

**Waterford City & County Council**

# **Dungarvan and Ballinroad Local Area Plan 2023-2029**

Pre-draft Public Consultation Issues Paper

**Submission Themes & Moderations Summary**

March 2023



Comhairle Cathrach & Contae Phort Láirge  
Waterford City & County Council

# **Pre-Draft Public Consultation Strategic Issues Paper - Dungarvan and Ballinroad Local Area Plan 2023-2029**

## **Submission Themes Summary**

## ECONOMY, TOURISM, EDUCATION & RETAIL

- **Economy**
  - Need to support local retailers and businesses
  - Double the town economy by 2030 to c€750m
  - Recent success of Irish language films set in An Rinn An Cailin Cuin and Rosa & Frank have facilitated massive attention on the Deise Gaeltacht and also on the local appreciation of the Irish language. This opportunity area must continue to be supported and built upon.
  
- **Tourism**
  - Shortage of Tourism Accommodation is a major problem
  - Water Sports has high potential for growth in the area
  
- **Education**
  - The Dept of Education state that if the projected population increase materializes, a requirement for additional education provision at both primary and post-primary level as well as special education needs may emerge over the lifetime of the plan.
  
- **Retail**
  - The importance of the Retail Sector to Dungarvan is highlighted. Waterford Council must continue to see the diverse, unique and very attractive retail landscape in Dungarvan and support the continuation of same

## TRANSPORT & MOBILITY

- **General Roads**
  - The strategic importance of the N25 and N72 in Dungarvan needs consideration and consultation with TII
  - Local Transport Plan should be undertaken to support and inform the Local Area Plan Review process
  - make the quay side one way for traffic
  - the previously proposed Burgery Roundabout needs to be given priority in the plan so as to facilitate connectivity between the Clonea Road, N25 and Strandside North
  - Reduce speed limits in the town to 30km p/h.
  
- **Permeability**
  - The provision of access between estates is an important issue in order for a more accessible community and to assist with smaller children having safer access to other estates rather than using the roads which are not ideal for cyclists.
  
- **Footpaths/Walking**
  - Number of submissions call for the urgent need for a footpath/cycle lane in Ballinroad between Ballinroad Cross (Church) & Clonea Road round-about
  - Outdoor dining/drinking areas need to be revisited to check their suitability now

- **Cycling**
  - Cycling through through Dungarvan town centre is problematic due to traffic, loading/unloading, restricted space, signage etc
  - More identified paths for safe cycling would also be welcome, along with safe civic spaces to park bikes
  - Additional instructional signage along the greenway as well as signs saying 'No cycling on footpaths' especially on The Causeway & The Devonshire Bridge would help
  - need to link the Greenway better, with the town centre and the quay side and restaurants and local hostelrys
  - Linking Ballinroad to the greenway
  
- **Public Transport**
  - Several comments in relation to the benefits and expansion opportunities of the Local Link service.
  
- **Parking**
  - More parking spaces are needed to support and sustain town centre economic activity

## HOUSING & SUSTAINABLE COMMUNITIES

- **General Issues**
  - CDP Objectives DGDO9 'to facilitate future expansion of the soccer pitch' and DGDO13 'To support the development of a public playground and sports facilities/playing pitches in Ballinroad' and requests support through the LAP to help clubs to pursue the means to obtain new spaces. Are welcomed but must be supported and delivered.
  - Community Communication and Consultation Team required to engage with and inform residents/communities of projects/initiatives that will have impact on them
  - Need to establish a community development corporation (CDC) and a Community Improvement District Group
  - Ballinroad lacks common community areas and community facilities. Eg playground/Hall
  - Development Objective DGD012 is welcomed – To support the redevelopment of the former landfill in Ballinamuck, Dungarvan to a nature park. - it's an untapped resource for walkways, playing fields, wetlands or cycle tracks.
  - Shortage of Creche facilities in the area
  
- **Housing**
  - Significant shortage of affordable housing provision for younger people
  - Vacancy needs to be addressed - Collect the vacant tax on the long-term vacant homes and ringfence that for town regeneration
  - Provide over the shop living
  - Publish a Housing dashboard tracking delivery
  - Establish Dungarvan & Abbeyside Housing Co-op & supply homes on state land for turnkey €150-200k (1 bed & 2bed) with zero energy bills.

- **Community Grid/Allotments**
  - Ballinroad is an ideal community for an allotment scheme/community electricity grid or community electric charge points pilot schemes.
  
- **Arts & Culture**
  - Dungarvan needs more cultural activities on a regular basis – not just weekend festivals ‘to bring in visitors’. The council could look at buying the Church of Ireland building (or another building) and run it as a mixed live event facility.
  - Support for festivals, events, art, music, movies etc. is imperative to sustain a dynamic, committed community which will help Dungarvan progress and evolve.
  
- **Irish language**
  - Welcomes the Coastal Path into Gaeltacht na nDéise and requests that the Irish language be prioritised in any signage erected as part of the project.
  
- **Sports/Recreation/Swimming Pool**
  - Need for two additional pitches at Dungarvan Utd AFC (all weather pitch needed in particular)
  - Provide a linked cycle route between Dungarvan Utd and the newly extended greenway to Cappoquin
  - Calls to provide a solar powered lit safe walking / running track at Dungarvan Utd AFC
  - Sports clubs in Ballinroad are at capacity and need to be expanded. Ballinroad FC in particular.
  - Two tennis courts behind St Laurence's Hall adjoining the soccer pitch in Ballinroad need to be refurbished.
  - Significant demand for the development of a new sustainable 25m community swimming pool facility within the West Waterford region

## CLIMATE ACTION, GREEN INFRASTRUCTURE, BIODIVERSITY AND ENVIRONMENT

- **General**
  - Reduce the towns emissions to net zero by being first town in Ireland to get to Net Zero, with energy 50% owned by the community itself.
  - Lands (including wetlands) need to be correctly zoned to protect nature eg Duckspool. Access to these areas needs to be managed carefully so as access does not disrupt/damage the nature that we want to protect.
  - The 5.4ha of land known locally as ‘Tournore Marsh’ be managed as a ‘nature park’ which would complement the existing zoning of these lands as “Open space” and the zoning of the adjacent lands as “High amenity” under the Waterford City & County Development Plan 2022–2028.
  
