sources were used to provide a broad capacity assessment of the requirement for additional convenience and comparison retail floorspace:

- Annual Services Inquiry 2009, (September 2011);
- County Incomes and Regional GDP 2009, (February 2012);
- Medium Term Fiscal Statement, (November 2011); and
- ESRI Mid-Term Review 2008 - 2015, (May 2008).

These sources have been examined and inform the broad capacity assessment for retail floorspace. This capacity assessment provides an overview of the floorspace capacity in the County based on population and expenditure growth estimates, turnover ratio estimates, gross additional expenditure and future sources of retail sales.

The key inputs and outputs to the capacity assessment are a derivation of the following:

- Step 1: Population and Expenditure Estimates;
- Step 2: Turnover Estimates;
- Step 3: Turnover Ratios;
- Step 4: Gross Additional Expenditure Potential;
- Step 5: Future Sources of Retail Sales; and
- Step 6: Capacity Potential.

6.2 Broad Capacity Assessment

~~As set out in the current RPG a key matter which should be included in development plans is a broad assessment of the additional retail floorspace required over their lifetime.~~ This section of the Retail Strategy for the County will provide a broad floorspace capacity assessment which will assist the Council in making the necessary provision to facilitate new retail floorspace.

This assessment is based on the population at 2011 and population forecasts for 2013, 2019 (end of the Development Plan period), and 2022, (end of the SERPG horizon). This assessment takes account of updated retail floorspace information and retail planning consents which have not been delivered. The capacity assessment enables a quantification of the type and amount of additional retail floorspace that will be required in order to accommodate expenditure growth within the County **and for the four main towns of the County (Wexford, Enniscorthy, New Ross and Gorey).** This assessment illustrates the total potential amount spent by residents in the County on retail goods. However, how much of that spend is retained within the County is dictated by factors such as scale of the existing retail floorspace, quality of goods sold, nature of sales, turnover efficiency, distribution of the population, travel times, accessibility and location of similar competing developments or centres.

The purpose of the capacity assessment is to indicate the quantum of additional floorspace that can be absorbed by the projected additional expenditure available

within the County and for the four main towns of the County (Wexford, Enniscorthy, New Ross and Gorey).

Capacity assessments take into consideration existing retail floorspace, granted retail schemes which are due to be developed and increases in turnover efficiency. Steps necessary to undertake the assessment include determining the population and expenditure estimates of the County, turnover estimates of existing and new floorspace, gross additional expenditure and sources of future retail sales.

Table 51 shows the existing floorspace (excluding vacant) in Wexford County at the end of 2011. Convenience floorspace equates to 28.1% of the overall retail floorspace, comparison floorspace comprises 39.6% of the floorspace, while retail warehousing (bulky goods) make up 32.3% of the total. Detail is also provided for the four main town catchments.

Table 51 Existing Floorspace County Wexford

	Convenience Existing	Comparison Existing	Bulky Existing	Overall Existing
Wexford Town	13,945	33,160	18,348	65,453
Gorey	9,807	14,008	9,318	33,133
New Ross	9,669	5,012	14,586	29,267
Enniscorthy	8,010	9,920	3,909	21,839
Bunclody	1,373	1,905	0	3,278
Castlebridge	439	254	1,648	2,342
Courtown	328	0	0	328
Kilrane/Rosslare	1,445	144	520	2,108
Wellington Bridge	1,057	546	4,634	6,237
County Wexford Total 2011	46,073	64,949	52,963	163,985
Wexford Catchment	16,885	34,104	25,150	76,139
Enniscorthy Catchment	9,383	11,825	3,909	25,117
New Ross Catchment	9,669	5,012	14,586	29,267
Gorey Catchment	10,135	14,008	9,318	33,461

Note: This table includes the retail provision in the above listed settlements only.

6.2.1 Population and Expenditure Estimates

The first step is to calculate the total amount of expenditure on convenience and comparison goods by the resident population of the County for 2013, 2019 and 2022. It is important to note that since the 2007 Wexford Retail Strategy was prepared there has been a significant downturn in the Irish economy which requires to be taken into account in the capacity assessment. The assessment, therefore, incorporates latest economic forecasts which reflect/respond to the very changed economic conditions that prevailed at the beginning of 2012.

