

Development Plan Team,
Waterford City & County Council,
Baileys New Street,
Waterford City,
Co. Waterford.

August 27, 2021.

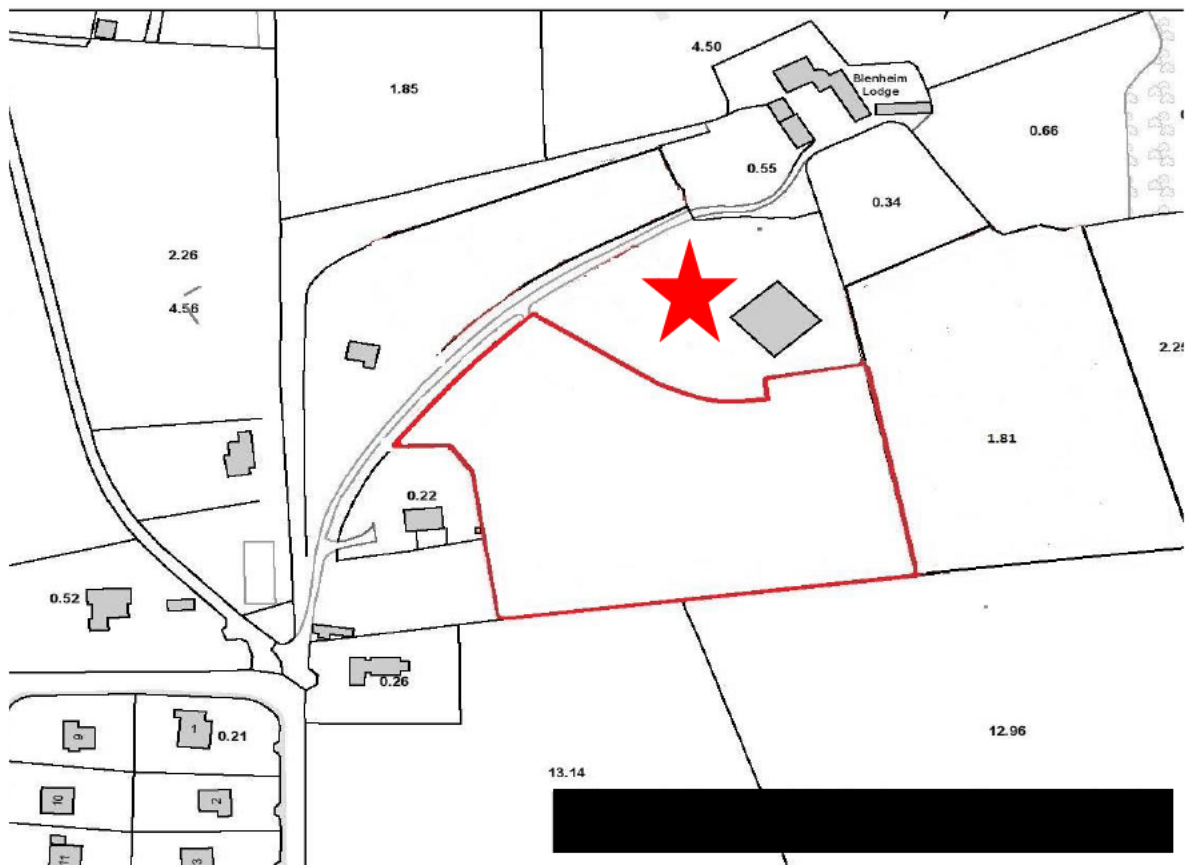
RE: REPRESENTATION TO DRAFT WATERFORD CITY AND COUNTY
DEVELOPMENT PLAN 2022 - 2028

PLANNING AND DEVELOPMENT ACTS 2000 - 2002

NOTICE OF PREPARATION OF DRAFT WATERFORD CITY AND COUNTY
DEVELOPMENT PLAN 2022 - 2028

A Chara,

We have been asked by our clients, Billy and Louise O'Sullivan, [REDACTED]
[REDACTED] Waterford, to make the following representation to the Draft Waterford
City and County Development Plan 2022 - 2028. Our clients' family own 54 acres of land
which surrounds their mother's house at Ballymacloode, Blenheim, just outside the built up
area of Waterford City.



