

**CHIEF EXECUTIVE'S REPORT ON PROPOSED
MATERIAL ALTERATIONS TO DRAFT PLAN
CONSULTATION
APRIL 2022**



**DRAFT
WATERFORD CITY AND
COUNTY DEVELOPMENT PLAN
2022-2028**



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PART 1 INTRODUCTION TO CHIEF EXECUTIVE'S REPORT

1.0 Purpose of the Chief Executive's Report

The purpose of this report is to provide an overview of the public consultation on the proposed material alterations to the Draft Development and was submitted to the Members of Waterford City and County Council on **28th April 2022** for their consideration as part of the process for the preparation of the City and County Development Plan 2022-2028.

This Chief Executive's Report forms part of the statutory procedure for the preparation of the City and County Development Plan, as required by Section 12(8) of the Planning and Development Act, 2000 (as amended) and sets out to:

- i) List the persons or bodies who made submissions or observations under this section i.e. during the public consultation period of the Proposed Amendments to the Draft City and County Development Plan 2022 - 2028 and the Draft Environmental Report and Natura Impact Report,
- ii) Summarise the recommendations, submissions and observations made by the Office of the Planning Regulator, and
- iii) The submissions and observations made by any other persons in relation to the proposed amendments
- iv) Give the response of the Chief Executive to the issues raised, taking account of any directions of the Members of the authority or the committee under Section 11.4, the proper planning and sustainable development of the area, the statutory obligations of any Local Authority in the area and any relevant policies or objectives in the area and any relevant policies or objectives of the Government or of any Minister of the Government

At the special Council meetings held on the 11th February 2022 as per Section 12 (6) the Elected Members amended the Draft Plan. As per Section 12 (7) it is the proposed amendments and the associated environmental reports and determinations that were on display from Thursday 3rd March to Friday 1st April 2022. Section 12 (7) invites submissions on the amendments and 12 (8) sets out that the Executive shall prepare a report on the submissions received "*in relation to the Draft Plan in accordance with this section*", which is taken to mean submissions in relations to the proposed amendments to the Draft Plan. Therefore, the responses and recommendations set out below relate to issues raised on the proposed amendments.

A total of **188** submissions were received and overall the level of engagement was high and included much positive commentary. Taking into account the submissions received at pre-draft, draft and material alterations stage it is clear that the citizens of Waterford care strongly about what happens in the County. Any submissions that referred to material or subject matter that was not included in either the Material Alterations Report were summarised in full in the Chief Executive's Report below. The CE gave a response and recommendation that the submission would not result in any amendments to the Draft Plan.

Members have a period of 6 weeks from the date of receipt to consider the Chief Executive’s Report. Following consideration of the proposed material alterations to the Draft Development Plan and the Chief Executive’s Report, the Members shall, by resolution, having considered the proposed material alterations and the Chief Executive's Report, make the Plan with or without the proposed amendments, except that where they decide to accept the proposed amendment, they may do so subject to any modifications to the amendment as they consider appropriate subject to:

Section 12(10) (c) of the Planning and Development Act 2000 (as amended) states:

“(c) A further modification to the alteration –

- (i) may be made where it is minor in nature and therefore not likely to have significant effects on the environment or adversely affect the integrity of a European site,
- (ii) shall not be made where it relates to –
 - (I) an increase in the area of land zoned for any purpose, or
 - (II) an addition to or deletion from the record of Protected Structures”.

The Development Plan shall have effect 6 weeks from the day that the Plan is made. Section 12(11) of the Planning and Development Act 2000 (as amended) states:

“In making the Development Plan under subsection (6) or (10), the members shall be restricted to considering the proper planning and sustainable development of the area to which the Development Plan relates, the statutory obligations of any local authority in the area and any relevant policies or objectives for the time being of the Government or any Minister of the Government.”

We wish to take the opportunity to thank all those who made submissions, all who visited the public consultation portal and all those who viewed the Draft Plan at the Customer Care Desk’s at Baileys New Street Waterford City and Civic Offices Dungarvan. We also wish to thank all the Elected Members who played a vital and active role in this process.



Figure 1 – Development Plan Timeline

1.1 Format of this Report

The report consists of four main parts as follows:

Part 1: Introduction to Chief Executive's Report

- Purpose of the CE Report
- Format of report; and
- Public Consultation.

Part 2: General Summary and Analysis of Public Consultation

- Public consultation – Summary and Analysis;
- Summary and Analysis of Issues Raised by Topic and Chief Executive Opinion and Recommendation; and
- Overview of nature of Main Issues raised and recommendations made.

Part 3: Summary of the submissions from the Office of the Planning Regulator (OPR), the Southern Regional Authority, other persons and the response and recommendations of the Chief Executive

- A summary of the observations, submissions and recommendations made by the Office of the Planning Regulator with the CE's response and recommendations
- A summary of the issues raised, and the recommendations made by the Southern Regional Authority (SRA) with the CE's response and recommendations
- A summary of the issues raised by other persons broken down by way of reference to the chapters and appendices of the Draft Plan with the CE's response and recommendations

Part 4: Appendices to the Chief Executive's Report

- Appendix 1. – List of Written Submissions Received.
- Appendix 2 – List of Prescribed Authorities and other Bodies Consulted.
- Appendix 3 – Chief Executive's Draft Plan Errata.
- Appendix 4 – Irish Water Table 6 Water and wastewater capacity assessment.
- Appendix 5 – Commonly Used Acronyms.
- Appendix 6 – Copy of Public Notices

For the purposes of reading this report please note the following:

Recommendations for amendments to the Draft Plan are shown by way of red text with deletions shown by way of a ~~strike through~~ and additions shown by way of underlining.

Responses in black are matters considered by the Chief Executive and where no change is recommended.

1.2 Overview of the Draft Consultation Process:

The Material Amendments to the Draft Plan went on public display from 1 Thursday 3rd March to Friday 1st April 2022. The Material Amendments Report was available for display via the online consultation portal and at the Customer Care Desk's at Baileys New Street Waterford City and Civic

Offices Dungarvan, by appointment only. A total of **188** No. written submissions were received during the Draft Plan consultation period.

The Council utilised a number of innovative means of communicating the messages contained in the Draft Plan including the following;

(A) Online

As dedicated consultation portal, **consult.waterfordcouncil.ie**, that was used during the Issues Stage and Draft Plan Stage. The portal is designed to engage with a wide audience, and keep members of the public up-to-date with the process of the preparation of the Development Plan. Submissions to the Material Alterations (MA) to the Draft Plan consultation stage could be made online via the Council's consultation portal, or by post.



In addition to the above, the portals website included copies of the statutory notices both in English and Irish, as well as all relevant MA Draft Development Plan documentation.

(B) Publicity and social media

The statutory notice of the Material Alterations to the Draft Waterford City and County Development Plan was placed in the Munster Express on Tuesday 10th March 2022, and the Dungarvan Observer on Friday 4th March 2022.

The notice advised of the consultation period, where the Draft Plan could be accessed and inviting submissions on the material alterations to the Draft Plan up to and including the closing date of 1st April 2022. The notice also directed the public to material on a dedicated consultation website (portal), and advised of the duration of the formal consultation period. A copy of the notice can be viewed in Part 4 Appendix 6 of this report.

The Material Alterations to the Draft Waterford City and County Development Plan was also advertised on the Council's social media platforms which reached a total of 11,010 engagements. There were 8 Facebook posts that generated 6,568 impressions with a 3.4 % engagement rate and 12 no. Twitter posts that gained 2,404 impressions and a 2.08 % engagement rate. There were also 3 LinkedIn Posts that gained 2,038 impressions and a 1.95 % engagement rate.

The Material Alterations to the Draft Development Plan and associated documentation was available for review at the Customer Care Desk's at Baileys New Street Waterford City and Civic Offices Dungarvan, and on the dedicated Development Plan consultation portal. It was also forwarded to all elected members and prescribed authorities.

1.3 Public and Stakeholder Meetings

One to one meeting could also be booked with members of the Forward Planning Staff during the public consultation window. The issues raised are reflected in the details of the written submissions received and set out in this report below.

PART 2 GENERAL SUMMARY AND ANALYSIS OF PUBLIC CONSULTATION

2.0 Public consultation – Summary and Analysis

This section consists of an analysis and summary of the submissions and issues raised during the public consultation period. This part includes the Chief Executive’s opinions and recommendations on the issues raised.

