

file
Rita
[Redacted]
Waterford.

18.3.05
cc Planning
27.8.21

Mr. M. Walsh,
Director of Services,
Planning & Environment,
Waterford City Council
Lombard Street,
Waterford.

Dear Sir,

Re: St. John's College - Rezoning Part of the College Grounds from
Community Facilities to Residential Use

Enclosed please find Submission from the Waterford City Community Forum (Environmental Cluster)
in relation to the above.

Yours faithfully,

12/11
Mary Higgins
Rita Canney,
Environmental Cluster

Encl.

**WATERFORD CITY COMMUNITY FORUM
(ENVIRONMENTAL CLUSTER)**

**SUBMISSION IN RELATION TO PROPOSED
VARIATION TO WATERFORD CITY
DEVELOPMENT PLAN**

**REZONING PART OF COLLEGE GROUNDS
FROM COMMUNITY FACILITIES TO
RESIDENTIAL USE**

We refer to the Submission by C. J. Falconer and Associates on behalf of the Bishop and Trustees of St. John's College covering the proposed rezoning of part of the college lands.

Waterford City Community Forum (Environmental Cluster) accepts that there is a need to secure a new, viable use for St John's College and its lands. We also acknowledge that the proposal in question should be in keeping with certain aspects of the Guidelines on Residential Density in that it should utilise the capacity of the existing social and physical infrastructure (p.11). However, when viewed holistically, we are of the opinion that the rezoning of these lands would not be in keeping with the "proper and sustainable development" of the area.

Our position is that the Falconer Submission does not give due consideration to all aspects of Sustainable Development. We will now outline the areas of Sustainability that we feel have been neglected in this Submission, with particular reference to supporting policies and legislative frameworks.

Social Sustainability

The Regional Planning Guidelines - implementing the National Spatial Strategy 2004 state:

"The Community Development Boards have an important role to play in the co-ordination and prioritisation of community infrastructure. This can best be done through close co-operation with local community groups, who can best identify their own needs and can participate in innovative delivery solutions", (Social Infrastructure and Community Development, 7.2 Community Development P.100).

"...it is important now that assistance is soughtfor the development of regional cultural facilities in Waterford City to promote the Regional gateway as the cultural, civic, educational and economic capital of the South-East in accordance with the principle recommendations of the National spatial strategy", (Social Infrastructure and Community Development, 7.5 Cultural facilities)

The Final Report of the Working Group on Urban Design for Sustainability to the European Union Expert Group on the Urban Environment: "Urban Design for Sustainability", informs us that:

"Sustainable development is essentially a concept of resource conservation and development. The important resources affected most by urban design and development are land, particularly green areas, ecological systems and biodiversity, air, water, physical infrastructure, the built environment, human health and well-being, social relations (social capital) and cultural heritage". (21.4, P.11)

The Regional Planning Guidelines – implementing the National Spatial Strategy, 2004 also inform us that:

“Planning Authorities should adopt as an objective that social, community and cultural needs of all persons and communities be catered for through the provision of well dispersed and easily accessible social and community infrastructure contributing to and ensuring the delivery of a high quality of life”, (Social Infrastructure and Community Development, 7.6 Social Inclusion, P.101)

Indeed, we note that the City Development Plan indicates that Community Facility zoning has been:

“reducing in area over the last two Development Plans, largely due to institutions disposing of lands for redevelopment”, (3.6.7 P.82 Zoning Policy and Objectives). This scenario is also echoed in The Regional Planning Guidelines – implementing the National Spatial Strategy, 2004 which inform us that: “Growth in urban populations has put stress on the provision of community facilities in expanding housing areas”, (Social Infrastructure and Community Development, 7.2 Community Development, P99).

At the same time, the Development Plan informs us that:

“It is clear that there is adequate zoned and serviced land available to cater for the projected demand (population increase), and that there is a spread in the location of these lands which accords with the proposed neighbourhood structure” (P.81 3.6.3 Residential Development).