To derive the overall retail spend for the County, the estimated per capita levels of expenditure are multiplied by the County population targets. The per capita expenditure estimates for comparison and convenience goods are derived from the CSO's 2009 Annual Services Inquiry (ASI), the latest year for which information is available (released September 2011). Per capita expenditure estimates for convenience and comparison goods are projected forward based on recent personal consumption growth estimates from the Medium Term Fiscal Status (November 2011) and the ESRI Medium Term Review 2008-2015.

The analysis of retail expenditure is only concerned with expenditure that occurs within retail outlets: i.e. expenditure related to retail floorspace only. As a result, the per capita expenditure figures exclude expenditure that does not occur in retail outlets e.g. via the internet as well as markets and stalls.

Both convenience and comparison expenditure per capita ratios are derived based on a 2009 price year. The per capita expenditure ratios for comparison goods for 2013, 2019 and 2022 are presented in Table 52 below. The per capita expenditure figures are calculated using projected annual growth rates for per capita convenience and comparison expenditure between 2013 and 2022. The expenditure by the resident population of Wexford and catchments for the four main towns is outlined in Table 52.

Table 52 Expenditure by the Resident Population of Wexford and Catchments (2009 prices, €m)

	2011	2013	2019	2022
	Population	Population	Population	Population
County Wexford	145,320	149,617	161,074	166,083
Wexford Catchment	55,727	57,594	62,484	64,626
Enniscorthy Catchment	33,042	33,864	36,148	37,147
New Ross Catchment	24,504	25,294	27,280	28,140
Gorey Catchment	32,048	32,865	35,162	36,169
	Per Capita Expenditure	Per Capita Expenditure	Per Capita Expenditure	Per Capita Expenditure
Per Capita Convenience	€3,429	€3,464	€3,795	€4,027
Per Capita Comparison	€3,325	€3,358	€3,782	€4,097
	Expenditure Estimates Convenience	Expenditure Estimates Convenience	Expenditure Estimates Convenience	Expenditure Estimates Convenience
County Wexford	€498.4	€518.2	€611.3	€668.8
Wexford Catchment Area	€191.1	€199.5	€237.1	€260.3
Enniscorthy Catchment Area	€113.3	€117.3	€137.2	€149.6
New Ross Catchment Area	€84.0	€87.6	€103.5	€113.3
Gorey Catchment Area	€109.9	€113.8	€133.4	€145.7
	Expenditure Estimates Comparison	Expenditure Estimates Comparison	Expenditure Estimates Comparison	Expenditure Estimates Comparison
County Wexford	€483.2	€502.5	€609.2	€680.4
Wexford Catchment Area	€185.3	€193.4	€236.3	€264.8
Enniscorthy Catchment Area	€109.9	€113.7	€136.7	€152.2
New Ross Catchment Area	€81.5	€84.9	€103.2	€115.3
Gorey Catchment Area	€106.6	€110.4	€133.0	€148.2
Note: Per Capita Expenditure Estimates for County Wexford (€, 2009 Prices)				

It is estimated that convenience and comparison expenditure will remain flat for 2012, rising slightly by 1% for 2013 and then rising modestly by 1.6% for convenience spending, and a slightly higher 2.0% for comparison expenditure to 2019 as the economy improves.

The ASI figures for 2008 and 2009 show that comparison expenditure fell faster than convenience expenditure, which has had a greater impact on the per capita expenditure for comparison goods. This is not unexpected as comparison expenditure is more discretionary (clothes, footwear etc.) compared to convenience expenditure which relates mainly to weekly food and beverage shopping. Indeed the overall proportion of comparison expenditure fell from 52.9% of the total retail expenditure in 2008 to 49.2% in 2009, while convenience expenditure increased from 47.1% of total retail expenditure in 2008 to 50.8% in 2009. It is also worth noting that the Indices of Disposable Income Per Person show that Wexford's per capita expenditure has fallen to 92.8% (in 2009) of the overall average for the state compared to 96.7% of the overall average for the state in 2008.