A total of **188** No written submissions were received, each of which is summarised in the submissions tables following (Tables 1 and 2). All the issues raised are indicated in the main (middle) column. The opinion and recommendation of the Chief Executive in relation to the issues raised, are outlined in the adjacent (last) column. Of note are a number of submissions which have been made in respect of three separate specific matters/ areas; these relate to:

1. Submission which relate solely to Duckspool, Dungarvan (100 No submissions)
2. Submission which relate solely to Watesgate, Bilberry, Waterford City (12 No submissions).
3. Submissions which relate solely to Apis mellifera/ Irish Native Honey Bee (10 No submissions).

As the submissions relating to the above contain very similar content and raise the same issue(s), they have been grouped into just three separate entries in the report below.

The submissions by prescribed authorities are also of note, and are noted for ease of cross reference in the main table, below. The submissions made by the SRA and the OPR, are separated from, and are presented in Table 1, in advance of, the main submissions table (Table 2). All submissions are presented in the tables in numerical order

Submission Ref. No. (WFD-C3-)	Prescribed Authority
3	Transport Infrastructure Ireland (TII)
6	Irish Water (IW)
32	Office of Public Works
56	Department of Transport
57	Department. of Education
118	Department of Environment, Climate and Communications
140	Southern Regional Assembly (SRA)
164	Land Development Agency (LDA)
167	National Transport Authority (NTA)
170	Wind Energy Ireland
172	Office of the Planning Regulator (OPR)

2.1 Overview of nature of Main Issues raised and recommendations made

Section	Main Issues Raised	Recommended Amendments
Chapter 1		
Vision	<ul style="list-style-type: none"> Minor modifications sought to the Draft Plan to reflect Climate Action Plan 2021 and Housing For All – A New Housing Plan for Ireland. 	<ul style="list-style-type: none"> Section 1.7.3 has been updated to reflect these changes. Renewable Energy Targets outlined in Chapter 7 have also been updated.
Chapter 2		
Spatial Vision & Core Strategy	<ul style="list-style-type: none"> Amendments sought to land use zonings. Minor amendment to housing and population targets in Section 2.13 Target Population Growth. 	<ul style="list-style-type: none"> CE Response provided in relation to all zoning request. Section 2.13 updated to reflect minimum housing target figure.
Chapter 3		
Waterford City and MASP	<ul style="list-style-type: none"> Minor amendment sought to footnote to Table 3.1 to expressly refer to 'higher densities' and taller buildings. 	<ul style="list-style-type: none"> Table 3.1 updated to reflect changes.
Chapter 4		
Economy, Education, Tourism and Retail	<ul style="list-style-type: none"> Minor modifications sought to update reference to Seveso III Directive 2012/18/EU; Greater flexibility sought to school authorities to make their own decisions around the use of the facilities outside of school hours. 	<ul style="list-style-type: none"> Section 4.9 'Seveso Directive/ Major Accidents' have been updated to reflect these changes. Policy Objective SC15 Childcare and Educational Facilities to align with Department of Education Guidelines.
Chapter 5		
Transport and Mobility	<ul style="list-style-type: none"> Greater cross-referencing should be made within the plan with regards to the Spatial Planning and National Roads Guidelines for Planning Authorities 2012 to ensure applicants/developers are fully aware of the provisions of official policy concerning access to national roads. Minor modifications sought with regards to accessible and integrated public transport. Minor modifications sought to active travel routes for Waterford City and a greater emphasis placed on a permeability measures in Tramore, Dungarvan and Waterford should be a priority 	<ul style="list-style-type: none"> Section 7.11 of the Draft Plan and Section 8.6, Section 5.21, Section 5.24 of the DM Standards have been updated to reflect these changes. Policy Objective Uni Des 02, H02, H17, Trans 01 and Section 8.1 of the Draft Plan and Section 2.5.2 and Policy Objective DM06 in DM Standards updated to reflect this change. Map 3 of the Draft Development Plan updated to reflect additional active travel routes and Strategic Objective No. 3 of Chapter 5 updated to give priority to permeability measures in Tramore, Dungarvan and Waterford.
Chapter 6		
Utilities Infrastructure, Energy and Comm's.	<ul style="list-style-type: none"> Minor modification sought to Table 6: Water and Wastewater Capacity Assessment – Settlements in Waterford County. 	<ul style="list-style-type: none"> Table 6 updated to reflect changes. UTL 06 and UTL 08 updated to reflect these changes stating that planning authorities. Irish Water will not

Section	Main Issues Raised	Recommended Amendments
	<ul style="list-style-type: none"> Developer Provided Infrastructure such as private wells or waste water treatment plants should generally not be considered by the Planning Authority. Minor modifications requested to Table 6.2 to reflect wind targets in line with the Climate Action Plan 2021. 	<p>retrospectively take over responsibility for developer provided treatment facilities or associated networks, unless agreed in advance.</p> <ul style="list-style-type: none"> Section 6.6 and Table 6.2 updated to reflect these changes.
Chapter 7		
Housing and Sustainable Communities	<ul style="list-style-type: none"> Minor modifications sought to strengthen Child Care within the Draft Plan. Minor modifications sought to align the requirement for a Social Infrastructure Audit (SIA) with the requirement for the submission of a Design Statement as specified in Policy Objective ‘Place 10 Safe Places’ i.e (15 + residential units (or less depending on the site context). 	<ul style="list-style-type: none"> Policy Objective SC 14 and Volume 2 DM Standards Section 5.17 Childcare Facilities. Policy Objective H17 ‘Housing Mix’ bullet point 7 to reflect alignment between Social Infrastructure Audit and Design Statement.
Chapter 9		
Climate Change, Biodiversity and Environment	<ul style="list-style-type: none"> Minor modifications sought to Draft Plan to strengthen the conservation of the native Irish honey bee, <i>Apis mellifera mellifera</i>. 	<ul style="list-style-type: none"> Policy Objective BH09 Building Adaptation updated to reflect these changes.
DM Standards		
	<ul style="list-style-type: none"> Minor modifications sought with regards to open space and developments which have a higher density and or comprise of taller buildings. Minor modifications to car parking standards to take account wider sustainability objectives and targets within the Plan and a general transition towards more active travel and a low carbon society 	<ul style="list-style-type: none"> Table 1 – General Standards for New Residential Development updated to reflect this change. Table 5 – Car-parking standards updated to reflect this change.
Appendices		
Appendix 2 Specific Development Objectives	<ul style="list-style-type: none"> Minor modifications sought to TRDO12 to include areas of high biological importance such as Glen Road, Monvoy Valley and the Garraun Stream. 	<ul style="list-style-type: none"> Appendix 2 Specific Development Objectives ‘TRDO12’ updated to reflect this change.
Appendix 13 Strategic Flood Risk Assessment	<ul style="list-style-type: none"> Discrepancies between flood maps in the SFRA and the interactive mapping tool. Additional plan making justification tests are required to address some land use zoning provisions. In these cases, avoidance of zoning for highly 	<ul style="list-style-type: none"> Inconsistency between the interactive draft development plan mapping and the SFRA has been corrected. The land use zones have been updated to ensure no transgression into floodzones. Furthermore, new

Section	Main Issues Raised	Recommended Amendments
	vulnerable land uses is recommended. <ul style="list-style-type: none"> The draft plan should support flood relief schemes across the County. 	plan making justification tests have been included in the SFRA. <ul style="list-style-type: none"> Policy Objective UTL 10 has been updated to provide support for Flood Relief Schemes.
Appendix 21 Regeneration and Opportunity Site	<ul style="list-style-type: none"> Minor modification sought to Appendix 21 to resolve the issue of conflicting uses between the zoning matrix and the regeneration vision. Minor modification sought to Appendix 21 which suggested that some regeneration objectives and site-specific criteria include greater flexibility to support the delivery of the sites. 	<ul style="list-style-type: none"> Regeneration and Active Land Management – Policy Objective H05 Regeneration Policy Objectives updated to reflect this change. Additional text added to the ‘General Objectives for Regeneration’ at the start of Appendix 21 to support greater flexibility.

Note1: This is high level and does not purport to show every amendment proposed. The report should be read in full.

Note 2: The report has been prepared to ensure any modifications to the amendments and the draft plan are minor in nature and ensure that the plan making process remains consistent with Section 12 (10) of the Planning and Development Act 2000 (as amended).