We believe that the following references from the Development Plan also support the need for informed discussion concerning the future of this Community Facility:

“There is a need to provide for a range of community facilities at the neighbourhood level”, (P.42, 2.2.2 Arts, Culture and Community Facilities).

“It is the policy of Waterford City Council to protect public and private recreational open space and the loss of such facilities will normally be resisted unless alternative recreational facilities are provided in a suitable location, or it can be demonstrated that there is no longer sufficient demand to sustain the facility”, (2.2.2 Arts, Culture and Community Facilities Policy p.43)

“The lack of appropriate community and recreational facilities in many local authority estates has been detrimental in the social development of the estates and the establishment of sustainable communities. Documented research has clearly established a relationship between poor housing conditions, lack of community facilities and social exclusion”, (2.2.1 Housing Strategy Community Facilities, p.30)

We would, therefore, suggest that there is no indication from the Submission that it was informed by any analysis of the social, community and cultural “needs of the city”, although such needs are clearly of equal importance to housing needs in achieving sustainable development. Therefore, there seems to be little basis for claims made in the Submission that the proposed rezoning would yield a “better use of the land” or necessarily meet the most pressing “needs of the city”, (Submission, P2).

Environmental Sustainability:

The Final Report of the Working Group on Urban Design for Sustainability to the European Union Expert Group on the Urban Environment: "Urban Design for Sustainability", informs us that:

"The development of a sustainable urban pattern needs to be based on an understanding of the landscape to achieve urbanisation that is balanced and with the green structure of natural and recreational space as an equal partner to other elements of infrastructure", (2.6, New Urban settlement Patterns, p.17). It acknowledges that the Compact City Strategy, as advocated in the Residential Density Guidelines, *"needs to be developed, paying closer attention to the need to establish a "green structure (the Green Compact City)"* (p.3)

The Environmental Cluster would like to make the following observations in this regard:

- i. **Green Space Provision:** We note that the EPA Millennium Report, (Chap 11, P 154) points to Waterford having the *"lowest percentage of green space"* amongst the 5 largest cities. We also wish to point out that there has been additional loss of green space to residential rezoning since the publication of this Report, though densities have been increasing – suggesting that *"balance"* is not being achieved.

Whilst the People's Park is located relatively close to the area, we believe that this should not negate the value of maintaining this additional green space, given that:

- (a) there is a paucity of green space in general within the city centre neighbourhood structure, which has recently also been subjected to increased infill development.
- (b) the People's Park offers a different type of green space to that on offer in the College.

- ii **Ecology:** The Submission does not provide any detail concerning the vegetative cover or ecology of the site. However, we have learned that the site in question is not *"lying fallow"*, as suggested (Submission p.4), but is, in fact, host to a planted woodland, which includes many deciduous trees and a number of walkways. The woodland is largely composed of: Ash (the main stand), Oak, Beech, Elm and Sorbus, interspersed with nursery stock such as Sitka Spruce. We understand that the latter would have been originally planted to shelter the developing deciduous saplings and would ordinarily be removed as part of a Woodland Management Plan.

Given the nature of the woodland, the Environmental Cluster is of the opinion that this site offers valuable *"green structure"* and is a significant contributor to the Urban Forest within the city – a view that we would regard as being reflected in the City Development Plan. We note, for instance, that the Plan promises to *"encourage the development of proposals for new tree planting and the uptake of funds under the Neighbourhood Scheme"*, (Objectives, P.65) and to *"prepare and*

implement a planned programme of tree planting and management schemes in the older parts of the City", (2.4.7, The Urban Forest, P.65). Such aspirations would suggest that City Council would value this site in "the older part of the city", particularly in view of the fact that it is a well established "NeighbourwWood Scheme". The fact that City Council acknowledges that "the survival rate of newly planted trees is unacceptably low" and that "it is desirable to have an uneven age profile in order to achieve a sustainable population" ((2.4.7, The Urban Forest, p.64) adds further weight to the case for retaining a "young" yet well established woodland.