6.2.2 Turnover Estimates

The current turnover of retail outlets in the County can be estimated by using the expenditure potential of the County's population and information on inflows and outflows of expenditure from the County area. Retail expenditure is not limited by County boundaries and more often than not no County will retain all the available expenditure as shoppers will use different centres outside the County at different times and for different purposes. This is particularly so with Wexford and its close proximity to centres such as Waterford, Kilkenny, Carlow, Arklow, and Dublin.

Current inflows and outflows of convenience and comparison expenditure are informed through consumer surveys by face to face (household shopper surveys) and on-street (shopper street surveys). Household shopper surveys enable an estimate of the amount of expenditure retained within an area. This estimate is commonly referred to as an area's market share. Shopper street surveys enable an estimate to be made on the amount of expenditure which originates from outside an area. This is normally referred to as an area's trade draw.

Market share is the proportion of retail expenditure by persons living in an area that is spent and retained in the area. It is normally assumed to be higher for convenience goods than for comparison shopping.

Trade draw is the proportion of retail expenditure to an area that is derived from residents from outside of the area. Higher trade draw is typically a characteristic of centres that are higher in the retail hierarchy.

The household and shopper surveys, presented in Section 3, enable the estimation of the extent of expenditure on goods in retail outlets in the County. They allow an estimate of the total amount of turnover for retail outlets in the County or, put another way, the total amount of expenditure on goods sold by retailers in the County to be derived.

According to the household surveys an estimated 95.2% of convenience expenditure (market share) by the resident population is spent in retail outlets located in the County. Of the residents doing their main food shopping outside the County, the majority of this expenditure leakage was to Waterford City and Arklow.

The comparison market share of resident's expenditure is 72.2%. It is evident that the majority of the leakage was accounted by Waterford City, Arklow and Dublin (including Dundrum Town Centre).

According to the shopper surveys an average of 11.2% of respondents were from outside the County, of whom 36.7% shopped regularly within the County. Of the non-resident respondents approximately half were in the County for either convenience or comparison shopping purposes. Taking these figures and adding them to estimated tourist spending figures results in a trade draw of 9.3% for convenience turnover and 8.3% of comparison turnover in 2011.

It is estimated that the overall market share and trade draw will alter over the period of the study as market forces shape retailing and new and improved retail formats come on stream to meet rising consumer expectations.

6.2.3 Projected Turnover of Retail Outlets

The derived market share and trade draw assumptions from the 2011 household and shopper surveys have been incorporated in Table 53 which provides the estimation of turnover in retail floorspace in the County over the period to 2022.

To calculate turnover, the amount spent by Wexford residents in retail outlets located outside the area (leakage) is subtracted from the total amount of potential retail expenditure by these residents. To this is added the additional expenditure which is due to people living outside the County. The combination of these deductions and additions provides the derived total turnover of retail outlets located in the County. This is the process used in calculating the turnover figures presented for 2011, 2013, 2016 and 2022 in Table 53 for both convenience and comparison floorspace. Table 53 also informs the County towns' allocation outlined in tables 54 and 55 as well as tables 58 and 59.

It is anticipated that tourism spending will increase, in line with Fáilte Ireland forecasts, which will increase spending from this sector. It is also assumed that over time it will become less attractive for shoppers to travel long distances due to increases in the costs of travel.

Table 53 Projected Turnover from Retail Outlets Located in County Wexford
(2009 prices, €m)

2011	Convenience		Comparison	
Resident Expenditure		498.4		483.2
Less Expenditure Outflow	4.8%	23.9	27.8%	134.3
Spend by Resident on Outlets in County		474.4		348.9
Add Imported Expenditure	9.3%	48.6	8.3%	40.1
Spend in Retail Outlets in Catchment		523.1		380.5
2013				
Resident Expenditure		518.2		502.5
Less Expenditure Outflow	4.8%	24.9	27.8%	139.7
Spend by Resident on Outlets in County		493.4		362.8
Add Imported Expenditure	9.6%	52.4	8.6%	43.2
Spend in Retail Outlets in Catchment		545.8		396.9
Growth between 2011 and 2013		22.7		16.5
2019				
Resident Expenditure		611.3		609.2
Less Expenditure Outflow	2.4%	14.7	25.5%	155.3
Spend by Resident on Outlets in County		596.6		453.9
Add Imported Expenditure	10.2%	62.3	8.9%	54.2
Spend in Retail Outlets in Catchment		664.3		498.2
Growth between 2013 and 2019		118.6		101.3
2022				
Resident Expenditure		668.8		680.4
Less Expenditure Outflow	2.4%	16.1	22.5%	153.1
Spend by Resident on Outlets in County		652.8		527.3
Add Imported Expenditure	10.5%	70.2	9.2%	62.6
Spend in Retail Outlets in Catchment		729.4		580.8
Growth between 2019 and 2022		65.0		82.6

