

Unique Reference Number: WXF-C3-94
Submission: Wexford Environmental Network Submission

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Date Created: 07.12.2020 - 8:34pm

Consultation:
Draft Wexford County Development Plan (2021-2027)

Status: Submitted
Date Submitted: 08.12.2020 - 11:36pm

Cover Letter

Wexford Environmental Network (WEN) is a local environmental network under the Irish Environmental Network umbrella. WEN connects with environmental organisations and also undertakes direct actions in our own right. Our submission is intended to show our support for environmental ambitions in the County Development Plan and advocate for urgent climate action and biodiversity measures to respond to the Climate & Biodiversity emergency.

Observations:

Summary

Chapter: Volume 1: Written Statement » Chapter 1: Introduction

- We are pleased to see the environment is a strong element. In the context of a climate and biodiversity emergency declared by the Dail in May 2019 we believe that it is important that development plans include the environment strongly. However, we believe that such is the urgency of the crisis that the environment needs to be at the centre of every element of the plan and even more central to every objective. We also believe there is an opportunity to move from more passive “do no harm” environmental objectives to restoration and mitigation actions for biodiversity. Adaptation and mitigation actions for climate also need to be central to every objective - we understand that there is a Climate Adaptation Plan but there is a risk that where this is a separate document the necessary actions won't integrate fully with development plan objectives.
- We are pleased to see a chapter on climate change. We believe biodiversity should have a similar chapter or at the very least needs to have it's own set of objectives and be central to other objectives - including producing a new Biodiversity Action Plan. In the existing plan there was a commitment to 'review the action plan with full audit, actions achieved and formulation of a new plan'. This was supposed to happen after 5 years, that is, in 2018. The formulation of the new plan should include all the stakeholders and full public participation .

- We would like to see a “Connecting Wexford” view of transport, rather than set out the plan mode by mode (i.e. separate sections for road, rail etc. We understand they are necessary but should be framed in a context of connection)
 - As part of delivering this plan, can the Council create a 'Wexford Transport and mobility forum' - made up of all stakeholders across the region prior to NRA Transport planning = including cycling lobby groups, pedestrian, disability access, education (primary, secondary & higher education). To provide a platform for debating and look at evidence based needs + environmental, health consequences. Example: Limerick Chamber & Limerick County Council.
 - We would like to see an overall vision and strategic goal for Wexford to be a Green Economy model and leader in Ireland. This is included in objective ED76 but we believe in order for this ambition to be achieved it needs to be more embedded in other objectives. This should build on the sustainable buildings centre of excellence in Enniscorthy and the opportunity offered by having a Teagasc research centre in Wexford to offer resources for quickly transitioning to regenerative and organic and/or chemical free farming. The economic strategy for Wexford should seek to support and encourage businesses that are based on the circular economy, better for environmental and citizen health over businesses that generate waste, unhealthy products and rely on the linear economy. We understand that Wexford County Council cannot control the local economy but that there is an opportunity through the planning structures and the use of available grants and supports to play a role in the rapid transition that is needed to avoid the worst effects of climate and biodiversity breakdown
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Monitoring & Implementation

Chapter: Volume 1: Written Statement » Chapter 1: Introduction

The Development Plan Guidelines for Planning Authorities (Department of

Environment, Heritage and Local Government, 2007) recommend that an annual

monitoring and evaluation report is prepared. The Council as the Planning Authority will go one step further and will produce quarterly reports in partnership with the Strategic Policy Committees to monitor and evaluate the objectives of the Plan. This report will facilitate the

identification of any issues concerning the implementation of the Plan. It will

inform the two-year review required by Section 15 of the Act. It will also inform the

mandatory review of the existing Plan and preparation of a new Plan required by

Section 11 of the Act, which must be commenced not later than four years after the

making of the Plan.

UN Sustainable Development Goals

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The Planning and Development Act 2000 (as amended) requires a development plan to deliver an overall strategy for the proper planning and sustainable development of the county. The Council, for the purposes of the Plan, defines proper planning and sustainable development as ensuring that a balance is achieved between economic, social, cultural and environmental considerations in the interests of the common good of present and future generations of the county.

Comment: Replace 'ensuring that a balance is achieved between economic, social, cultural and environmental considerations' with 'prioritising policies relating to the environmental value of the natural world and this comprehensive environmental evaluation should precede all economic and social considerations'. If the environmental pillar is not considered first and foremost in every planning permission and licensing decision, we risk losing its innate value, which would in turn result in the collapse of both the economic and social constructs of the Development Plan.

These SDGs inform and underpin the Plan which is focused on the integration of employment, transport, schools, community facilities, amenities and sustainable urban and rural settlements as key mechanisms for achieving sustainability. There is significant alignment between the UN Sustainable Development Goals and this Plan, particularly, good health

and well-being, education, environmental quality, clean energy, economic growth, sustainable communities and climate action.

Comment: If this is the case, can we have each section headed by the SDG it is aligned with and a brief description on how it fulfills the objectives of the SDG.

Social inclusion

Chapter: Volume 1: Written Statement » Chapter 1: Introduction

1.6.3 Social Inclusion, Accessibility and Age Friendly

The Council is committed to developing a socially inclusive society in County Wexford and the Plan focuses on promoting and facilitating social inclusion for everyone in the county.

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

Insert immigrant communities at *

Support for Climate Objectives

Chapter: Volume 1: Written Statement » Chapter 2: Climate Action

Title

Support for Climate Objectives

2.2.2 The Climate Action and Low Carbon Development Act, 2015

This Act placed climate change at the heart of Government policy and decision making. Amongst other things the Act made provision for two national plans; the National Mitigation Plan and the National Adaptation Framework. The Act requires local authorities to have regard to both in the performance of their functions and also requires local authorities to prepare Climate Change Adaptation Strategies setting out local level adaptation measures.

Comment replace National Mitigation Plan with Climate Action and Low Carbon Development (Amendment) Bill 2020

2.2.3 National Mitigation Plan

Comment: Completely remove this section and replace with

2.2.3. Climate Action and Low Carbon Development (Amendment) Bill 2020

Comment: The Council should comment on the role of the Local Authority in this Bill which requires the Council and all local authorities to produce a Local Climate Action Plan.

Comment: There is mention of CNG in Table 2-1 Key Climate Action Regional Planning Objectives. CNG is largely made up of methane, which is one of the Greenhouse gases (GHG). Thus, it is responsible for global warming as well. Although methane in itself is a non-toxic gas, it can create problems for humans when present in greater amounts. Leakage of CNG through giant transmission pipelines may cause severe problems as it is high in methane. Retrofitted CNG engines produce 30% more methane than originally fitted CNG engines.

<https://edtimes.in/is-cng-really-a-green-fuel/#:~:text=Retrofitted%20CNG%20engines%20produce%2030,can%20cause%20death%20as%20well.>

We would like to see evidence for CNG as a sustainable fuel in order for this to be included as an objective.

2.2.9 County Wexford Climate Adaptation Strategy 2019-2024

According to the baseline information, agriculture (43%), transport (22%) and residential (18%) accounted for 83% of the county's CO2 emissions in 2006. The remaining 17% was attributed to commercial (8%), industry (7%), and the public sector (2%).

We would like this to be aligned with current EPA emissions inventories and projections data (for 2019) to verify measures are working, and respond to current trends.

<https://www.epa.ie/pubs/reports/air/airemissions/ghgprojections2019-2040/>

Coastal Areas & Marine Sector

Chapter: Volume 1: Written Statement » Chapter 2: Climate Action

2.3.3: Coastal Areas and Marine Sector:

Ireland has a target to designate 30% of our Maritime Area as Protected by the year 2030. We have fallen behind the 2020 target significantly which is having a disastrous impact on our marine ecology, climate, industry, and communities. Indeed coastal communities known historically as prosperous fishing harbors or

popular tourist destinations with white-sandy beaches, such as Courtown, are being significantly impacted by coastal erosion and degradation of coastal and offshore habitats. Co. Wexford is one of 13 Coastal Counties in Ireland, and must, therefore, take a step forward to support increased protection, specifically the restoration of our coastal areas and marine sector. Local Authority support/submission on the Marine Spatial Plan and National Marine Planning Framework should outline Co. Wexford's commitment to increase Marine Protected Areas, putting us forward as 'The Model County'.

Action: We would like to see this sentence added to the WCDP: "Wexford Co. Council supports the introduction and enforcement of Marine Protected Areas along the coast Wexford and the adjacent marine area."

2.3.6 Agriculture, Forestry and Biodiversity

Chapter: Volume 1: Written Statement » Chapter 2: Climate Action

* Forestry will play an important role in mitigation as trees act as carbon sinks helping to reduce greenhouse gases emissions.

Comment: Not all forestry are carbon sinks. Forests can also be net emitters of carbon - there are so many variables including the age of the forests, use of harvested wood etc.

FRL 2021-2015: Ireland, a National Forestry Accounting Plan, for the Department of Agriculture a recent report concludes Ireland's forest estate transitioned from a sink – capturing CO₂ – to a source during the 2012 to 2017 period, with indications of likely increases in greenhouse gas emissions from 420 gigatons in 2018 to 2,161 gigatons CO₂ equivalent by 2025.

Insert 'Sustainable' at *.

2.4.2 Mitigation and Spatial Planning

Chapter: Volume 1: Written Statement » Chapter 2: Climate Action

2.4.2 Mitigation and Spatial Planning

Increase employment opportunities * within the county so as to reduce the amount of unsustainable commuting out of the county for work, much of which is car-based
Commuting.

Comment: Insert 'and remote working hubs' at *

Facilitate sustainable * agriculture such as afforestation which not only acts as a carbon sink but is a source of renewable fuel and biomass.

Comment: Insert 'and regenerative' at * and replace 'afforestation' with 'sustainable agroforestry'

Facilitate the transition to a low carbon economy which is focused on clean, low carbon technologies and promotes the development of sustainable renewable energy sources such as wind, tidal and solar energy as a means of reducing dependencies on fossil fuels *.

Comment: Can we add 'with particular support for community owned and locally produced renewable energy generation projects' at *

Support for Community Energy

Chapter: Volume 1: Written Statement » Chapter 2: Climate Action

Can Wexford County Council work with communities to support community owned and/or led energy projects?

3.5 LEADING THE WAY: TIPPERARY ENERGY CASE STUDIES

Tipperary has been a leader in the area and there have been a number of local and community-led renewable energy and energy efficiency schemes in the county that demonstrate the benefits of investment in the area and that will be used as examples for further investment. The following are examples of:

- Direct Community investment in energy
- Direct Community investment in energy efficiency
- Local Authority investment in energy
- Community Gain Scheme

3.5.1 DIRECT COMMUNITY INVESTMENT IN ENERGY - TEMPLEDERRY WIND FARM

In 2001, the local community in Templederry sought to investigate ways to increase employment and investment in their area. Renewable energy was examined as an investment opportunity and 'Templederry Energy Resources' was set up and 30 shares in the company were allocated.

The TEA and the North Tipperary LEADER assisted in the planning and development phase of a new wind farm consisting of two wind turbines. This entailed assessment of the wind resource in the area, acquiring finance, a connection to the national grid and securing planning permission. The group is now producing enough electricity to power 3,500 houses per annum.

3.5.2 COMMUNITY INVESTMENT IN ENERGY EFFICIENCY - DRUMBANE/UPPERCHURCH

Upperchurch/Drombane is a community of around 1,200 people and 400 houses. A community team called the Drombane Upperchurch Energy Team (DUET) surveyed the areas energy spend in 2011 and found that the community was spending €1 million per annum on domestic energy (heating and electricity).

FIGURE 9: UPPERCHURCH/DRUMBANE COMMUNITY

Over two years with the help of the TEA, Limerick Institute of Technology and North Tipperary LEADER Partnership, retrofit works were carried out on 50 homes and two community halls by local contractors, and retrofitting work continues. Householders have lower energy bills, and the local economy has benefited from the project.

3.5.3 LOCAL AUTHORITY INVESTMENT IN ENERGY - COUNCIL PHOTOVOLTAIC SCHEME

In 2014, in conjunction with the TEA the Council installed solar photovoltaic (PV) panels on 9

local authority buildings to provide renewable electricity and reduce demand by 171,000 kWh annually. The buildings include 3 Civic Offices, 2 Fire Stations, 2 Libraries, a Machinery Yard and a Leisure Centre.