It is unclear from the Submission whether any of the Trees of Special Amenity Value on the site (City Development Plan, Schedule 2, p.109) are located in the woodlands. The Environmental Cluster feels that this is a very serious omission from the Submission.

Finally, we note that the EU Report on Urban Design for Sustainability indicates the need for:

"Promoting the long-term health of the citizens, including addressing the relationship between social and psychological well-being and the possibility of experiencing elements of nature locally (particularly important for children)", (Urban Design for Sustainability, p.12)

We note that the site in question is located in close proximity to a significant number of schools. In the event of the broader site being utilised as a multi-purpose community facility, it could, we believe, offer a valuable contribution to the achievement of the above objective.

Point 7 of the Schedule of Permitted Uses (P.83 of the Waterford City Development Plan) also has as an objective *"To protect and conserve rural character....."* for, amongst others *"persons who are long standing residents in the area"*.

In the light of the commitments made in the "Greening of Waterford" document and the City Development Plan which entails provision of green spaces, we suggest that this site offers an ideal green lung for the City.

- iii **Other Biological Functions:** Open space offering a vegetative cover fulfils various other environmental functions. These include surface water management, improved air quality, shelter and reduction of noise pollution (Crann magazine, No. 68, Spring 2005). There is no indication that the Submission has made any attempt to integrate consideration of these values into its "needs" analysis.

Additional Matters of Concern:

Inadequate Information:

We contend that the people of the Diocese should be given full background information concerning this proposal, particularly when viewed from the perspective that this community facility was built and maintained by contributions of past and present generations of Waterford citizens. The Environmental Cluster finds it extremely surprising that the residents of the surrounding areas were not, as far as we know, engaged in any meaningful consultation regarding the proposal to rezone this potentially highly valuable amenity and community facility in advance of the formal proposal being sent to City Council.

We suggest that the following background information should have been provided to facilitate a more comprehensive consideration of the Submission:

- i *"Details of how money obtained from the sale of the college and its lands will be allocated"* (as referred to in Part 6, Page 2 of the Submission). Whilst there seems to be an implicit suggestion in this document (Statement of Reasons for Rezoning, Page 1) that the monies for the future sale of lands would be utilised to refurbish and maintain the College building, the document does not contain any explicit commitment that would confirm that this is, if fact, the intention.

Indeed, when viewed in conjunction with the current request for a "Variation of a Policy regarding Protected Structures", one could construe, in the absence of the above information, that the Diocese might, in fact, seek to sell the College building at a future date in the event of a relaxation of the Policy regarding Protected Structures.

Allied to the above is the absence of details concerning the estimated value of the lands already zoned within the site (to the rear of Sacred Heart Church) and how this money will be allocated.

- ii References to support the claims made with regard to the "need" for "good quality housing" in the City.
- iii Details of any Options Analysis undertaken by the Committee charged with this task (as reported in the media: Munster Express, 23/01/'04).

Traffic Congestion

We suggest that an evaluation should be undertaken in relation to the capacity of the already congested St John's Hill and Folly traffic routes to absorb the inevitable traffic generated by the re-zoning of these lands. Whilst the opening of the Outer Ring Road may provide some relief from congestion on these routes by diverting traffic heading for the Industrial Estate and main arteries to Dublin and Cork, it will have no effect on the traffic generated by the proliferation of schools in the area and also on traffic heading

towards the town centre. The development of the nearby lands at St. Otteran's Hospital will further exacerbate the traffic congestion.

Type of development

Whilst there are constant references in the Submission to 'good quality housing', there is no definition of same or guarantee that this will occur.