6.2.4 Turnover Ratios

The turnover figures for 2011 set out in Table 53 are an estimate of the amount of expenditure that will be sustained by the estimated amount of floorspace in the County at the beginning of the Retail Strategy period. For example, in 2011, the County has approximately 46,072 sq m of convenience floorspace that was generating turnover of €523.1m and approximately 117,912 sq m of comparison (including bulky goods) floorspace that was generating turnover of €380.5m. Looking at the indicative turnover ratios (turnover divided by floorspace) this would imply convenience sector turnover of €11,353 per sq m while average comparison turnover ratios are calculated to be approximately €3,291 per sq m.

With regards to the convenience turnover ratio, with a mixture of both older and modern formats, a figure of €11,500 per sq m has been used. From this the convenience floorspace is under trading slightly.

The comparison floorspace comprises some 64,950 sq m of 'mainstream' comparison floorspace and 52,963 sq m of retail warehousing (bulky goods) floorspace. In the past a split of 80:20 between 'mainstream' comparison and bulky goods has been used. Over the past 10 years the proportion of bulky goods spending has been increasing with the development of retail warehousing parks as well as the inclusion of 'mainstream' comparison goods within some retail warehouse parks. In addition the overall proportion of bulky goods floorspace as a percentage of the comparison floorspace has been increasing. Therefore it is considered appropriate to assume a 75:25 mainstream comparison: bulky goods split which would result in a turnover ratio for mainstream comparison floorspace of €4,392 per sq m and €1,795 per sq m for bulky goods floorspace. Industry standards suggest that a figure of €4,500 turnover ratio for mainstream comparison floorspace and a figure of €2,500 for bulky goods floorspace would be appropriate (Cork Retail Strategy). From these assumptions, it would appear that the 'mainstream' comparison floorspace is trading at near equilibrium, while bulky goods floorspace is undertrading by a significant degree, indicating an oversupply of retail warehousing floorspace at a County level.

6.2.5 Gross Additional Expenditure Potential

Using the derived turnover estimates, it is possible to estimate the growth in spare expenditure capacity that will occur in the County and for the four major towns of Wexford, Enniscorthy, New Ross and Gorey between 2011-2013 and 2013-2019, with 2022 provided to give a longer term picture. This is illustrated in Tables 54 and 55.

Table 54 Gross Spare Expenditure Capacity in County and Catchments (2009 prices, €m)

	Convenience €m	Comparison Mainstream €m	Bulky €m
Wexford County			
Growth between 2011 and 2013	22.7	12.3	4.1
Growth between 2013 and 2019	118.6	76.0	25.3
Growth between 2019 and 2022	65.0	61.9	20.6
Growth between 2011 and 2022	206.3	150.2	50.1
Wexford Catchment			
Growth between 2011 and 2013	9.5	5.2	1.7
Growth between 2013 and 2019	47.6	30.4	10.1
Growth between 2019 and 2022	26.1	24.5	8.2
Growth between 2011 and 2022	83.2	60.1	20.0
Enniscorthy Catchment			
Growth between 2011 and 2013	4.6	2.5	0.8
Growth between 2013 and 2019	25.6	16.5	5.5
Growth between 2019 and 2022	14.0	13.6	4.5
Growth between 2011 and 2022	44.2	32.5	10.8
New Ross Catchment			
Growth between 2011 and 2013	4.1	2.2	0.7
Growth between 2013 and 2019	20.3	13.0	4.3
Growth between 2019 and 2022	11.1	10.5	3.5

Growth between 2011 and 2022	35.4	25.7	8.6
Gorey Catchment			
Growth between 2011 and 2013	4.5	2.5	0.8
Growth between 2013 and 2019	25.1	16.2	5.4
Growth between 2019 and 2022	13.8	13.3	4.4
Growth between 2011 and 2022	43.5	31.9	10.6