All photovoltaic arrays began generating power in early November 2014 and have an expected life in excess of 25 years. The power produced equates to an average annual reduction in electricity demand of approximately 11% and the Council is saving over €27,000 per annum on its electricity bills with a payback of 7 years.

3.5.4 COMMUNITY FUND - LISHEEN WIND FARM, CO TIPPERARY

A number of wind energy projects in Tipperary have entered into agreements with communities to deliver particular and agreed financial benefits to the local community. Such community funds can empower communities to have direct benefit from renewable energy projects while also contributing to a low carbon economy.

Lisheen Wind Farm is operated by Bord Gáis Energy and is located 15km north of Thurles, Co. Tipperary and is located within the grounds of a zinc mine. During the design process and after discussion with the local community it was agreed to set up a Community Fund known as the Moyne/Templetouhy Community Trust Fund. This was established in 2009 on commissioning of the windfarm. Whilst this is not an example of direct community investment, it is an example a partnership with the local community who has, through this trust fund been able to invest in a number of community projects.

In this respect, the Irish Wind energy Association (IWEA) supports the provision of financial contributions by wind farm operators to local communities and have prepared 'Best Practice Principles in Community Engagement & Community Commitment' 2013 for delivering extended benefits to local communities for wind farm developments of 5 Megawatts (MW) or

above.

6.4 COMMUNITY INVOLVEMENT IN RENEWABLE ENERGY

It is an objective of the Council to encourage direct community investment in renewable energy in Tipperary. Community investment is encouraged at the design and conception stage for all renewable energy installations, and particularly in large scale proposals. The Council will support communities in identifying in the potential for local renewable energy as an investment and economic opportunity for both individuals and the wider local economy. There are a number of ways that local communities can invest in and/or benefit from energy development;

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1. Community Ownership/Investment - where the community either own a renewable energy development in full or own a percentage of the investment
2. Community Benefits Scheme - the establishment of a community benefits agreement (between the developer and the local community), with funds contributed annually by the developer.

Opportunities for community investment and benefit in renewable energy development will be encouraged by the Council. However, outside of the requirement with respect to SID development, community benefit is not a material consideration under the Planning and Development Act 2000, (as amended) and no weight can be given to community benefit when considering a planning application. However, it is an objective of the Council to investigate how community investment in energy with resultant returns to the local community can become much more commonplace in Tipperary.

Climate action objectives

Chapter: Volume 1: Written Statement » Chapter 2: Climate Action

CA11: Flood risk management should prioritise natural solutions.

To carry out climate adaptation measures such as developing NZEB social housing and retrofitting local authority housing, ensuring new public buildings are NZEB and retrofitting existing public buildings, promoting jobs and innovation in the green economy through the Local Enterprise Office and Economic Development Section, facilitating EV infrastructure in public car parks, ensuring flood risk management in conjunction with the Office of Public Works, promoting water conservation in conjunction with Irish Water, incorporating biodiversity and green infrastructure planning into local authority own developments including residential schemes, public parks, open spaces, walking trails and greenways.

Comment: Can we add 'establishing remote working hubs' somewhere and also comment on the Council's own commitment to climate adaptation measures eg. EV for its own fleet?

Can the Council clarify its plan, commitment and transition plan to moving its fleet of vehicles to EV or hydrogen? How will this fleet, maintenance, tools and machinery and servicing of equipment transition to a zero carbon goal? Please address assets, jobs and workers skills.

CA12: We suggest that instead of supporting the development of sustainable buildings the Council could insist all council properties are sustainable (not instead of but as well!).

CA13 & CA14: WEN supports these objectives but suggests that specific time bound targets could be added for elements that are in the Council's control. For example, specific energy targets for council-owned or controlled buildings by a certain date, and decarbonisation of the Council fleet or travel on official Council business by a certain date.

CA16: WEN would like to see clear reference to types of mitigation and adaptation programmes, and suggests to promote regenerative farming methods and full conversion to Organic and/or chemical free production.

There is evidence that switching to regenerative crop and pasture systems could draw down a significant percentage of the annual CO2 emissions. Mentioning the GLAS scheme and the two government departments is positive but more specific and targeted action is needed. Maybe through the new Biodiversity Action Plan (working with farmers) this can be explored?

WEN suggest adding a Climate Action Objective (CA17) to seek opportunities to implement nature friendly carbon sequestration options on council owned or control public lands (for example, community orchards on grass patches or small rewilding schemes to encourage native growth).

Biodiversity as part of core strategy

Chapter: Volume 1: Written Statement » Chapter 3: Core Strategy

3.1 Core Strategy Vision - County Wexford 2027

Comment

Make biodiversity part of our core strategy for Wexford. For example:

Continue to value *and protect* its unique natural environment, built and cultural heritage, and

which offers a range of high quality experiences to both residents and visitors. *Be a county in which biodiversity is restored and flourishes.*

3.4 Core Strategy Guiding Principles

Chapter: Volume 1: Written Statement » Chapter 3: Core Strategy

A. Climate Action

The Core Strategy Development Approach is focused on developing and

strengthening the role of our towns and villages. There is a focus on increasing

residential densities and employment in the main towns, creating 'live-work towns'*,

thereby decreasing the distance that people have to travel from their home to work.

Comment: Insert 'providing a network of remote working hubs' at *

E. Compact growth and liveable sustainable settlements and F. Regeneration

Comment: With higher density living being proposed it is even more important that communities will have access to green open spaces and be connected to nature. The physical and mental health benefits of being able to access nature (as per the Covid-19 experience) has been well documented.

This approach will improve visual amenities, design quality * and place making and will facilitate increased residential population and employment activity, making attractive places to live, work and visit.

Comment: Insert 'enhance biodiversity/access to green open spaces'

3.5 Core Strategy Settlement Hierarchy

Chapter: Volume 1: Written Statement » Chapter 3: Core Strategy

All settlements, regardless of their level, have an important role and contribution to make to the

* economic and social life of the county.

Comment: Insert 'environmental,'

3.6

Chapter: Volume 1: Written Statement » Chapter 3: Core Strategy

3.6.1 Level 1 Key Towns

Wexford Town

There are also public realm projects which will enhance the attractiveness of the town including the Crescent Quay Enhancement work and the public realm elements of the Trinity Wharf scheme which will develop a new urban quarter with high quality public realm, civic spaces, a new boardwalk and an urban greenway.

Comment: People need access to green open spaces, community allotments, orchards and so on. The 'high quality realm and civic spaces' should include biodiversity with lots of planting as there's a tendency for these spaces to be hard landscaped.

Development Approach

Comment: In the development approach section there should be mention of establishing remote working hubs, connecting the public realms and green spaces with cycle lanes and pedestrian walkways, prioritising pedestrians and cyclists in the town centre, making sure that when the Council 'prioritise the development of infill and brownfield sites' - that this development could include community allotments, community gardens/orchards and rewilded areas or spaces for nature. 'Development' should not just mean building. This development approach should apply to all towns eg. Gorey, Enniscorthy Town and New Ross Town and the Level 3 settlements

3.6.7 Open Countryside

The open countryside is at the lowest level of the Settlement Hierarchy and comprises those parts of the county outside of settlements in Level 1 to 6. One off rural housing in the open countryside will be considered where a social or functional economic need is demonstrated in accordance with Section 4.9, Chapter 4 Sustainable Housing.

Comment: The Council should be alert to removal of existing (often mature) trees and hedgerows - particularly boundary hedgerows that provide important wildlife corridors. The works for one off housing often start with the removal of these important biodiverse features. Whilst there is a need for sight lines and access for construction equipment there could be better understanding of the need to keep as much as possible. One example would be for the Council to produce guidelines (in pamphlet form) on the design and layout for one off housing and encourage the private developer to seek assistance on the design of the landscape, including keeping important landscape/biodiverse features, if they are unsure. Where trees and hedgerows are removed for safety or access reasons, there should be within the planning proposal mitigation measures such as tree planting elsewhere on the development site and/or to reinstate the hedgerow once construction works have ceased.

Climate resilience tests

Chapter: Volume 1: Written Statement » Chapter 3: Core Strategy

Have the plans for Trinity Wharf been tested against sea level rise scenarios up to 2 degrees of warming? Can we be assured that the plans for Trinity Wharf, Monck Street and Crescent Quay are climate resilient against sea level rise and flooding from extreme weather events?

Natural gas infrastructure

Chapter: Volume 1: Written Statement » Chapter 3: Core Strategy

GT07, ET07, NT08 considering the urgency of the climate emergency declared by the Dail in May 2019, and the need to rapidly cut greenhouse gas emissions, any proposal to install new natural gas infrastructure needs to be reversed and removed from the plan. While natural gas is touted as a transition fuel it nevertheless remains a fossil fuel with GHG emissions that we would be locking in beyond 2030 if we install new natural gas pipework. This proposal needs to be reviewed and other options such as renewable electricity prioritised instead.

Transport & Commuting

Chapter: Volume 1: Written Statement » Chapter 3: Core Strategy

We strongly support core objectives CS07, CS08 and CS09 and would like to add the proactive development of remote working strategy for Wexford county identifying key locations for hubs in towns and villages (CS16) and the marketing of Wexford's towns (Enniscorthy, New Ross, Wexford and Gorey) as remote working centres of excellence, to reduce the requirement for some of the commuting between north Wexford towns and Dublin.

It is noted that Gorey already has a remote working hub at the edge of the town that could be used as an exemplar.

Restoring biodiversity

Chapter: Volume 1: Written Statement » Chapter 3: Core Strategy

Objective CS04

Comment: Whilst there is a need to achieve more compact growth the concept of 'development' could include developing the infill and brownfield/ regeneration sites or underutilised lands as community allotments, community gardens/orchards and rewilded areas or spaces for nature. A common approach for stewardship of the land could be considered for communities in partnership with landowners and the Council.

CS14 When preparing new local area plans to also ensure they are prepared in accordance with updated environmental guidelines.

CS23 speaks of protecting the environment and landscape. In May 2019 the Dail declared a climate and biodiversity emergency. While we appreciate that biodiversity is usually dealt with in separate biodiversity plans, the urgent need for restoration of habitats and biodiversity, and the urgent transformative change required in how we use our land, we would like to include restoration of biodiversity and retaining as much as possible the existing biodiverse/landscape features such as existing hedgerows and (often mature) trees as a

core strategic objective. This could be achieved by supporting habitat restoration projects in rural communities, by producing landscape guidelines and attaching biodiversity restoration conditions to any rural development.

This element could also be elaborated in the updated Biodiversity Action Plan - through creating awareness of the importance of retaining these landscape/biodiverse features when developing one-off housing and so on.

We would also request that biodiversity restoration actions be added to WT06 and WT09: rather than develop in a manner that does not damage habitat, we would like to see Wexford County Council be pioneers in doing development that enhances and increases biodiversity.

Rebuilding Ireland

Chapter: Volume 1: Written Statement » Chapter 4: Sustainable Housing

4.3 WEN would like to swap position between Pillar 3 and 5, to make clear that “Utilise Existing Housing” will be prioritised over “Build More Homes” (SH 07)

4.4 Sustainable Housing Strategy

SH02: To ensure that all new residential developments provide a high quality living

environment with attractive and efficient buildings which are located in a high quality

public realm and are serviced by well-designed and located open spaces*.

Comment: Insert ‘with local connections to green open spaces and nature. Provision should also be made for planned pedestrian linkages and cycle lanes that will connect all new development to existing services, town centres, nearby schools and so on.’ at *

4.6 Locations for Future Housing page 107

Chapter: Volume 1: Written Statement » Chapter 4: Sustainable Housing

Can waste reduction and management infrastructure be included as a specific item in the infrastructure providers list, for rural settlements? Can this also be added to the fourth bullet point on page 111?

4.7.2.4 Land Development Agency

Chapter: Volume 1: Written Statement » Chapter 4: Sustainable Housing

The Land Development Agency has been established to coordinate and develop key

state owned lands for regeneration and development, and to drive strategic land assembly working with public and private sector landowners to promote the delivery of housing and other development. It is envisaged the agency will have Compulsory Purchase Order (CPO) and other legislative powers to allow a more proactive land management role. The Council will work with the Agency to activate key sites and lands that will assist with the delivery of housing.