Extract from ordnance map which shows the four acres of land in the ownership of the applicants.

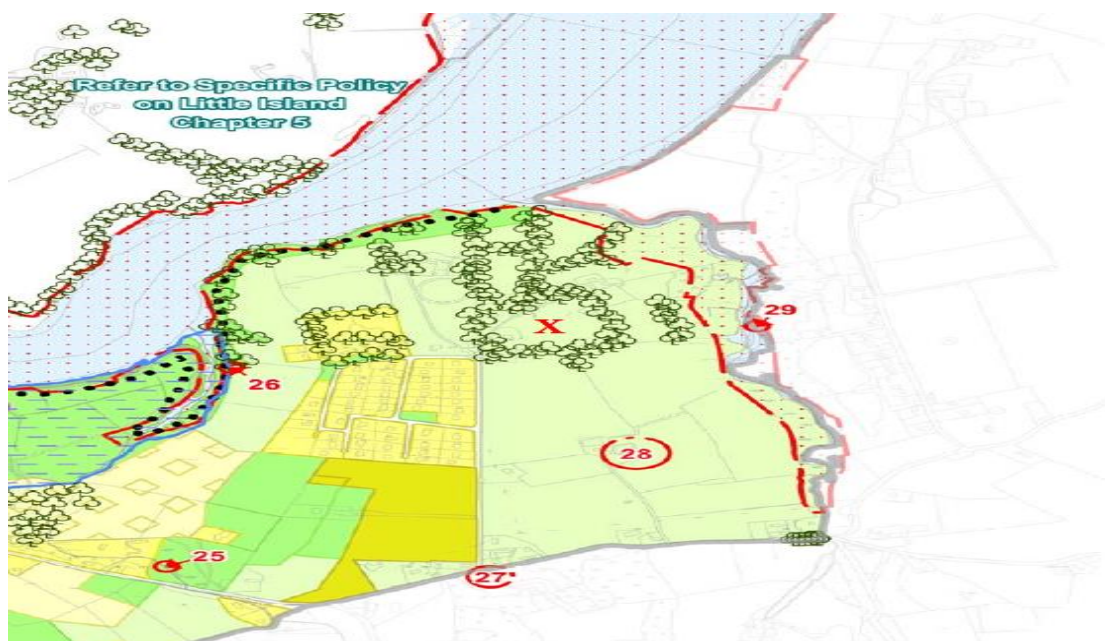
All of their lands are within the boundaries of Waterford City, and are in agricultural use at the moment. The lands outlined in red on the extract from an ordnance map attached is approximately two hectares - four acres - in extent and is central to two other houses in the family. The request her is to included a specific objective in the approved Waterford City and County Development Plan 2022 - 2028 to allow their four children build four houses for themselves thereby remaining in the general area where the farm and most of their relatives reside. While we understand that the rezoning of these lands for residential use would be unsustainable and result in unnecessary precedent for other lands in the area, we are of the opinion that allowing four houses, with a possible specific objective that the individuals had to comply with the rural housing provisions on the statutory development plan for the area would be appropriate and allow our clients have their children close by to both assist on the farm lands and to care for their elderly parents as they get older.



Aerial view of the subject site. The lands outlined in red are the lands the subject of this representation.

WATERFORD COUNTY DEVELOPMENT PLAN 2011 -2017

The subject site is within the functional area of Waterford City and County, and is therefore governed by the objectives, policy and Development Control Standards as set out in the statutory Development Plan for the area, which at present is the Waterford City Development Plan 2011 -2017, which has been extended to 2022 by virtue of the Regional Spatial and Economic Strategy for the Southern Region and the Draft Waterford City and County Development Plan 2022 - 2028. In that plan the site is zoned for agriculture as can be seen from the extract from the statutory development plan for the area below.