Source: Table 53

Table 55 Gross Spare Expenditure Capacity in County and Catchments (sq m)

	Convenience Sq m	Comparison Sq m	Comparison (Bulky) Sq m
Wexford County			
Growth between 2011 and 2013	1,931	2,690	1,614
Growth between 2013 and 2019	9,523	15,587	9,352
Growth between 2019 and 2022	5,068	12,333	7,400
Growth between 2011 and 2022	16,523	30,610	18,366
Wexford Catchment			
Growth between 2011 and 2013	809	1,127	676
Growth between 2013 and 2019	3,825	6,229	3,737
Growth between 2019 and 2022	2,034	4,888	2,933
Growth between 2011 and 2022	6,668	12,243	7,346
Enniscorthy Catchment			
Growth between 2011 and 2013	391	544	327
Growth between 2013 and 2019	2,053	3,381	2,028
Growth between 2019 and 2022	1,095	2,702	1,621
Growth between 2011 and 2022	3,539	6,628	3,977
New Ross Catchment			
Growth between 2011 and 2013	346	482	289
Growth between 2013 and 2019	1,626	2,659	1,595
Growth between 2019 and 2022	862	2,095	1,257
Growth between 2011 and 2022	2,835	5,236	3,141
Gorey Catchment			

Growth between 2011 and 2013	385	537	322
Growth between 2013 and 2019	2,019	3,319	1,992
Growth between 2019 and 2022	1,077	2,647	1,588
Growth between 2011 and 2022	3,481	6,503	3,902

Source: Table 54 and Turnover ratios

6.2.6 Future Sources of Retail Sales

The Gross Spare Expenditure figures that have been estimated for the County are gross estimates and need to be adjusted to take account of vacant retail floorspace and expenditure that may occur via new retail developments (extant planning permissions) that are due to come on stream post 2013, and through increases in turnover efficiency of existing and future floorspace. All of these future sources of spend have been factored into the derivation of the net expenditure that is available for additional retail floorspace. Turnover efficiency of existing floorspace needs to be taken into account as well.

Vacant Floorspace

The amount of vacant floorspace in Wexford and for the four major towns of Wexford, Enniscorthy, New Ross and Gorey is set out in Table 56. Overall there was some 34,348 sq m of vacant retail floorspace comprising 5,434 sq m of convenience floorspace (15.8% of vacant retail floorspace), 18,035 sq m of comparison floorspace (52.5% of vacant retail floorspace), and 10,880 sq m of retail warehousing floorspace (31.7% of vacant retail floorspace).

The convenience floorspace vacancy rate was 10.5%, while the comparison floorspace vacancy rate was 27.7%. The retail warehousing vacancy rate was 17.0%. The four major towns of the County accounted for the vast majority of the vacant retail floorspace at 94.7%. Wexford Town accounted for some 56% of all vacant retail floorspace, followed by New Ross (19.9%), Gorey (12.1%), and Enniscorthy (6.7%).

Table 56 Vacant Retail Floorspace

	Convenience Vacant	Comparison Vacant	Retail Warehousing Vacant	Overall Floorspace Vacant
Wexford Town	3,383	8,854	7,012	19,249
Gorey	88	3,820	235	4,143
New Ross	318	4,100	2,405	6,823
Enniscorthy	636	1,226	454	2,316
Bunclody	87	34	774	895
Castlebridge	0	0	0	0
Courtown/Riverchapel	98	0	0	98
Kilrane/Rosslare	824	0	0	824
Wellington Bridge	0		0	0
County Wexford Total	5,434	18,035	10,880	34,348
Wexford Catchment	4,207	8,854	7,012	20,073
Enniscorthy Catchment	723	1,260	1,228	3,211
New Ross Catchment	318	4,100	2,405	6,823
Gorey Catchment	186	3,820	235	4,241

Source: Wexford County Council Retail Floorspace Survey 2011

It is important that vacant retail floorspace located in the core retail areas of towns is included in the assessment of new proposals as well as extension of time applications.