Comment: The Council, in conjunction with the Land Development Agency, should promote the housing cooperative models such as Co-housing and Ecovillages run by social and community groups rather than just working with public and private sector land owners (developers).

Objective SH21

To ensure that new housing developments contribute to the social or recreation infrastructure of the community in which they will be located, either through the provision of amenities or through financial contribution.

Comment: These 'amenities' could include providing allotments, community gardens, community orchards, spaces for nature and so on.

4.8.2 Housing for Older People

Chapter: Volume 1: Written Statement » Chapter 4: Sustainable Housing

Comment: Planned pedestrian (and accessible) linkages (and cycle lanes) should be for all settlements/housing units not just for those catering for the elderly.

Objective SH30

Chapter: Volume 1: Written Statement » Chapter 4: Sustainable Housing

To prioritise the delivery of accommodation solutions for people who are homeless or who find themselves in need of emergency accommodation.

Comment: Is the Council familiar with the Housing First Service? Could it work with organisations like the Peter McVerry Trust to roll out this service in the county?

Objective SH36

Chapter: Volume 1: Written Statement » Chapter 4: Sustainable Housing

To facilitate the development of suitably located and well-designed student accommodation which will enable and encourage students to attend third level institutions in the county.

Comment: Does Wexford have a 3rd level institution?

4.9.1 Single (One-Off) Rural Housing Policy Context

Chapter: Volume 1: Written Statement » Chapter 4: Sustainable Housing

As outlined in Section 3.3 single rural housing will be considered in the open countryside only where it is for those with a demonstrable economic or social functional need to live there. Notwithstanding the demonstration of this need, the planning application will be determined based on the proper planning and sustainable development of the area, in accordance with all relevant development plan objectives and development management standards including traffic safety, public health, the protection of natural heritage*, landscape and siting and design. The demonstration of a local rural housing need will not outweigh the need to comply with all other relevant planning and environmental criteria and standards.

Comment: insert 'and biodiversity' at *

Design and Place Making in Towns and Villages

5.5 “Vibrant, Inclusive, Resilient and Adaptable.....resilient to challenges such as climate change and economic instability.” WEN would suggest to add “possible Pandemics” to the challenges.

Objective TV11

To ensure our towns have easy access to biodiversity rich green spaces for physical and mental health. Access to nature should be prioritized in any new development.

Comment: Add a new objective after TV10

Objective TV15 and TV16

Comment: Often the design of the public realm favours hard landscaping. There should be an emphasis on trees (see Tree Strategy proposal in Chapter 11) and enhancing biodiversity - this will encourage ‘place making’ (think mature oaks surrounding a square). Incorporating green infrastructure (see Chapter 11) can both reduce flooding and enhance biodiversity.

Objective TV17

To require that new developments, street, public spaces and other areas of public realm including parks are designed to reflect the design principles of Connectivity,

Enclosure, Active Edge and Pedestrian Facilities/Activity7*.

Comment: Add ‘and enhance the Biodiversity of the town/village’ at*.

Community Orchards

5..7.2. WEN would like to see mentioned in Public Realm places such as: Areas for Organic / Chemical Free/ Regenerative Food Production (Orchards, allotments, communal green houses and so on) to help in supporting a circular economy which tends to guarantee a stable access to Whole Food in the communities (this also in support of Objective TV49 and in line with 5.9.1. Infill, regeneration and Renewal.)

Town and Village objectives

Chapter: Volume 1: Written Statement » Chapter 5: Design and Place-making in Towns and V...

Can restoration and protection of biodiversity in towns and villages be added as an objective in its own right?
Could the Council include an objective to support community initiatives on housing estates, working with residents' associations (no mow zones, pesticide bans, hedgehog highways, insect hotels etc)?

Can lessening human impact and/or enhancing biodiversity be added as a design principle? This would include things like areas for biodiversity in parks, low impact street lighting (see Section 10.8) in towns, green enhancements to buildings or hard structures like bus stops etc (ref bee friendly bus shelters in Utrecht)

Connected places and street design objectives

Chapter: Volume 1: Written Statement » Chapter 5: Design and Place-making in Towns and V...

We welcome the principle that priority is given to pedestrians but it is not clear whether this includes accessibility for those with limited mobility and/or wheelchair users. We would like to see this made clearer in the objectives TV19 to TV26

Connectedness for biodiversity should be included in objectives TV19 to TV26. Including small green features such as street trees and in the public realm, flower boxes or green privacy strips provides connectedness for pollinators and garden birds. Urban trees improve air quality and offset urban heat in periods of high temperature. They can be an alternative to traditional hard structures like bollards. Establishing green infrastructure such as rain gardens, swales and green roofs can also provide biodiversity connectedness or ecological networks - see Chapter 11 and proposed Tree Strategy.

5.9 Compact Growth and Regeneration

Chapter: Volume 1: Written Statement » Chapter 5: Design and Place-making in Towns and V...

For objectives TV27-TV41 the concept of redevelopment, renewal of areas, regeneration- for infill, brownfield, derelict sites and institutional lands - should also encompass developing these areas for community gardens, community orchards, allotments and spaces for nature (wilding areas). There is also the possibility of transforming these areas into continuous productive urban landscapes (CPULs), also referred to as urban farms. CPULs is an urban design concept integrating food growing into the design of towns and cities through joining together existing open space and disused sites. There is potential for this to connect with the design of the public realm where (TV16) - connected to CPULs or the surrounding agriculture - that the existing and planned squares in towns and villages become 'market squares' at the weekend for local farmers and food

growers.

https://www.researchgate.net/publication/44960513_Continuous_Productive_Urban_Landscape_CPUL_Essential_infrastructure_and_edible_ornament

5.10 Vibrant, Inclusive, Resilient and Adaptable

Chapter: Volume 1: Written Statement » Chapter 5: Design and Place-making in Towns and V...

Objective TV47

To support development which will add to the vitality and vibrancy of our towns and villages including development which will increase population, result in additional services and extend opening hours.

Comment: Add to this objective or make a new one: The provision of a flexible open space/public realm that can function as a market square at the weekend and as a place for festivities during the holiday period. This could mean reinstating the old market square (often used as a car park) back to its original purpose. Reinstating or providing for a 'town square' for people to come together to celebrate/trade can enhance the place-making of a town or village.

Economic Development, 6.3

Chapter: Volume 1: Written Statement » Chapter 6: Economic Development Strategy

WEN would like to add Remote Working to the options for reducing transport emissions.

Economic Development, Agriculture

Chapter: Volume 1: Written Statement » Chapter 6: Economic Development Strategy

"Support the agriculture sector to transition to economically and environmentally viable farming methods" WEN would like to add "such as Regenerative farming and Organic and chemical free methods", we would like to ask for a much stronger commitment to an immediate cease of damaging agricultural practices by clearly mentioning in the plan the need for new stronger bans on chemicals and soil damaging practices, and towards a Fully Organic production within Co. Wexford. We would like to suggest that along with other detailed plans, Wexford should create a County Food Plan to detail how we can achieve food sovereignty and resilience.

Models such as Edible Cities would be worth examining

6.5.2

Key Sectors:

WEN would like to see more encouragement towards primary food production, with a focus on regenerative agriculture and horticulture, as it is evident from FIGURE 6-5 that Sows needs to be incremented as more environmentally friendly than any other farming activity. We cannot shy away from having to reduce livestock emissions and the need to support farmers for a just transition.

We would like to see a core objective of the plan to be “Recognising the value of agriculture and quality food supply to the economy of Wexford, but balancing that with the environmental impacts, a core objective of this plan is to set a target for Wexford to become the model in Ireland for sustainable farming producing high quality food with positive environmental impacts”

Figure 6.5 is sourced from the IFA which is a lobby group for agriculture - the facts in figure 6.5 are correct but the other side of the equation that presents the environmental cost of *current* agricultural norms is not shown (greenhouse gas emissions, water pollution, soil degradation, biodiversity loss). Nitrate pollution is consistently high in Co. Wexford’s waters, pesticides are regularly detected by water monitoring and in the last EPA Water Quality report two of Wexford’s estuaries were identified as two of the four highest levels of nitrate in the country.

We would like these facts to be displayed as part of Figure 6.5 to give the full picture of both the value of agriculture and the impacts and costs of current environmental practices:

1. Habitats and Species: The NPWS report on the status of Habitats and Species under Article 10 of the EU Habitats Directive found only 15% of the habitats assessed were favourable conditions: 46% were inadequate and 39% were bad. Page 83 of the NPWS report identifies agriculture as by far the biggest pressure, and biggest threat, to our habitats with over 70% of the habitats assessed showing agriculture practices having a negative effect on their condition.

(https://www.npws.ie/sites/default/files/publications/pdf/NPWS_2019_Vol1_Summary_Article17.pdf)

2. Water Quality: Agriculture, as the most prevalent land use in Ireland, exerts the most pressure on water quality (page 338 of Ireland’s Environment: An Integrated Assessment 2020, EPA). Agriculture is the main pressure on river, lake and groundwater quality in Wexford’s four catchments (EPA catchments.ie website). High nitrogen is generally caused by agricultural fertilisers and the Corock estuary, New Ross Port and Upper Slaney estuary have all exceeded environmental quality standards for nitrogen in 2013 - 2018 (Water Quality in Ireland 2013-2018, EPA).

3. Greenhouse Gas Emissions: Agriculture is Ireland’s largest source of greenhouse gas emissions, at 33% in 2018. EPA projections show that instead of decreasing, agricultural greenhouse gas emissions will increase over

the next decade due to planned increases in the dairy herd.

Changing and modernising agriculture is no longer “a pressure” on the environment - this should be reworded to “damaging”. The main pressure on Wexford’s catchments is agriculture (according to subcatchment assessments on the catchments.ie website)

ED94 The criteria that will be used to assess intensive agriculture should be publicly available, it is unlikely such facilities would not cause impacts on animal welfare, environment or both so full transparency is important.

ED95 should be carried out in the context of Wexford’s ambition to be a leader in the Green Economy and this should be referenced in the objective.

ED96 waste should be added to the list of factors. Environmental impacts should be expanded to include ambient water quality, biodiversity and soil quality.

Objective ED55

Chapter: Volume 1: Written Statement » Chapter 6: Economic Development Strategy

“To facilitate commercial development, including office, industrial and commercial development, at scale appropriate with the nature and scale of the settlement.” WEN would strongly recommend to only facilitate smaller scale developments such as local shops over more big mixed retailers and supermarkets, or any other commercial development that promotes unhealthy or non sustainable (wasteful) lifestyle, in order to minimise their environmental impact.

Rural Economy

Chapter: Volume 1: Written Statement » Chapter 6: Economic Development Strategy

WEN welcomes the intention to leverage funding for helping the development of the rural economy in Ireland, and would like for the Council to focus and commit in directing them only towards Best Practices, by clearly mentioning the encouraged methods for agriculture and aquaculture and adding the terminology: Chemical Free, Organic, Permaculture, Regenerative, Riparian and so on.

Section 6.6 & Remote Working

Chapter: Volume 1: Written Statement » Chapter 6: Economic Development Strategy

During 2020 remote working became the norm for many office based staff and anecdotally it appears that this led to some level of resettlement to Wexford, from Dublin.

Objectives ED 06 and ED10 should reference remote working and a strategy to provide infrastructure or remote working hubs, as an alternative to commuting from Wexford to Dublin.

Local Enterprise Offices could commission a short study to find out the impacts of Covid19 remote working on Wexford - did people move, where did they move to, how many people already in Wexford were able to reduce their commute and what did this mean to them, how can remote working be supported long term (offset isolation, provide centralised facilities) and are there any large office-based companies based in Dublin would be interested in partnering on a remote working initiative with Wexford.

6.6.1 People Objectives

Chapter: Volume 1: Written Statement » Chapter 6: Economic Development Strategy

If Wexford can combine being a leader in sustainable agriculture with being a leader in sustainable construction, through the NZEB Centre of Excellence in Enniscorthy, then Wexford can position itself as the national leader in the implementation of a green economy. This ambition is set out in section 6.7.5 but without linking it to specific objectives in developing people skills it appears somewhat standalone.