**PART 3 CE'S RESPONSE TO PUBLIC BODIES (THE OFFICE OF THE PLANNING
REGULATOR – OPR AND THE SOUTHERN REGIONAL ASSEMBLY – SRA) AND THEIR
PERSONS**

3.0 Summary of Observations, Submissions and Recommendations from Office of the Planning Regulator (OPR) and CE's response and recommendations.

Office of the Planning Regulator Submission WFD-C3-172

The OPR welcomes the opportunity to further inform the plan making process and acknowledges the major task undertaken by Waterford City and County Council in preparing and publishing the material alterations to the draft Plan, with over 360 material amendments, and appendices containing the associated technical and environmental reports. The presentation of the material amendments in a systematic and coherent manner has allowed all parties to access and understand the proposed amendments, and the Office would like to commend the planning authority for its approach.

Many of the material amendments will strengthen the Plan i.e., the inclusion of the renewable energy targets for County Waterford, the revised rural housing strategy, the response taken to the multi or joint retail strategy for the Waterford MASP, the inclusion of targets for infill/ brownfield development in the core strategy, the inclusion of Appendix 21 'Waterford City and County Regeneration and Opportunity Sites', the material amendments to protect public right of ways, and the monitoring and implementation of sustainable transport and modal share targets.

There are however a number of amendments are not consistent with national or regional policies in respect of the Core Strategy and the supply of residential zoned land, compact growth and regeneration, flood risk management, and certain specified land-use zoning amendments. Set out hereunder are the 4 recommendations of the OPR along with the relevant response and recommendation of the Chief Executive.

OPR Recommendation 1

In accordance with Section 10(2A) of the Planning and Development Act 2000, as amended, the planning authority is required to reinstate population targets into the Core Strategy Table (Table 2.2).

CE Response and Recommendation

The content of the submission is noted. The modifications to Table 2.2 along with minor modification to the associated narrative text of the draft development plan are set out below in response to observation 1 of the Southern Regional Assembly (WFD-C3-140).

OPR Recommendation 2

Having regard to national and regional policy objectives NPO 3c, RPO 34 & 35, and NPO 18a, the requirement under the Development Plans, Guidelines for Planning Authorities (2007) and Development Plans, Guidelines for Planning Authorities - Draft for Consultation (August 2021) that a sequential approach to the zoning of lands is applied, and section 10(2)(n) of the Planning and Development Act 2000, as amended, and to Recommendation 4 of the Office's submission to the draft Plan, the planning authority is required to remove the R1 New Residential zoning objective for that part of the lands at Monang, Dungarvan not designated as Strategic Reserve Residential under MA 213 (UID 117). The lands in question are set out in the map below.



CE Response and Recommendation

The content of the submission is noted. It is also noted that the recommendation relates to the rezoning of land which did not constitute a Material Alteration in the Material Alterations Report on Draft Waterford City and County Development Plan 2022 – 2028 dated the 3rd of March 2022. As such it is considered inappropriate that any change be made to the land use zoning of the lands in question, and it is therefore recommended that the lands be zoned for new residential development R1 in the development plan in a manner consistent with the draft plan. It is worthy of note that a small portion of these lands may become available for development in the short-term but the developing out of the entirety will take time and will probably require active land management on behalf of Waterford City and County Council over the lifetime of the development plan.

While the draft development plan has included a roads objective to enhance access across these lands and neighbouring lands, it would be appropriate to include an additional specific development objective for these lands to ensure they are developed out subject to a masterplan to be prepared in consultation with the planning authority. The following objective is therefore recommended for inclusion by way of minor modification to Appendix 2 of the draft plan:

DGDO 22: To secure the sustainable and sequential longer-term development of lands at Monang, located between the Old Hospital Road and the N25, development of Tier 2 residential lands shall be informed by and consistent with a masterplan, the scope and detail of which shall be agreed in writing with the planning authority prior to the masterplan being prepared.

OPR Recommendation 3

Having regard to national and regional policy objectives NPO 3c, RPO 34 & 35, and NPO 18a, the Development Plans, Guidelines for Planning Authorities (2007) and Development Plans, Guidelines for Planning Authorities - Draft for Consultation (August 2021), and section 10(2)(n) of the Planning and Development Act 2000, as amended, the Office considers that the following residential zonings proposed under the material amendments are inconsistent with the core strategy and/or contrary to the implementation of compact growth, sequential zoning and the provision of a sustainable settlement and transport strategy. The planning authority is required to make the Plan without the following material amendments:

MA Ref. No. & Location	MA Ref. No. & Location
MA 211 Dungarvan & Ballinroad	MA 243 Dunmore East
MA 215 Dungarvan & Ballinroad	MA 231 Dunmore East

MA Ref. No. & Location	MA Ref. No. & Location
MA 217 Dungarvan & Ballinroad	MA 241 Dunmore East
MA 218 Dungarvan & Ballinroad	MA 204 Clonmel Environs
MA 222 Dungarvan & Ballinroad	MA 270 Portlaw
MA 225 Dungarvan & Ballinroad	MA 193 An Rinn
MA 284 Tramore	MA 201 Cappoquin
MA 295 Tramore	MA 281 Tallow
MA 305 Tramore	MA 205 Crooke
	MA 251 Lemybrien

A map indicating the location of each MA is included in the table below for ease of reference.

CE Response and Recommendation

Save with additional comments in the table below, the following response pertains to recommendation no. 3 and the relevant schedule of MA. With the exception of MA 215 and MA 217 relating to lands at Shandon, and MA 305 Tramore it is considered that the recommendation of the OPR seeks to ensure the Development Plan is made without the respective material alterations so as to align appropriately the amount of land zoned in the respective settlements with the requirements of the core strategy and housing targets in the interest of achieving a compact and sequential pattern of development across all our settlements.

Dungarvan: Notwithstanding the above, the recommendation to make the development plan without MA 215 and MA 217 in Dungarvan poses a significant challenge for the continued provision of choice and affordability in the housing market for this important designated self-sustaining Key Town and may undermine continued private investment and delivery of jobs locally. Taking cognisance of recommendation 4(ii) of the OPR submission on the draft development plan which sought to consolidate future expansion of the town close to its historic centre, it is considered that there are limited opportunities to deliver and real quantum of housing into the current market within the historic core i.e., south of the N25, and that the opportunity to develop the lands at Shandon offer the most sustainable solution to provide for the future compact growth of Dungarvan within its physical constraints and context, principally to the south and west of the Colligan River and north of the town core.

Without the inclusion of the lands at Shandon, the lands zoned for new residential development (R1) would be principally located at Duckspool (between The Burgery and St. Augustine's College) and at Kilrush and would provide 7.8 ha from a total of 10.8 ha of R1 zoned land to deliver new housing over the lifetime of the development plan. With the exception of the smaller parcels of land and the lands at Monang (Referred to under recommendation 3 of the OPR above), this would likely result in a single active housing development site in the immediate and short-term with the possible release of new land for housing over the next 24 months at Kilrush. It is considered that this level of activity would be inadequate to deliver for Dungarvan, a town designated for growth in the RSES. In addition, the failure to include the lands at Shandon will further impede the optimum and probable sequence of land release for housing, particularly in the medium-term given the investment required to overcome infrastructural constraints locally and the delivery time for same.

The quantum of lands zoned R1 at Shandon as set out in MA 215 & 217 will ensure a commercial reality to delivering new housing and associated service infrastructure as part of a broader masterplan for additional lands in the vicinity to be developed out over the period of a number of development plan cycles. MA 215 & 217 provide a nucleus for a mixed-use neighbourhood in close proximity to the historic core of Dungarvan and associated services/facilities and will consolidate the future expansion of the town in the broader interest of achieving a sustainable 10-minute neighbourhood based on the principles of compact and sequential growth. As such the Shandon lands offer significant potential not only for housing

development in the near and mid-term but also scope for additional consolidated educational and community facilities close to the historic core along with enhanced linkages for sustainable modes to further reduce congestion and private car usage locally and thereby build on the success of Active Travel measures development out to date.

It is also recognised that there is a need to rebalance the socio-demographic profile of Dungarvan which has experienced growth in new housing stock and affluence predominantly in Abbeyside, post 2000. This can be demonstrated in the general deprivation indices set out below relating to Dungarvan No 1 Urban (historic town area) and No. 2 Urban (Abbeyside) taken from Section 5 of the Housing Strategy and HNDA (Appendix 3 of the draft plan) along with the AIRO report (Appendix 18 of the draft plan).