Extant Planning Permissions

The freeze date for extant planning permissions incorporated in the capacity assessment is the end of 2011. There was planning consent for an additional **86,765 sq m** of net retail floorspace comprising in the order of 18.9% of convenience, 54.8% comparison and 26.2% retail warehousing (bulky) goods floorspace. The vast majority of extant permissions (89%) are accounted for within the four major towns as follows. Wexford Town accounted for 43.1%, Gorey 33.1%, New Ross 8.8%, and Enniscorthy 4.0%. It is worth noting that 30% of the overall extant floorspace of the

County is accounted for by the proposed Trinity Wharf development in Wexford Town. Overall 13 no. significant extant applications (over 1,000 sq m net comparison 500 sq m net convenience) comprise 75,216 sq m or 86.7% of the total extant floorspace. It is important that Extension of **Duration** applications are assessed using a rigorous application of the sequential test, updated zoning objectives since they were permitted and also to account for the Retail Planning Guidelines 2012.

Table 57 Extant Permissions County Wexford

	Convenience Extant	Mainstream Comparison Extant	Retail Warehousing Extant	Overall
Wexford Town	4,636	28,097	4,637	37,370
Gorey	6,397	4,245	18,107	28,749
New Ross	3,220	4,393	0	7,613
Enniscorthy	202	3,280	0	3,482
Bunclody	990	272	0	1,262
Castlebridge	0	2,849	0	2,849
Courtown/Riverchapel	0	1,914	0	1,914
Kilrane/Rosslare	0	526	0	526
Wellington Bridge	1,000	2,000		3,000
County Wexford Total	16,445	47,576	22,744	86,765
Wexford Catchment	2,818	16,736	2,319	43,745
Enniscorthy Catchment	596	1,776	0	4,744
New Ross Catchment	1,610	2,197	0	7,613
Gorey Catchment	3,198	3,080	9,053	30,663

Source: Wexford County Council Retail Survey 2011

It is also important to consider whether retail developments proposed during the period are reflective of the current economic and retail climate. There has been little progress on the outstanding granted permissions that were not already under construction, which is a direct consequence of the effects of the current economic recession. It is not a trend that is unique to County Wexford but one which prevails across the Country. Over the period to 2019, it is unlikely that all of the grants will be

developed out and trading and a number are likely to re-emerge but reduced in scale to reflect the current economic climate. For the purposes of the capacity assessment, it has been assumed that 50% of the extant floorspace could be fully trading and capturing expenditure potential at 2019. This assumption has been incorporated in the broad assessment of the requirement for additional retail floorspace at County level and for the four major towns of Wexford, Enniscorthy, New Ross and Gorey.

Turnover Efficiency

Over time, the efficiency of comparison and convenience floorspace is assumed to increase by 1% per annum. It is anticipated that the existing floorspace will account for capacity equating to some 4,933 sq m of convenience floorspace, 6,954 sq m of comparison floorspace, and 5,671 sq m of retail warehousing (bulky goods) floorspace.

6.3 Capacity Potential

From the estimates of gross additional expenditure potential in Table 55, the expenditure accounted for by the extant planning permissions and turnover efficiency growth is subtracted to give the net capacity for the County and for the four major towns of Wexford, Enniscorthy, New Ross and Gorey. Given the high levels of vacant floorspace (10.5% for convenience floorspace, 21.7% comparison floorspace and 17% bulky goods floorspace), it is considered appropriate that this is taken into account as well at County level and for the four main towns. In this regard a vacancy rate of between 5% is considered reasonable to enable choice and competition in the retail market.

The Council will have regard to the findings of the capacity assessment in assessing planning applications. However, when considering any individual planning proposal in any town the applicant will be required to demonstrate in the RIA that the floorspace is appropriate having regard to the quantum of floorspace required in that town. The RIA shall take account of the particular catchment, extant permissions and their likelihood of being implemented and vacancies in the individual towns. The quantitative need for the quantum of floorspace will not be the only deciding factor, the Council will also consider whether any given planning application will be better

located sequentially than permitted developments or whether it would be required for qualitative reasons such as strengthening the County's retail profile.

