



Oifig an
Rialaitheora Pleanála
Office of the
Planning Regulator

12th March 2026

Forward Planning,
Wexford County Council,
County Hall,
Carricklawn,
Wexford,
Y35 WY93.

Re: Proposed Variation No. 1 to the Wexford County Development Plan 2022-2028

A chara,

Thank you for your authority's work in preparing the Proposed Variation No. 1 (proposed Variation) to the Wexford County Development Plan 2022-2028 (County Development Plan).

As Wexford County Council (Planning Authority) is aware, a key function of the Office of the Planning Regulator (Office) is the assessment of statutory plans to ensure consistency with legislative and policy requirements relating to planning. The Office has evaluated and assessed the proposed Variation pursuant to Part 3 of the Planning and Development Act 2024 (Act) and its functions under section 546 and this submission has been prepared accordingly.

Recommendations issued by the Office further to section 58(9) of the Act relate to clear breaches of the relevant legislative provisions, of the national or regional policy framework and/or of the policy of Government. As such, planning authorities are requested to implement or address any recommendation(s) made by the Office in order to ensure consistency with the relevant policy and legislative provisions.

Observations issued by the Office pursuant to section 546 of the Act may take the form of a request for further information or justification on a particular matter, or clarification regarding particular provisions of a plan on issues that are considered necessary to ensure alignment

with policy and legislative provisions. Planning authorities are requested by the Office to action an observation.

A submission can also include advice on matters that the Office considers would contribute positively to the proper planning and sustainable development of the area. Planning authorities are requested by the Office to give full consideration to the advice contained in a submission.

On adoption of the Variation, the Office will assess it in accordance with the statutory framework in section 63 of the Act.

Overview

As well as including land use zonings and specific objectives for Enniscorthy and New Ross towns, the proposed Variation includes a number of changes to the County Development Plan with regard to the implementation of the NPF Implementation: Housing Growth Requirements (2025) (Housing Growth Guidelines) and the following elements:

- core strategy;
- policy amendments; and
- zoning amendments.

The Office welcomes the proposed Variation Housing Growth Guidelines and in particular the land use plans for both Enniscorthy and New Ross where town plans for both settlements have expired.

The Office particularly welcomes that a plan is being prepared for Enniscorthy which has benefitted from significant investment in transport accessibility and water services and with a population of more than 10,000, is recognised in the Programme for Government 2025 and Delivering Homes, Building Communities (2025-2030) as an emerging Key Town.

Infrastructural investment and Key Town status will provide Enniscorthy with multiple new opportunities for growth and expansion of services and amenities. The emerging Local Transport Plan (LTP) will be key to the success of the town, and the Office very much looks forward to seeing the key measures from the LTP transposed into the County Development Plan as soon as the separate LTP process has been completed. The staff of the Office will

be available to provide support to the Planning Authority should any assistance be required in this regard.

Given recent events in Enniscorthy particularly, the Office also notes, welcomes and very much supports specified objectives within the proposed Variation relating to Phase 1 Flood Defence works for the town. The Office has noted however that no consultation was undertaken between the Planning Authority and the Office of Public Works (OPW) prior to the publication of the proposed Variation. This lack of engagement has resulted in a recommendation below which includes a significant number of issues that must now be addressed as part of the variation process, within tight legislative deadlines.

Furthermore, the Office notes the inclusion of an extensive quantum of proposed General Industry lands to the north of Enniscorthy before a supporting evidence-base to justify same has been put forward. In providing for such a quantum of General Industry lands, planning authorities would usually engage with statutory agencies including Uisce Éireann, Transport Infrastructure Ireland and the National Transport Authority (NTA) as well as Enterprise Ireland, the Industrial Development Agency and the enterprise sector generally, prior to their inclusion in a variation such as that proposed. However, this would not appear to be the case. The Office therefore considers that the approach to employment zoning that has been taken by the Planning Authority is somewhat pre-emptive pending the development of an employment lands strategy as part of the forthcoming comprehensive review of the County Development Plan.