We suggest developing ED17, or adding a new objective, around developing skills to implement the green economy in Wexford by building on the NZEB Centre of Excellence and Teagasc.

ED22 can be expanded to include an ambition to make Wexford a national leader in green economy implementation, making stronger links to section 6.7.5

Circular Economy

Chapter: Volume 1: Written Statement » Chapter 6: Economic Development Strategy

Section 6.6.2

In the context of an overarching ambition to make Wexford a leader in the Green Economy we would like to see more reference to specifically fostering the circular economy when fostering entrepreneurship in Wexford county.

ED21 & ED22 add leader in circular economy to these objectives

ED23 includes “leader in green economy” as a quality we strive for. As this becomes more important to companies (for both their image and to avoid environment taxes/fines) this should be a valid reason to attract investment.

ED24 add “circular economy” as well as lean initiatives

ED25 add circular economy as well as innovation

Environmental boundaries and targets

Chapter: Volume 1: Written Statement » Chapter 6: Economic Development Strategy

ED50 There are no environmental limits or boundaries on this target, and we would like to see them added as a core element.

For example

“To prioritise the provision of waste, water, ICT and transport infrastructure for the

four towns and ensure that the areas identified for economic development in each

towns are adequately and appropriately served. To ensure that existing environmental limits for each location are well understood and communicated, to develop within these boundaries and to seek to couple economic development with environmental regeneration rather than simply seek to “do no harm”.

Doughnut Economics provides a useful framing with two circles of different sizes: the outer circle represents planetary boundaries and the inner circle a social foundation. The space between these two rings is described as the doughnut, a **safe and just space** between the two, in which **humanity** can thrive. Each town can analyse where they are in the doughnut drawing a visual representation with data which becomes an info-graphic for monitoring, communication and focusing action.

Wexford Town

Chapter: Volume 1: Written Statement » Chapter 6: Economic Development Strategy

ED51 Has the plan for Trinity Wharf been tested for climate resilience? Add the green economy as a reason to attract tourism and a mechanism to keep tourism sustainable.

Gorey Town

Chapter: Volume 1: Written Statement » Chapter 6: Economic Development Strategy

ED52 Can the local enterprise office seek partnerships with Dublin based organisations to participate in a remote working partnership or pilot. If Wexford county adopts an ambition to be a leader in the green economy then this offers opportunities for Gorey to have niche retail in sustainable/circular economy products that could attract consumers from Dublin.

Enniscorthy Town

Chapter: Volume 1: Written Statement » Chapter 6: Economic Development Strategy

ED 53 Now that remote working is more understood following Covid 19, could Enniscorthy be developed and marketed as a suitable location for remote working hubs

New Ross Town

Chapter: Volume 1: Written Statement » Chapter 6: Economic Development Strategy

ED54 rather than limit the development of New Ross Port to be in compliance with the habitats directive, could we show leadership in development that restores or augments habitats? Can an objective be included to develop New Ross port to include mitigations or solutions for high nitrate levels in the water.

Rural settlements

Chapter: Volume 1: Written Statement » Chapter 6: Economic Development Strategy

ED61 Can restoration and/or augmentation of habitats and/or circular economy projects be added to the list of items the council will seek investment in

E89 Rather than “do not impact negatively on the quality of the environment or character of the area” can the objective be to enhance or restore it?

Economy & Forestry

Chapter: Volume 1: Written Statement » Chapter 6: Economic Development Strategy

ED 103 Change the requirement that the forestry has “no significant adverse impacts” to improves or restores

Tourism Strategy, 7.5.2

Chapter: Volume 1: Written Statement » Chapter 7: Tourism Development

WEN strongly support rolling out EV charging to all tourist destinations in the county

Wexford has an ambition to be a leader in the green economy and sustainable development. The enhancements and protection of habitats and biodiversity should be part of the strategy, so that ecotourism (that is sensitive to habitats and species) can become a strategic goal. One example of amenities like this is the Wexford Wildfowl reserve where the species and habitat is prioritised but viewing towers and hides allow visitors to watch the wildfowl from a distance. Protecting and enhancing other habitats like Our Lady's Island and having similar sensitive amenities would be another driver to habitat protection.

Development of Wexford as a model for ecotourism that prioritises habitat and species protection should be added as objective.

Blueways

Chapter: Volume 1: Written Statement » Chapter 7: Tourism Development

Blueways are particularly sensitive to litter pollution, especially plastics. We would like to add text to the effect "strong litter control measures will be required as part of any blueway development"

For TM30 we would like to see litter control as part of the planning conditions for these facilities and strong promotion of plastic free business.

Integrated Resorts and Amenities

Chapter: Volume 1: Written Statement » Chapter 7: Tourism Development

WEN would like to suggest to facilitate only low impact tourist amenities such as the already mentioned nature trails, walking trails, trekking courses.

Co. Wexford already counts 9 Golf courses and 15 Spas, all well established. These recreational activities have a much higher environmental impact and we would like to see a clear shift from luxuries towards more sustainable and inclusive recreational options.

Climate action & tourism

Chapter: Volume 1: Written Statement » Chapter 7: Tourism Development

More summer droughts is a potential impact of climate change, so assessing the capacity and resilience of water supply for increased summer volumes would need to be added to the last bullet point at the top of page 247.

Accessibility

Chapter: Volume 1: Written Statement » Chapter 8: Transportation Strategy

We would like it to be specified that “walk” is updated or expanded to always mean that footpaths or walkways are also accessible to wheelchairs or other mobility aids by default.

Concrete plans for walking and cycling

Chapter: Volume 1: Written Statement » Chapter 8: Transportation Strategy

WEN are concerned that the most concrete plans in the Transport chapter are for road building and improvements. There are aspirational objectives for walking and cycling but they have not been worked out in the same detail as the road proposals.

We would like to see the 2027 targets for increasing walking and cycling to work and school broken into annual targets for each year, and preferably for targeted geographical areas each year to achieve shifts each year. High level objectives could be set in the county development plan with implementation details in the subsequent local transport plans.

Climate change mitigation cannot be achieved if road building and prioritisation of road outpaces development of public transport, walking and cycling infrastructure.

Title TS36

Chapter: Volume 1: Written Statement » Chapter 8: Transportation Strategy

New bus shelters can be modelled on the pollinator friendly bus shelters of Utrecht that have pollinator friendly plants on the roofs

National Roads Objectives

Chapter: Volume 1: Written Statement » Chapter 8: Transportation Strategy

An objective should be added to ensure that biodiversity corridors are installed on national routes and native planting at roundabouts.

An objective should be added that it will be a condition of all new road projects to include wildlife connections (wildlife tunnels, wildlife bridges).

Include specific Council focussed objectives: to prohibit council staff using pesticides along roadways and to establish no cut and no mow zones on Council managed land.

Working definition of infrastructure

Chapter: Volume 1: Written Statement » Chapter 9: Infrastructure Strategy

In chapter 9 the term infrastructure extends to water, wastewater, waste management, telecommunications and ICT infrastructure. Please amend waste management to specify that in the chapter it means “waste minimisation, recovery and recycling infrastructure”.

9.4.2 Strategy

To promote and facilitate best practice in the prevention, re-use, recovery, recycling

and disposal of all waste produced in the county.

A similar statement should be made about water, ie,

To promote and facilitate best practice in protecting water quality, water conservation, rainwater harvesting, water loss minimisation and leak management and water use efficiency before considering expanding the water supply infrastructure.

Water supply should also be pandemic proofed as current, and future pandemics could potentially increase our consumption of clean water (for handwashing, cleaning and so on).

Objectives IS01 & IS04

Chapter: Volume 1: Written Statement » Chapter 9: Infrastructure Strategy

Include implementing rainwater harvesting for toilet flushing/grey water use, water use controls and drinking water filtration as integrated elements in all new developments as a condition of planning permission.

To ensure the efficient and sustainable use and development of water resources and water services infrastructure in order to manage, protect and conserve water resources in a manner that supports a healthy society, economic development requirements and a cleaner* environment.

Comment insert biodiversity rich at *

Objective IS04

To provide and upgrade waste water treatment infrastructure to address environmental problems and protect water bodies*

insert as a matter of priority at *

Objectives WS05, 06, 13, 14 & 15

Chapter: Volume 1: Written Statement » Chapter 9: Infrastructure Strategy

Objective WS05

To work with the EPA to address issues with water supplies identified on their

Drinking Water Remedial Action List during the lifetime of the County Development

Plan including* the water supply in Clonroche.

Protecting drinking water sources is important but should be expanded to include continuity of safe supply, to eliminate the need for boil water notices to be issued. The priority to keep hazardous chemicals out of our water is important - the impact of hazardous chemicals on biodiversity needs to be better understood. The Council needs to lead by example and have a clear and transparent Pesticide and Hazardous Chemical Strategy (preferably ban all pesticides!).

Insert but not limited to at *

Objective WS06

And to require all existing

Strengthen WS13 to require all new developments and new builds to install rainwater harvesting by default.

Objective WS14

Included a new objective whereby the Council has to work with the relevant bodies (Department of Agriculture, Food and the Marine, EPA?) to minimise pollution risk from agricultural sources. Agriculture (through nutrient loss from fertiliser/slurry, sediment loss and runoff from pesticides) is the main pressure on Wexford's waters and needs a transformational approach to respond to this. More programmes like the Duncannon Blue Flag Farming and Communities Scheme need to be rolled out.

Objective WS15

Include an objective where the public can engage with the Council and Irish Water on specific needs or when issues arise. The Council should also put more resources into community initiatives that are needed, such as river clean-ups and educational activities (citizen science, school programmes and so on).

The Council and Irish Water need to engage with and support (resources/funding)the LAWPRO programme to support bottom-up, water management.

9.6.2 Planned Public Wastewater Projects

Chapter: Volume 1: Written Statement » Chapter 9: Infrastructure Strategy

Several projects have been put on the long finger and this is not acceptable, especially when there is a commitment WS01 to comply with European legislation on the discharging of wastewater. According to the EPA 2019 report the Wexford seaside towns of Duncannon, Arthurstown and Ballyhack all continue to pump raw sewage into the Suir estuary.

Include an objective to seek timebound commitments from Irish Water for treatment plant works.

Waste Management Objectives

Chapter: Volume 1: Written Statement » Chapter 9: Infrastructure Strategy

We would like to see some objectives around local waste minimisation and alternative treatments "co-op schemes" at the local area level, involving communities.

We would like an additional requirement to minimise agricultural waste to WM10.

Objective WM01

To sustainably manage waste generation, support the investment in different types of waste treatment and support circular economy principles, prioritising prevention, reuse, recycling and recovery, to support a sustainable and healthy environment, economy and society.

Comment: Could new commercial developments show commitment to reducing their in-house waste - either through reusing and/or recycling as part of the condition for planning? Could there be grants for existing commercial developments to reduce their in-house waste generation or produce products that are easily recyclable without downgrading? Could the Council with other relevant organisations provide 'circular economy training' and closed loop self-sustaining systems for businesses? Promote substitution of certain materials and dematerialisation? Eg. 'rent floor covering' not 'buy carpet'.

Objective WM03

To support the development of appropriately sited waste recycling and recovery facilities, such as bring centres, civic amenity centres, waste transfer stations, material recovery facilities and waste recovery facilities and authorised treatment facilities for end-of-life vehicles as a means of facilitating a reduction in the quantity of waste that goes to landfill disposal sites subject to compliance with the locational requirements for waste management facilities contained in Section 9.7.3 and subject to compliance with Objectives WM05 or WM06, and normal planning and environmental criteria and the relevant development management standards set out in Volume 2.

Comment: Special attention shall be given to recycling and recovery facilities along the coastal region due to the sensitivity of plastic pollution in the marine environment. The Council shall engage in a comprehensive and countywide campaign in tackling plastic pollution beginning with educational awareness of the catastrophic impact of plastic pollution on marine wildlife (the No. 1 killer). The increased use of PPEs and disposable masks could significantly add to the plastic pollution of our water bodies and therefore a pandemic proofing should be part of the Council's strategy.