The final part of the capacity assessment is to determine the amount of floorspace that is required to accommodate this anticipated increase in expenditure over the timescale of the Retail Strategy and forward to 2022. This is achieved by applying 2009 Price Year turnover ratios to the expenditure figures. For the convenience and comparison floorspace, turnover ratios for 2013, 2019 and 2022 have been used. Applying these turnover ratios to the net expenditure capacity growth provides the estimates of the net floor space potential available in the County **and for the four main towns**. Given the levels of vacant and extant floor space available, it is considered appropriate to provide a two stage approach to the net spare capacity. Table 58 shows the net spare expenditure capacity **when turnover efficiency growth only** is subtracted from gross expenditure potential in Table 58 while Table 59 shows the final net space expenditure capacity when all factors are included.

Table 58 Net Spare Expenditure Capacity in County (Turnover Efficiency) (sq m)

	Convenience Sq m	Comparison Sq m	Comparison (Bulky) Sq m
<u>Wexford County</u>			
Growth between 2011 and 2013	1,024	1,410	571
Growth between 2013 and 2019	6,853	11,823	6,283
Growth between 2019 and 2022	3,713	10,422	5,842
Growth between 2011 and 2022	11,590	23,656	12,695
<u>Wexford Catchment</u>			
Growth between 2011 and 2013	476	455	180
Growth between 2013 and 2019	2,846	4,252	2,280
Growth between 2019 and 2022	1,537	3,885	2,193
Growth between 2011 and 2022	4,860	8,592	4,653
<u>Enniscorthy Catchment</u>			
Growth between 2011 and 2013	206	311	250
Growth between 2013 and 2019	1,509	2,695	1,802

Growth between 2019 and 2022	819	2,355	1,506
Growth between 2011 and 2022	2,534	5,362	3,558
New Ross Catchment			
Growth between 2011 and 2013	155	383	2
Growth between 2013 and 2019	1,066	2,368	750
Growth between 2019 and 2022	578	1,948	828
Growth between 2011 and 2022	1,799	4,699	1,580
Gorey Catchment			
Growth between 2011 and 2013	186	261	138
Growth between 2013 and 2019	1,432	2,508	1,452
Growth between 2019 and 2022	779	2,235	1,314
Growth between 2011 and 2022	2,396	5,003	2,904

Note: Vacant and extant permissions not subtracted from Table 55. These figures include a percentage of leakage for comparison shopping and it is the aim of the Council to get some of this leakage back.

As noted above vacancy rates and extant permissions also need to be taken into account. Reducing vacancy rates to a more sustainable rate (5%) would result in a capacity requirement of the order of 8,460 sq m convenience floorspace, 8,869 sq m in comparison floorspace, and 4,464 sq m for bulky goods floorspace up to 2022 for the entire County. Vacancy rates applicable to the individual towns were incorporated into the figures.

Table 59 Net Spare Expenditure Capacity in County to 2022 (sq m)

	Convenience Sq m	Comparison Sq m	Comparison (Bulky) Sq m
Wexford County			
Capacity between 2011 and 2019	2,201	-6,054	-2,948
Capacity between 2019 and 2022	-1,963	-8,865	-3,960
Capacity between 2011 and 2022	237	-14,919	-6,908
Wexford Catchment			

Capacity between 2011 and 2019	232	-7,236	-1,576
Capacity between 2019 and 2022	-1,553	-8,057	-1,843
Capacity between 2011 and 2022	-1,321	-15,293	-3,420
Enniscorthy Catchment			
Capacity between 2011 and 2019	1,290	1,784	1,536
Capacity between 2019 and 2022	394	1,132	990
Capacity between 2011 and 2022	1,684	2,916	2,526
New Ross Catchment			
Capacity between 2011 and 2019	499	-272	-86
Capacity between 2019 and 2022	-144	-1,075	-10
Capacity between 2011 and 2022	355	-1,347	-96
Gorey Catchment			
Capacity between 2011 and 2019	179	-332	-2,821
Capacity between 2019 and 2022	-660	-865	-3,097
Capacity between 2011 and 2022	-482	-1,196	-5,919

Note: Gross capacity minus turnover efficiency, vacancy rates (to 5%) and extant permissions (50%).