The submission below has been prepared to provide a strategic level input to your authority in finalising the proposed Variation and in relation to matters including employment lands, flood risk management, transportation and regeneration. It is within the above context that the submission sets out four (4) recommendations and three (3) observations under the following key themes:

Key theme	Recommendation	Observation
Residential	Recommendation 1	-
Employment	Recommendation 2	-
Flood risk management	Recommendation 3	-
Transportation	Recommendation 4	-
Regeneration	-	Observation 1

Implementation and monitoring	-	Observation 2
Updates to data and legal context	-	Observation 3

1. Residential

The Office notes that in order to zone enough land for residential development to meet the housing growth requirements for Enniscorthy to the end of the plan period in 2034, it is necessary to zone 132 ha of land, assuming a density of 35 units per hectare, a net density yield of 75%, and 50% additional provision taking account of the Housing Growth Guidelines. However, the Planning Authority proposes to zone 255 ha of land, almost double what is considered necessary without a clear rationale. The proposed Residential lands will serve Enniscorthy to the end of the plan period in 2034 and far beyond.

Section 3.1 of the Housing Growth Guidelines states that there should be ‘a particular focus on the likelihood that the lands identified for residential development within the plan will come forward for development within the remaining period of the plan’. This is also reflected in section 6.2 of the Development Plans, Guidelines for Planning Authorities (2022) (Development Plans Guidelines) which states that when zoning lands for residential purposes, sites should be identified ‘with realistic capacity for development during the plan period, including infrastructural requirements and housing yield potential’.

Notwithstanding the above however, the Office considers that where lands are serviced or serviceable and were previously zoned, such zonings are acceptable at this time but should be revisited again as part of the imminent review of the County Development Plan and in the wider county context.

Having regard to the extent of New Residential zonings proposed and the need to progress significant housing delivery in the interim, the inclusion of further Long Term Development sites as indicated on the Enniscorthy Land Use Zoning map (No. 6) and the Enniscorthy Objectives map (No. 7) has not been justified by reference to the Housing Growth Guidelines above.

Furthermore, the retention of such long-term development sites, which are outside the CSO boundary but are within the development plan settlement boundary, would also lead to an undesirable and unsustainable pattern of development and would be likely to pose difficulties in relation to servicing in a coherent manner.

The Planning Authority will be aware from the Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024) (section 3.2.1 refers) that net site area would generally be between 65 and 80 percent (approximately) of the gross area, having regard to the specific land involved and local circumstances. The Office notes that while 75% net density has been attributed to Enniscorthy which is considered satisfactory; 65% has been attributed to New Ross as a Large Town when a higher percentage would be expected. However, the Planning Authority should note that the Office does not expect any changes to the quantum of proposed zoning arriving from a higher net density as it is considered that the proposed lands can reasonably deliver additional housing yield.

Recommendation 1 - Residential

Having regard to the need for compact growth, sequential and sustainable development, and in particular to:

- NPO 9 of the NPF (compact growth);
- NPO 43 of the NPF (prioritising homes in sustainable locations);
- section 3.1 of the NPF Implementation: Housing Growth Requirements (2025) (delivery of residential development);
- section 3.2.1 of the Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024) (Compact Settlements Guidelines) (net densities); and
- section 6.2 of the Development Plans, Guidelines for Planning Authorities (2022) (delivery of residential development),

the Planning Authority is recommended to:

- (i) reduce the settlement boundary so that the following lands are omitted from map No. 6 (Land Use Zoning) and map No. 7 (Objectives Map) for Enniscorthy;
 - a) lands to the northwest of Enniscorthy that have no associated land use zonings; and
 - b) all lands identified as Long Term Development; and

(ii) attribute a higher net density for New Ross to reflect its Level 2 Large Town designation in the core strategy while taking due account of section 3.2.1 of the Compact Settlements Guidelines.

2. Employment

A significant element of the proposed Variation is the proposal to zone an extensive area of some c. 211 ha of land for General Industry stretching 3km from the edge of Enniscorthy northwards towards the N30/N80 junction.

The lands in Enniscorthy occupy a highly strategic location, potentially one of a small number in the county proximate to significant urban development on the one hand and strategic transportation access on the other.