- **Flooding**
  - OPR - prepare an updated Strategic Flood Risk Assessment (SFRA)
  - OPW: –
  - The National CFRAM studies used extreme water levels defined by the Irish

Coastal Protection Strategy Study (ICPSS). These sea levels have been superseded by the Irish Coastal Wave and Water Level Modelling Study (ICWWS). The ICWWS levels for Dungarvan are above the previously defined ICPSS levels used in the National CFRAM. Therefore, the risk of coastal flooding is likely to be greater than shown in the National CFRAM

- Map Review Programme - As part of the design of the flood relief scheme for Dungarvan & Environs a review of the flood mapping will be conducted and the mapping will be updated at this stage.
  
- **Nature Conservation**
  - The grassland fields from the Shandon traveller accommodation to Ballyneety Bridge are zoned as Residential Strategic Reserve; in order to secure this area for future usage by birds from the SPA the Department recommends this area adjoining the estuary be zoned for Open Space and Recreation
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- **Enhancing wetlands/ Create Pond Networks**
  - The establishment of a pond network across Dungarvan and Ballinroad which will provide ecological and landscape benefits, including high-value wildlife refuges and corridors for biodiversity and amenity features
  - Incorporation of SuDs ponds as a nature-based solution for local surface water management and flood defence measures
  - Promote community group engagement in pond creation/management and monitoring of local ponds on public land e.g. adopt a pond scheme,

## **LANDSCAPE, COAST/ MARINE AND BLUE GREEN INFRASTRUCTURE**

- Include Duckspool in the Dungarvan Harbour SPA area and utilize it as a educational grounds for best practice of wet land management.
- Objective DGDO14 is to “Support the development of a coastal path particularly between Dungarvan and Tramore and West of Dungarvan to Gaeltacht na nDéise”. The Department wish to ensure that the bird species for which Dungarvan Harbour is designated a SPA are not adversely affected by excessive human disturbance. - It may be possible to identify a route sufficiently back from the shore to avoid disturbance but this is not at all certain and this constraint should be reflected in the Objective.
- Seeks the protection of the migratory birds habitats at Duckspool and Cunnigar and Dungarvan Bay and to protect the sea and fisheries from unnecessary development in the waters offshore from Tramore to Ardmore.

## **UTILITIES INFRASTRUCTURE, ENERGY & COMMUNICATION**

- Water pressure is compromised in Ballinroad in summer months when people are camping in Clonea. This needs to be addressed and improved  
Uisce Éireann (IW) state: In terms of servicing it is stated that:
- • The 2022 Water Supply Capacity Register indicates there is sufficient capacity to cater for the projected growth within the lifetime of the plan.
- • In terms of wastewater it is envisaged that capacity is available to cater for the

## HERITAGE

### Department of Housing, Local Government and Heritage :

- show the boundary of the identified 'Zone of Archaeological Potential' in Dungarvan in the Zoning Map included in the LAP
- include on the accompanying maps the location of the identified Recorded Monuments
- the LAP should contain a specific section on underwater archaeology and that the protection of underwater cultural heritage in all its forms within the LAP area
- Within the SRR area at Ballynamuck East and Shandon there are caves where fauna of Pleistocene and Early Holocene date have been found. Though much of the latter cave system was removed in the nineteenth century it is likely that heretofore undocumented extensions of it extend into the area zoned SRR in the LAP. A Specific Development Objective to protect these caves should be included in the LAP and they will require consideration as part of an overall archaeological assessment of any development proposals for the area

## OPRSUBMISSION-SUMMARY

- • the housing supply targets for Dungarvan and Ballinroad should be consistent with the Waterford City and County Development Plan, 2022 – 2028;
- • the proposed preliminary core strategy map should consider how to prioritise housing delivery in areas close to the facilities and services of the town centre, such as Shandon and Kilrush, where land is already served by appropriate infrastructure or is capable of being serviced within the plan period, and is accessible by walking, cycling and public transport;
- • identify opportunity/regeneration sites, vacant and underutilised buildings, together with specific investment and/or infrastructure to support regeneration development, such as site assembly, land acquisition, and/or sustainable transport initiatives;
- • provide for the sustainable expansion of Dungarvan to strengthen the strategic location of the urban centre and in its sub-regional role as a Gaeltacht Service Town, and acting as a key economic driver for West Waterford and the town;
- • the LAP should be informed by the preparation of a Local Transport Plan and should integrate land use and transport planning to provide for enhanced active and sustainable transport modes to help achieve the 10-minute town concept. The planning authority is advised to consult with the NTA and TII in this regard;
- • include objectives for the delivery of Traveller Accommodation on lands at Shandon, consistent with a Specific Development Objective DG016; and
- • prepare an updated Strategic Flood Risk Assessment (SFRA) and include policies and objectives in relation to the implementation of SuDS and nature based solutions as a means for managing surface water run-off at key development sites. The planning authority is advised to consult with the OPW in this respect.

# **Pre-Draft Public Consultation Strategic Issues Paper - Dungarvan and Ballinroad Local Area Plan 2023-2029**

## **Moderations Summary**



URN	Author	Location	
<a href="#">WFD-C17-1</a>	Ciara Langan	Duckspool, Abbeyside, Dungarvan co waterford	
<b>Summary</b>			
The submission seeks to include Duckspool in the Dungarvan Harbour SPA area and utilize it as a educational grounds for best practice of wet land management.			

<a href="#">WFD-C17-2</a>	David Lumsden	Dungarvan	
<b>Summary</b>			
The submission seeks the reduction of the maximum speed limit to 30km/h for all of Dungarvan, not just residential estates which would make the town safer and attractive. A number of benefits of 30km/h speed limits are listed in the submission along with some examples of the effect of reduced speed limits in other jurisdictions.			