Recommendations:

We propose:

1. That there is a need for a holistic plan for St John's College and grounds. We are strongly opposed to the current ad-hoc development of the site, which we feel mitigates against the strategic approach to the "*provision of public open space, recreational and community facilities*" that is advocated in the Development Plan, (p.43, 2.2.3 Recreation and Amenity).
2. That a detailed Options Analysis is undertaken (if this has not already been done). We suggest any such Analysis should look firstly to explore viable uses that accord with the current zoning of the site, with reference to the Waterford City Development Board Report on Sports and Community Facilities in Waterford City (2000) and the City Development Plan, (2.2.3 Recreation and Amenity, p.42). We also propose that any Committee charged with this task should include representatives from the community sector.

Possible viable uses

St. John's College - Performance space to accommodate 700+ people, a designated rehearsal space, an art gallery, a retirement home, sheltered housing, childcare, cultural, recreational and/or educational facilities, community centre.

The grounds - The woodlands could be developed to provide a splendid nature trail/walks for the local residents, particularly young mothers and the elderly. We would envisage a development, albeit on a smaller scale, similar to that undertaken in Marley Park, Rathfarnham.

3. We advocate that an ecological study of the woodlands be carried out by an independent, qualified expert, together with a study of the impact of the removal of trees on the surrounding environment and also details of the woodlands status as outlined in the "Greening of Waterford" Report/Draft Preliminary Study for the Local Biodiversity Plan.

Conclusion:

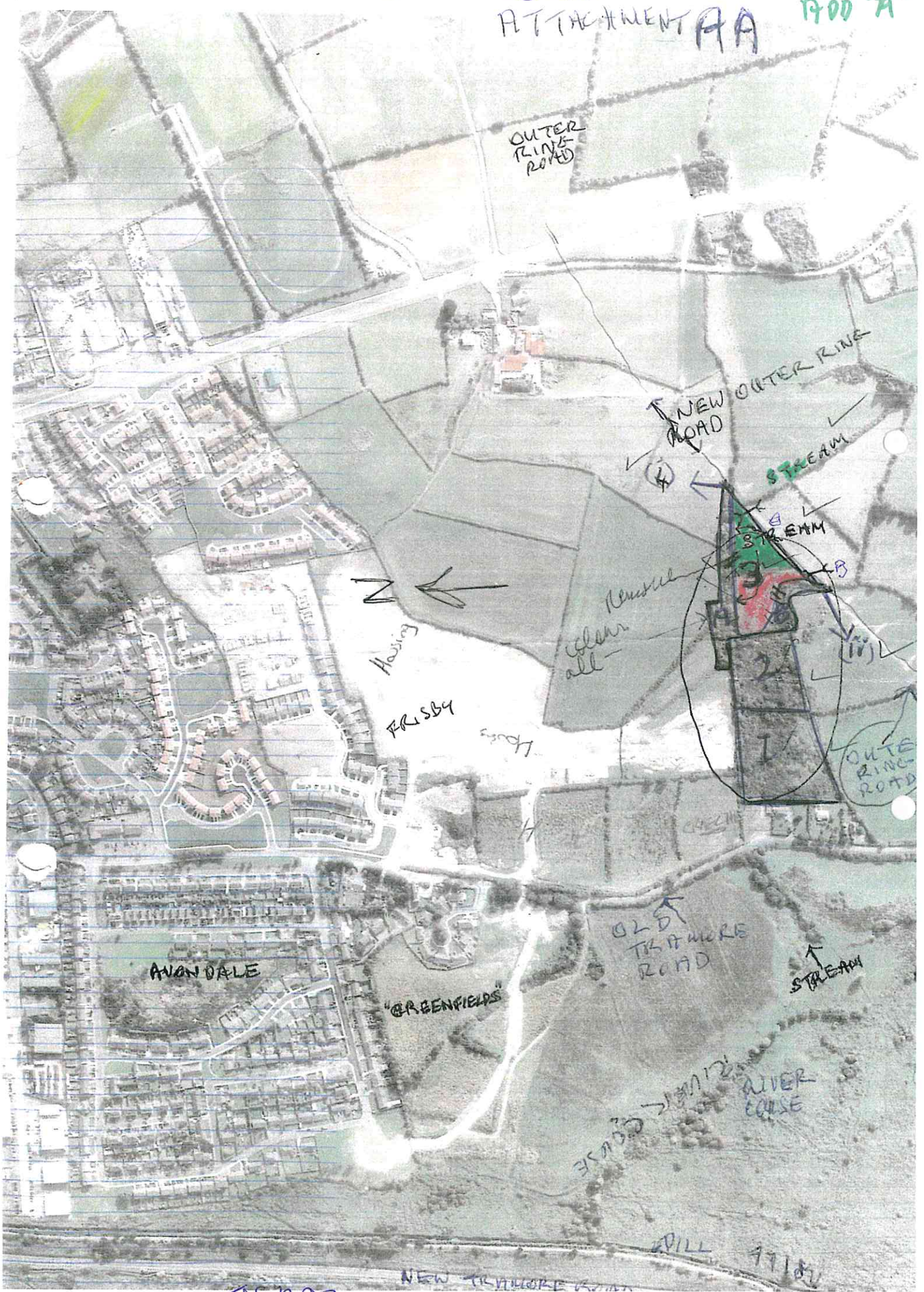
It is our opinion that this community facility/ potential amenity which was built and maintained by contributions from past and present generations of Waterford citizens should be preserved for future generations. We would contend that a unique opportunity has now been presented to Waterford City Council to provide "a well-developed green structure". Such an opportunity very rarely presents itself and should not be lost, as happened with the Ballinamona estate some years ago, through no fault of City Council.