On the one hand, the General Industry lands could accommodate industrial and employment generating investment and development at scale, and support more self-sustaining economic progress in County Wexford.

On the other hand, considering the extent of the lands and the need for consideration of attendant on and off-site infrastructural requirements, the attention of the Planning Authority is drawn to section 6.2.5 of the Development Plans Guidelines, which indicate a need for evidence to underpin the zoning of land for employment purposes.

Notwithstanding the comments of the Office in the Overview section above, it is considered that the potential of the General Industry lands as a strategic location could be carefully managed by including an objective to ensure that any development would be subject to the preparation of a detailed masterplan, which would take account of and support the implementation of the emerging LTP for Enniscorthy. The masterplan would be informed by an evidence-based employment strategy for County Wexford. The employment strategy would form part of the forthcoming review of the County Development Plan (currently expected to commence later in 2026).

The Planning Authority is strongly advised to liaise with relevant enterprise and infrastructure agencies generally in developing the above strategy for strategic economic development locations throughout the county and optimising the positioning of the lands in Enniscorthy in that context.

With regard to the above, the Planning Authority should also note that the Office has published a Practice Note titled [Planning for Employment Growth - The Development Plan and Employment Lands](#) which provides a step-by-step approach to assist planning authorities in assessing enterprise and employment lands.

While the majority of the proposed General Industry zoning fronts onto the R772 that runs through the subject lands in a north-south direction, the N30 (to the west and east), N80 (to the north) and M11 (further to the east) are all located in proximity to the proposed General Industry lands and, therefore, the Planning Authority should address the implications of section 2.7 of the Spatial Planning and National Roads Guidelines for Planning Authorities (2012) which states that

planning authorities must exercise particular care in their assessment of development/ local area plan proposals relating to the development objectives and/ or zoning of locations at or close to interchanges where such development could generate significant additional traffic with potential to impact on the national road.

Recommendation 2 - Employment

Having regard to the location, extent and serviceability of the proposed lands for General Industry to the north of Enniscorthy and in particular to;

- NPO 19 of the NPF (the identification of locations for strategic employment);
- NPO 93 of the NPF (integration of land-use and spatial planning to support active and sustainable transport modes);
- NPO 103 of the NPF (serviceability of lands within the life of the Plan);
- RPO 151 (a), (c) and (d) of the RSES (integration of land use and transport);
- RPO 154 of the RSES (integration of transport and land use planning);
- RPO 62b of the RSES (employment and accessibility);
- RPO 163a of the RSES (effective integration of land-use and transport planning);
- Objective ED06 of the Wexford County Development Plan 2022-2028 (County Development Plan) (ensuring that employment lands are serviced);

- Objective ED58(ii) of the County Development Plan (location of economic development in accessible locations);
- section 6.2.5 of the Development Plans, Guidelines for Planning Authorities (2022) (providing an evidence-based rationale for employment zoning); and
- section 2.7 of the Spatial Planning and National Roads Guidelines for Planning Authorities (2012) (National Roads Guidelines) (the zoning of locations at or close to interchanges),

the Office recommends that the Planning Authority:

- (i) includes an objective in the proposed Variation No. 1 to bring forward an evidence-based employment strategy for County Wexford as part of the forthcoming review of the County Development Plan and a detailed masterplan for the General Industry lands north of Enniscorthy that would take account of and support the implementation of the emerging Local Transport Plan for Enniscorthy;
- (ii) as part of the evidence-based employment strategy, include an infrastructure assessment to inform the manner and pattern of development of employment lands in Enniscorthy particularly, and to ensure that the progressive development of any proposed lands are:
 - a) capable of being supported by the provision of enabling physical infrastructure such as water services;
 - b) easily accessible by sustainable modes of transport, both existing and proposed;
 - c) compatible with the safe and efficient operation of the adjacent road network (both regional and national) taking due account of section 2.7 of the National Roads Guidelines in particular, related to the zoning of locations at or close to interchanges; and
 - d) consistent with sustainable planning principles including compact growth and sequential development.