<a href="#">WFD-C17-3</a>	Rene Murray	Ballinroad soccer pitch	
<b>Summary</b>			
The submission requests that the existing two tennis courts behind St Laurence's Hall adjoining the soccer pitch in Ballinroad be refurbished.			
Specific Developmental Objective DGD09 'to facilitate future expansion of the soccer pitch' could be amended to facilitate this upgrade.			

<a href="#">WFD-C17-4</a>	Heritage Group		
<b>Summary</b>			
The submission sets out a number of general issues relating to the environment and heritage. eg use of fluoride in drinking water, 5G, high buildings, heritage graveyards, windfarms, pesticides.			
In more specific terms the submission seeks the protection of the migratory birds habitats at Duckspool and Cunnigar and Dungarvan Bay and to protect the sea and fisheries from unnecessary development in the waters offshore from Tramore to Ardmore.			

<a href="#">WFD-C17-5</a>	Department of Education	Dungarvan and Ballinroad	
<b>Summary</b>			
The submission notes projected population increase of 1,476 persons for Dungarvan and Ballinroad from 10,388 in 2016 to 11,864 in 2028. It is stated that if this projected population increase materialises, a requirement for additional education provision at both primary and post-primary level as well as special education needs may emerge over the lifetime of the plan.			
The Department looks forward to engaging with the Council in regard to the draft plan.			

<a href="#">WFD-C17-6</a>	Avice White	Dungarvan and West Waterford	
<b>Summary</b>			
The submission seeks that the plan supports the development of a new sustainable 25m community swimming pool facility within the West Waterford region.			

<a href="#">WFD-C17-7</a>	Transport Infrastructure Ireland	The LAP area.	
<b>Summary</b>			
The submission recognises the strategic importance of the N25 and N72 in Dungarvan and makes a number of recommendations under the following headings:			
1. DEVELOPMENT STRATEGY AND NATIONAL ROADS			
TII would welcome consideration by the Council of including as a Core Strategy Objective/Guiding Principle in the Draft Local Area Plan strategic objectives to reflect the foregoing policy requirements, which are summarised as;			
a) to maintain the strategic function, capacity and safety of the national roads network, including planning for future capacity enhancements, and			
b) to ensure that the existing extensive transport networks, which have been greatly enhanced over the last two decades, are maintained to a high level to ensure quality levels of service, safety, accessibility and connectivity to transport users.			
Reason: To ensure conformance with official policy provisions included in NPO 74/NSO 2 and RPO 140.			
2. ENHANCED REGIONAL ACCESSIBILITY			
Any additional improvements relating to national roads identified at a local level should be done so in consultation with and subject to the agreement of TII and be developed, subject to an appropriate evidence base, in accordance with the requirements of Section 2.7 of the DoECLG Spatial Planning and National Roads Guidelines (2012).			
Reason: To ensure conformance with official policy provisions included in NPO 74/NSO 2 and RPO 167.			
3. LOCAL AREA PLAN AND LOCAL TRANSPORT PLANS			
TII considers that a Local Transport Plan should be undertaken to support and inform the Local Area Plan Review process and that the Local Transport Plan should be based on the Area Based Transport Assessment (ABTA) guidance produced by the NTA and TII and include consultation with statutory stakeholders. Any zoning strategy prepared for the Local Area Plan should support compact growth and present an ability to serve areas of existing and planned new development by active travel and sustainable mobility measures. Any recommendations of the Local Transport Plan should reflect the provisions of official policy relating to maintaining the strategic function, capacity and safety of the national roads network in the area.			
Reason: To ensure conformance with official policy provisions included in NPO 74/NSO 1 and NSO 4 and RPO 151, RPO 152 and RPO 157.			
4. MAINTAINING THE STRATEGIC CAPACITY AND SAFETY OF THE NATIONAL ROAD NETWORK			

TII requests that the Council gives due consideration to reflecting the requirements of Section 3 of the DoECLG Spatial Planning and National Roads Guidelines in the Local Area Plan prior to finalisation, in particular;

- i. TII Publications (Standards) and Road Safety
- ii. Traffic and Transport Assessment (TTA)
- iii. Signage
- iv. Safeguarding national road drainage regimes
- v. Renewable Energy and Grid Connection
- vi. Noise
- vii. Other Matters (active travel and sustainable transport measures)

<a href="#">WFD-C17-8</a>	An Taisce	Dungarvan and Ballinroad	
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**Summary**

The submission seeks the establishment of a pond network across Dungarvan and Ballinroad which will provide ecological and landscape benefits, including high-value wildlife refuges and corridors for biodiversity and amenity features.

The submission requests the inclusion of the following recommendations in the Draft Local Area Plan:

1. Incorporate the creation of new ponds, the resurrection of 'ghost ponds' (a 'ghost pond' is an old pond lost to in-filling) and the maintenance of existing ponds, including currently unmanaged ponds as an objective within the LAP.
2. Establish a minimum of one new local freshwater pond in Dungarvan and Ballinroad (ponds can range between one metre squared up to five hectares in area and need to contain water for a minimum of four months of the year).
3. Incorporation of clean, freshwater ponds into new developments as well as existing public amenity and green space areas as part of an integrated green infrastructure network strategy for the incorporation of biodiversity enhancement and climate change mitigation measures.
4. Incorporation of SuDs ponds as a nature-based solution for local surface water management and flood defence measures.

The submission also requests that the following Specific Development Objectives for Dungarvan be expanded on to include reference to ponds:

**DGD02-** Inclusion of SuDs in new development - these can achieve outcomes for biodiversity, flood mitigation, and amenity value through Nature-based solutions.

**DGD012 -** Enhancing wetlands - creating new clean water ponds to increase carbon sequestration/support climate mitigation and enhance amenity value.

