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1st April, 2022

RE: Material Alterations to the Draft City and County Development Plan.

SRA File Ref: 20/005

A Chara,

I refer to your Notice of the publication of Proposed Material Alterations to the Draft Waterford City and County Development Plan 2022-2028 received on 3rd March 2022.

The Southern Regional Assembly (SRA) welcome this opportunity to comment on the Proposed Amendments.

The SRA commend the continued work undertaken in the preparation of this Draft Plan and the amendments to strengthen policies and objectives. These observations are focused on the published material amendments and are intended to assist the Council in achieving successful alignment of the Development Plan with the Regional Policy Objectives (RPOs) of the Regional Spatial and Economic Strategy (RSES), Waterford Metropolitan Area Strategic Plan (MASP) and National Policy Objectives.

The SRA's review of Material Alterations below is set out in two parts:-

- **Observations on the Proposed Material Alterations**
- **Other issues arising from the Observations/ Recommendations issued in relation to the Draft Development Plan in August 2021**

It is acknowledged that these are the Material Alterations and that non-material alterations may be made in response to our initial submission on the Draft Development Plan where appropriate. We note that a large number of Proposed Material Alterations relate to additional references or considerations which are relatively minor edits and we have focussed our comments on the more significant amendments in these observations.

1.0 Observations on the Proposed Material Alterations (PMA)

PART 1

Chapter 1 Waterford & the Development Plan

Amendments 1 & 2 include additional references to the Metropolitan Area, health and well-being and strengthen the emphasis on well-being, health and lives of all citizens and their communities.

We welcome the additional Figure of the Irish Planning System Hierarchy in Amendment 3, which addresses **SRA Observation 1.0.** and the additional reference in Amendment 4 to Metropolitan Scale Regional Amenities at section 1.3.2, which addresses **SRA Observation 2.0.**

Amendment 5 provides a substantial response to our previous **Observation 11.0** regarding Dungarvan's role as a Key Town and addresses both RPO 11 Key Towns and RPO24 Dungarvan. However, it is noted that no population target is included for Dungarvan in the Core Strategy. This is a matter of concern that is addressed further in these observations in chapter 2.

Amendments 6 to 12, provide additional positive context with regard to the UN SDGs and references to wider international, national and regional policy. We also note and welcome how new Figure 1.1 in Amendment 6 indicates the links between the plan vision and statement to NPF, RSES, UN SDGs and the Core Strategy Strategic Aims. This also addresses **SRA Observation 3.0**

Chapter 2 Spatial Vision & Core Strategy

Amendment 13 addresses the significant influence of Waterford City to a wider hinterland '*in addition to the population target for Waterford City*'. This amendment and its link to the population targets set for the Waterford Metropolitan Area is an important reference in the context of other Core Strategy Material Alterations.

Proposed Amendment 15 addresses **SRA Observation 4.0** in highlighting the important role for Waterford in implementation of RPO 6 regarding collaboration between the Cities and Metropolitan Areas in the Region so as to realise their combined strengths and potential as a viable alternative to Dublin.

We also note updated Figure 2.1 – the updated spatial strategy map as part of proposed Amendment 15. The updated map includes intra-regional linkages and networks and addresses **SRA Observation 5.0.**

Amendment 17 provides for the simplification of Table 2.1 through the merging of two previous settlement categories for Large and Small Rural Towns into a new category 'Rural Towns' and the identification of the attributes of Rural Towns and Rural Villages. This amendment addresses **Observation 6.0** and the divergence in settlement categories between the Draft Plan and the SEA.

We note Amendment 18 to identify the whole of County Waterford as being 'under urban influence' and that a number of related amendments also follow this reclassification in the course of the Draft Plan document. We also note that the amendment is as a result of an evidence-based assessment of data.

Proposed Amendments 20, 21 and 22 are significant amendments to the Core Strategy, which provide for the replacement of Sections 2.12, 2.13 and Table 2.2 – ‘Core Strategy Population’ with new sections 2.12 & 2.13 on Waterford City and County Population Targets with a new Table 2.2 – Core Strategy Table’.