The Planning Authority is strongly advised to liaise with both the National Transport Authority and Transport Infrastructure Ireland in relation to items (ii) b) and (ii) c) above.

3. Flood risk management

While the Office notes and welcomes the Phase 1 flood relief works for Enniscorthy in particular, a number of queries and concerns have arisen related to flood risk management for both Enniscorthy and New Ross, including: the extent of the flood zones relative to the proposed land use zonings; the location of past flood events; the approach to sustainable urban drainage systems; the consideration of watercourses and the potential flood risk in Enniscorthy and the extent to which land use zonings have been informed by the proposed flood relief scheme for the town; the types of development that are permissible on Flood Zone A lands; and details around a flood relief scheme constructed by the Planning Authority.

The Office considers that a number of the issues outlined in Recommendation 3 below could have been appropriately addressed by the Planning Authority through consultation with the OPW prior to the publication of the proposed Variation. Consequently, Recommendation 3 now includes a wide range of issues that will need to be addressed as part of the variation process.

Recommendation 3 - Flood Risk Management

Having regard to the need to manage flood risk, and in particular to:

- NPO 78 of the NPF (flood risk management);
- NPO 79 of the NPF (sustainable drainage systems);
- RPO 114 of the RSES (flood risk management);
- RPO 116 of the RSES (inappropriate development in areas at risk of flooding);
- RPO 119 of the RSES (flood relief schemes);
- RPO 122 of the RSES (sustainable drainage systems); and
- the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009),

the Planning Authority is recommended to:

- (i) clearly show Flood zones A and B on the land use zoning maps for both Enniscorthy and New Ross;

- (ii) clearly show the location of past flood events for both Enniscorthy and New Ross;
- (iii) set out how climate change will be managed on lands not currently at risk of flooding in both Enniscorthy and New Ross, but that could potentially be at risk of flooding in the future as shown within the future scenario flood extents;
- (iv) update the Strategic Flood Risk Assessment (SFRA) to provide guidance on Sustainable Urban Drainage Systems at a strategic level rather than site-by-site, taking due account of the Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas and the Implementation of Urban Nature-based Solutions guidance documents;
- (v) determine whether stage 3 flood risk assessments are required to inform land use zonings related to a number of small watercourses in the plan area including:
 - a) to the north of Enniscorthy (in the vicinity of the proposed General Industry, District Centre and Existing Residential and Infill land use zonings); and
 - b) to the southeast of Enniscorthy (in the vicinity of the proposed New Residential and Existing Residential and Infill land use zonings);
- (vi) clarify the extent to which land use zonings in Enniscorthy have been informed by the proposed flood relief scheme for the town;
- (vii) include a specific objective to ensure that zoning and development proposals support and do not impede or prevent the progression of flood relief scheme measures;
- (viii) clarify that less vulnerable development will not be permitted in Flood Zone A, noting the SFRA which states 'new or infill less vulnerable development within Flood Zone A, FFLs should meet the requirement of Table 2-4' (in the case of Enniscorthy) and table 3-2 (in the case of New Ross);
- (ix) include a key flood risk infrastructure register for the flood relief scheme constructed by the Planning Authority in New Ross, noting details of the defences, standard of protection and the body responsible for the maintenance of those elements. The location of defences shall also be clearly indicated on an appropriately scaled map;

- (x) specify which scheme elements of the defended areas for the flood relief scheme in New Ross have an allowance for climate change already;
- (xi) clarify for the New Residential zoning in New Ross (proposed within the defended area extents and within the high-end future scenario extents to the west of the River Barrow, immediately adjacent and to the west and north-west of the R723), how any potential increase in risk identified might be managed or mitigated;
- (xii) clarify if Objective NRT20 is only relevant to the lands outlined in blue to the south of New Ross. All site-specific flood risk assessments should consider flooding from all sources including pluvial; and
- (xiii) include a specific objective to reflect the SFRA to state that no new or infill highly vulnerable development shall be permitted within Flood Zone A or Flood Zone B prior to completion of the Flood Relief Scheme.

The Office strongly advises the Planning Authority to meaningfully engage with the Office of Public Works with regard to all of the above items.

