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### **Submission to the Draft Waterford City and County Development Plan 2022-2028**

The Land Development Agency (LDA) welcomes the opportunity to input our observations to the public consultation of the Draft Waterford City and County Development Plan 2022-2028. The adopted Development Plan will be an important statutory framework to guide the future sustainable growth and development of Waterford in the coming years to achieve the vision for growth. This submission principally focuses on the proposed provisions of the Draft Development Plan in the context of national and regional planning policy.

The LDA has a key role to play in working with our partners in local authorities and state bodies, to support with delivering sustainable development, when and where this is most needed. This is particularly in relation to making the most effective use of State lands where appropriate and to support in achieving a stable, sustainable supply of land for housing into the future.

The LDA is working to enable and unlock land for the provision of more affordable housing nationwide with a key focus on delivering compact urban and sustainable growth through optimizing relevant public lands. The LDA is currently active on nine sites with a capacity to deliver at least 4,200 homes. Additional sites are also at the early design stages, providing delivery capacity up to 10,000 homes in the coming years across the State.

Waterford has the potential to develop further as a compact sustainable City Region with increased regional connectivity and growth focusing on the delivery of sustainable transport patterns. Waterford City and suburbs is well positioned to be a regional driver of growth and to achieve 50% population and growth over the next twenty years, as set out by the National Planning Framework.

### **NATIONAL PLANNING FRAMEWORK**

The **National Planning Framework (2018)** (NPF) sets out a strategic development framework for the Country to 2040 and provides for the future growth of the Regional Cities, estimating that the Waterford City and Suburbs will grow by c. 30,000 people in the period to 2040. The NPF is underpinned by the requirement to ensure that the future growth of Waterford City occurs within its Metropolitan limits. In order to achieve this, the NPF establishes the requirement for 'Compact Growth'.

In relation to 'Compact Growth', the NPF is:

*"Targeting a greater proportion (40%) of future housing development to happen within and close to existing built-up areas. **Making better use of under-utilised land, including 'infill' and 'brownfield' and publicly owned sites together with higher housing and jobs densities, better serviced by existing facilities and public transport.**"* (Our emphasis)



In order to achieve this the NPF notes that planning standards should be flexibly applied in response to well-designed development proposals that can achieve urban infill and brownfield development objectives in settlements of all sizes.

This is relevant to key parts of Waterford City and especially publicly owned sites which are identified as deemed suitable for regeneration. There is potentially a large number of brownfield, publicly owned sites, which have potential as infill sites in existing urban areas and should be prioritised for residential redevelopment to ensure a more sequential approach with infill, brownfield sites taking priority where appropriate ahead of urban extensions. This has the potential to significantly contribute to the national and regional policy objectives surrounding compact growth.

## REGIONAL SPATIAL AND ECONOMIC STRATEGY FOR THE SOUTHERN REGION

The ***Regional Spatial and Economic Strategy for the Southern Region (2019-2031)*** (RSES) provides a Metropolitan Area Strategic Plan (MASP) to deliver compact regeneration and growth in the Waterford metropolitan area. The MASP defines and provides a high-level strategic framework for the sustainable development of the Waterford Metropolitan Area

In terms of specific policy objectives that build upon the NPF requirement for compact growth, Regional Policy Objective 10 sets out the following:

*“To achieve compact growth, the RSES seeks to: prioritise housing and employment development in locations within and contiguous to existing city footprints where it can be served by public transport, walking and cycling”.*

RPO 10 is supported by the Waterford MASP Policy Objective 1 which seeks to:

*“Promote the Waterford Metropolitan Area as a cohesive metropolitan area with (i) the city centre as the primary location at the heart of the metropolitan area and region (ii) compact growth and regeneration of the Metropolitan Area across the city centre and suburbs, (iii) active land management initiatives to deliver housing and employment locations in a sustainable, infrastructure led manner”.*

Furthermore, in respect of housing, the Waterford MASP Policy Objective 8 supports:

*“High quality compact growth of Waterford City Centre and suburban areas, the assembly of brownfield sites for development and the regeneration and redevelopment of Waterford City Centre to accommodate residential use. The MASP will support initiatives which facilitate compact growth and which promote well designed high-density residential developments which protect amenities and are located in the city centre and suburban areas”.*

Waterford City includes many potential areas/ sites including north of Gracedieu Road, the North Quays, underutilized city centre car parks/depos, and lands at Saint Otteran's. All of these strongly align with the locational characteristics identified by RPO 10 and the MASP Objectives. The objectives provide significant support for the redevelopment of underutilised brownfield Waterford City lands to deliver consolidated, compact growth within the metropolitan area. As such, the LDA supports Policy H01 of the Draft Development Plan.



## RELEVANT NATIONAL GUIDELINES

### ***Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (March 2018)***

Government Guidelines support and elaborate on national policy objectives relating to securing more compact and sustainable urban development. The aims being to enable more people to live nearer to where jobs and services are located, making best use of existing infrastructure services and facilities. This requires that at least half of new homes within Ireland's cities are to be provided within the current built-up area of each i.e. on sites within the existing urban 'envelope'. The Guidelines state that it is therefore critical to ensure that compact urban development and apartment living is an increasingly attractive and desirable housing option for a range of household types and tenures.