<a href="#">WFD-C17-9</a>	John Coffey		
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**Summary**

The submission proposes that the plan supports the development of a new 25metre Municipal Swimming Pool for the Dungarvan region

<a href="#">WFD-C17-10</a>	Jenny Beresford	Ballinroad	
<b>Summary</b>			
<p>The submission notes the following:</p> <p>The population increase by 14% in 6 years is welcome, but must be in line with sustainable community development and service provision.</p> <p>Ballinroad lacks common community areas and community facilities.</p> <p>It is important to see a commercial enterprise serving the community in Ballinroad (where viable) be encouraged so that a hub is re-established.</p> <p>Creche provision is worth considering, it is in short supply, based on age profile of Ballinroad, there would be demand for childminding &amp; creche provision services.</p> <p>The provision of access between estates is identified as an important issue in order for a more accessible community and to assist with smaller children having safer access to other estates rather than using the roads which are not ideal for cyclists.</p> <p>Linking Ballinroad to the greenway or trying to get children safely to school by bike from the village is not safe at present as the road structure is challenged and road markings are poor. Massive potential in this area.</p> <p>Existing footpaths are not ideal for wheelchair users or double buggy's</p> <p>The local link-transport system could be extended to Sundays</p> <p>Ballinroad is an ideal community for an allotment scheme.</p> <p>Suggestion for a community electricity grid or community electric charge points pilot schemes.</p> <p>Suggestion for a community playground/community hall with biodiversity area</p> <p>Water pressure is compromised in Ballinroad in summer months when people are camping in Clonea. This needs to be addressed and improved.</p> <p>Silt removal from Ballinacourty and Barnawee would open opportunity for water based tourism businesses / projects</p>			

<a href="#">WFD-C17-11</a>	Dungarvan & West Waterford Chamber		
<b>Summary</b>			
<p>The submission outlines the need to build on the success of the Greenway and for the need for availability of accommodation for tourists</p>			
<p>The submission highlights the benefits and expansion opportunities of the Local Link service.</p>			
<p>The submission highlights that more parking spaces are needed to support and sustain town centre economic activity in line with a rising population.</p> <p>More identified paths for safe cycling would also be welcome, along with safe civic spaces to park bikes.</p>			

The submission highlights that Water Sports has high potential for growth in the area. The removal of silt from the harbour and river mouths would facilitate many types of water activities and water / adventure tourism.
The submission highlights the importance of the Retail Sector to Dungarvan. Waterford Council must continue to see the diverse, unique and very attractive retail landscape in Dungarvan and support the continuation of same.
The submission states that having Dungarvan as a Gaeltacht service town is a unique selling point we much cherish and refers to the recent success of Irish language films set in An Rinn An Cailin Cuin and Rosa & Frank have facilitated massive attention on the Deise Gaeltacht and also on the local appreciation of the Irish language.  This opportunity area must continue to be supported and built upon.
The submission notes that allotment schemes could be more prevalent in the area
The submission notes that support for festivals, events, art, music, movies etc. is imperative to sustain a dynamic, committed community which will help Dungarvan progress and evolve.

<a href="#">WFD-C17-12</a>	Comhlucht Forbartha na nDéise	Gaeltacht na nDéise	
<b>Summary</b>			
The submission welcomes the Coastal Path into Gaeltacht na nDéise and requests that the Irish language be prioritised in any signage erected as part of the project.			

<a href="#">WFD-C17-13</a>	Uisce Éireann		
<b>Summary</b>			
The submission sets out some high level comments in relation to the following areas:			
<ul style="list-style-type: none"> <li>• National and Regional Policy</li> <li>• Key Uisce Éireann Policies and Plans</li> <li>• Water Services Infrastructure &amp; Constraints</li> <li>• Land Development Issues (Zoning, Developers, Serviceability of Settlements, LA Projects)</li> </ul>			
In terms of servicing it is stated that:			
<ul style="list-style-type: none"> <li>• The 2022 Water Supply Capacity Register indicates there is sufficient capacity to cater for the projected growth within the lifetime of the plan.</li> <li>• In terms of wastewater it is envisaged that capacity is available to cater for the population targets identified to 2028</li> </ul>			

<a href="#">WFD-C17-14</a>	Karen & Donal Dempsey Dempsey	Ballinamuck, Dungarvan	
<b>Summary</b>			
<p>The submission is in favour of Development Objective DGD012 – To support the redevelopment of the former landfill in Ballinamuck, Dungarvan to a nature park.</p> <p>The submission sets out the merits and benefits of a public park this scenic location which would be giving something positive back to the community as it's an untapped resource for walkways, playing fields, wetlands or cycle tracks.</p>			

<a href="#">WFD-C17-15</a>	Brian Sandford	Dungarvan, Abbeyside, & Ballinroad	
<b>Summary</b>			
<p>The submission raises a number of wide ranging issues in relation to Dungarvan &amp; Abbeyside:</p> <ul style="list-style-type: none"> <li>• The LAP should concentrate more on making the town a better place to live without a primary focus of a drive for population, industry, and visitor/tourist growth.</li> <li>• The council needs a Community Communication and Consultation Team to engage with and inform residents/communities of projects/initiatives that will have impact on them. eg for Active Travel Projects,</li> <li>• Even if Dungarvan is designated a 'Gaeltacht Service Town' that the town itself and its suburbs are very high majority English speaking areas and that services/signage etc. provided will reflect that.</li> <li>• Expansion of the local link travel service should be considered</li> <li>• Cycling through through Dungarvan town centre is problematic due to traffic, loading/unloading, restricted space, signage etc.. Additional instructional signage along the greenway as well as signs saying 'No cycling on footpaths' especially on The Causeway &amp; The Devonshire Bridge would help</li> <li>• Outdoor dining/drinking areas need to be revisited to check their suitability now that we are in a less-restrictive post-covid period, and they need to be fully removed where necessary.</li> <li>• Dungarvan needs more cultural activities on a regular basis – not just weekend festivals 'to bring in visitors'. The council could look at buying the Church of Ireland building (or another building) and run it as a mixed live event facility.</li> <li>• Sports clubs in Ballinroad are at capacity. The council should investigate the provision of council owned sporting facilities that could be shared between local sports clubs.</li> <li>• Lands (including wetlands) need to be correctly zoned to protect nature eg Duckspool. Access to these areas needs to be managed carefully so as access does not disrupt/damage the nature that we want to protect.</li> </ul>			