Extract from Waterford County Development Plan 2011 -2017 with site marked with red X

DRAFT WATERFORD CITY AND COUNTY DEVELOPMENT PLAN 2022 - 2028

As stated above the subject site is within the functional area of Waterford City and County, and is therefore governed by the objectives, policy and Development Control Standards as set out in the statutory Development Plan for the area, which at present is the Waterford City Development Plan 2011 -2017. This representation is made on the Draft Waterford City and County Development Plan 2022 - 2028 which is to be adopted next year.

Chapter seven of the Draft Waterford City and County Development Plan 2022 - 2028 deals with housing, and in relation to rural housing the plan stated the following:-

Rural Ireland has faced challenges in recent decades, such as the loss of traditional industries and employment, emigration and poor connectivity. However, the emergence of new technologies and improved infrastructural connectivity provide opportunities to sustain resilient rural communities into the future. National and regional planning policy support an approach that ensures that our rural areas continue to be a living and lived-in landscape, focusing on the requirements of rural economies and rural communities, while at the same time avoiding ribbon and overspill development from urban areas and protecting existing environmental qualities.

Accordingly, building on Government policy and the 2017 Action Plan for Rural Development, the National Planning Framework and the Regional Spatial and Economic Strategy for the Southern Region, the Council will focus on supporting rural communities by planning for the future growth and development of rural areas, including addressing decline, with a special emphasis on activating the potential for the renewal and development of smaller towns and villages.

Rural Housing Policy Objectives – General

Objective H 23 *We will support the sustainable development of rural areas by encouraging growth and arresting decline in areas that have experienced low population growth or decline in recent decades and by managing the growth of areas that are under strong urban influence to avoid over-development, while sustaining vibrant rural*



Map showing the strategic open space designation in the Draft Waterford City and County Development Plan 2022 - 2028 and the approximate location of the site as per the our clients landholding at this location.(red star)

Section 7.11.2 of the plan deals with Housing in the Open Countryside

Our open countryside is, and will continue to be, a living and lived-in landscape focusing on the requirements of rural economies and rural communities, based on agriculture, forestry, tourism and rural enterprise.