The key changes which we note in these amendments are:

- The ‘new’ Section 2.12 includes additional references to the role of the *Housing Supply Target Methodology for Development Planning: Guidelines for Planning Authorities - DHLGH (DEC 2020)* in the calculations for the Core Strategy Table.
- A new paragraph in section 2.12 to address the potential upward impact on population estimates arising from the University designation in Waterford - with estimates for up to 1500 additional learners annually along with additional professional, managerial and support staff.
- New Parag 2.13 states that the replacement Table 2.2 ***‘identifies the population and housing unit target as envisaged for Waterford City and County in the SRSES, NPF, Section 3(a) and (b) of the Implementation Roadmap for the National Planning Framework and the Housing Supply Target Methodology for Development Planning: Guidelines for Planning Authorities DHLGH (DEC 2020).’***
- New Parag 2.13 states that ***‘These figures have been further adapted to facilitate a more linear progression in reaching our 2031 target, in order to enable time to address constraints to implementing development across the city and county.’***
- New Parag 2.13 states that ***‘The population growth target of 4,800 will ensure that Waterford City has the capacity to develop in its role as a regional economic driver for the wider city region as envisaged in the NPF/SRESES’***
- New Table 2.2 has significant additional detail on ‘housing target units’, ‘housing targets %’ and land use zoning requirements taking into account residential density¹ and infill lands, etc but does not provide any Population Targets for the critical dates of 2022 and 2028 – the start and finish of the Development Plan Period.
- New Table 2.2 provides for significant reductions in zoned land in Waterford and other settlements.

In considering the above amendments, it is clear that a detailed approach to housing needs and demand assessment has been undertaken. However, there is concern that the assessment does not take due account of NPF, RSES and MASP policy to grow the population and employment base of Waterford, including the ambitious NPF target for Waterford of + 50-60% growth in population by 2040 and for Waterford to become a ‘Regional City of Scale’. In this regard it should be noted that **National Policy Objective 8** in the NPF set Population Targets for each City and specifies that these are **Minimum** Population Targets.

It is noted that Table 2.0 - Waterford City & County Population Targets, remains in the Core Strategy and is not the subject of the proposed Material Alterations. This table contains population targets for 2026 and 2031 attributed to the RSES and Waterford MASP which were then applied to the plan period 2022-2028 in Table 2.2 (Core Strategy Table) in the Draft Plan, which has now been proposed for deletion.

¹ Additional information on residential density and projected housing units nos addresses two aspects of our observations on the Draft Plan - in **SRA Observation 13.0**.

The Waterford MASP, co-developed with Waterford and Kilkenny Local Authorities, sets out a framework for the future development of the city and metropolitan area and includes key policy objectives to achieve these aims including:

- **Waterford MASP Policy Objective 1** which states that *'It is an objective to strengthen the role of the Waterford Metropolitan Area as an international location of scale....and a primary driver of economic and population growth in the Southern Region.*
- **Waterford MASP Policy Objective 2** - Driving Regional Growth for the South-East which states that *'It is an objective to support of the role of the Waterford Metropolitan Area as a primary economic driver for the Southern Region'*
- **Waterford MASP population projections in Table 1** provides for an uplift of 12,500 to 60,716 by 2026 and by an additional 6,250 to 66,966 by 2031 with Waterford City and suburbs (Waterford City and County Council area).