Table 59 assumes that the vacant floorspace uptake and extant permissions will absorb further the net capacity outlined in Table 58 on a 50:50 basis between the periods 2011-2019 and 2019 and 2022, (to accord with the Development Plan period). It is noted that the proportions may alter with prevailing market conditions.

The issue of extant permissions (and the granting of Extension of **Duration** applications) to significant retail developments needs to be carefully considered against updates to National Retail Planning Guidance, and also changes to Development Plan (particularly zoning) policy. As highlighted above, a relatively small number of extant permissions (13 in total) account for the vast majority (86.7%) of the overall extant floorspace of 86,765 sq m. This is noted in tandem with an understandable current reluctance in the market to implement significant permissions on key sites.

At the same time, it is not the purpose of the Retail Strategy to limit competition, and therefore there is an obligation to consider robust quantitative and qualitative

arguments for renewal and investment in new floorspace where it can be demonstrated that there would not be a material negative impact on existing floorspace (less than 5% trade diversion from existing floorspace).

6.4 Conclusions

Since the preparation of the 2005 Retail Strategy and the 2007 Review, the County has witnessed a considerable improvement in the competitiveness of its retail offer. The downturn in the economy since 2008 has resulted in a reservoir of vacant retail floorspace throughout the County. In the interests of sustainability, it is considered appropriate that potential floorspace capacity over the period of this strategy is used to reduce the levels of vacant floorspace. It was also found that some extant permissions have a role in the residual capacity for additional retail floorspace.

The figures presented in the capacity assessment provide a broad assessment of the requirement for additional new floorspace. They should thus be taken as indicative and as guidance on the quantum that will be required and are in no way intended to be prescriptive. It is not the purpose of the capacity assessment to place a cap on the scope for future retail developments in the County. In developing the Retail Strategy's objectives the capacity assessment is viewed in the context of the following factors and issues:

- The strengths and weaknesses of the County's retail profile and how these are best harnessed and addressed respectively;
- The actions required to sustain and grow retail activity particularly in the light of the increasing attraction of Dublin for residents in the north of the County;
- How to address the issue of vacant retail floorspace;
- Qualitative improvements to the four main town centres; and
- How extant permissions are managed in light of new zoning designations and application of sequential test.

The issue of extant permissions (and the granting of Extension of **Duration** applications) to significant retail developments needs to be carefully considered against updates to national Retail Planning Guidance, and also changes to Development Plan (particularly zoning) policy.

Special Meeting of Wexford County Council

November 12th 2012

Manager's Report on the Submissions and Observations received on the Draft Wexford County Development Plan 2013-2019.

It is recommended that the following be included in the Manager's Report under Section 6: Other Recommended Changes.

Volume 2: Record of Protected Structures

Following an internal review of this Volume, the following duplications became evident:

Structure: House at Ramstown

RPS Reference Numbers WCC0217 House and outbuildings Ramstown Lower, Gorey and WCC0614 House, Ramstown Lower both refer to the same buildings.

The NIAH has one reference number for the buildings: NIAH Reference No. 15701132.

Recommendation: In the interests of clarity, it is recommended that WCC0614 be deleted from the Record of Protected Structures.

Structure: Castleboro House

Castleboro House is already on the Record of Protected Structures; RPS Reference No. WCC0673 and it is included on the list of structures proposed for retention.

The NIAH reference no. 15702504 (Castleboro Stables) was incorrectly assigned to WCC0673. This, in turn, resulted in the NIAH Reference No: 15702503 Castleboro House being regarded as not listed, and therefore, it was included in the list of proposed additions to the Record of Protected Structures.

WCC0673 has been corrected to correspond to NIAH Reference No. 15702503.

Recommendation: In the interests of clarity, as Castleboro House is on the list of structures proposed for retention, it is recommended that it be removed from the list of proposed additions to the Record of Protected Structures.

Structure: Glenbower House

Glenbower House is already on the Record of Protected Structures; RPS Reference No. WCC0205, and it is included on the list of structures proposed for retention.

NIAH reference numbers 15601076 and 1560177 relate to this building and it was proposed to add this structure to the Record of Protected Structures.

Recommendation: In the interests of clarity, as Glenbower House is on the list of structures proposed for retention, it is recommended that it be removed from the list of proposed additions to the Record of Protected Structures