Objective WM10

To require that the disposal of agricultural waste is carried out in a safe, efficient and sustainable manner having regard to protection of the environment and public health and in compliance with the Nitrates Directive , Good Agricultural Practice for the Protection of Waters) Regulations 2017 (SI 605 of 2017), the Habitats Directives and any other relevant statutory provisions.

Comment: The Council could be proactive in this situation - for example - they could work with the relevant bodies (Department of Agriculture, Food and the Marine, Teagasc) to minimise pollution risk from agricultural sources such as slurry. Awareness campaign etc. - understanding the fertilising benefits of slurry, when is a good time to spread with minimal loss of N and surface run-off into water bodies and so on.

Objective WM11.

There is no clear information on medical packaging about how to dispose of it properly. The information usually says "dispose of carefully" - this is too generic to be effective. An extensive awareness campaign needs to be initiated to prevent disposal through flushing or pouring down the sink. There is no collection or disposal facility from domestic waste collection providers

Bring Back schemes are needed at pharmacies to provide this facility.

An extensive awareness campaign needs to be initiated to prevent disposal of medication through flushing or pouring down the sink. The effects on biodiversity needs to be shown explicitly - like the awareness campaign initiated for plastics - for example, showing animals damaged by these medications. We would like to see working with Irish Water on such an awareness campaign included as an objective.

WW12

Chapter: Volume 1: Written Statement » Chapter 9: Infrastructure Strategy

Ban the use of pesticides by the Council.

Section 9.7

Chapter: Volume 1: Written Statement » Chapter 9: Infrastructure Strategy

Add community reuse networks, repair cafes and upcycling services to table 9.7

Include encouragement and support for reuse networks, repair cafes and upcycling services to section 9.7.3. Add this to objective WM 03.

Litter management

Chapter: Volume 1: Written Statement » Chapter 9: Infrastructure Strategy

9.7.7 “While local communities and local authorities are actively involved in clean-up projects across the country, it is clear that enforcement and resources are still required to tackle on-going litter and fly tipping problems.”

WEN would like to address that Litter pollution requires a much stronger approach to be contained and eventually avoided, surely the increase of recycling facilities able to finally recycle wrappings not currently recyclable in Ireland is a much needed step, but it is clear that even recycling is not a sustainable solution as it is already impossible to keep up with the amount of waste produced daily. So, even more important is to commit to avoiding the problem at its source everywhere possible, as soon as possible. As we believe there are already enough supermarkets and gadget or clothing shops in Co.Wexford, we suggest to encourage and support businesses that sell recyclable and compostable items of all kinds (taking into account that some businesses sell medical and other essentials that require the use of non recyclable plastics/materials) and gradually enable the alignment for all existing businesses towards a zero waste system.

WEN recommend commissioning a waste audit in conjunction with the Tidy Towns network to identify the top occurring brands in Wexford’s litter. The results of this audit should be used to create an enforcement strategy for implementing “polluter pays” actions against the brands who contribute most to litter pollution.

Historic Landfills Objectives

Chapter: Volume 1: Written Statement » Chapter 9: Infrastructure Strategy

Objective HL02

To implement remediation plans for the identified historic landfills in the county including recognising the potential of these landfills, after suitable remediation measures that involve safe management of gas and leachate, to become public parks.

Graveyards and Crematoria

Propose a new objective:

GC04: To encourage native planting and biodiversity schemes at graveyards in a manner that is sensitive to these locations and enhances the tranquility and comfort for those visiting graves. The Council could produce guidelines on how to manage these graveyards to protect and enhance wildlife. The Council could also roll out a pilot project on a suitable graveyard to show the tangible benefits of such an approach - creating a graveyard-nature reserve!

To add an objective for the provision of multi-denominational and non-denominational burial grounds as part of an inclusive and integrated society.

We would like the Council to examine the provision of Natural Burial Grounds or Woodland and Green Burial sites?

<http://www.naturaldeath.org.uk/index.php?page=find-a-natural-burial-site>

Telecommunications & ICT Strategy

Chapter: Volume 1: Written Statement » Chapter 9: Infrastructure Strategy

Add the development of remote working hubs to objective TC04

9.11 Flood Risk and Surface Water Management

Chapter: Volume 1: Written Statement » Chapter 9: Infrastructure Strategy

Objective FRM07

To ensure that all future development proposals comply with the requirements of the Planning System and Flood Risk Management –Guidelines for Planning Authorities (DEHLG and OPW, 2009) and Circular PL2/2014, in particular through the application of the sequential approach and the Development Management Justification Test. In this regard, the Planning Authority will apply the precautionary principle and will screen all proposals for flood risk and will pay particular attention to lands within,

along the edge or adjacent to Flood Zone A or B.

Comment: Soil sealing exacerbates flood risk - green areas need to be protected, particularly natural wetlands that can provide a flood relief buffer. Planning needs to prioritise building on land that has already been sealed (e.g. brownfield or abandoned sites) to protect green field sites. The protection of natural wetland areas or potential flood zones along rivers or the coast needs to be strengthened to reflect their importance as natural water retention zones to help reduce flood impact.

Objective FRM14

To require the use of sustainable drainage systems (SuDS) to minimise and limit the extent of hard surfacing and paving and require the use of sustainable drainage techniques where appropriate, for new development or for extensions to existing developments, in order to reduce the potential impact of existing and predicted flooding risks.

Comment: Sustainable (Urban) Drainage systems (SuDS) should be considered. SuDS help to prevent flooding and pollution from surface runoff by storing or re-using surface water at source, by decreasing flow rates to watercourses and by improving water quality. There are several ways this is done:

- source control methods decrease the volume of water entering the drainage/river network by intercepting run-off water on roofs for subsequent re-use (e.g. for irrigation) or for storage and subsequent evapotranspiration (e.g. green roofs).
- pre-treatment steps, such as vegetated swales (ditches) or filter trenches, remove pollutants from surface water prior to discharge to watercourses or aquifers.
- retention systems delay the discharge of surface water to watercourses by providing storage within ponds, retention basins and wetlands for example.
- infiltration systems, such as infiltration trenches and soak ways mimic natural recharge, allowing water to soak into the ground. See <https://youtu.be/LMq6FYiF1mo>

For developments over a certain size, for example, housing estates, hospitals, large hotels and so on, planning should only be granted where Sustainable (Urban) Drainage systems are also implemented. Many of the green infrastructure/SuDS - green roofs, rain gardens, retention ponds and so on have shown to enhance biodiversity. The local authorities should also consider retrofitting existing streets and spaces with SuDS. SuDS can have a positive effect on reducing combined storm overflows (CSOs) and thereby reducing the potential for water pollution from urban wastewater.

Objective FRM15

To ensure that where flood risk management works take place that the natural and cultural heritage and rivers, streams and watercourses are protected, * and improved where possible.

Insert with particularly emphasis on protecting and enhancing biodiversity at *

Add the prioritisation of natural flood solutions and the engagement of an ecologist to objective FRM11, and FRM15.

We very much support FRM16 & 17. Nature-based solutions (as well as SuDS) should be prioritised, this will minimise ongoing maintenance and increase survivability and success of waterworks. Wetlands are an extremely valuable resource for filtering grey water and agricultural run-off and provide areas of high biodiversity. These solutions however should be designed with ecologists as well as engineers to ensure sensitive habitats are not negatively impacted by flooding.

In rural areas the Integrated Constructed Wetlands might be a more appropriate solution.

See the Anne Valley catchment in neighbouring county Waterford.

<https://www.irishtimes.com/news/environment/swampy-tale-that-could-help-us-out-of-a-morass-1.1510859>

A balance needs to be struck between protecting communities from floods while preserving water quality. Some recent flood relief works in Ireland have negatively impacted on water ecology and it is not apparent that natural flood relief methods are considered first, ahead of artificial methods like dredging and installing hard infrastructure. Natural flood relief should be the default. Also, in urban settings implementation of SuDS will prevent localised flooding. ICWs will help prevent flooding in large river valley catchments and appropriately sited broadleaf forestry have shown to reduce the risk of flooding.

Objectives FRM18

To ensure riparian buffer zones, a minimum of 10 metres in width (in some cases buffer zones of up to 50 metres may be appropriate), are created between all

watercourses and any future development. In considering the appropriate width, the Council will have regard to 'Planning for Watercourses in the Urban Area' (Shannon Regional Fisheries Board).

Comment: Could this be rolled out to agricultural lands retrospectively, that is, to ensure riparian buffer zones along rivers and lakes bounding farmland? The Council could support measures to install natural buffer zones and prevent river bank erosion, through things like

riparian planting and/or brush (https://www.sepa.org.uk/media/219450/bank_protection_guidance.pdf), to protect our water courses and help manage flood risk. The Council could support measures with Teagasc and other relevant bodies. Flooding results in increased riverbank erosion, further increasing turbidity of water and impacting all submerged aquatic vegetation that aquatic species rely on for their life cycles, such as salmonids.

Objective FRM19

To only consider proposals for the culverting/piping of streams and watercourses where these works are absolutely necessary and appropriate. Inland Fisheries Ireland (IFI), National Parks and Wildlife (NPWS) and the Office of Public Works (OPW) will be consulted, where appropriate.

Comment: Would the Council consider 'daylighting rivers'? Add

Objective FRM20

To consider daylighting rivers and streams that have been culverted/piped. Inland Fisheries Ireland (IFI), National Parks and Wildlife (NPWS) and the Office of Public Works (OPW) will be consulted, where appropriate.

9.11.11 Surface Water Management

Chapter: Volume 1: Written Statement » Chapter 9: Infrastructure Strategy

All developments will be required to incorporate SuDS. The application of SuDS techniques will be site-specific and will depend on the site's characteristics and will be required to demonstrate that climate change considerations have been incorporated into the design.

SWM02 and SWM03 - separation of foul and surface water should be prioritised and addressed with some urgency to prevent foul water from infiltrating surface water bodies during periods of high rainfall.

Objective SWM04

To promote and support the retrofitting of Sustainable Urban Drainage Systems (SuDS) in established urban areas.

Stronger wording than 'promote and support'. To provide for the retrofitting of Sustainable Urban Drainage Systems (SuDS) in established urban areas as a matter of priority. The added benefit is the enhancement of biodiversity in urban areas through the provision of swales, rain gardens, retention ponds and green roofs. The Council will seek funding from the EU and other sources to achieve this objective.

SWM06 and SWM07 - rather than use language like encourage/discourage - Green Roofs and the use of hard non-porous surfacing and pavements within the boundaries of urban residential developments and rural housing sites should be part of the planning condition.

Power transmission

Chapter: Volume 1: Written Statement » Chapter 9: Infrastructure Strategy

Add an objective to install community power generation in housing and industrial areas to augment the power that needs to be transmitted (solar arrays, turbines)

9.13 Gas network

Chapter: Volume 1: Written Statement » Chapter 9: Infrastructure Strategy

Remove this objective and replace it with support for alternative energy solutions such as sustainable and renewable sources.

While gas is touted as a transition fuel it is still a fossil fuel with GHG emissions: installing new infrastructure locks us into GHG emissions for at least the next decade and is inconsistent with the seriousness of the climate emergency and Paris Agreement.

Preamble

Chapter: Volume 1: Written Statement » Chapter 10: Environmental Management

As part of the preamble for this chapter, we suggest the Environmental Pillar is considered first and foremost, before all planning and regulatory decisions. Though we greatly understand the importance of social and economic pillars, these socio-economic constructs will be massively impaired if we do not prioritise environmental sustainability. All Government Departments and Local Authorities need to have full access to information informing them of the true socio-economic value of healthy and resilient soils, rivers, marine areas and climate.

Climate Action and the Environment

Chapter: Volume 1: Written Statement » Chapter 10: Environmental Management

Requiring new agricultural developments to comply with the Nitrates Directives and

facilitate development that will contribute to achieving the objectives of the Green,

Low Carbon Agri-Environment Scheme (GLAS)

Comment: Stronger statement on reducing pollution from agricultural sources need to be made - ie

- Agriculture subsidies that currently reward farmers for utilising every square inch of their land should be overhauled. The Council in collaboration with relevant bodies such as Teagasc should support farmers to increase habitat and riparian vegetation on their land which is proven to be a multidimensional solution for climate change, biodiversity loss, water quality degradation, habitat loss, bank erosion and siltation of riverbeds and Zostera, seagrass beds. Alternative sources of funding (other than the CAP) should be identified to support farmers to implement these measures.