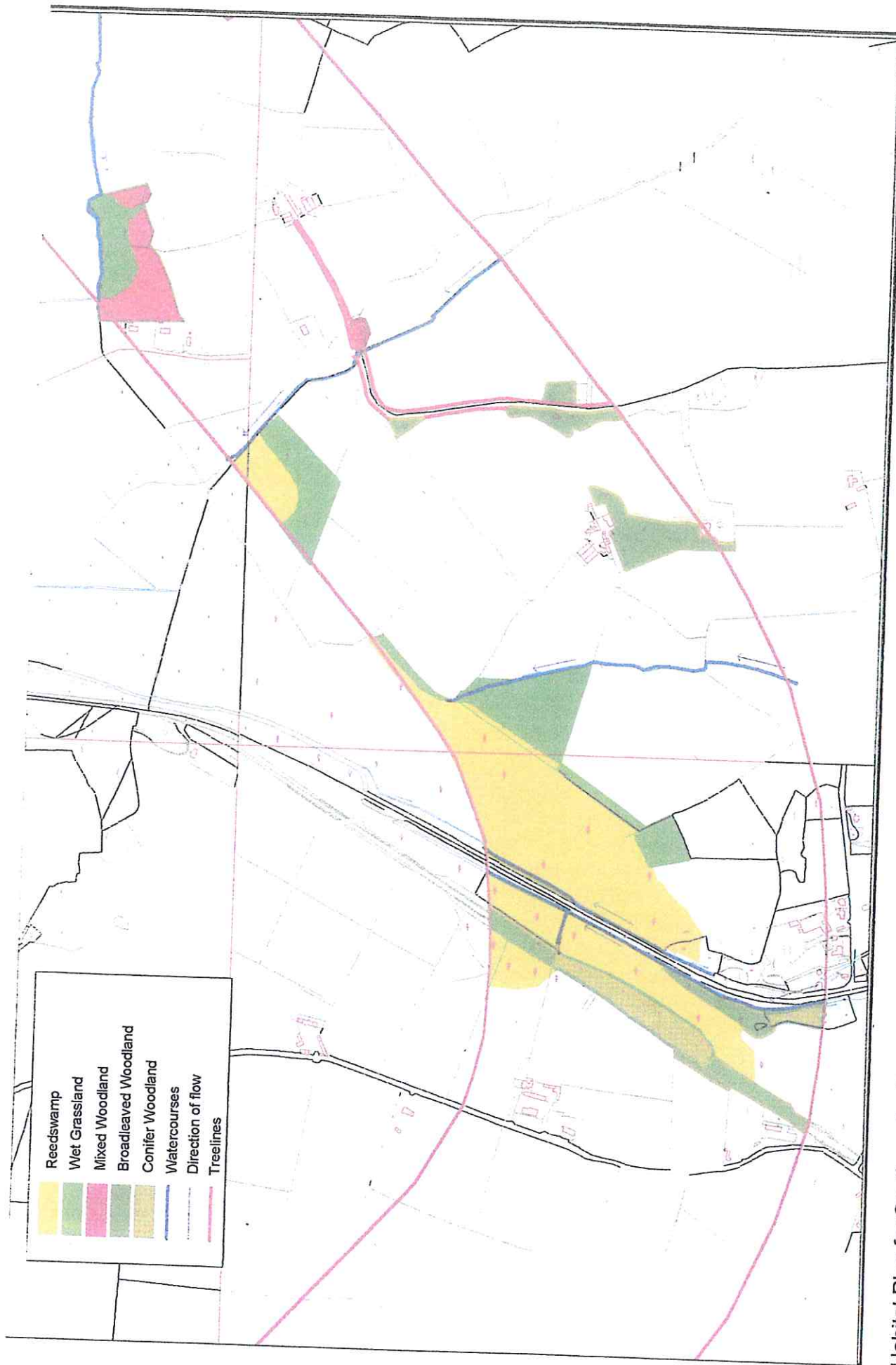
18.3.05

COURSE

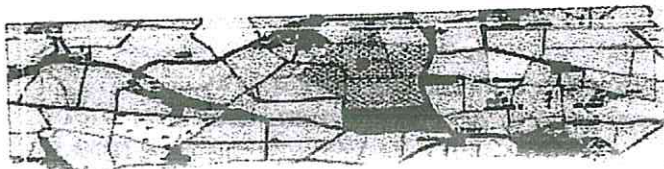
ATTACHMENT AA

1700 'A'





Habitat Plan for Southern Section of Study Area



98
cc RAD
2/11/07
(4)
Flynn, Furney.

environmental consultants

cc Planning
27.8.21
NT

25 September 2007

Re: Planning Application No. 07/333. Construction of 58 houses, semi-detached and terraced, 2 storey units (extension of Fairfield Park, planning Ref. No. 00/514), together with associated site development works and associated services installation.

To Whom It May Concern,

Flynn, Furney Environmental Consultants wish to make the enclosed submission to Waterford City Council in relation to the above application for planning. This purpose of this submission is to communicate the need for protection of habitat areas within and in the vicinity of the proposed development.

Yours faithfully,

Billy Flynn

On behalf of Flynn, Furney Environmental Consultants

Ballynagarragh
Kilbrittin
Co.Cork.

1. Introduction

Flynn, Furney Environmental Consultants Ltd is a team of ecological professionals which specialises in the protection of natural and semi-natural habitats from development and the mitigation of significant impacts against wild species and habitats.

The company has some 2 years' experience in the city and county of Waterford, working with engineers, architects and waste water treatment personnel. The company has been involved with protecting some rare and unusual species and habitats within the city boundaries.

The company has been consulted by NGOs such as the Waterford branch of the Irish Wildlife Trust and asked to assess the application in question (07/333). The following submission is therefore made under the following headings: *Protected Species*, *Vulnerable Habitat* and *Overall Development Strategy*.