The proposed Material Alterations to the Core Strategy references a population growth target of 4,800 for Waterford City. This population target appears in the plan text only of new section 2.13 but the beginning and endpoint for this population target or the rationale for this target is not clear. If it applies to the period 2022-2028 -it appears to represents a significantly lower growth trajectory than the NPF, RSES and Waterford MASP ambition for population growth of the Waterford Metropolitan Area. Table 1 of the Waterford MASP would indicate a target of c7500 for the 6-year plan period to meet population targets. There is concern that the approach followed and population growth target of 4,800 is not consistent with RSES RPO 3, RPO 11 and the Guiding Principles under Section 3.3 A Tailored Approach for determining appropriate levels of growth in the Core Strategy and would undermine the stated RSES, MASP and Development Plan policy for Waterford to develop to become a 'Regional City of Scale'. The lower population growth target would also seem to be at variance with Material Alteration no. 20 where the new section 2.12 indicates that the new University designation in Waterford will have an upward influence on the City's population with estimates of up to 1500 additional learners annually along with additional professional, managerial and support staff

Furthermore, it is unclear as to the baseline population for 2022 for Waterford or for any of the constituent settlements including Dungarvan Key Town. There is concern that that replacement Table 2.2 includes no Population Targets for the County, City, Metropolitan Area or for any of the settlements – either for the start of the plan period in 2022 or for the end of the plan period in 2028 and clarity is required on these points.

The lack of population targets in the new Core Strategy Table may impede development of Waterford, Dungarvan and other settlements and could undermine planning for the provision of essential infrastructure by Government Departments and Agencies that require clear projections for population and employment based on population targets.

The New Core Strategy Table (Proposed Amendment 21) indicates a significant reduction in the provision of zoned land required for Waterford and other settlements that does not appear to take account of the Targets contained in the RSES and MASP for population and employment growth and may further undermine the ambition for Waterford as outlined above.

1. *Proposed Amendments Nos 20, 21 and 22 to the Core Strategy would result in the omission of population targets from the Core Strategy Table, a significant reduction in proposed land use zoning requirements and would appear to set a significantly lower*

growth trajectory for Waterford than envisaged in the NPF, RSES and Waterford MASP, which set population targets to support the targeted growth of Waterford to become a 'Regional City of Scale'.

*It is recommended that the local authority should address this point to ensure alignment with NPF/RSES population targets and RPO 3 – Local Authority Core Strategies and RPO 5 - Population Growth and Environmental Criteria and the Waterford MASP objectives for Metropolitan Area population and employment growth. This could be addressed by the inclusion of two additional columns for population targets for the Waterford Metropolitan Area and for all settlements/settlement categories for the plan period, i.e 2022 and 2028, with such population figures for these years drawn from Table 2.0 in Chapter 2, which we note to be extant and unaffected by the proposed Material Alterations. In relation to the column for 'Housing Targets Units' in Table 2.2, for the Waterford Metropolitan Area, it is recommended that this is amended to **Minimum** Housing Targets Units' and that the Local Authority ensure the Zoned Land required for the City and Suburbs reflects the population targets for the Metropolitan Area contained in the Waterford MASP and in Table 2.0 referred to above.*

[Chapter 3 Waterford City & MASP](#)

We note and welcome Amendment 24, which supports the provisions of the Urban Development and Building Heights Guidelines for Planning Authorities (2018) and Table 3.1 which identifies potential regeneration sites and sites which may be suitable for higher densities and taller buildings

We note and welcome amendments 32, 33 and 34 which strengthen policy with regard to a Joint Retail Strategy, the Waterford City Decarbonisation Zone, Transport & Mobility and Citywide Amenity with additional reference to the Waterford MASP Policy Objective 21 (c) to identify a location for a Regional Scale Park in the Waterford Metropolitan Area, which addresses **SRA Observation 14.0** on the Draft Plan.

[Chapter 4 Economy, Education & Retail](#)

We note and welcome amendments 36 and 37 which strengthen policy and highlight the important role of education in quality of life and the enhanced role of this sector for the City and South-East with the transition of WIT to University status as TUSE, reflecting RSES policy for Learning and Education.

We note and welcome amendment 38 with regard to Section 4.4 Clustering, Innovation and Enterprise Hubs, which strengthen policy support for an expanding innovation network identified in the RSES. We also welcome the reference and support for key RSES policies RPO 28 – Collaboration/partnership, RPO 29 – Rural Settlement networks and RPO 30 – Inter-Urban Networks as Regional Drivers of Collaboration and Growth. We also note the expanded section on Networks in the amended Table 4.0 – Strategic Employment Locations. These amendments address **SRA Observation 12.0** on the Draft Plan.