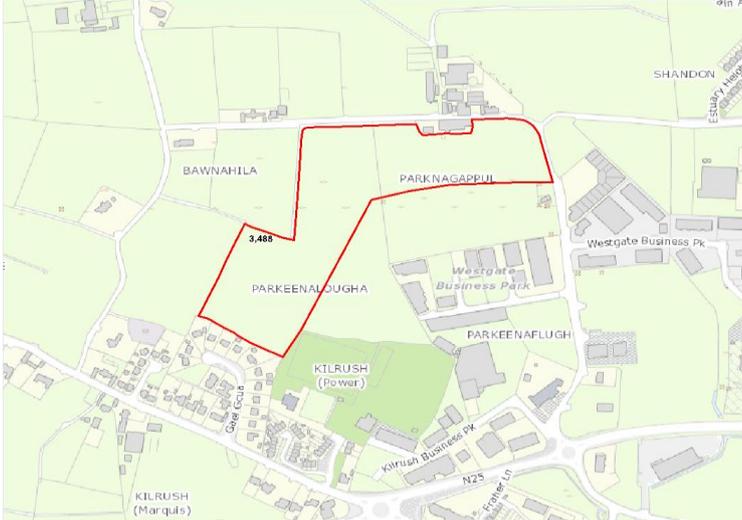
ED Name	Population 2016	Dev Score 2016	Age Dependency	Lone Parents ratio	Primary Ed only	Third Level	Unemployment Male	Unemployment Female
Dungarvan No. 1 Urban	4787	-11.08	34.38	33.58	20.11	22.34	27.67	19.13
Dungarvan No. 2 Urban	3440	1.83	37.92	22.67	8.25	40.56	14.04	10.57

The draft development plan core strategy stated the need and intention to address this issue in the medium term however the availability and of land at Shandon provides the opportunity to support this recalibration of the spatial growth pattern of this Key Town in the shorter term.

The amended core strategy table as set out in response to the submission by the SRA has included aspirational population targets reflective of the RSES in addition to the minimum housing delivery targets for the development plan period. These aspirations are of particular importance to Waterford City and Dungarvan which are designated for growth in the NPF and RSES. This aspiration would suggest the need to provide an additional c. 8.5 ha of zoned land to facilitate the growth of the Key Town. The recommendations relating to each MA are set out in the table below.

Tramore: With regard to MA 305 at Newtown, it is considered that the inclusion of these lands will support the continued functioning of the housing market in a manner similar in many respects to the response above relating to Dungarvan and will provide additional development lands within the built footprint of the town. It is considered however that the quantum of lands relating to the MA (7.18 ha) is excessive for the purposes of the core strategy and population ambition and an area of 3 ha would be more appropriate.

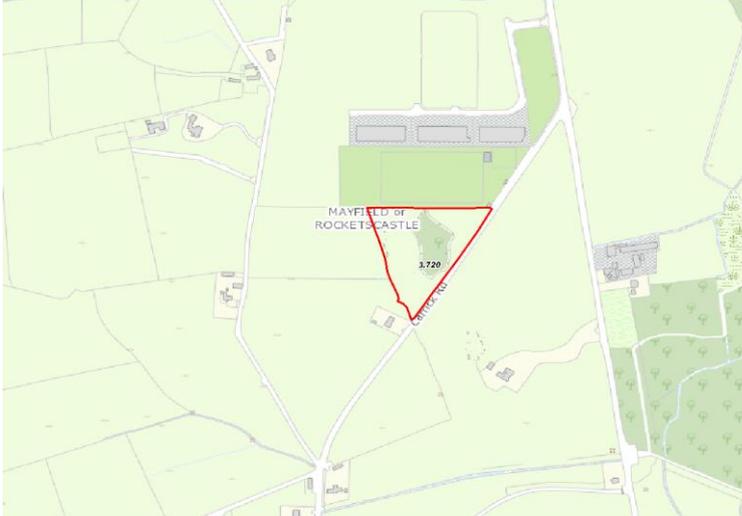
MA Ref & Location	Map of Relevant Lands	CE Recommendation
MA 211 Dungarvan & Ballinroad (UID 3669)		It is recommended that the Development Plan is made without the material amendment MA 211 which had proposed to zone the lands for new residential use (R1). The lands will therefore be zoned as open-space and recreation (OS) as set out in the draft development plan.

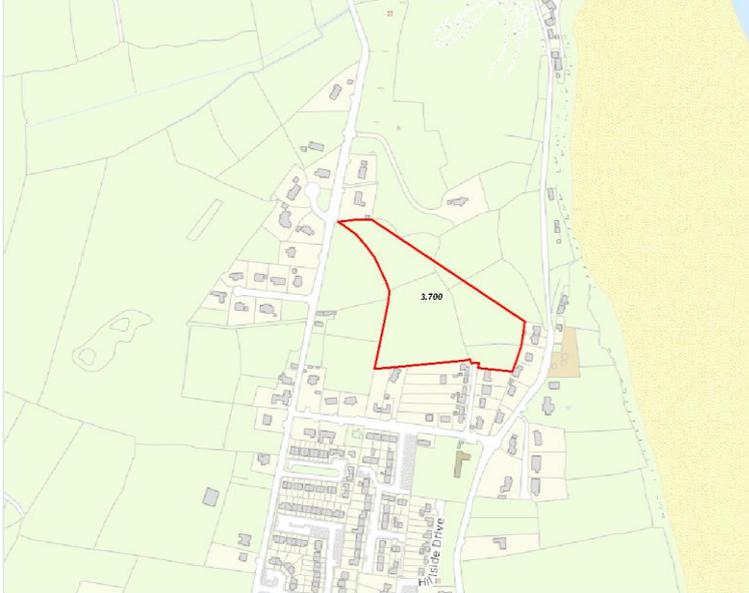
MA Ref & Location	Map of Relevant Lands	CE Recommendation
<p>MA 215 Dungarvan & Ballinroad (UID 1132)</p>		<p>It is recommended that the Development Plan is made with the material amendment MA 215 which proposes to zone the lands for new residential use (R1).</p>
<p>MA 217 Dungarvan & Ballinroad (UID 3488)</p>		<p>It is recommended that the Development Plan is made with the material amendment MA 217 which proposes to zone the lands for new residential use (R1).</p>
<p>MA 218 Dungarvan & Ballinroad (UID 3589)</p>		<p>It is recommended that the Development Plan is made without the material amendment MA 218 which had proposed to zone the lands for new residential use (R1). The lands will therefore be zoned as strategic residential reserve (SRR) as set out in the draft development plan.</p>

MA Ref & Location	Map of Relevant Lands	CE Recommendation
<p>MA 222 Dungarvan & Ballinroad (UID 3653)</p>		<p>It is recommended that the Development Plan is made without the material amendment MA 222 which had proposed to zone the lands for strategic residential reserve (SRR). The lands will therefore be zoned as open-space and recreation (OS) as set out in the draft development plan.</p>
<p>MA 225 Dungarvan & Ballinroad (UID 3666)</p>		<p>It is recommended that the Development Plan is made without the material amendment MA 225 which had proposed to zone the lands for new residential use (R1). The lands will therefore be zoned as strategic residential reserve (SRR) as set out in the draft development plan.</p>
<p>MA 284 Tramore (UID 3659)</p>		<p>It is recommended that the Development Plan is made without the material amendment MA 284 which had proposed to zone the lands for new residential use (R1). The lands will therefore be zoned as open-space and recreation (OS) as set out in the draft development plan.</p>

MA Ref & Location	Map of Relevant Lands	CE Recommendation
<p>MA 295 Tramore (UID 3496)</p>		<p>It is recommended that the Development Plan is made without the material amendment MA 295 which had proposed to zone the lands for new residential use (R1). The lands will therefore be zoned as strategic residential reserve (SRR) as set out in the draft development plan.</p>
<p>MA 305 Tramore (UID 3383)</p>		<p>It is recommended that the Development Plan is made with the material amendment MA 305 which had proposed to zone the lands for new residential use (R1). It is recommended that the area of the land zoned for new residential development should be modified from the 7.18 ha as set out in MA 305 to 3ha (area shaded in the attached map) so as to enhance alignment with the core strategy.</p>
<p>MA 243 Dunmore East (UID 3012)</p>		<p>It is recommended that the Development Plan is made without the material amendment MA 243 which had proposed to zone the lands for new residential use (R1). The lands will therefore be zoned as strategic residential reserve (SRR) as set out in the draft development plan.</p>