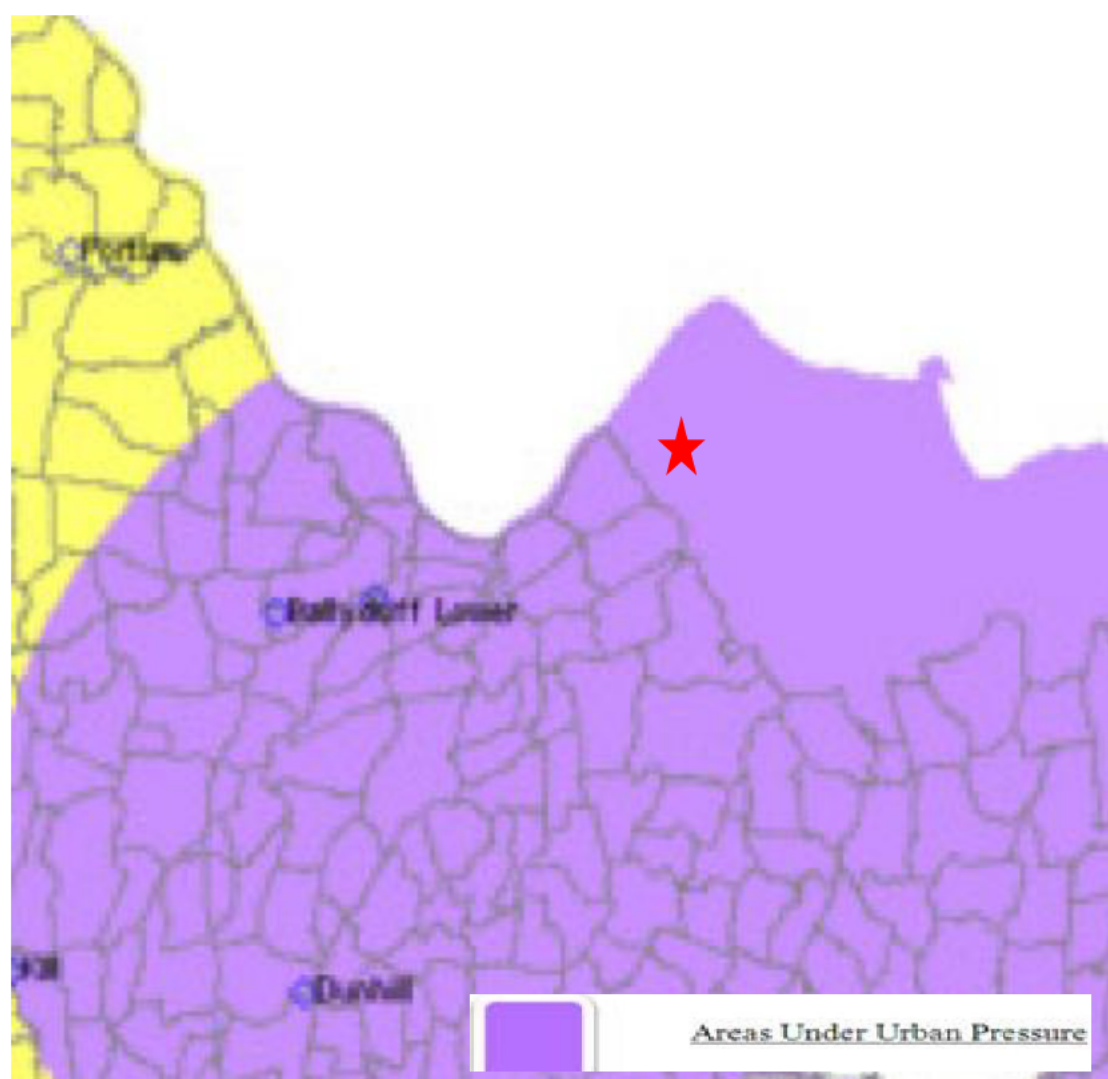
It is recognised that there is a continuing need for housing provision for some people to live and work in the open countryside. However, it is important to differentiate between rural areas located within the commuter catchment of our larger settlements (areas under urban influence) and those rural areas located outside of those catchments. Also, the NPF and the SRSES require that a clear distinction be made between areas under urban influence (i.e. those within the commuter catchment of cities and large towns and centres of employment) and other rural areas.

Having regard to national and regional policy, a rural typology has been undertaken for Waterford (set out in Part 1 Chapter 2 Core Strategy) which is consistent with national and regional policy. This typology is premised largely on two categories as follows:

Rural Area under Strong Urban Influence

The key Development Plan objectives in this area are, on the one hand, to facilitate the housing requirements of the local rural community, subject to satisfying site suitability and technical considerations, whilst on the other hand directing urban generated development to areas zoned and designated for housing in the adjoining villages and settlement nodes.

The Council will manage sustainable growth in designated 'Rural Areas Under Strong Urban Influence' and facilitate the provision of single houses in the countryside based on the core consideration of demonstrable economic, social or local need to live in a rural area, siting and design criteria for rural housing and compliance with statutory guidelines and plans, having regard to the viability of smaller towns and rural settlements. We will have due regard to any future revision of the Sustainable Rural Housing Guidelines for Planning Authorities including inter alia definitions relating to genuine housing need and vary the Development Plan as necessary.