<a href="#">WFD-C17-16</a>	David Walsh	DG015	
<b>Summary</b>			
<p>The submission outlines the need for two additional pitches at Dungarvan Utd AFC in particular the need for an all-weather pitch, given the increase in numbers at the club.</p> <p>It is stated that the the club's existing facilities could be better used during week days 8am to 5pm (when our facility is empty), and could potentially be used as a creche facility.</p> <p>The submission highlights the proximity of the club to the old rail line and would like to have a linked cycle route between Dungarvan Utd and the newly extended greenway to Cappoquin, to allow many children cycle safely to many parts of the the town, from where our kids live. We would also like to have safe cycle paths from our club in to the town centre.</p> <p>The club could become a solar powered lit safe walking / running track for our many parents and visitors to use and for this to be another community facility for our town.</p>			

<a href="#">WFD-C17-17</a>	David Walsh		
<b>Summary</b>			
<p>The submission highlights the need to link the Greenway better, with the town centre and the quay side and restaurants and local hostelryes. The Greenway currently finishes without a link to the town.</p> <p>Public Toilets need to be provided, with safe bike parking facilities also.</p> <p>The submission also outlines a need to make the quay side one way for traffic</p>			

<a href="#">WFD-C17-18</a>	An Post		
<b>Summary</b>			
<p>The submission requests that the draft LAP provide flexibility under the land use zonings matrix and objectives in relation to An Post's facilities and operational requirements. The submission suggests that both An Post (retail) and An Post Mails &amp; Parcels (distribution/logistics) as permissible or open for consideration land uses across all zoning objectives. The inclusion of supportive policy objectives that could assist An Post as they invest in the mails and parcels infrastructure in the County over the next decade would be welcomed. The submission requests that more flexibility be provided in relation to car parking standards for postal facilities to operate in an efficient manner.</p>			

<a href="#">WFD-C17-19</a>	Department of Housing, Local Government & Heritage		
<b>Summary</b>			
<p>The submission from the Department of Housing, Local Government and Heritage outlines heritage &amp; archaeology and Nature Conservation related observations/recommendations co-ordinated by the Development Applications Unit under the stated headings for Dungarvan LAP.</p>			
<b>Archaeology</b>			
<ul style="list-style-type: none"> <li>• It might be useful to clearly show the boundary of the identified 'Zone of Archaeological Potential' in Dungarvan in the Zoning Map included in the LAP, for information purposes. It is noted that the Architectural Conservation Area has been included on the map provided in the Issues Paper.</li> <li>• Similarly, it would be more informative to include on the accompanying maps the location of the identified Recorded Monuments located within the LAP area.</li> </ul>			
<b>Architectural Heritage and Plan Alignment:</b>			
<ul style="list-style-type: none"> <li>• it is recommended that area based plans (such as Local Area Plans, Municipal District Local Area Plans or similar) should specifically include the relevant architectural heritage statutory designations and development management policies and objectives or have a clear cross-referencing system to where this information can be found in the City and/or County Development Plan. All plans should also reference any guidance documents or assessments that the relevant authority may have produced in respect of architectural heritage.</li> </ul>			
<b>Underwater Archaeology</b>			
<ul style="list-style-type: none"> <li>• The extensive coastline at Dungarvan and the Colligan estuary within the LAP boundary contains a rich and diverse underwater archaeological heritage which requires preservation, protection and promotion. It is vital therefore that the LAP contain a specific section on underwater archaeology and that the protection of underwater cultural heritage in all its forms (which includes a range of features, including wrecks, remains of bridges and submerged, or partially submerged, coastal and riverine structures, objects and palaeolandscapes) is a core objective in relation to archaeological heritage.</li> <li>• A total of 161 wrecking events are recorded in the The Wreck Inventory of Ireland Database (WIID) from Dungarvan and its environs. Many more previously unknown wrecks therefore await discovery in the coastal waters off Dungarvan and its inland waterways, dating to earlier times but which went unrecorded when lost.</li> </ul>			
<b>Climate change policies and objectives for archaeological heritage:</b>			
<ul style="list-style-type: none"> <li>• The submission contains a number of recommendations with regards to policy on climate change.</li> </ul>			
<b>Caves</b>			
<ul style="list-style-type: none"> <li>• Within the SRR area at Ballynamuck East and Shandon there are caves where fauna of Pleistocene and Early Holocene date have been found. Though much of the latter cave system was removed in the nineteenth century it is likely that heretofore undocumented extensions of it extend into the area zoned SRR in the LAP. A Specific Development Objective to protect these caves should be included in the LAP and they will require</li> </ul>			



consideration as part of an overall archaeological assessment of any development proposals for the area.

**Nature Conservation**

- The grassland fields southeast of Ballyneety Bridge in the townland of Ballynamuck East are extensively used by waterbirds associated with the Colligan estuary section of Dungarvan Harbour Special Protection Area (site code 004032). The extent of usage is dependent on agricultural activities which can vary but this is an important ex-situ feeding and roosting site for a range of bird species which are qualifying interests for the adjoining SPA. These fields from the Shandon traveller accommodation to Ballyneety Bridge are zoned as Residential Strategic Reserve in the issues paper; in order to secure this area for future usage by birds from the SPA this Department recommends this area adjoining the estuary be zoned for Open Space and Recreation.
- The Department notes Objective DGDO14 of the issues paper is to “Support the development of a coastal path particularly between Dungarvan and Tramore and West of Dungarvan to Gaeltacht na nDéise”. Many of the bird species for which Dungarvan Harbour is designated a SPA are adversely affected by excessive human disturbance. Therefore the construction of a coastal pathway in previously undisturbed areas within or adjoining the SPA would be a significant conservation concern. Key areas of ex-situ usage outside the SPA could also be potentially impacted by such a development. It may be possible to identify a route sufficiently back from the shore to avoid disturbance but this is not at all certain and this constraint should be reflected in the Objective.
- Similarly while outside the area covered by this LAP, the Objective supports a coastal route from Dungarvan to Tramore which could entail very substantial overlap with the Mid-Waterford Coast SPA (site code 004193). This site is designated to protect bird species that could be adversely affected by such a development. Therefore any expressed support for such a development should be dependent on a route being found which would not negatively impact on the European Site. This European Site includes most of the coastline from Dungarvan to Tramore and on average spans from the coastline to in the region of three hundred metres inland. The Objective should reflect this constraint.