MA Ref & Location	Map of Relevant Lands	CE Recommendation
<p>MA 231 Dunmore East (UID 3547)</p>		<p>It is recommended that the Development Plan is made without the material amendment MA 231 which had proposed to zone the lands for new residential use (R1). The lands will therefore be zoned as new residential (R1) as set out in the draft development plan.</p>
<p>MA 241 Dunmore East (UID 3282)</p>		<p>It is recommended that the Development Plan is made without the material amendment MA 241 which had proposed to zone the lands for new residential use (R1). The lands will therefore be zoned as strategic residential reserve (SRR) as set out in the draft development plan.</p>
<p>MA 204 Clonmel Environs (UID 3697)</p>		<p>It is recommended that the Development Plan is made without the material amendment MA 204 which had proposed to zone the lands for existing residential development (RS). The lands will therefore be zoned high amenity (HA) as set out in the draft development plan.</p>

MA Ref & Location	Map of Relevant Lands	CE Recommendation
<p>MA 270 Portlaw (UID 3720)</p>		<p>It is recommended that the Development Plan is made without the material amendment MA 270 which had proposed to zone the lands for new residential use (R1). The lands will therefore be zoned industry/ tech/ manufacturing (CD) as set out in the draft development plan.</p>
<p>MA 193 An Rinn (UID 3567)</p>		<p>It is recommended that the Development Plan is made without the material amendment MA 193 which had proposed to zone the lands for new residential use (R1). The lands will therefore be zoned high amenity (HA) as set out in the draft development plan.</p>
<p>MA 201 Cappoquin (UID 3738)</p>		<p>It is recommended that the Development Plan is made without the material amendment MA 201 which had proposed to zone the lands for rural village development (RV) within the village boundary. The lands will therefore be located outside the settlement boundary of Cappoquin as set out in the draft development plan with no associated land use zoning.</p>

MA Ref & Location	Map of Relevant Lands	CE Recommendation
<p>MA 281 Tallow (UID 3688)</p>		<p>It is recommended that the Development Plan is made without the material amendment MA 281 which had proposed to zone the lands for rural village development (RV) within the village boundary. The lands will therefore be located outside the settlement boundary of Tallow as set out in the draft development plan with no associated land use zoning.</p>
<p>MA 205 Crooke (UID 3700)</p>		<p>It is recommended that the Development Plan is made without the material amendment MA 205 which had proposed to zone the lands for rural village development (RV) within the village boundary. The lands will therefore be located outside the settlement boundary of Crooke as set out in the draft development plan with no associated land use zoning.</p>
<p>MA 251 Lemybrien (UID 3675)</p>		<p>It is recommended that the Development Plan is made without the material amendment MA 251 which has proposed to zone the lands for rural village development (RV) within the village boundary. The lands will therefore be located outside the settlement boundary of Lemybrien as set out in the draft development plan with no associated land use zoning.</p>

OPR Recommendation 4

Having regard to NPO57 and to the provisions of The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) the planning authority is required to make the Plan without the following material amendments:

MA Ref. No. & Location	
MA 342 (Waterford City)	MA 302 (Tramore)
MA 244 (Dunmore East)	MA 306 (Tramore)
MA 268 (Portlaw)	MA 316 (Tramore)
MA 273 (Portlaw)	

A map indicating the location of each MA is included in the table below for ease of reference.

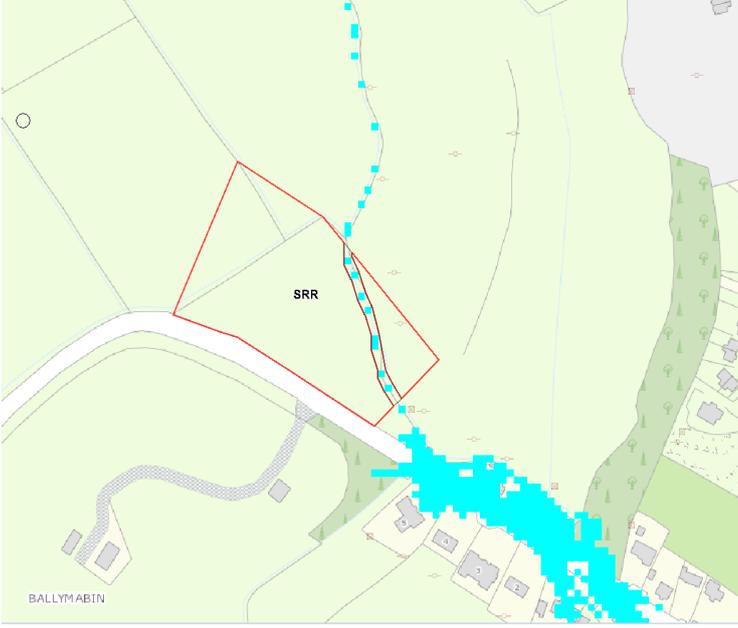
CE Response and Recommendation

With regard to the recommendations of the OPR, it is noted that there is an inherent resolution incompatibility between the draft plan land-use zoning map layers and the floodzone map data which has resulted in an overlap in some instances as commented on further below. It is considered that the redrafting of the land-use zoning boundaries so as to ensure they do not overlap the floodzones. In most instances this will address the inconsistencies and will facilitate the zoning of land without impacting on floodzones.

In addition, the SFRA has been further amended to address the concerns of the OPR as reflected in comments received from the OPW. Finally, plan making justification tests have now been included within the SFRA for the historic core of Dungarvan, Gaeltacht na nDéise and Tramore with an additional specific development objective (SDO) to be included in Appendix 2 of the draft plan for the lands adjacent to the floodzone in Tramore which will preclude residential development thereon and facilitate employment uses to support a more self-sustaining settlement. A SDO will also be set out to provide a 10m buffer between the flood zone and any new development in MA 244 (Dunmore East) and 316 (Tramore Golf Club).

With regard to the lands at Portlaw (MA 268 & 273), it is considered that for reasons of proximity to centre and flooding that the recommendation to make the development plan without MA 268 & 273 is reasonable.

The table hereunder summarises the recommendation to each of the MA specified in the text of the OPR recommendation no. 4 while the text of the SDO for Tramore and Dunmore East are also set out hereunder. The amended SFRA is attached to this CE Report for reference. It is considered that the resulting modifications to the draft plan and the material alterations are minor in nature and consistent with the provisions of Section 12(10) of the Planning and Development Act 2000, as amended.

MA Ref & Location	Map of Relevant Lands	CE Recommendation
<p>MA 342 (Waterford City) (UID 2978)</p>	 <p>The map shows a residential area with a red boundary labeled 'R1'. A large cyan area represents the flood zone. A label 'Water's Gate' is visible near the flood zone boundary.</p>	<p>It is recommended that the Development Plan is made with the material amendment MA 342 and that the boundary between the R1 zoned land and the flood zone be modified as per the detail of the insert map to ensure no overlap exists between the land-use zone and the floodzone. All developable lands will be located in floodzone C.</p>
<p>MA 244 (Dunmore East) (UID 3293)</p>	 <p>The map shows a large green area with a red boundary labeled 'SRR'. A cyan area represents the flood zone. A label 'BALLYMABIN' is visible in the bottom left corner.</p>	<p>It is recommended that the Development Plan is made with the material amendment MA 244 and that the boundary between the strategic residential reserve zoned land (SRR) and the flood zone be modified as per the detail of the insert map to ensure no overlap exists between the land-use zone and the floodzone. The lands which fall within the floodzone will be zoned for open space and amenity (OS) use only by way of minor modification. All developable lands will be located in floodzone C.</p>
<p>MA 268 (UID 3685) Portlaw and MA 273 (UID 3687)</p>	 <p>The map shows a residential area with a red boundary labeled 'HA'. A cyan area represents the flood zone.</p>	<p>It is recommended that the Development Plan is made without the material amendment MA 268 and 273. The lands will therefore be zoned high amenity (HA) as set out in the draft development plan.</p>

MA Ref & Location	Map of Relevant Lands	CE Recommendation
<p>MA 302 (UID 2196) Tramore and MA 306 (UID 652)</p>		<p>It is recommended that the Development Plan is made with the material amendment MA 302 further to the plan making justification test included in the SFRA (Appendix 13 of the draft plan) and a new SDO to preclude residential development on the lands and identified relevant mitigation measures be included in Appendix 2 of the draft plan as detailed below.</p>
<p>MA 316 (Tramore) (UID 3660)</p>		<p>It is recommended that the Development Plan is made with the material amendment MA 316 and that the boundary between the community infrastructure (CI) zoned land and the flood zone be modified as per the detail of the insert map to ensure no overlap exists between the land-use zone and the floodzone. All developable lands will be located in floodzone C.</p>

Tramore and Dunmore East Specific Development Objectives

The following specific development objective to be included by way of minor modification in Appendix 2 of the draft plan:

TRDO 13: Development of these lands at Pickardstown shall be for commercial uses only with residential use excluded. Given the shape and form of land within the zoning objective, it is likely that onsite mitigation could be provided, and if not, then development will be restricted to Flood Zone C.