In addition to providing guidance surrounding apartment design standards, the Guidelines state that generally, apartments are most appropriate located within urban areas. In Paragraph 2.2, the Guidelines have regard to the appropriate locations for higher density apartment development:

*"As with housing generally, the scale and extent of apartment development should increase in relation to proximity to core urban centres and other relevant factors. Existing public transport nodes or locations where high frequency public transport can be provided that are close to locations of employment and a range of urban amenities, including parks/ waterfronts, shopping and other services, are also particularly suited to apartments."* (page 5)

As part of this, the Guidelines introduce a level of flexibility surrounding the application of certain planning standards in respect to apartment development. Such flexibility is generally based on a site's location in the context of public transport accessibility or the nature of that project, for example, whether build to rent/ building refurbishment/ small infill development. As set out below, the Guidelines have been designed to strike a balance between achieving high quality development and ensuring the necessary housing growth.

*"...the purpose of this update of Guidance is to strike an effective regulatory balance in setting out planning guidance to achieve both high quality development and a significantly increased overall level of apartment output."* (page 2)

Having regards to the above, we note that the *Design Standards for New Apartments (2018)* provides a broad description of proximity and accessibility considerations to help determine the suitability of a site for higher density apartment development. On a similar basis, the Guidelines allow for flexibility surrounding certain apartment design parameters, for example, dual aspect ratio and car parking requirements.

We consider that the effective application of the above provisions is pivotal to the delivery of the housing growth required to meet the housing targets maintained by the RSES and the NPF. We note that due to its locational characteristics, Waterford City Centre provides a key opportunity to deliver significant compact and sustainable housing development, and the LDA therefore support Policy H04 and H05 of the Draft Development Plan.

### ***Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities (2009)***

These Guidelines provide national guidance in relation to the appropriate locations for the siting of higher density residential development, having regard to the locational characteristics of the lands in question.



Section 5.4 onwards has regard to ‘*appropriate locations for increased densities*’, and states that in general, increased densities should be encouraged on residentially zoned lands and particularly in the locations listed below (not exhaustive):

- Brownfield sites (within city or town centres);
- Public transport corridors; and
- Institutional lands.

These Guidelines encourage increased density and also seek to protect/promote open spaces by way of policies SC40 – SC42. Waterford City Centre and the North Quays provide an opportunity for increased densities. There are several publicly owned, brownfield/ serviced sites that can make a notable contribution to the delivery of housing growth and the LDA encourage the identification of such sites.

### ***Urban Development and Building Heights Guidelines for Planning Authorities (December 2018)***

This guidance document states that, to meet the objectives of the NPF, significant increases in building heights and overall building densities need to be not only facilitated but actively sought out and brought forward by the planning process, particularly at local authority and An Bord Pleanála level. This document further outlines that increasing building heights has a critical role to play in delivering more compact growth in urban areas.

Section 3.2 of these Guidelines set out a number of criteria which should be satisfied in terms of proposals for greater height.

The above referenced guidelines play a vital role in the delivery of the national and regional objectives for the future growth of our cities. Having regard to the residential redevelopment of all well serviced brownfield sites throughout Waterford, these guidelines implement the strategic national policy requirements for higher density development and compact growth in a planning application assessment context. We therefore maintain that the national guidelines are integral to unlocking a sites full potential from a housing delivery perspective.

In addition, there is a potential opportunity for centrally located public lands where relevant and other underutilised sites to support the Council’s objectives to regenerate the city. These sites have the potential to facilitate opportunities for more people to live, work and enjoy leisure time in the city, support the proper planning and sustainable development of Waterford while enhancing vitality and achieving wider social and economic benefits. The LDA is supportive of the Council’s objectives to facilitate the ongoing compact growth and regeneration of the Metropolitan Area and to progress active land management initiatives to deliver housing and employment locations in a sustainable, infrastructure led manner that support Waterford’s ongoing sustainable growth and ambition to be a key regional city of scale.

### ***Conclusion***

The LDA welcomes Waterford City and County Council’s identification of infill regeneration opportunities, the need for infrastructure and plan led residential development, and the prioritisation of public transport and active modes of transport.

The LDA is committed to working with our partners to support with developing and delivering quality, sustainable and affordable homes in places where they are most needed. This is in keeping with NPF aims for new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.



There is significant potential to unlock the potential of underutilised brownfield lands to deliver a strategic high quality compact sustainable urban environment. The LDA is supportive of the Council's aims and will continue to work with our local authority partners to attract investment and to develop these key areas. In particular, the LDA supports the Draft Plan's specific reference to the utilisation of available funding for plan led development and regeneration of key sites identified in Table 3.1

The LDA welcomes and supports the ambitions for Waterford City and the potential that Waterford has to be a key driver of Ireland's economy to 2040 and to grow by 50% over the next twenty years. The LDA looks forward to engaging and working with the Council in support of achieving the plan's vision and key objectives.

Your sincerely

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