We note that Amendment 39 would provide for an additional bullet point to policy ECON 01 to *'Work closely with the Southern Regional Assembly, neighbouring Local Authorities, WIT, the Chamber's and other agencies to build and maintain a shared evidence base'*. Additional content on 'bidding expertise and capacity' is also noted.

We also note and welcome amendments 41 to 48 which provide for additional content in relation to Town Centre First policy, Town Centre Health Checks, economic collaborative partnerships, aggregates, social enterprise and Waterford Estuary.

We also note and welcome additional content relating to climate action, employment and Just Transition through proposed amendments 49 and 50.

We also note and welcome Amendment 52, which provides for significant additional content on Tourism in Waterford and which includes an enhanced focus on sustainable tourism throughout. The amendment includes additional Policy Objectives with a regional focus, supporting development of the Ireland's Ancient East Brand and Destination Experience Plans.

We note and welcome Amendments 53 to 55, which provide for strengthened content on education facilities and skills development.

It is noted that Amendments 56 and 59 include additional content and policy in relation to retail policy.

Proposed Material Alterations to chapter 4 also address SRA Observations 15.0 and 16.0 on the Draft Plan.

[Chapter 5 Transport & Mobility](#)

We note and welcome Amendments to Chapter 5, which will strengthen transport and mobility objectives and content in the areas of safety for women and children, integration of land use planning and transportation, development of a County Transport Plan, Area Based Transport Assessments, modal change and additional support for active travel, bus and rail transportation and additional content in relation to national roads, regional and local roads and car parking.

[Chapter 6 Utilities, Infrastructure, Energy & Communications](#)

In relation to Amendment 76, we note and welcome the updated Table 6.0 on Water and wastewater capacity with the benefit of input from Irish Water. We note that the table references population targets that are no longer included in the Core Strategy Table - **Material Alterations Observation 1.0** addresses this matter. The lack of population targets therefore precludes a full assessment being made of water and wastewater capacity.

The lack of population targets also impacts **SRA Observations 7.0, 8.0, 9.0 and 10.0** on the Draft Plan issued last August in relation to the assimilative capacity and environmental criteria for settlements and rural areas.

2.0 *Concern is expressed that the lack of population targets in the Core Strategy precludes a full assessment being made of water and wastewater capacity of settlements for the plan period, undermines investment strategy for water and wastewater services and will impede the implementation of broader plan objectives.*

We note and welcome other amendments to Chapter 6 which will strengthen the plan content and policy in relation to renewable energy, water and wastewater infrastructure, waste management, storm and surface water management, flood risk management and ICT/Communications. In this regard we welcome Amendment 82 to Policy UTL 09 with the additional reference to Nature Based Solutions in relation to storm and surface water management. This also addresses **SRA Observation 17.0** on the Draft Plan.

Amendment 81 to Policy UTL 08 Protection of Water Resources addresses **SRA Observation 20.0** on the Draft Plan with regard to cumulative impacts of septic tanks and waste water treatment systems.

In relation to Amendment 84, we note and welcome Amended Policy Objective UTL 13 Renewable Energy and the additional policy statements to support the delivery of renewable energy to achieve Renewable Energy Targets and support for wind energy developments undertaken in an environmentally sensitive manner. The updated policy objective also addresses **SRA Observation 19.0** on the Draft Plan

The updated policy objective also refers to the wind energy designation map in appendix 2 of the Renewable Energy Strategy. Observations on the amendments to the Wind Energy Strategy are included later under Appendix 2/the Renewable Energy Strategy.

We also note and welcome Amendment 89 for new policy objective UTL 24, which will support the development of electricity transmission networks and infrastructure, subject to environmental assessment. This also address **SRA Observation 18.0** on the Draft Plan.