TRDO 14: Development of the CI zoned lands at the Golf Club shall ensure that a 10m buffer of open space is maintained between the boundary of the floodzone and any new land uses.

DMDO 16: Development of the lands neighbouring the Waterford to Dunmore East Road R 684 at Knockacurrin shall ensure that a 10m buffer of open space is maintained between the boundary of the floodzone and any new land uses.

Relevant plan making justification tests for Gaeltacht na nDéise, Tramore (Pickardstown), Dungarvan and Waterford City (Kilcohan & Kings Channel) have been inserted into the SFRA (Appendix 13 of the draft plan) in response to the issues raised in this submission and the submissions made by the SRA (WFD-C3-140) and OPW (WFD-C3-32).

3.1 Summary of Observations, Submissions and Recommendations from Southern Regional Assembly (SRA) and CE's response and recommendations.

Southern Regional Assembly Submission WFD-C3-140

The submission welcomes many material alterations which have come about in response to issues raised by the SRA on the draft development plan and is supportive of the planning authority in this regard. There are three principal issues arising from the submission which are set out hereunder along with the response and recommendation of the Chief Executive.

SRA Observation 1

The submission identifies that the amended core strategy fails to account for the population aspirations to grow Waterford as a 'Regional City of Scale' by accommodating an additional 50-60% persons by 2040. Taking cognisance of this, the following modifications are recommended to the Core Strategy:

1. Residential land use zoning for the Waterford metropolitan area should reflect the population targets for the metro area set out in Table 2.0 of the draft plan and the Core Strategy. Table 2.2 should be amended so as to identify 2 additional columns for assumed population for 2022 and aspirational population for 2028 with the data drawn from Table 2.0 of Chapter 2 of the draft plan.
2. Housing target units set out in Table 2.2 be renamed minimum housing target units to further reinforce the ambition of the NPF, RSES and MASP. It is noted that these population targets are also absent from the HNDA/HST Appendix 3 of the draft plan.

CE Response and Recommendation

The amended core strategy table has been devised to adhere to the typology set out in the Draft Development Plan Guidelines for Planning Authorities (2021) and as such has attempted to provide clarity on how the development plan will address the housing supply targets for the city and county derived from the Housing Strategy and HNDA (Appendix 3 of the draft plan). It is recommended that the core strategy table (Table 2.2) be duly modified to include the ambitious population targets as referenced in the SRA submission. It is considered that the quantum of land zoned for new residential development and the possible housing yield from the 30 no. regeneration sites set out in Appendix 21 of the draft plan (as included by MA 186) is sufficient to cater for the population ambitions of the RSES and MASP. The amended Table 2.2 is included below.

Table 2.2. Core Strategy Table

Settlement		Population & Minimum Housing Target			RSES Population Ambition		Land Zoning Requirement to deliver Minimum Housing Target					
Settlement Class	Settlement Type	Census 2016 Pop	Census 2016 (%)	Minimum Housing Target Units 2028 (Based on HST/HNDA)	Population 2022 (Based on RSES targets)	Population Ambition 2028 (Based on RSES targets)	Existing Zoning (ha)	Zoned land required for Minimum Housing Target (ha)	Target residential density (UPH)	Minimum 50% / 30% infill lands (ha) (Based on minimum housing target)	Remaining 50% / 70% (non infill) (ha) (Based on minimum housing target)	Shortfall / Excess of Zoned Land
1	Regional City											
	Waterford City & Suburbs	48,216	41.57	3,169	55,299	62,382	254.36	90.6	35	45.3	45.3	163.8
2	Key Town											
	Dungarvan/ Ballinroad	10,388	8.96	330	11,616	11,864	72.61	11.0	30	3.3	7.7	61.6
	Clonmel Environs	925	0.80	29	991	1,056	40	1.0	30	0.3	0.7	39.0
3A	Large Urban Town (>1500 Pop)											
	Tramore	10,381	8.95	261	10,965	11,549	44.04	8.7	30	2.6	6.1	35.3
3B	Urban Towns (>1500 Pop)											
	Dunmore East	1,808	1.56	43	1,905	2,002	76.6	1.7	25	0.5	1.2	74.9
	Portlaoigh	1,742	1.50	42	1,863	1,929	7.04	1.7	25	0.5	1.2	5.4
	Lismore	1,374	1.18	33	1,448	1,521	5.93	1.3	25	0.4	0.9	4.6
	Gaeltacht na nDéise	499	0.43	20			32.48	1.0	20	0.3	0.7	31.5
4A & 4B	Rural Towns & Villages (<1,500)											
				350					20			
5	Rural Nodes/ Other Rural Areas											
				516								
	Overall Total	116,162		4,824			533.06	117.0				416.1

In order to reflect the content of the modified Table 2.2, the following modifications are proposed to the narrative text in section 2.14 of the draft development plan as amended under MA 22:

“2.14 Housing Land Requirement

Table 2.2 identifies the quantum of land required to facilitate the delivery of the **minimum housing targets and the population ambition growth targets of the RSES** set out in this Core Strategy. In addition to the density assumptions referred to in Section 2.11.1 above, and the specified NPF household size of 2.5 persons, the following have been considered in determining the residential land requirement for the period of the Development Plan:

- Guidelines for Planning Authorities on Housing Supply Target Methodology for Development Planning (2020) issued by DHLGH.
- **Population ambition set out in the NPF and RSES, particularly for the designated centres of Waterford City and Dungarvan.**
- Delivering an effective balance of housing types and tenures between and within our larger urban settlements, between Waterford City and Tramore, within Waterford City, and within Dungarvan (east and west of the Causeway);
- Achieving the longer-term objective of compact growth and transformative change by altering patterns of existing expansion and unbalanced urban spread which will require the availability of an appropriate mix and quantum of alternative land banks, particularly in Dungarvan;
- Transitioning existing settlements to a more self-sustaining model, particularly Tramore;
- Infrastructure availability and delivery; and,
- Land ownership and displacement of existing viable uses, including agriculture, particularly in Dungarvan.

Further details regarding the spatial pattern of housing land for Waterford City is set out in Chapter 3, Part 2 of Volume 1. With regard to the other urban settlements the following should be noted:

Dungarvan Key Town: The provision of lands for new residential development seeks to consolidate existing residential areas close to the historic core of Dungarvan, at Monang to the east of the Old Hospital Road and at Shandon. The longer-term objective will be to further consolidate the town by way of future residential development, school(s), amenity, and commercial uses west east of the Colligan River in the general Shandon area (between the Shandon Road, The Colligan River and the Cappoquin Road) subject to investment in enabling storm water and roads infrastructure and amenity spaces during the lifetime of the Development Plan.

The recent decision by An Bord Pleanála to permit a Strategic Housing Development in Duckspool based on the land use zoning objectives of the Dungarvan Town Development Plan 2012-2018 is noted however it is considered that any change to the land use zoning objectives of the draft Plan to support this decision would be contrary to the stated vision, strategic goals and outcomes of the draft Plan which seek to sustainably develop Dungarvan by way of compact, sequential and town centre first development. Lands identified for future residential development during the life of the Plan have been identified as either Tier 1 or Tier 2, the details of which are identified in Table 2.3, Appendix 17 and the associated maps. the former being located at Shandon and the latter at Monang.