2. Protected Species

The Eurasian otter (*Lutra lutra*) is a known species in this area. This species is protected under the Wildlife Act 2000 and under the Bern Convention (1979) to which Ireland is a signatory. Therefore, all care must be taken and consideration given when planning developments for areas in which this animal is known to occur. Specifically designed culverts and underpasses have been put in place under the Outer Ring Road in order to allow passage for this mammal. These are less than 500m from the extent of the site of the proposed development. Any decisions regarding planning in this area must therefore be made in consideration of this species and its habitat.

3. Vulnerable Habitat

The site of the proposed development is adjacent to areas of the following habitat types: lowland stream, rough grassland and scrub, developing woodland.

Whilst none of the areas proposed for development are under designation. However, nearby lands are designated as Natural Heritage Area (NHA), Kilbarry Bog (001700).

The authors are concerned at the prospect of the more natural or naturalised areas adjacent to the site becoming damaged by the proposed development. In particular the protection of the adjacent stream habitat (see Fig 1, attached).

In an area which has substantially been wetlands, the deterioration in water quality from a number of sources (e.g. transport, building materials) must be a concern. The authors are therefore submitting that the proposed development should not be allowed to impact in any negative way upon the the watercourse indicated as attached. We would recommend that a 10m buffer zone is retained around the stream and wetland.

Apart from water quality, this stream is in effect a corridor upon which many species depend. The stream is utilised by a range of species which use the corridor as refuge, food and water source as well as a means of movement between habitat types and along territories. The streams and associated vegetation of such areas are therefore vital for the overall well-being of habitat areas such as Kilcohan.

4. Overall Development Strategy

The Waterford City Development Plan 2007-2013 (2007) acknowledges that what Kilbarry Bog (NHA) is a 'remnant' of a much larger wetland area. This is accurate. The site description (Site Synopsis No. 001700 see: www.npws.ie) of the area describes some of the extensive damage that has occurred on this site in recent years. The City's Development Plan (2007) details the intention to use this area as part of a number of strategic 'green wedges'. The purpose of this being to 'separate development areas and provide opportunities for ... nature conservation'. The zoning strategy also specifically details buffer zones for the purpose of protection of natural areas.

The authors welcome these initiatives and believe that this part of Waterford will greatly benefit from them. We therefore ask that these intentions be applied *specifically* around the environs of this proposed development. This being for the sole purpose of buffering the remaining valuable habitat areas, especially watercourses and wet areas from deleterious impacts from this development of an already degraded habitat.

5. Conclusion

Many of the inhabitants of Waterford City and environs are proud of their knowledge and awareness of the natural heritage of this area. This is justifiably so as a great deal of work has been done to promote and protect the wild species and habitats of this city. The inventory and recording work of the city has been a credit to local authority as well as NGO involvement. The authors look forward to the preparation of a Local Biodiversity Plan which will catalogue the many habitats still extant within the city bounds.

In the shorter term, however, the authors ask the City Council to observe and implement the objectives of the Development Plan (2007) in order to afford long-term protection for existing habitat areas adjacent to the lands proposed for development.

Land Use Zoning Maps

Map Hierarchy: Boundaries and Functions

Zoning and Flood Mapping

Specific Development Objectives...

