



KPMG
1 Stokes Place
St. Stephen's Green
Dublin 2
D02 DE03
Ireland

Telephone +353 1 410 1000
Fax +353 1 412 1122
Internet www.kpmg.ie

Department within KPMG:

KPMG Future Analytics, Chartered Town Planning and Development Consultants

Planning Department
Waterford City and County Council
Menapia Building
The Mall
Waterford City

30 August 2021

Re: Submission in respect of the Draft Waterford City and County Development Plan 2022-2028.

Dear Sir/Madam,

KPMG Future Analytics, 1 Stokes Place, St. Stephen's Green, Dublin 2 (Chartered Town Planning and Development Consultants), have been appointed by Mr. Michael Ryan of [Redacted-Personal Information] to make a submission in respect of the *Draft Waterford City and County Development Plan 2022-2028* (Draft Plan).

In accordance with Section 12(1)(b) of the Planning and Development Act 2000 (as amended), Waterford City and County Council has prepared a Draft City and County Development Plan which is on public display and available for public inspection from 18 June to 30 August 2021 (inclusive). This submission is lodged within this timeframe.

Purpose of this Submission

The purpose of this submission is to demonstrate to Waterford City and County Council the merit of placing a 'specific development objective' that supports sustainable residential development at a site in Ardmore, Co. Waterford.

Subject Site

The subject site is located in the settlement of Ardmore, southwest of Dungarvan, in County Waterford and is approximately 1.9 ha in area (Figure 1). It is bound by agricultural lands and associated buildings to its north, Powers Caravan Park to its east, residential development to its south and residential development and Dungarvan Road to its west. The subject site lies approximately 300 meters or a 4-minute walk from the centre of Ardmore and is proximate to well-established residential areas, local services and a host of amenities.

The subject site benefits from good accessibility. It is situated within a few minutes' drive of the N25 national road which provides connections to several major urban centres, including Cork City, Waterford City and Wexford. Bus route numbers 260 (connecting Ardmore to Cork City) and 361 (connecting Ardmore to Dungarvan) are also within a 5-minute walk of the subject site.

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Figure 1: Site Context Map with the Indicative Boundary of the Subject Site Outlined in Red.

Waterford County Development Plan 2011–2017: Zoning

As illustrated in Figure 2 below, the subject site is zoned ‘R3 – Reserved for future sustainable residential development 2017-2023’ in the current *Waterford County Development Plan 2011-2017*. This is despite its centrality and prospect of sustainable development.