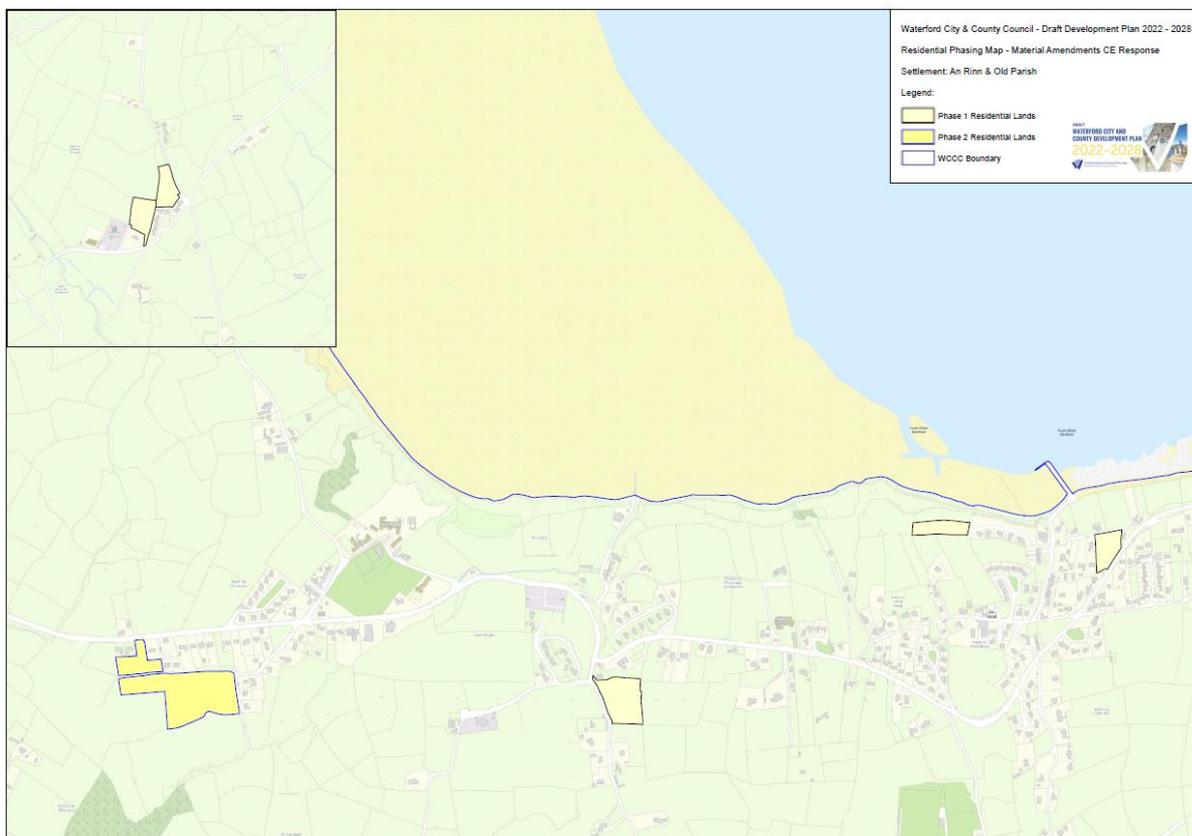
Tramore: The Development Plan proposes to consolidate the future growth of the commuter town within its built footprint and with strategic objectives to support compact, town centre and sequential development. Lands zoned for new residential development are located at Crobally Upper, Newtown, north of Mountfield (Carrickavantry South), with some other parcels distributed across the built-up area of the town. There is additional scope for new mixed-use development at Ballycarnane and on regeneration lands adjacent to the Old Waterford Road and Pond Road which may provide additional residential development.

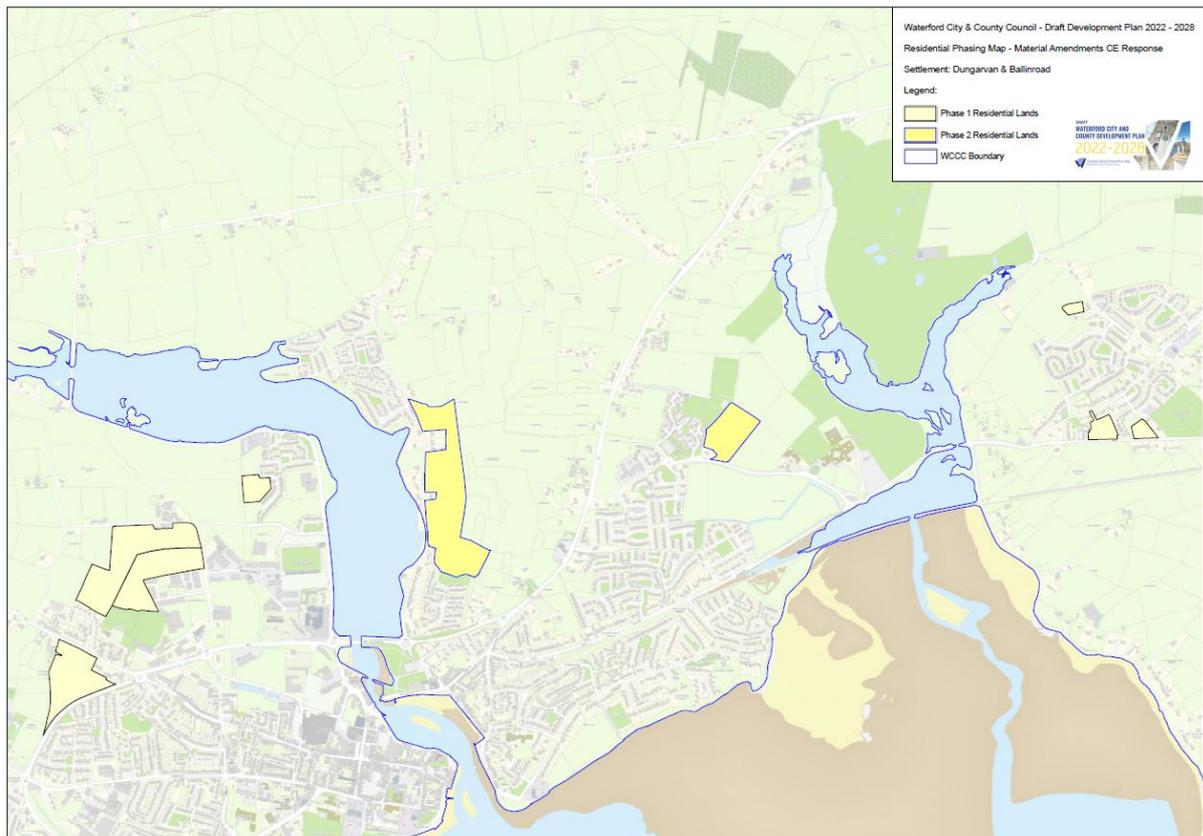
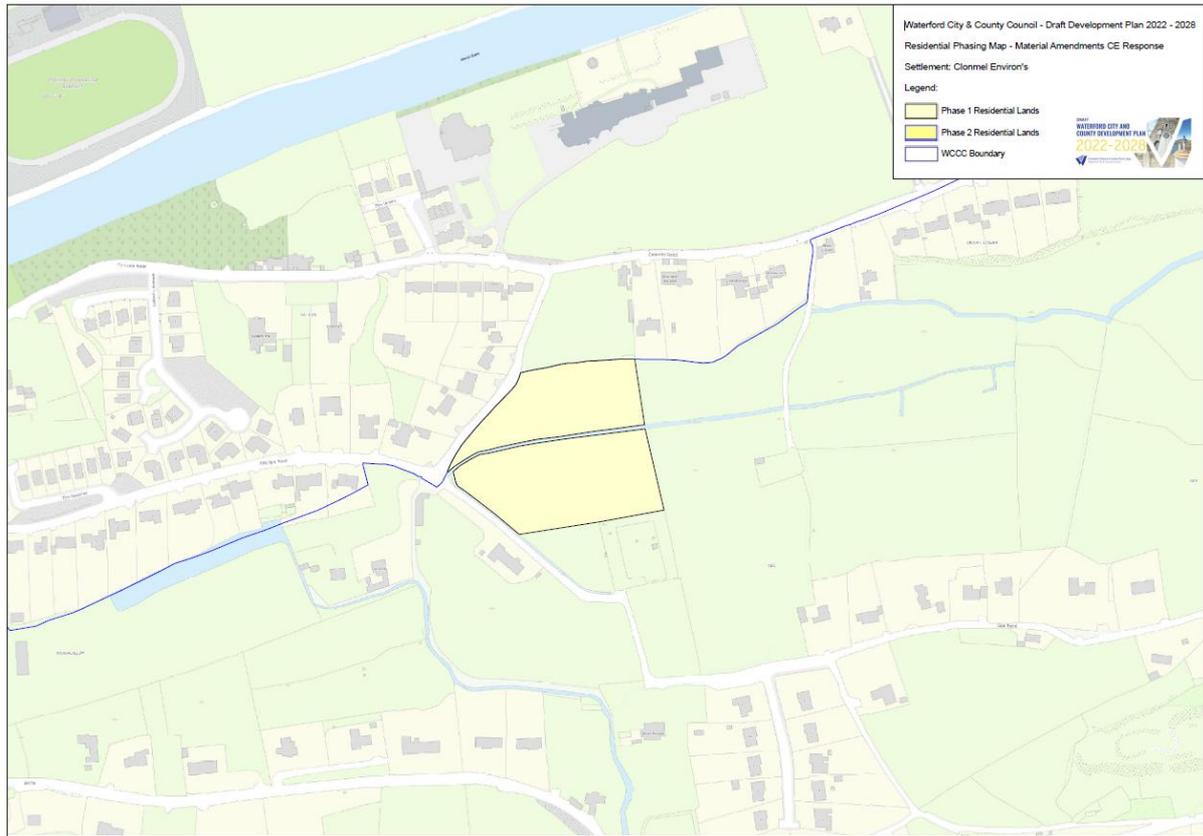
Dunmore East, Portlaw and Lismore: The land use zoning objectives for new residential development in these areas seek to consolidate each settlement and provide choice in terms of location and landownership”.