<a href="#">WFD-C17-20</a>	Office of Public Works		
<b>Summary</b>			
Submission relates primarily to the need to make specific reference to the Guidelines on the Planning System and Flood Risk Management (Nov, 2009), and assoc. circulars and technical appendices - ensure the principles are adopted.			
<b>Specific flood risk management (FRM)</b> issues noted for consideration, include clear commitments and strategic objectives regarding flood risk and the principles of the Guidelines are included in the Draft Local Area Plan – such as the three stage process of (1) flood Risk ID, (2) Initial Flood Risk Assessments and (3) Detailed flood risk assessment; as well as Sequential Approach and the Justification Test.			
<b>Specific Flood Risk Management Issues for Consideration</b> issues noted include keeping a register of key flood risk infrastructure in the Local Area Plan where it would not otherwise be readily identified or protected from interference or removal.			
<b>Coastal Change</b> – the submission requests that the planning authorities should have regard to areas that may be at risk or vulnerable to coastal erosion or coastal change, including change associated with climate change (e.g. sea level rise, increased storm frequency, accelerated rates of coastal erosion, etc).			

The National CFRAM studies used extreme water levels defined by the Irish Coastal Protection Strategy Study (ICPSS). These sea levels have been superseded by the Irish Coastal Wave and Water Level Modelling Study (ICWWS). The ICWWS levels for Dungarvan are above the previously defined ICPSS levels used in the National CFRAM. Therefore, the risk of coastal flooding is likely to be greater than shown in the National CFRAM.

**Nature-based Solutions and SuDS** – the submission advises that the preparation of Local Area Plans should take account of the opportunities for nature-based solutions to reduce runoff and provide other benefits such as to water quality, biodiversity, etc. This can include in areas around existing developments, as well as within existing and proposed development in the form of Sustainable Urban Drainage Systems (SuDS). Waterford City & County Council should refer to The Best Practice Interim Guidance Document ‘Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas’ for further guidance.

Other issues raised include:

- The flood maps produced under the National CFRAM Programme provide an important resource for plan making and consideration of development in relation to the implementation of the Guidelines.
- Map Review Programme - As part of the design of the flood relief scheme for Dungarvan & Environs a review of the flood mapping will be conducted and the mapping will be updated at this stage.
- National Indicative Flood Mapping.
- Consideration of Climate Change Impacts.

<a href="#">WFD-C17-21</a>	James Mansfield		
<b>Summary</b>			
<p>The submission outlines that the previously proposed Burgery Roundabout be given priority in the plan so as to facilitate connectivity between the Clonea Road, N25 and Strandside North. This will facilitate the forward planning for the entire Abbeyside area in a comprehensive and inclusive manner and allow individual and disparate landowners to make necessary strategic decisions in relation to their lands in accordance with the general policies underpinning the City and County Development Plan. This would at least enable landowners and prospective developers to plan ahead with some degree of confidence.</p> <p>The existing access road between the N25 and the Clonea Road should be closed on completion of the Burgery roundabout between the N25 and the roundabout to the east and this section of roadway would then be reserved for existing householders.</p>			

<a href="#">WFD-C17-22</a>	Robert Cass		
<b>Summary</b>			
<p>This detailed submission sets out a number of levers available to boost the local economy, the local housing output in particular for young people and deliver on community facilities and also to reduce the towns emissions to net zero.</p>			

<a href="#">WFD-C17-23</a>	Office of the Planning Regulator		
<b>Summary</b>			
This submission is made by the Office of the Planning Regulator (OPR). Issues raised in the submission are summarised below:			
<ol style="list-style-type: none"> <li>1. <b>Strategic Policy Framework</b> <ol style="list-style-type: none"> <li>a. The OPR encourages the planning authority to liaise with the Southern Regional Assembly in preparation of the draft LAP to ensure consistency with the RSES, particularly where clarity is required on the objectives and guiding principles set out therein.</li> <li>b. The LAP should consider the strategic vision, goals and guiding principles of the RSES, in addition to consistency with the relevant regional policy objectives (RPOs).</li> <li>c. The LAP should also consider practical implementation issues and measures that can best be promoted via the policies and objectives of the LAP</li> </ol> </li> <li>2. <b>Development plan and core strategy</b> <ol style="list-style-type: none"> <li>a. The Office cautions against the introduction of any objectives that would conflict with the detailed provisions of the core strategy for the proposed area of the LAP and the housing supply target for the settlement.</li> <li>b. The Issues Paper refers to a requirement of 600 housing units up to 2028, whereas the Development Plan (Table 2.4), refers to a core strategy allocation of 330 housing units for Dungarvan and Ballinroad up to 2028. It will be necessary, therefore, to ensure that the LAP is consistent with the Development Plan.</li> </ol> </li> <li>3. <b>Zoning, compact growth and infrastructural services</b> <ol style="list-style-type: none"> <li>a. The LAP should consider how the delivery of housing in locations such as Shandon and Kiltrush that are well serviced in terms of the social and physical infrastructure, and are easily accessible by walking, cycling and public transport, can be supported and prioritized</li> <li>b. The LAP should also be informed by Specific Objective DGDO 22 ensuring that a masterplan is prepared for the lands at Monang to provide for planned and sustainable development.</li> <li>c. The provisions or standards for residential density or building height in the LAP should have regard to relevant section 28 guidelines, including Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas: Cities, Towns &amp; Villages (2009), Urban Development and Building Heights Guidelines for Planning Authorities (2018), and Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2020) and should be consistent with any SPPRs therein.</li> </ol> </li> <li>4. <b>Regeneration</b> <ol style="list-style-type: none"> <li>a. The LAP provides an opportunity to identify specific regeneration projects aimed at enabling compact growth and Town Centre First implementation, consistent with the</li> </ol> </li> </ol>			

objectives of the regeneration strategy of the development plan and the guiding principles of the RSES for urban infill and regeneration.