[Chapter 7 Housing & Sustainable Communities](#)

We note and welcome Amendment 91 and additional work undertaken on regeneration and active land management with the addition of Appendix 21, which identifies and profiles a range on brownfield sites and amended policy H 05 which refers to Appendix 21 and provides a commitment to undertake a viability assessment for key brownfield sites. This also address **SRA Observation 21.0** on the Draft Plan

We note and acknowledge amendments 92 to 95 which address social housing, Part V, Housing for All, housing type and tenure and housing mix, including amendments to address recent legislative changes regarding Part V. We also note that Amendment 100 to Section 7.11.2 – Housing in the Open Countryside provides for the recategorization of the entire county as a 'Rural Area under String Urban Influence'.

We note and welcome other amendments to Chapter 7, which will strengthen the plan content and policy in relation to climate resilient housing, student accommodation, sports related policy and amended and new policies at section 7.2.7 in relation to sustainable communities.

[Chapter 8 Placemaking](#)

In relation to Amendments to chapter 8, we note additional policy content to strengthen policy on the use of a Design Statement to assist in development of regeneration sites, strengthened policy Place 17 for creating attractive places and strengthened policy Place 26 for the 10-minute neighbourhood/community.

[Chapter 9 Climate Action, Biodiversity & the Environment](#)

In relation to Amendments to chapter 9, we note and welcome the additional reference at Amendment 119 - Policy BD02 Biodiversity to the *All-Ireland Pollinator Plan*, which addresses our previous observation on the Draft Plan **SRA OB 22.0** and will support RSES RPO 128 - All Ireland Pollinator Plan.

[Chapter 10 Landscape, Coast/Marine and Blue](#)

In relation to Amendments to chapter 10, we note and acknowledge additional policy content to strengthen policy on coastal zone vulnerability, geological heritage, greenway development, public rights of way, outdoor recreation and historic routes including abandoned rail lines. In relation to **SRA OB 23** on the Draft Plan, it is not clear if the list of protected views/ scenic routes have been mapped as recommended.

[Chapter 11 Heritage](#)

In relation to Amendments to chapter 11, we note and acknowledge amended and additional policy content in relation to 'Regeneration and Re-use', industrial heritage (and in particular glass making) and the amendments relating to archaeological consideration and policy.

[PART 2: Material Alterations to the Development Management Standards \(Volume 2 of the Draft Development Plan\)](#)

We note the extensive and detailed amendments to Part 2 - Material Alterations to the Development Management Standards (Volume 2 of the Draft Development Plan).

[PART 3: Material Alterations to Appendices of the Draft Waterford City and County Development Plan 2022 – 2028](#)

[Appendix 2: Specific Development Objectives](#)

We note amendments to Appendix 2 - Specific Development Objectives

[Appendix 3: Housing Strategy and Housing Need Demand Assessment](#)

It is noted that the Housing Strategy has been updated to consider 'further relevant housing needs and demands for Waterford City and County over the development plan period' with updated information and data to inform the HNDA and determine future housing requirements.

The Housing Strategy refers to the identified population growth targets for Waterford in the NPF Implementation Roadmap but does not address the population projections for the Metropolitan Area contained in the Waterford Metropolitan Area Strategic Plan (MASP).

In this regard, concern is expressed that the Housing Strategy and proposed material alterations to the Core Strategy for the County and for the Metropolitan Area do not take full account of population targets. As a result it is not clear if the land use zoning requirements in the Amended Core Strategy Table are sufficient to achieve the NPF, RSES and Waterford MASP population growth targets. Observations in relation to population growth targets are provided above under Chapter 2 - Spatial Vision & Core Strategy.

[Appendix 7: Renewable Energy Strategy.](#)

It is noted that proposed Material Alteration 176 to the Renewable Energy Strategy would amend the Wind Energy Strategy consisting of four (4no.) classifications (Strategic Areas, Preferred Areas, Areas Open to Consideration, No Go Areas) to three (3 no.) classifications to be identified on the proposed revised wind energy designations map:

- Preferred Areas,

- Areas Open to Consideration,
- No Go Areas.