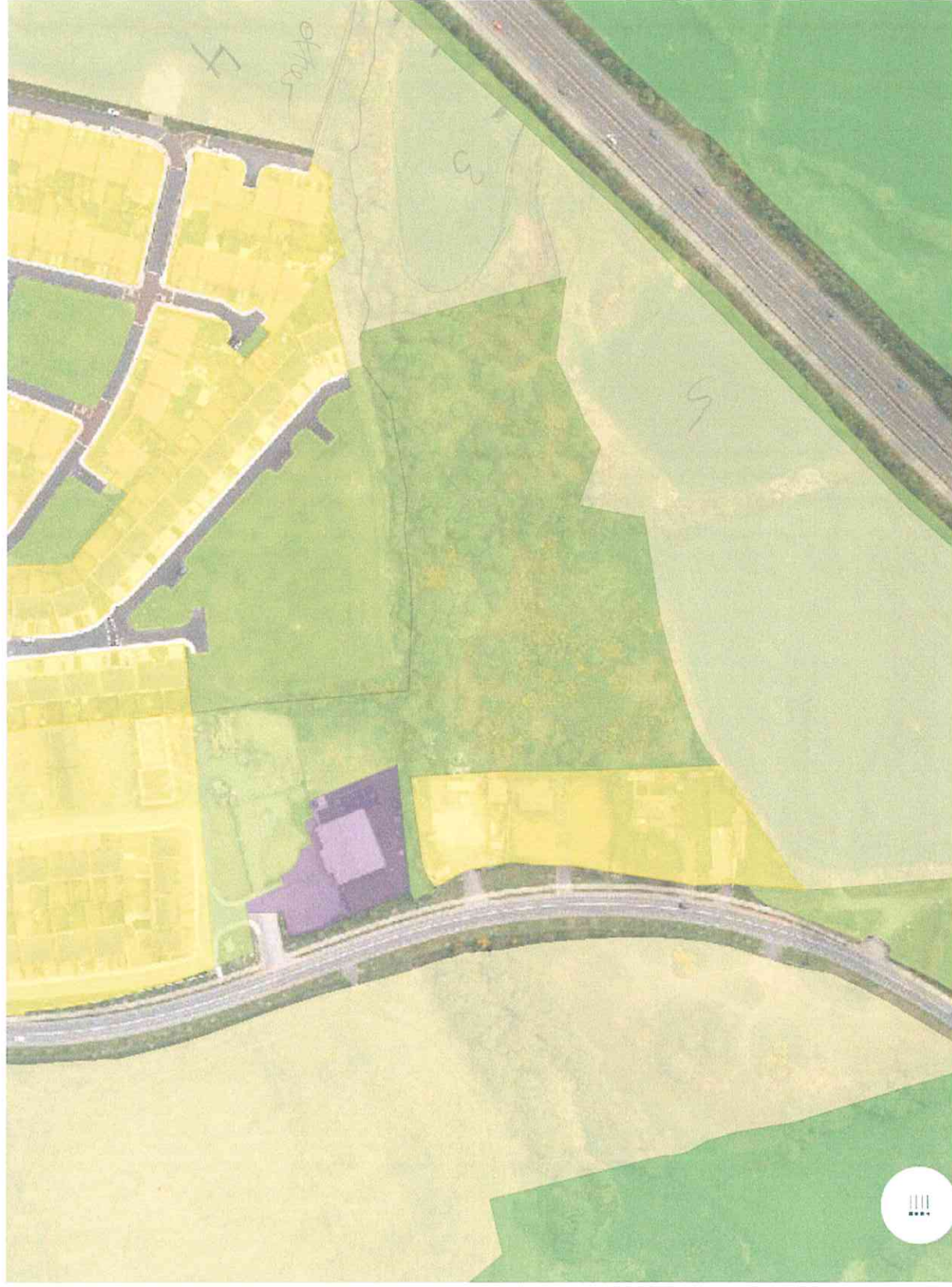
Combined Map

C

Map of the City and County of San Francisco, California, showing the boundaries and functions of the various cities and counties. The map is color-coded to show the different zoning types and functions. The map is a combination of the various zoning types and functions, showing the boundaries and functions of the various cities and counties. The map is a combination of the various zoning types and functions, showing the boundaries and functions of the various cities and counties.

Map for the land use zoning
different zoning types.

Map on land use zoning
matrix and zoning
refer to Volume 2 -



Map



- Wetlands Map
- High Water Quality River Map
- Protected Trees Map
- Waterford City BGI Map
- Combined Natural Heritage Map

he network of
rks, gardens,
corridors,
terways, urban
open countryside.
rovide
, social and
its and give added
tegrated in the
rocess.

n opportunity for
work in proximity
ceas of green
the benefits of a
nment. The Draft
lan will seek to
tection of these
trive to create