In areas where diffuse phosphate application is an identified pressure on water bodies, comprehensive riparian vegetation and wetland restoration should be strictly enforced and supported by DAFM and Dept. of HPLG. Where nitrate sensitivity is an identified pressure on waterways, restrictions should be put in place to limit application of organic and synthetic fertilizers, to minimise the threat of eutrophication in our rivers, estuaries, and coastal maritime areas

- Promoting a circular economy for all developments to save energy and reduce waste thereby reducing potential waste pollution. Eliminating single use plastics and drastically reducing the use of plastic in other circumstances - with the Council taking the lead through the continued elimination/minimisation of plastic when conducting all its services.

To set objectives and targets for achieving zero waste. To set conditions and incentives for reduction in plastic use. To pursue Zero Waste status for Wexford towns and villages, starting with one implementation in one location in the first three years of this plan

<https://www.zerowastescotland.org.uk/content/why-we-need-more-zero-waste-towns>

Environmental Management Strategy

Chapter: Volume 1: Written Statement » Chapter 10: Environmental Management

We would like the strategy statement to reference the climate and biodiversity crisis declared by the Dail in 2019. We would like the strategy statement to reference the need for an urgent decade of action called for by Ireland's Environment: An Integrated Assessment 2020 (EPA, 2020). To reinforce the statement that the Environmental Pillar is to be considered first and foremost, before all planning and regulatory decisions. Though we greatly understand the importance of social and economic pillars, these socio-economic constructs will be massively impaired if we do not prioritise environmental sustainability.

We would like the strategy statement to include an objective to prioritise urgent action to transition to a carbon free, sustainable society where nature is enhanced and protected, both via the County Development Plan itself and via all the associated plans that will be published.

Please add a new Objective to objectives EM01 to EM05:

To recognise that Ireland is in a Climate and Biodiversity Emergency. To not grant permission to any project or development that contributes to this twin emergency. To prioritise and support projects and developments that contribute to just transition to a carbon free society and urgent transformational change towards sustainable economy.

Also in the statement

- To recognise the benefits of a good quality * environment for the ** health and wellbeing of our residents, visitors, habitats and ecosystems.

Insert 'biodiversity rich' at * 'mental and physical' at **

10.5 Water Quality

Chapter: Volume 1: Written Statement » Chapter 10: Environmental Management

The protection of these valuable resources is of vital importance to protect both human health * and provide for a healthy environment.

Comment: Insert 'the biodiversity and health of aquatic species' at *

In Section 10.5.3 Overview of Water Quality in County Wexford it would be useful to include the main causes of moderate, poor or bad status in Wexford: the top three pressures are Agriculture, Waste Water and hydromorphology pressures (catchments.ie website)

Water Quality Objectives

WQ Objectives should reference objectives WS05, WS14, WM10, FRM07, FRM18 and SWM02 and SWM03.

Objective WQ11

To take actions to reduce chemical and biological pollution of water sources and to also consider this when assessing planning applications.

Comment: consider WS05 and proposed Objective WM11.

Objective WQ13 and Objective WQ17

Adding to these objectives the catchment approach with the 'river trust model' rolled out to as many suitable river catchments. The Rivers Trust is the umbrella organisation for 60 local member Trusts - they are a group of environmental charities in the UK and Ireland, dedicated to protecting and improving river environments for the benefit of people and wildlife. The River Trusts can lead the way in river protection and improving river biodiversity <https://www.theriverstrust.org/who-we-are/about-us/> .

Objective WQ18

To participate and support the farming community in the application of schemes such as the Duncannon Blue Flag Farming and Communities Scheme and the LIFE programmes to achieve the objectives of the respective Directives in a collaborative

Manner.

Comment: Need stronger message - see WS14 and WM10.

Section 10.6 Air Quality

Chapter: Volume 1: Written Statement » Chapter 10: Environmental Management

Include a reference to poor air quality in our urban centres, particularly during winter months. Add that the main drivers of poor air quality in Wexford are the burning of solid fuels and transport. Add that Wexford County Council supports a call for a ban on the sale and burning of smoky coal.

Objective EL02

Chapter: Volume 1: Written Statement » Chapter 10: Environmental Management

Comment: Can the Council change public lighting from blue and white toned LEDs to amber toned lighting as the blue and white tones are hugely contributing to a collapse in night pollinators -

<https://onlinelibrary.wiley.com/doi/abs/10.1002/jez.2184> . The Council should research the best wildlife friendly lighting for street lighting.

Biodiversity strategy

Chapter: Volume 1: Written Statement » Chapter 10: Environmental Management

Understanding that a new biodiversity plan is imminent, we would like to see biodiversity added as a new section to Chapter 10 or Chapter 13 to establish an overarching strategy for biodiversity in Wexford that the new (updated) biodiversity plan can build on.

Green Infrastructure

Chapter: Volume 1: Written Statement » Chapter 11: Landscape and Green Infrastructure

11.4 Goal

The overall goal is to protect the inherent beauty * of our landscape and to promote and enable appreciation and enjoyment of the County's landscapes.

Comment: Insert 'and biodiversity' at *

Objective GI01

recognise the economic, social, environmental * and physical value of green spaces

Add ', biodiversity' at *

b) The retention and enhancement of landscape connections, where possible, such as trees, hedgerow and water features, that provide habitat for species and allow movement between areas. Such connectivity both within and to features outside the site should be demonstrated in the application *. In the event that it is not possible to retain landscape connections, proposals to mitigate and compensate/ provide for new connectivity shall be detailed.

Comment: Replace 'where possible' to 'as much as possible retain existing features'

Insert 'This is particularly important for development in rural areas and one off housing' at *.

g) Landscaping plans shall use species appropriate to the physical and environmental conditions of the site including soil conditions, availability of space and aspect.

Use a high diversity of native trees. Choose a variety of sizes and age classes to improve visual and structural diversity;

Comment: Insert The Council should produce a Tree (and Hedgerow) Strategy. Prior to the tree strategy, the Council should produce a comprehensive survey of existing trees, hedgerows and woodlands, taking particular note of hedgerows with high biodiversity, heritage trees, veteran trees and mature trees with high nature value. From the survey, the Council can identify specific trees or a particular area, group or woodland that need protection by issuing Tree Protection Orders. These trees may have high amenity value and/or ecological, historic or cultural significance.

Dún Laoghaire-Rathdown produced a Tree Strategy for the period 2011-2015.

https://www.dlrcoco.ie/sites/default/files/atoms/files/trees_strategy.pdf

Currently Dún Laoghaire-Rathdown council is reviewing its dlr TREES Strategy 2011-2015 with a view to adopting a new strategy in Autumn 2021. The new strategy will be designed to meet current and future challenges in managing, protecting and expanding the county's tree cover - 'A Climate for Trees: Human Well-being and Nature' – reflects international best practices and research on the multiple benefits of trees, with a special focus on their vital role in Climate Adaptation and Human Health'. Can the Council look at this model/best practice?

h) Avoid culverting where possible *

Comment: Add 'and daylight streams and rivers where possible as part of providing green infrastructure' at *.

Restoration

Chapter: Volume 1: Written Statement » Chapter 11: Landscape and Green Infrastructure

Landscape restoration: Can we add restoration objectives, particularly for biodiversity?

Green infrastructure restoration:

As well as protect and manage what is there can we add objectives around restoring and adding new infrastructure? Can we set targets for minimum green infrastructure restoration/installation each year?

Comment: See - Objective FRM 14 (flood risk and surface water management) - The Council should also consider retrofitting existing streets and spaces with green infrastructure such as SuDS for flood risk, surface water management and to enhance biodiversity in urban areas.

Marine life

Chapter: Volume 1: Written Statement » Chapter 12: Coastal Zone Management and Marine Sp...

Objective CZM21 should be amended to encompass the potential impacts of development on marine life, recognising that fish and their habitats in particular are essential to coastal communities. Any further deterioration in fish stocks or marine habitats - many of which are already at unsustainable levels - would adversely impact coastal communities.

Similarly objective CZM30 should also reference marine life in the items that protection works wouldn't be detrimental to.

12.6.2 Fisheries & Aquaculture

Chapter: Volume 1: Written Statement » Chapter 12: Coastal Zone Management and Marine Sp...

Recognising the damaging impacts of marine litter on marine life, much of which is discarded fishing gear, to promote litter management and reclamation facilities in all developments associated with fisheries.

Objective CZM47

Chapter: Volume 1: Written Statement » Chapter 12: Coastal Zone Management and Marine Sp...

Remove gas infrastructure from this objective: development of new fossil fuel infrastructure is not consistent with the Paris Agreement goals or actions needed to respond to the climate emergency.

Section 12.5.9

Chapter: Volume 1: Written Statement » Chapter 12: Coastal Zone Management and Marine Sp...

Add objective to require and enforce the fencing off of all waterways from livestock as per Government regulation coming into action on January 1st, 2021. As well as aid landowners in restoring wetlands and riparian (riverside) vegetation which is a proven, natural solution to prevent water quality issue that impact rivers, estuaries and the marine zone.

12.3: Marine Spatial Planning

Chapter: Volume 1: Written Statement » Chapter 12: Coastal Zone Management and Marine Sp...

Action: Add General Objective:

“Wexford Co. Council supports the introduction and enforcement of new and existing Marine Protected Areas along the coast Wexford and the adjacent marine area.”

AND

“Wexford Co. Council recognises the inherent socio-economic and environmental value of wildlife, especially apex predators such as seals. WCC recognises the role that biodiverse ecosystems play in regulating our environment, and therefore, supports the increased protection of wildlife and their habitats”.

Ireland has a target to designate 30% of our Maritime Area as Protected by the year 2030. We have fallen behind the 2020 target significantly which is having a disastrous impact on our marine ecology, climate, industry, and communities. Indeed coastal communities known historically as prosperous fishing harbors or popular tourist destinations with white-sandy beaches, such as Courtown, are being significantly impacted by coastal erosion and degradation of coastal and offshore habitats. Co. Wexford is one of 13 Coastal Counties in Ireland, and must, therefore, take a step forward to support increase protection and specifically the restoration of our coastal areas and marine sector.

Environment & Heritage

Chapter: Volume 1: Written Statement » Chapter 13: Heritage and Conservation

As part of the preamble for this chapter, we suggest the Environmental Pillar is considered first and foremost, before all planning and regulatory decisions. Though we greatly understand the importance of social and economic pillars, these socio-economic constructs will be massively impaired if we do not prioritise environmental sustainability

13.1.4 Strategy

- To sustainably manage the competing pressures on the natural and built heritage

in the county;

Comment: as above - the natural heritage (including biodiversity)/the environmental pillar should be considered foremost before all planning and regulatory decisions. Not manage 'competing pressures'.

- To conserve and protect sites and species, both designated and undesignated for

their * ecological or environmental sensitivity;

Add 'biodiversity' at *

- To protect upland peat and bog areas and to ensure their protection from *

inappropriate recreational use (such as quad bikes);

Comment: insert 'extractive uses and'

We would like to include specific objectives for Co. Wexford around limiting and reversing

net land take and reduce habitat fragmentation as per the European Environment Agency indicators

(<https://www.eea.europa.eu/data-and-maps/indicators/mobility-and-urbanisation-pressure-on-ecosystems-2/assessment>, <https://www.eea.europa.eu/data-and-maps/indicators/land-take-3>)

Wexford is unique in Ireland for having miles of coastline and unique habitats and species (such as Our Lady's Island and the Slobs). We would like to see Wexford - or a large section of Wexford - designated as a national park in the same way as Pembrokeshire is in Wales.

<https://www.nationalparks.uk/park/pembrokeshire-coast/>

Objective NH03

Chapter: Volume 1: Written Statement » Chapter 13: Heritage and Conservation

To promote initiatives that provide better public access for all visitors to our historic built and natural environment *.

Comment: insert 'whilst ensuring the full protection of these sites' at *

13.2 Natural Heritage

Chapter: Volume 1: Written Statement » Chapter 13: Heritage and Conservation

It is important that the development objectives in the Plan are balanced with objectives which ensure that the county's natural heritage is protected, conserved and enhanced.