4. Transportation

The Office notes that the Regional Spatial and Economic Strategy for the Southern Region has identified Enniscorthy as a Key Change Location to drive innovation and a low carbon economy. In this regard, the Office welcomes that an LTP is currently being prepared for Enniscorthy. The LTP should maximise the integration of land use and transport planning and prioritise the delivery of sustainable and active travel infrastructure. As the LTP has not yet been finalised it has not informed the proposed Variation. However, there will be an opportunity for the land use zoning map and associated objectives for Enniscorthy to be revisited when the LTP is finalised. The Office considers that site specific objectives for land parcels that are particularly affected by LTP measures could be prepared in order to set out a clear vision regarding how these land parcels will develop in the future taking account of such matters as sustainable travel, permeability and public realm proposals.

The implementation of active travel measures and the promotion of new linkages in order to improve permeability by walking and cycling is supported through Objective E07, however the proposed Variation does not include any detail relating to same. Furthermore, Objective E08 relates to a number of proposals for new Arterial and Link roads, however it would appear that these new routes would serve Long Term Development lands for which no

development is proposed for the remainder of the plan period to 2034. Also, and related to the proposed General Industry zoning (further discussed above), Objectives E13 and E14 relate to the provision of footpaths and street lighting along the length of the R772 which would facilitate the development of the General Industry lands.

Therefore, the Office has concerns related to the appropriate integration of land use and transport infrastructure measures that would result in a low carbon economy for Enniscorthy in particular.

Recommendation 4 - Transportation

Having regard to the need for a low carbon and climate resilient society including the reduction of greenhouse gas emissions and the need for appropriate land use and transport infrastructure, and in particular to:

- NPO 69 of the NPF (reducing our carbon footprint);
- NPO 93 of the NPF (improved air quality);
- RPO 157 of the RSES (Local Transport Plans);
- RPO 163a of the RSES (effective integration of land-use and transport planning);
- the Climate Action Plan 2025 (to reduce vehicle kilometres travelled);
- the Climate Action and Low Carbon Development Act 2015, as amended (mandatory target to reduce greenhouse gas emissions by 51%);
- the National Sustainable Mobility Policy (2022) (to reduce vehicle kilometres travelled);
- Objective TS02 of the Wexford County Development Plan 2022-2028 (County Development Plan) (minimising the generation of greenhouse gases by the transport sector); and
- Objective TS73 of the County Development Plan (prevention of new or intensifying any existing access points onto regional roads),

the Office recommends that the Planning Authority:

- (i) includes any priority active travel measures for Enniscorthy and New Ross in consultation with the National Transport Authority and Transport Infrastructure Ireland;
- (ii) identifies the timeframes of the priority transport projects included at (i) above;
- (iii) includes an objective to require that the transport measures identified in the Local Transport Plan (LTP) for Enniscorthy, once finalised, relating specifically to the sustainable transport measures in the County Development Plan through a Variation, the process for which will be initiated no later than six months after the completion of the LTP; and
- (iv) as part of the variation process relating to (iii) above, identify land parcels affected by measures arising from the LTP. Site specific objectives should be prepared for each of the identified land parcels relating to the vision for the development of these lands with respect to:
 - a) the layout, design and height of buildings and the spaces between them;
 - b) current/ future access arrangements;
 - c) existing/ proposed pedestrian, cycle and public transport connections;
 - d) flood risk considerations (where applicable);
 - e) public realm proposals; and
 - f) where relevant, proposed densities and indicative housing yield.

5. Regeneration

The Office notes that the Objectives Maps for Enniscorthy and New Ross (map No. 7 and No. 9, respectively) show the locations of proposed regeneration and masterplan sites in both towns with the relevant plan objectives referenced within the legend.

Both Objectives (E06 for Enniscorthy and NRT06 for New Ross) refer to Town Centre First Plans, however, no details in relation to same have been incorporated into either objective. The objectives and / or the associated maps should include more detail related to a range of issues including: the proposed vision for each of the identified sites; current and future access arrangements; existing and proposed pedestrian, cycle and public transport connections (including any emerging LTP measures); flood risk considerations; and public realm proposals. Where residential uses are envisaged, potential densities and indicative housing yield should also be provided.