The maps which accompany the Wind Energy Strategy are also proposed to be amended under proposed Material Alteration 176 and are included in the consultation documents.

Proposed Amendment 176 states that proposed changes to the Wind Energy Strategy and maps are based on the overlaying of a series of maps and data as listed.

The RSES is strongly supportive of developing Renewable Energy resources and supports the many opportunities for onshore wind as a major source of renewable energy. RPO 99 - Renewable Wind Energy states that 'It is an objective to support the sustainable development of renewable wind energy (on shore and offshore) at appropriate locations and related grid infrastructure in the Region in compliance with national Wind Energy Guidelines'.

In this regard, the Planning Authority should ensure that the proposed Material Alteration meets the requirements of the '*Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change*' (Department of Housing, Planning, Community and Local Government July 2017) and, in particular, Section 4 which relates to the specific planning policy requirement under Section 28(1C) of the Act when making, reviewing, varying or amending a development plan, or a local area plan, with policies or objectives that relate to wind energy developments.

[Appendices 9, 11,12,14,16.](#)

We also note the extensive and detailed amendments to the following appendices:-

- Appendix 9: Record of Protected Structures
- Appendix 11: Natural Heritage Assets
- Appendix 12: Airport Masterplan
- Appendix 14: Infrastructure Capacity
- Appendix 16: Implementation and Monitoring

[Appendix 17: Tiered Approach to Zoning](#)

We note the amendments to Appendix 17 which include updated site assessments and site identification for Waterford City and other settlements having regard to their infrastructure capacity.

[Appendix 19: Strategic Environmental Assessment \(SEA\)](#)

WE note the additional ecological and geological designations identified at Appendix II of the SEA.

[Appendix 21: Waterford City and County Regeneration and Opportunity Sites](#)

We note and welcome the new appendix 21 identifying Regeneration and Opportunity Sites in Waterford and all settlements in the county.

[Appendix 22: Archaeology](#)

We note the addition of Appendix 22 with the listing of all Sites and Monuments Records in the County.

[Part 4: Material Alterations to the Land Use Zoning provisions of the Draft Waterford City and County Development Plan 2022 – 2028](#)

We note the addition of Part 4 to the Draft Plan to provide a table of all Material Alterations to the Land Use Zoning provisions of the Draft Waterford City and County Development Plan 2022 – 2028.

2.0 Environmental Assessment

We note the preparation of an SEA Screening on the proposed Material Alterations at Section 2 of the SEA, a Strategic Environmental Report for 'relevant proposed material alterations', a Natura Impact Report (Appropriate Assessment) for proposed Material Alterations and an updated Strategic Flood Risk Assessment (SFRA) published alongside the proposed Material Alterations to the Draft Plan and some of the observations above relate to these documents.

The Planning Authority should note that the RSES is informed by extensive environmental assessments, contained in the SEA Statement, AA Determination and Natura Impact Report, which are available on the SRA Website. These assessments looked at environmental sensitivities for all parts of the Region and we would recommend that Waterford City and County Council review these documents to inform the Council's own environmental assessments of proposed material alterations and to ensure that mitigation measures identified to address environmental sensitivities and constraints are included in the Final County Development Plan where relevant.

3.0 Conclusion

The SRA welcomes the publication of proposed material alterations to the Draft Development Plan and commend the Planning Department on the inclusion of amendments which address key RSES Strategy policy objectives through their inclusion in the Draft Plan.

These observations are provided to assist and strengthen policy objectives and to strengthen alignment between the Draft Development Plan and RSES Strategy.

Further engagement between the SRA as a key stakeholder and the Planning Department of Waterford City and County Council in the final phase of the Draft Development Plan is encouraged.

The RSES team are available for further consultation and for any clarification required regarding this submission.

Mise le meas,



David Kelly

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