Comment: point as above that the Environmental Pillar/Natural Heritage/Biodiversity is considered first and foremost, before all planning and regulatory decisions.

13.2.1 Natura 2000 Sites

The five candidate SACs should be formally adopted as SACs.

13.2.2 Natural Heritage Areas and County Geological Sites

All thirty one proposed Natural Heritage Areas (pNHA) as listed in Table 13.2 and on Map 2a should be formally designated by Statutory Instrument

Objective NH01, NH02, NH03 and NH04

Chapter: Volume 1: Written Statement » Chapter 13: Heritage and Conservation

Comment: The innovative project such as the Stepping Stones project in the UK - <https://www.nationaltrust.org.uk/carding-mill-valley-and-the-long-mynd/features/stepping-stones-project> and <https://www.blackmountains.wales/> - should be looked at in catchments with SACs/SPAs/NHAs and agricultural land.

Also Dún Laoghaire-Rathdown County Council produced a policy to develop an Ecological Network throughout the County, which will improve the ecological coherence of the Natura 2000 network in accordance with Article 10 of the Habitats Directive. The network will also include non-designated sites. Perhaps Wexford County Council can follow this example?

NH08

Chapter: Volume 1: Written Statement » Chapter 13: Heritage and Conservation

Add a condition that the criteria (by which the competent authority makes a decision about a development being imperative, despite impacting a Natura site) will be published in advance and that public consultation will be held and taken into account before the development commences.

We would like to see the rights established in the Aarhus Convention, 1998, for the public to have greater access to environmental information and to play a greater role in driving environmental policy; in particular the Habitats Directive, Article 9(3): the “right to challenge decisions that contravene provisions of national or EU law relating to the environment”

Objectives NH09 - NH13

Chapter: Volume 1: Written Statement » Chapter 13: Heritage and Conservation

As well as requiring an ecological assessment, this objective should specify that the ecological assessment must be shared with the Council so that it can be used to define the development planning permission conditions (to prevent an assessment being made but not acted on).

Comment: As above, the Council should produce a policy to develop an Ecological Network throughout the County, which will improve the ecological coherence of the Natura 2000 network in accordance with Article 10 of the Habitats Directive. The network will also include non-designated sites within the county.

Objective NH10

To ensure that traditional field boundaries, ponds or small woods which provide important ecological corridors, stepping stones or networks are protected.

Where such features exist on land which is to be developed the applicant should demonstrate that the design of the development has resulted in the retention of these features insofar as is possible and that the existing biodiversity value of the site has been protected and enhanced.

Comment: What does 'in so far as possible' mean? Can the Council take steps to ensure as much as possible of the existing trees and hedgerows should be retained. As per comment on objective CS23 - this could be done by producing landscape guidelines and attaching biodiversity restoration conditions to any rural development.

This element could also be elaborated in the updated Biodiversity Action Plan - through creating awareness of the importance of retaining these landscape/biodiverse features when developing one-off housing and so on.

Objective NH11

To protect trees or groups of trees and woodlands of particular amenity and nature conservation value and make tree preservation orders where appropriate.

Comment: As per comment on objective GI01 The Council should produce a Tree (and Hedgerow) Strategy. Prior to the tree strategy, the Council should produce a comprehensive survey of existing trees, hedgerows and woodlands, taking particular note of hedgerows with high biodiversity, heritage trees, veteran trees and mature trees with high nature value. From the survey, the Council can identify specific trees or a particular area, group or woodland that need protection by issuing Tree Protection Orders. These trees may have high amenity value and/or ecological, historic or cultural significance.

Objective NH12

Same comment as for NH11

Objective NH13

To ensure applications for development include proposals for native planting and leave a suitable ecological buffer zone between the development works and any areas or features of ecological importance. To minimise the removal of hedgerow and natural boundaries, and where hedgerows are required to be removed the applicant developer will be required to reinstate the hedgerows with a suitable replacement of native species.

Comment: All developments on greenfield sites and/or with features of ecological importance should have an ecologist and/or landscape architect with suitable ecological qualifications to help design the landscape - including the location and layout - at the initial stages of the design. Native planting should be prioritised and

any planting should be guided by the Trees (and Hedgerow) Strategy.

Objectives NH14 - NH24

Chapter: Volume 1: Written Statement » Chapter 13: Heritage and Conservation

Objective NH14 “To work with local communities, groups, landowners, National Parks and Wildlife Service and other relevant parties to identify, protect, manage and, where appropriate, enhance and promote sites of local biodiversity value.” Also - an opportunity for all the relevant parties to create awareness and identify projects that can prevent pollution from agricultural sources. As per comment 6.5.2 Key Sectors: on the value of agriculture and the impacts and costs of current environmental practices on Habitats and Species (https://www.npws.ie/sites/default/files/publications/pdf/NPWS_2019_Vol1_Summary_Article17.pdf) and Water Quality (page 338 of Ireland’s Environment: An Integrated Assessment 2020, EPA). This comment can also be extended to Objective NH15.

Insert another objective after NH14:

To support citizen science initiatives that are used to create awareness and understanding of the importance and value of the Natura sites (SPAs, SACs and NHAs) and other sites of high biodiversity value. The citizen science initiatives could include schools and be part of the educational programmes and/or curriculum.

For Objectives NH18-NH24 - in the control of invasive species - pesticides and toxic chemicals should only be used as a last resort (and only if they have proven in the eradication of that particular invasive species). More awareness and an educational campaign needs to be instigated in relation to invasive species.

Objective NH24 - Add “To ban the use of pesticides by the Council in the management of parks, open spaces, roadside verges and all vegetation (except for very controlled use to remove invasive species like Japanese Knotweed).

Objective NH16

To ensure the protection of natural heritage is integral to the Council’s own developments, actions and methods of operation.

Comment: Both objectives NH16 and NH24 are about the Council’s commitment to protect the natural heritage/biodiversity of County Wexford through its own developments, action and methods of operation. Could the Council be transparent about its use of pesticides and toxic chemicals, about its policy on hedgerow

cutting (for example if it's for safety reasons along a road) or when it's felling/cutting street trees etc. and make sure there is an awareness campaign and transparency about its own policies, actions and methods of operation.

There needs to be an additional objective - NH25 - about tackling pollution from agricultural sources which has a huge impact on water quality and the SPAs, SACs and NHAs. Nitrate pollution is consistently high in Co. Wexford's waters, pesticides are regularly detected by water monitoring and in the last EPA Water Quality report two of Wexford's estuaries were identified as two of the four highest levels of nitrate in the country. The NPWS report on the status of Habitats and Species under Article 10 of the EU Habitats Directive found only 15% of the habitats assessed were favourable condition: 46% were inadequate and 39% were bad. Page 83 of the NPWS report identifies agriculture as by far the biggest pressure, and biggest threat, to our habitats with over 70% of the habitats assessed showing agriculture practices having a negative effect on their condition. Improving water quality in Special Areas of Conservation, Special Protection Areas and Nature Reserves and in sensitive habitats needs to be added as a priority. Restoring the status of Our Lady's Island lake and Ballyteigue waterbodies from "bad" is especially urgent given that they are important ecosystems.

Title 13.4.8 Biodiversity and built heritage

Chapter: Volume 1: Written Statement » Chapter 13: Heritage and Conservation

Add "habitats or species" to the list of elements in objective BH12 (older buildings can offer habitats to roosting species such as bats). Expand the objective to conduct an assessment of species and habitats at/in the grounds of protected structures so that protected structures that have an ecological function can be identified and this ecological function be protected.

Objective G03: Add ecological significance as an element to identify.

14.3 Policy Context

Chapter: Volume 1: Written Statement » Chapter 14: Recreation and Open Space Strategy

Please include the following:

SDG 11: Sustainable Cities and Communities

The United Nations Sustainable Development Goals (SDGs), specifically implementing SDG 11: Sustainable cities and communities, and targets relating to increasing green space access as a key goal for enhancing the liveability and sustainability of the places where we live;

And

Habitat III, the United Nations' New Urban Agenda

Habitat III, the United Nations' New Urban Agenda, which specifically highlights the importance of the creation and maintenance of well-connected and well-distributed networks of green spaces to improve physical and mental health.

Insert new heading and following text:

EPA Research - Eco-Health: Ecosystem Benefits of Greenspace for Health

The EPA Research - Eco-Health: Ecosystem Benefits of Greenspace for Health

http://www.epa.ie/researchandeducation/research/researchpublications/researchreports/Research_Report_32_8.pdf sought to examine environment and health relationships through investigating the potential of green space as a health-promoting environment. In part of its summary it found that accessible and well-designed green spaces are essential infrastructure that is fundamental to the health and well-being of thriving and inclusive communities. The research highlights the policy context that supports future investment in green spaces as key to enhancing urban and rural liveability and providing health-promoting environments.

14.2 Climate Action and Recreation

Chapter: Volume 1: Written Statement » Chapter 14: Recreation and Open Space Strategy

Insert after

Develop a connected network of greenways for safe recreational cycling and

Walking.

'Develop well-managed, well-located and well-connected open spaces that operate as part of a wider green network in the urban settlements'.

Protect and expand green infrastructure provisions in existing and new recreation

and open space areas. *

Insert 'Green infrastructure will help combat the urban-heat-island effect and sponge effect for excessive rainfall and surface run-off'. at *

Insert

'Protect existing trees (particularly any mature trees identified in the Tree Survey) and planting new trees in green spaces. These measures help mitigate climate change as a single tree can absorb up to 150 kg of CO2 per year. The appropriate trees and spaces will be identified in the Tree strategy'. (<https://treesincities.unece.org/>)

Protect and enhance the spaces around our river channels, * the riparian zone and buffer from development which would reduce its ability to attenuate and filter flood water *.

Insert 'the daylighted rivers and streams in urban areas,' at *

14.4.1 Goal, Strategic Aims and Objectives

Chapter: Volume 1: Written Statement » Chapter 14: Recreation and Open Space Strategy

Objective ROS03

To ensure urban and rural communities have access to a range of high quality open space, sporting, recreation and play facilities that are appropriate in scale and location. These facilities should be located in existing settlements, close to residential areas and other community facilities so as to maximise participation levels and reduce the need to travel. *

Insert 'Consideration is also to be given to the specific design attributes that afford different groups of people opportunities for healthy activities and how people's needs vary over their life course.' at * . See EPA Report.

14.5.7 Designing Public Open Spaces

Chapter: Volume 1: Written Statement » Chapter 14: Recreation and Open Space Strategy

Please include:

Based on the EPA research findings, key design principles for green space include:

- Accessible spaces with good links (pedestrian and cycleways) to nearby neighbourhoods - as per Section 14.5.6 Merging and Linking Public Open Spaces .
- A networked approach: emphasising green infrastructure networks (rather than isolated parks) can provide opportunities for connecting existing and new green spaces and creating new linkages between urban and rural areas - as per Section 14.5.6 Merging and Linking Public Open Spaces. Note: the term green infrastructure is not the same as used when referring to green infrastructure in Chapter 11 of the draft Plan but rather a network of green spaces.
- Inclusive in design, catering for local needs from young to old and all physical abilities. Green spaces that are designed to support very specific functions tend to attract limited groups of users.
- Well managed and maintained, creating a high-quality environment: poorly managed spaces or vandalism prompt negative perceptions among potential users.
- Multifunctional uses: examples include spaces that encourage active mobility, physical activity and sports, relaxation and tranquillity, and opportunities for social exchange (e.g. incorporate community gardens, encourage parkruns).
- Enhance urban greening through planting strategies (that is compatible with the proposed Tree Strategy) that mitigate noise and air pollution and maximise local biodiversity gain and facilitate sustainable drainage (e.g. deciduous wooded and wildflower meadow areas).
- Create multisensory restorative environments that help mitigate the psychological stresses of modern living through the provision of “restive places for rejuvenation”.

For sections Location and Layout of Open Spaces, Use of Existing Features and Biodiversity in Open Spaces please add the following:

Please insert the following at the end of each section : ‘When designing a scheme with features such as rivers, streams, wetlands, rock outcrops, trees and hedgerows an ecologist and/or landscape architect with suitable ecological qualifications should be part of the design process, in particular at the initial stages of the design.’

Allotments and Community Gardens as Open Spaces

Please insert note that community gardens include community orchards.