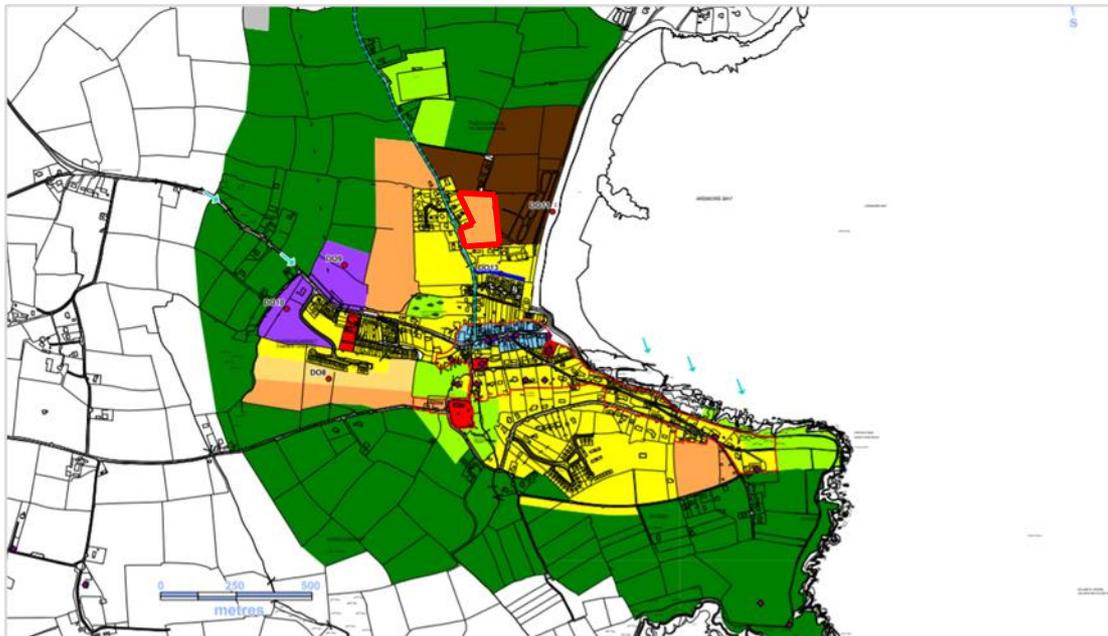


Figure 2: Ardmore Zoning Map from the Current Waterford County Development Plan 2011-2017 with the Indicative Boundary of the Subject Site Outlined in Red.

Draft Waterford City and County Development Plan 2022–2028: Zoning

Unlike in the current *Waterford County Development Plan 2011-2017*, the Draft Plan (according to resources made available online) does not prescribe land-use zoning designations to land parcels within Ardmore, simply defining the town as a ‘Rural Settlement’ and a ‘Small Rural

Town'. Therefore, the subject site has no zoning objective in the Draft Plan (Figure 3). The alternative approach adopted for Ardmore has been to apply 'specific development objectives' to certain areas, identifying them for particular types of development or requiring them to incorporate various criteria into designs.



Figure 3: Ardmore Map from the Draft Waterford City and County Development Plan 2022-2028 with the Indicative Boundary of the Subject Site Outlined in Red.

Intent to Deliver

Mr. Ryan intends to promptly bring the subject site forward for development during the lifetime of the Draft Plan, once adopted. Mr. Ryan is committed to the timely delivery of housing on this prime and well located site, proximate to the centre of Ardmore, which has an array of services and facilities (including but not limited to healthcare, childcare, education and religious), and Ardmore beach.

This proposition notably aligns with several of the policy objectives in the Draft Plan, inclusive of those highlighted below.

Compact Growth Policy Objective CS 03: *“In a manner consistent with NPO 34 and 35, we will promote and support an efficient, equitable and sustainable pattern of residential and other development that delivers compact growth and critical mass for sustainable communities in Waterford, by managing the level of growth in each settlement.”*

New Homes in Small Towns and Villages and Rural Cluster Policy Objective H 25: *“We will support the proportionate growth of appropriately designed development in rural towns and villages that will contribute to their regeneration and renewal.”*

Request to Apply a 'Specific Development Objective'

Noting the above, it is requested that a 'specific development objective' that supports sustainable residential development is applied to the subject site. As regard the wording of said objective, it is considered that the following would be appropriate for inclusion in the Development Plan, with the addition of the corresponding point to the Council's mapping:

"To facilitate the delivery of sustainable residential development on this site during the lifetime of the Development Plan".

Housing Requirement for Ardmore

Identified as a Small Rural Town in the Settlement Hierarchy, the Core Strategy states that Ardmore (and other small rural towns in County Waterford) *"can support a maximum of c. 40 houses during the life of the Development Plan subject to compliance with the policies and standards of the Development Plan"*. Whilst the Core Strategy details that new residential development can be delivered in the town during the lifetime of the Development Plan, there is no associated 'specific development objective' on the map. In order to ensure the proper planning and sustainable development of Ardmore, it is submitted that a 'specific development objective' that supports and guides sustainable residential development should be included on the map, specifically at the subject site.

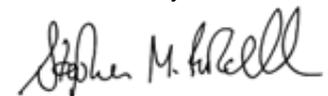
Furthermore, it is duly considered that the stated quantum of houses that can be delivered in Ardmore during the life of the Development Plan may be too low. It is submitted that the delivery of a greater number of residential units should be considered in accordance with the proper planning and sustainable development of the area and on a case-by-case basis, recognising the variation between Small Rural Town settlements, the approach to designs and the need to deliver housing to meet ongoing shortages.

Concluding Remarks

This submission has shown that the subject site is appropriately located and should be designated for residential development during the lifetime of the forthcoming Development Plan.

As the landowner of the subject site, Mr. Ryan is committed to the prompt delivery of an appropriately designed residential scheme thereat and respectfully request that Waterford City and County Council assign a 'specific development objective' which supports this intent.

Yours faithfully,



Stephen M. Purcell MIPI FSCSI FRICS
Director and Co-Head
KPMG Future Analytics
Chartered Town Planning and Development Consultants