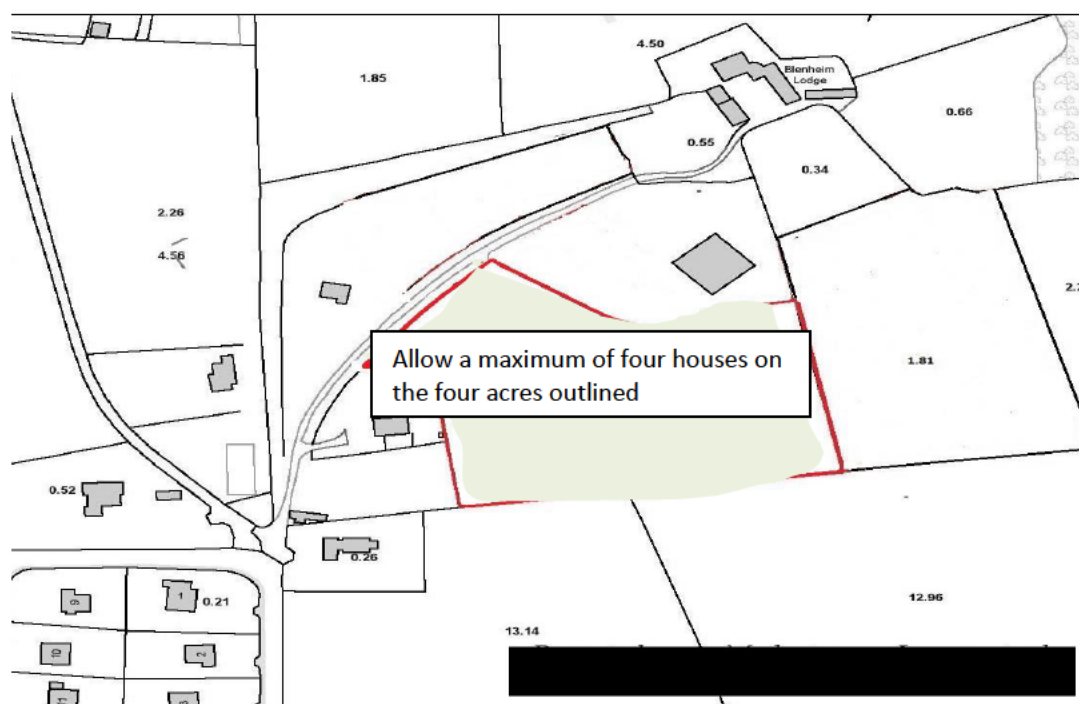
1.1 PROPOSED LOCAL OBJECTIVE ON LANDS

Having reviewed the draft plan in detail, and examined the content of the Draft Waterford City and County Development Plan 2022 - 2028, we are of the opinion that the most appropriate way to deal with the subject site is to include a Local Objective which would deal with the Planning Authority's specific policies for the site as a rural area within an are under

urban pressure, but with a genuine rural family seeking family houses, an essential element in the overall development of the city and county of Waterford, and also ensure that the type of development proposed would comply with the requirements of the Planning Authority in its assessment of developments within the area. We are of the opinion that while the wording in the Draft development plan are laudatory, there is a need for some flexibility in the plan which can only be done using local objectives for specific requirements. In the present instance the inclusion of a specific zoning objective on the lands highlighting the specific development parameters for the site would assist our clients make a planning application that could be prepared to satisfy the objectives, policies and vision of the Planning Authority for the lands.

We would therefore recommend that the following Local Objective for the subject site be included in the Waterford Development Plan 2022-2028 as follows:

Allow a maximum of four houses on the subject lands.



As such we would respectfully request the Planning Authority, through the statutory development plan process, to facilitate the development of a family complex on the lands that the family have farmed since 1988.

If possible we would welcome an oral hearing to further develop our viewpoint, and would ask that all correspondence relating to the above be sent to this address.

Yours Sincerely,

Michael A. O'Neill MPl