The Office also notes that while proposed masterplan sites are identified on map No. 7 and No. 9, the plan objectives relating to these sites (E05 for Enniscorthy and NRT05 for New Ross) do not refer to the preparation of a masterplan.

Observation 1 - Regeneration

Having regard to the need for the integration of regeneration with the town centres of both Enniscorthy and New Ross, and in particular to:

- RPO 152 of the RSES (permeability and sustainable modes of transport);
- RPO 154 of the RSES (integration of transport and land use planning); and
- section 4.2 of the Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024) (high quality urban design and place making),

the Planning Authority is advised to:

- (i) include specific details relating to the vision for the regeneration and masterplan sites in both Enniscorthy and New Ross with respect to:
 - a) the layout, design and height of buildings and the spaces between them;
 - b) current/ future access arrangements;
 - c) existing / proposed pedestrian, cycle and public transport connections (including any emerging Local Transportation Plan measures);
 - d) flood risk considerations (where applicable);
 - e) public realm proposals; and
 - f) where relevant, proposed densities and indicative housing yield; and
- (ii) remove the reference to Proposed Masterplan Sites on the legend of the proposed Enniscorthy Objectives map 7 and the proposed New Ross Objectives map 9, retaining the references to the proposed objectives in brackets in each case.

6. Implementation and monitoring

Taking due account of the term of the proposed Variation to 2034, the extent of New Residential zoning, the delivery of infrastructure and the emerging LTP for Enniscorthy in particular, the Office considers it appropriate that the Planning Authority develops and implements a monitoring programme for all key objectives that form part of the proposed Variation with a particular focus on measuring outcomes with respect to compact growth, infrastructure delivery and sustainable transport measures.

Observation 2 - Implementation and Monitoring

Having regard to the need to ensure the integration of housing and infrastructure delivery over the term of the plan period to 2034 and in particular to;

- NPO 106 of the NPF (implementation and monitoring of compact growth); and
- NPO 108 of the NPF (implementation and monitoring),

the Planning Authority is advised to set out a detailed systematic approach to monitoring the implementation of key objectives of the proposed Variation No. 1 to the Wexford County Development Plan 2022-2028, including in relation to the delivery of New Residential development and the delivery of infrastructure including the sustainable transport measures in the Local Transport Plan, when finalised. The approach should include meaningful engagement with stakeholders including landowners and prescribed bodies in order to ensure that any identified barriers to the delivery of development can be overcome in a timely manner.

7. Updates to data and legal context

It is important to reflect the most recently published material as part of any updates to development plans. In this regard the Office notes that the 2016 Census and the Planning and Development Act 2000 are both referenced throughout the proposed Variation material.

Observation 3 - Updates to data and legal context

The Planning Authority is advised to update the proposed Variation material to reflect both the 2022 Census and the Planning and Development Act 2024.

Summary

The Office requests that your authority addresses the recommendations and observations outlined above. As you are aware, the report of the Chief Executive of your authority prepared for the elected members under section 58(11) of the Act must summarise these recommendations and how the Chief Executive proposes they should be dealt with.

Where the Planning Authority makes a variation, it is required to notify the Office **within one week** of the decision to adopt the Variation. Where your authority decides not to comply with the recommendations of the Office, then it shall inform the Office as soon as practicable and provide reasons for the decision not to so comply.

Your authority is also required to send the Office a copy of the Variation and any submissions made by the Minister, the relevant regional assembly and the NTA during the Variation preparation process.

Please be advised that planning authorities are also required to publish notice of the Variation within a week of the adoption, stating that a copy of the County Development Plan as varied will be available for inspection on a website and at a place specified in the notice no later than five weeks after the date of adoption.

Please feel free to contact the staff of the Office in the context of your authority's responses to the above, which we would be happy to facilitate. Contact can be initiated through plans@opr.ie.

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Niall Cussen

Planning Regulator

Designated Public Official under the Regulation of Lobbying Act 2015