The Planning Authority will also consider the provision of allotments/community gardens as part of the open space provision in a residential scheme. The facility

should be appropriately located within the scheme, allowing for ease of access by residents, whilst also ensuring that the amenities of residents and visual amenities of the scheme are protected.

Comment: Can the Planning Authority also consider the provision of allotments/community gardens NOT part of the open space provision in a residential scheme ie. the provision of allotments/community gardens on publicly owned land? This is particularly important for residential schemes already in existence without any access to allotments/community gardens.

Below the section Allotments and Community Gardens as Open Spaces can the Council add another section? Whilst there are references for the need to add biodiversity to existing spaces or new green spaces, there should also be an acknowledgement of the need for 'Wild Areas' or 'Nature Pockets' which prioritise biodiversity over public use. These spaces could have sensitive and/or controlled (or no) access to the public. The idea would be that these nature pockets would enhance the general biodiversity of the locality and therefore people's experience of nature. For example in marginal lands alongside roadways, roundabouts, little islands on lakes or even small pocket spaces within the larger parks/green spaces. These spaces would add to the ecological networks already in existence.

Wild areas/nature pockets as Open Spaces

The Planning Authority will also consider the provision of Wild Areas or Nature Pockets, in both public and private lands, as part of its scheme to enhance biodiversity in a locality. Local people, whilst they may have limited or no access to these areas, would benefit from seeing the increased biodiversity and therefore, contact with nature, of the locality. This would also be consistent with the Council signing up to the All-Ireland Pollinator Plan.

Objective ROS07

To support investment in the on-going maintenance and enhancement of existing public open space facilities, and support the provision of new public parks, green space corridors * and other public open spaces in tandem with planned population growth to create green, ** healthy settlements throughout the county.

Insert ',wild areas' at * and 'biodiversity rich and' at **

Objective ROS08

To ensure a range of accessible open spaces are provided in towns and villages so that all residents have reasonable access to different types of open space * and to ensure that new open spaces are integrated with good pedestrian and cyclist link and provide access for all people regardless of their age or abilities.

Insert 'with consideration being given to the specific design attributes that afford different groups of people opportunities for healthy activities and how people's needs vary over their life course.' at *

Objective ROS09

To ensure that future Local Area Plans apply the hierarchy of public open spaces set out in Section 14.4.3 where relevant and appropriate and outline the mechanism for the delivery for each level of open space. The Planning Authority will also carry out an audit of underutilised lands during the preparation of local area plans to identify underutilised lands that could be zoned for sporting, community and leisure uses and activities to increase the availability of same for local communities.

Insert another objective after ROS09 or as part of it:

It is also necessary to mobilise knowledge into local solutions through developing innovative community engagement models and therefore the Council will, i) organise green infrastructure workshops with local communities at the beginning of plan-making initiatives and ii) organise green space co-design workshops with local communities to collaboratively develop enhancements to existing local green spaces, as well as the provision of new green spaces for health and well-being. These workshops should include relevant practitioners from local authorities (e.g. parks professionals, planners, community officers), a distribution of cohorts from across the life course, and residents of various physical abilities. See EPA Research.

Insert another objective after ROS09:

To support citizen science initiatives that are used to interest and involve communities in the planning and design of their local environments from a health and well-being perspective (e.g. a local authority-sponsored app development competition for schools that provides real-time information that is collated and viewable on a

web portal, which can be used to inform the retrofitting and development of green spaces from a health and well-being perspective).

Objective ROS12

To facilitate the development of allotments and community gardens at appropriate locations and on suitable sites which are accessible from the built-up areas of the county taking into consideration the demand for such facilities and subject to normal planning and environmental criteria including potential impacts on residential and visual amenities. The Planning Authority will identify land for use as allotments and community gardens in larger towns and villages during the preparation of local area plans *. The Planning Authority will also consider the provision of allotments and community gardens as part of the public open space provision in new residential schemes subject to appropriate siting, design and layout, protection of residential and visual amenities and normal planning and environmental criteria.

Insert 'and will mobilise knowledge into local solutions through developing innovative community engagement models as per ROS09.' at *

Instead of 'allotments and community gardens' replace with 'allotments, community gardens and wild areas/nature pockets'.

Objective ROS13

To facilitate, through community consultation and involvement, the merging and linking of existing open spaces with new open spaces as a mechanism for providing larger more useful public open spaces, improving permeability and promoting social Cohesion.

Insert 'This community consultation and involvement will be facilitated by developing innovative community engagement models such as green infrastructure workshops at the beginning of plan-making initiatives and green space co-design workshops which will be a collaborative effort with relevant practitioners from local

authorities (e.g. parks professionals, planners, community officers), a distribution of cohorts from across the life course, and residents of various physical abilities.'

Objective ROS15

To ensure a detailed landscaping plan, for both hard and soft landscaping, prepared by a suitably qualified landscape architect, accompanies all major planning applications for residential schemes 10 or more houses and significant industrial and commercial developments of 1,000m² gross floor space or more.

All developments on greenfield sites and/or with landscape features such as rivers, streams, wetlands, rock outcrops, trees and hedgerows should have an ecologist and/or landscape architect with suitable ecological qualifications to help design the landscape - including the location and layout - at the initial stages of the design. Native planting should be prioritised and any planting should be guided by the Trees (and Hedgerow) Strategy.

ROS17 & ROS18

We strongly support both these objectives and welcome their inclusion in the plan. We would like to add that wildlife signage be added to help citizens identify the biodiversity in their local green spaces to increase awareness and educate citizens on the importance of local biodiversity.

Objective ROS17

To ensure that the design of residential schemes, including open spaces, optimises the existing features and topography of the site such as rivers, streams, rock outcrops, trees and hedgerows,* and to ensure that biodiversity and green infrastructure are fully considered and integrated into schemes.

Insert 'by including an ecologist or landscape architect with relevant ecological qualifications at the initial stages of the design'. At *

Objective ROS18

To encourage the use of measures specifically designed to enhance wildlife in residential schemes such as holes should be left in boundary walls to allow for passage of hedgehogs between gardens, bat and swift boxes *.

Insert 'and the inclusion of wild areas/nature pockets in the residential scheme.' at *

Walking and Cycling Objectives

For the objectives ROS33 - ROS43 and ROS47 - ROS50- all these objectives will increase public access to upland areas, forestry, coastal areas and ecological networks - which may be part of Natura sites, areas of high biodiversity, greenways, blueways, natural amenity areas and so on - there should be a public awareness/educational campaign on the wildlife and sensitivity of habitats to public use within these areas and of the potential for the public to damage/destroy or kill wildlife in these areas by going off-route, bringing dogs into wildlife sensitive areas, leaving behind non biodegradable plastic litter and so on. The awareness campaign could be in the form of large posters in the sensitive wildlife areas and the Council could counteract plastic pollution by providing more litter bins and so on. The Council should develop a coherent strategy with all the stakeholders on how to counteract the potential damaging effects by facilitating access to these scenic, wild areas and natural amenities.

Section 15.1

Chapter: Volume 1: Written Statement » Chapter 15: Sustainable Communities and Social In...

Sustainable communities are rightly placed at the heart of the vision for the county.

We would like to have the first section of 15.1 amended to include:

- Reference to the climate and biodiversity emergency declared by the Dail in May 2019
- That in the context of this twin emergency, sustainable communities are necessary in order to react to these emergencies. That sustainable communities are the only way to ensure resilience in the face of climate change and to reverse biodiversity loss
- That communities are the delivery mechanisms for a decade of urgent transformational change, that the EPA calls for in the latest State of the Environment Report (Ireland's Environment: An Integrated Assessment 2020)

Section 15.5.1

Chapter: Volume 1: Written Statement » Chapter 15: Sustainable Communities and Social In...

Areas of social and material deprivation can also be areas of lower environmental quality (e.g. air quality, water quality, litter and illegal dumping etc)

Amend this goal to include “ and all residents and visitors live in a healthy environment that meets all the environmental and health standards for air and water quality, waste management and environmental noise levels”

Section 15.5.2

Chapter: Volume 1: Written Statement » Chapter 15: Sustainable Communities and Social In...

For the last bullet point, amend to include environmental (along with social, community and cultural). Also include “with equal access to all stakeholders for important decisions that shape the direction of environmental, social, community and cultural development in the county”

Objective SC01 - SC05

Chapter: Volume 1: Written Statement » Chapter 15: Sustainable Communities and Social In...

Objective SC01: Add environmental to “community, health and educational”.

Objective SC02 & SC03: Amend to also include reference to a just transition to a low carbon society, and reference to the need for communities to develop resilience to the effects of climate change.

Objective SC04 and SC05: Social and community infrastructure/facilities should include community gardens, community orchards and allotments.

15.7.4 Community Facilities

Chapter: Volume 1: Written Statement » Chapter 15: Sustainable Communities and Social In...

Community facilities provide opportunities for activities, sports and recreational events, social interaction and meeting spaces, all of which benefit the local community and assist with social inclusion. *

Insert ‘Community facilities should also include community gardens, community orchards and allotments which increase the public’s access to affordable, fresh, healthy food; promotes people’s connection with the earth and foster respect for the natural environment and for other people and promotes social cohesion and community

engagement.' at *

A lack of available land or competition from other users can represent a significant barrier to establishing and maintaining a community garden and allotments. One way to tackle this is to establish a Food Policy Council. At local level, food policy councils can allow different actors to come together and discuss issues. There is only one Food Policy Council in the Republic of Ireland (See Cork Food Policy Council - <http://corkfoodpolicycouncil.com/>) - they can be divisions within local authorities or operate semi-independently but are connected with the Council or they can be non-governmental organisations that operate entirely independently of the Council. Not only can they bring together different stakeholders in the food system to share ideas and experiences, they can also serve as the 'go to' body for local authorities when they want to get an insight on issues affecting the food system locally, or if they want to

make decisions which might impact local food production, for example whether more community gardens or allotments are needed.

Objective SC34

To facilitate the formation of a Food Policy Council for the County.

Volume 2, Table 2.1

Chapter: Volume 2 Development Management Manual

In 8, Public Realm add "space for nature is considered as an integral landscaped element in the design of the public realm"

In 11, Parking

An additional key question is "how can the need for private vehicles and parking be minimised"

Volume 2, Section 2.7 Lighting

Chapter: Volume 2 Development Management Manual

Lighting that is proven to have lower impact on nocturnal animals will be required as the default lighting choice

Volume 2, Landscaping

Chapter: Volume 2 Development Management Manual

Landscaping: on page 34 change “the removal of hedgerows should be avoided” to “the removal of hedgerows is not permitted”

Volume 2, Rural Dwellings

Chapter: Volume 2 Development Management Manual

Rural architecture: add that new dwellings should include integrated supports for nature (bat bricks, swift boxes, sparrow bricks etc) as part of their construction, as condition number 10 n 3.1.2

Volume 2, Section 5

Chapter: Volume 2 Development Management Manual

Enterprise and employment developments should be required to supply an estimated “carbon cost” for the greenhouse gas emissions that the development will likely cause.

5.10.9 Construction of new motor fuel stations is inconsistent with the requirement to decarbonise our economy. There is no shortage of these facilities in Wexford at present. No new motor fuel stations should be constructed unless they are for low carbon or EV recharging.

Volume 2, Section 6

Chapter: Volume 2 Development Management Manual

Section 6

There are no biodiversity provisions in the TRansport and Mobility section to specify conditions that would protect and enhance biodiversity. Guidelines for the following should be added:

- Conditions for the installation of wildlife tunnels and/or bridges to connect habitats
- Conditions for lighting along roadways, and for the lighting to be as low impact on nocturnal species as possible

Conditions for planting of verges and roundabouts to promote native plants and enhance pollinator habitats. Conditions to ban the use of pesticides on roundabouts and verges.

Volume 2, Section 8

Chapter: Volume 2 Development Management Manual

8.2.3 Rather than “encourage” developments to include rainwater harvesting this should be “required” with the possibility to seek an exemption only when there is strong and clear evidence that this is not possible to implement.

8.5 Lighting should be as low impact as possible on nocturnal animals and especially where the lighting is close to bat roosts or flight paths.

Documents Attached: No

Boundaries Captured on Map: No