- b. The OPR notes that it will be important for the LAP to identify opportunity/regeneration sites, vacant and underutilised buildings.
- c. The LAP should also identify specific investment and/or infrastructure to support regeneration development, such as site assembly, land acquisition, and/or sustainable transport initiatives. The best use of the planning authority's own powers in terms of land activation, such as compulsory purchase, derelict sites etc. will be important in this context.

#### **5. Education, social and community amenities**

- a. The LAP should also be consistent with the objectives of the RSES for education facilities. It should also have regard to the provisions for social audits under the Development Plans, Guidelines for Planning Authorities (2022) (Development Plans Guidelines) (or civic infrastructure audits under the LAP Guidelines).
- b. The office notes that the LAP must include objectives in relation to planning for the housing/transport/accessibility and leisure needs of an aging population (NPO 30) and for the Traveller community. The LAP should also be consistent with the objectives of the RSES for social and community facilities – LECP and TAP should inform LAP.
- c. The local authority's Traveller Accommodation Programme, 2019-2024, and Specific Development Objective DG016 which includes a policy objective to provide for Traveller Accommodation on lands at Shandon, should also be reflected in the LAP
- d. The LAP should consider the capacity of existing facilities, including community centres, leisure, amenity and cultural facilities to serve existing and future residents.
- e. The LAP should give focus to the implementation of Key SDOs to deliver on the provision of social and community facilities including DGD07 (community facilities within Ballinroad village), DG08 (provide neighbourhood play areas), DGD09 (facilitate future expansion of the soccer pitch), DGD011 (support the development of community hall facility) and DGD013 (support the development of a public playground and sports facilities/playing pitches in Ballinroad).

#### **6. Economic development and employment**

- a. The OPR notes that the LAP Guidelines state that LAPs should include objectives to promote local economic development and employment growth by focusing on issues such as the creation of vibrant and dynamic city and town centres where local businesses thrive and the provision of low cost accommodation for start-up businesses. This will be particularly important for Dungarvan given its role as a Key Town and as an economic driver in west Waterford.
- b. The proposed preliminary core strategy map should consider how it can prioritise employment and commercial sites that will contribute to the delivery of compact growth consistent with the National Strategic Objective of the NPF and will help implement the Government's Town Centre First policy.
- c. The facilitation of retail facilities will also need to be considered to provide for the anticipated population growth. Regard should be had, in particular, to the sequential approach to the location of retail development and other provisions of the Retail Planning Guidelines for Planning Authorities (2012) and the position of the settlement in the retail hierarchy of the Development Plan.

- d. An integrated approach to land use and transport planning for enterprise, employment and commercial development will also play an important role in mitigating climate change and in achieving the Government's obligatory target of 51% for GHG emissions reduction by 2030 and for a carbon neutral economy by 2050.

## **7. Transport and mobility**

- a. The OPR notes that the LAP should be informed by the guiding principles and be consistent with the RPOs of the RSES relating to integration of land use and transport planning, where applicable.
- b. The OPR acknowledges and welcomes the Development Plan policy objective (Trans 04) to prepare a Local Transport Plan (LTP) for Dungarvan, within one year of adoption. The LTP can include priorities for the town in terms of public transport infrastructure and services, cycle investment and improvements to the pedestrian environment.
- c. The transport strategy of the LAP should also demonstrate consistency with the Avoid-Shift-Improve principle, the implementation of the Decide Provide approach and the 10minute town concept.
- d. The LAP should include provisions for alignment in relation to RPO 24 to support the continued development of cycling and walking infrastructure as part of Go Dungarvan Smarter Travel Programme.

## **8. Climate change and flood risk management**

- a. The effective implementation of climate mitigation objectives through the LAP, consistent with national and regional policy objectives (and guiding principles) identified by the Office under each of the themes, will be critical to the achievement of the Government's GHG emissions reduction target to mitigate climate change.
- b. In terms of climate adaptation, flood risk management is the most critical climate change adaptation measure to be addressed in the LAP, informed by an updated Strategic Flood Risk Assessment (SFRA)The planning authority is advised to liaise with the OPW regarding the requirements in respect of the LAP.
- c. The planning authority should overlay the flood risk zones on any proposed land use zoning maps, to illustrate the potential flood risk arising and to demonstrate how the sequential approach has been applied. The planning authority is also requested to make a copy of digital mapping data available to the Office and to the OPW to facilitate assessment.
- d. The implementation of objectives for green and blue infrastructure consistent with national and regional policy objectives should also form an important part of the LAP's response to climate change adaptation.
- e. The LAP is required to integrate sustainable water management solutions, such as Sustainable urban Drainage Systems (SuDS). In this regard the Office would draw the planning authority's attention to Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas, Water Sensitive Urban Design, Best Practice Interim Guidance Document (2021) which was issued by the Department of Housing, Local Government and Heritage after the adoption of the Development Plan.

## **9. Environment and natural and built heritage**

- a. The planning authority is required to have regard to the revised section 28 Strategic Environmental Assessment Guidelines for Regional Assemblies and Planning

Authorities (2022). It should also consider the Appropriate Assessment of Plans and Projects in Ireland Guidance for Planning Authorities (2010), as revised.

- b. The planning authority should ensure the LAP is consistent with objectives of the NPF concerning environmental protection (NPO 52, NPO 57, **NPO 58**, NPO 60, NPO 62, NPO 63, NPO 64 and NPO 65, among others), in addition to the objectives or guiding principles of the RSES.
- c. The Office highlights the importance of integrating green and blue infrastructure into the LAP, in accordance with NPO 58 and the objectives and guiding principle of the RSES. Planning for green and blue infrastructure, such as public parks and water bodies can contribute to climate change adaptation, in particular flood risk management through nature-based solutions. It can also make a positive contribution to climate mitigation, when integrated with greenways, and have positive impacts on biodiversity
- d. The planning authority should consider what location specific objectives or measures would assist in the protection or improvement of built heritage over the period of the LAP. In this regard the planning authority should have regard to the Architectural Heritage Protection Guidelines for Planning Authorities (2011), as amended.

**10. Implementation and monitoring**

- a. The planning authority is encouraged to provide for monitoring of implementation of the objectives of the LAP, having regard to the provisions of the Development Plans Guidelines and the LAP Guidelines.

<a href="#">WFD-C17-24</a>	Tournore Park Residents Group		
<b>Summary</b>			
<p>This detailed submission proposes that the 5.4ha of land known locally as ‘Tournore Marsh’ be managed as a ‘nature park’ which would complement the existing zoning of these lands as “Open space” and the zoning of the adjacent lands as “High amenity” under the Waterford City &amp; County Development Plan 2022–2028.</p>			
<p>The many benefits of a nature park are set out including as supporting wetland habitat for waterbirds, an educational resource for local schools, nature trail off the greenway, scenic gateway entrance to the greenway, provide “connectivity” and “permeability” including the provision of safe, accessible, user friendly and attractive routes for local residents etc..</p>			
<p>The zoning objectives for the wider Duckspool area as set out in the CDP are welcomed as well as new Active Travel Schemes in the area:</p>			
<p>Active Travel Scheme - Junction &amp; Road Realignment at Cluain Garbhán and Pedestrian Crossing at Tournore Park</p>			
<p>Active Travel Scheme - Sallybrook, Clonea Road - Junction Realignment</p>			

<a href="#">WFD-C17-25</a>	Donnacha O Dea	Ballinroad, between Ballinroad Church and Clonea roundabout.	
<b>Summary</b>			
The submission outlines the urgent need for a footpath/cycle lane in Ballinroad between Ballinroad Cross (Church) & Clonea Road round-about			

<a href="#">WFD-C17-26</a>	Ballinroad Football Club	Ballinroad, Dungarvan	
<b>Summary</b>			
The submission highlights the need for the long-term future of more playing pitches across Dungarvan, and, in particular, the Ballinroad area given the increase in numbers at the club.			
The submission welcomes CDP Objectives DGDO9 'to facilitate future expansion of the soccer pitch' and DGDO13 'To support the development of a public playground and sports facilities/playing pitches in Ballinroad' and requests support through the LAP to help clubs to pursue the means to obtain new spaces.			
Objectives DGDO9 and DGDO13 should be achievable, supported by the local authority and the Waterford Sports Partnership. It is requested that the LAP to include objectives to actively seek to secure the extra community spaces required.			

<a href="#">WFD-C17-27</a>	Carolyn O'Dea	Ballinroad, Dungarvan, Co. Waterford	
<b>Summary</b>			
The submission outlines the urgent need for a footpath/cycle lane in Ballinroad between Ballinroad Cross (Church) & Clonea Road round-about			

<a href="#">WFD-C17-28</a>	National Transport Authority	Full LAP area	
<b>Summary</b>			
This submission is made by the National Transport Authority (NTA). Issues raised in the submission are summarised below:			
<b>Guiding Principles</b>			
<ul style="list-style-type: none"> <li>The NTA recommends that the preparation of the Local Area Plan (LAP) should be guided by, and should include, land use policies and objectives that support the consolidation of urban-generated development within existing urban areas. The submission outlines a number of factors that should be considered.</li> </ul>			
<b>Road User Hierarchy</b>			
<ul style="list-style-type: none"> <li>The LAP should align with The National Sustainable Mobility Policy (NSMP) and The National Investment Framework for Transport in Ireland (NIFTI) and should seek the reallocation of road space in appropriate locations in accordance with the road user hierarchy, in order to prioritise walking, cycling and public transport use and prioritise the place-making functions of the urban street network.</li> </ul>			
<b>Climate Action Plan</b>			

- For transport, there are three main actions required that should inform the policies, objectives and measures of the LAP, namely: Reducing the demand for travel; □ Increasing use of public transport, walking and cycling and a reduction in trips by car; □ Conversion of the transport fleet to zero emissions vehicles.

**Movement at Settlement Level – Local Transport Plans (LTP)**

- The NTA recommends that an Local Transport Plan should be prepared in tandem with the Draft LAP, and is available to liaise with the Council in this regard.

**Walking and Cycling**

- The LTP should identify the weaknesses in the walking and cycling networks in the town and the measures required to provide safe and efficient routes from origin (housing) to destination (school, work and services). The LTP can identify measures such as filtered permeability, junction improvements, and footpath and cycle track upgrades required.
- It is recommended that the LAP and proposed LTP, in developing a town cycle network, should be cognisant of the draft network and its proposals as they relate to Dungarvan.

**Provision of Public Transport Services in Rural Areas**

- It is recommended that the LAP acknowledge the role rural transport services can perform in providing for social and economic connectivity between small villages/rural areas and larger towns. Policies and objectives to support the role of rural transport, in particular, the Connecting Ireland plan should be included in the LAP.

**Accessibility**

- Enabling universal access and facilitating and promoting universal design should be a key consideration in the LAP, as it relates to transport policies and objectives.
- The NTA notes that Objectives which promote universal design should be included in the Draft LAP such as in the external built environment, such as providing separate pedestrian entrances, the provision of dropped curbs and tactile paving, will provide a safer and more attractive environment for all.

**Strategic Road Network**

- In order to protect the strategic transport function of the national roads, including motorways, the NTA recommends that development objectives should accord with the DOECLG Spatial Planning and National Roads Guidelines (2012), and that this should be referenced in the LAP.

**Traffic Management**

- The LTP should include an analysis of car parking provision within the town and the inclusion of objectives and measures to manage car parking, which is a key determinant of the likelihood of someone using a car.

**Indicators – Modal Share**

- It is recommended that consideration is given at the LAP level to the inclusion of sustainable transport indicators, including mode share, for the purpose of monitoring the effectiveness of policies and development objectives.

<a href="#">WFD-C17-29</a>	John Paul Mills	Ballinroad	
<b>Summary</b>			
The submission outlines the urgent need for a footpath/cycle lane in Ballinroad between Ballinroad Cross (Church) & Clonea Road round-about			





Comhairle Cathrach & Contae Phort Láirge  
Waterford City & County Council