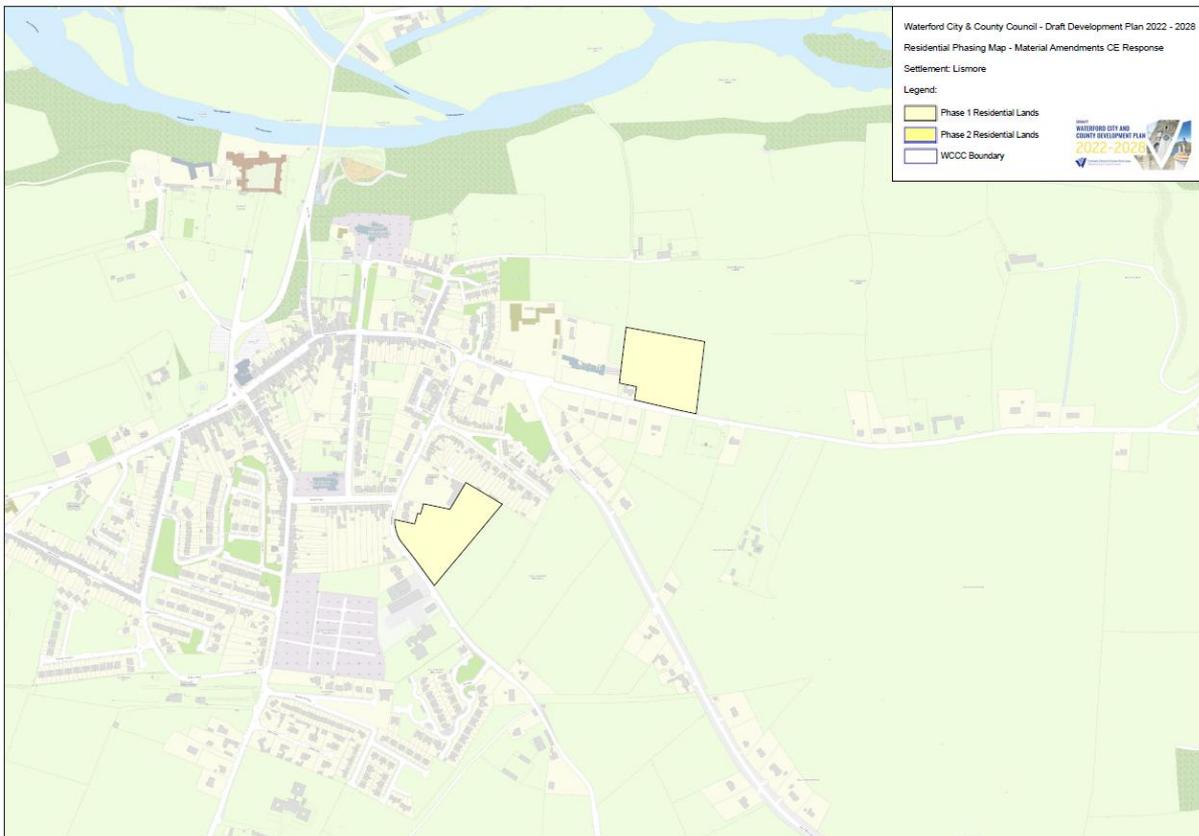
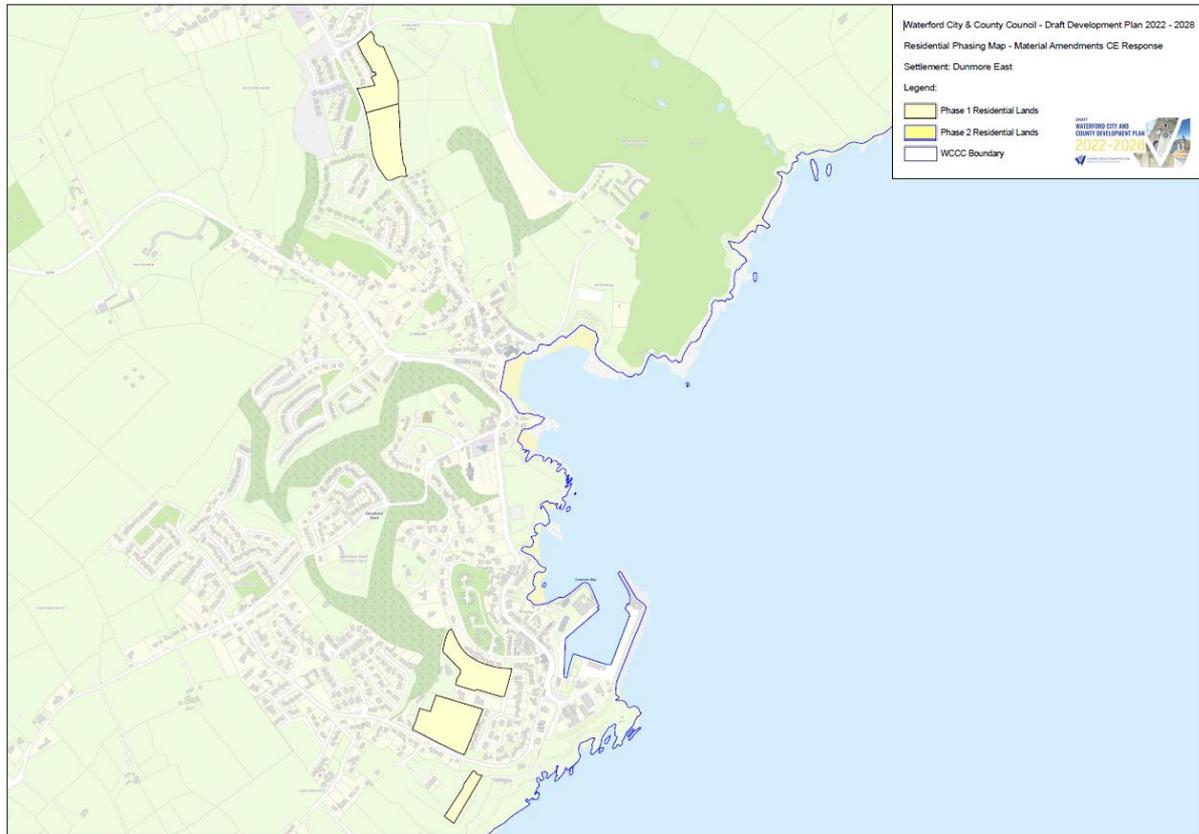
In addition to the modification to the Core Strategy Table 2.2, associated and resultant modifications are required to Table 2.3 (as already amended under Material Alteration no 22) relating to phasing/tiering of residentially zoned land, the associated phasing maps already amended under MA 22, and Appendix 17 Tiered Approach to Zoning of the draft plan. This is required to fully reflect the changes to land use zoning associated with the core strategy and Table 2.2. Table 2.3 and associated maps are set out hereunder.

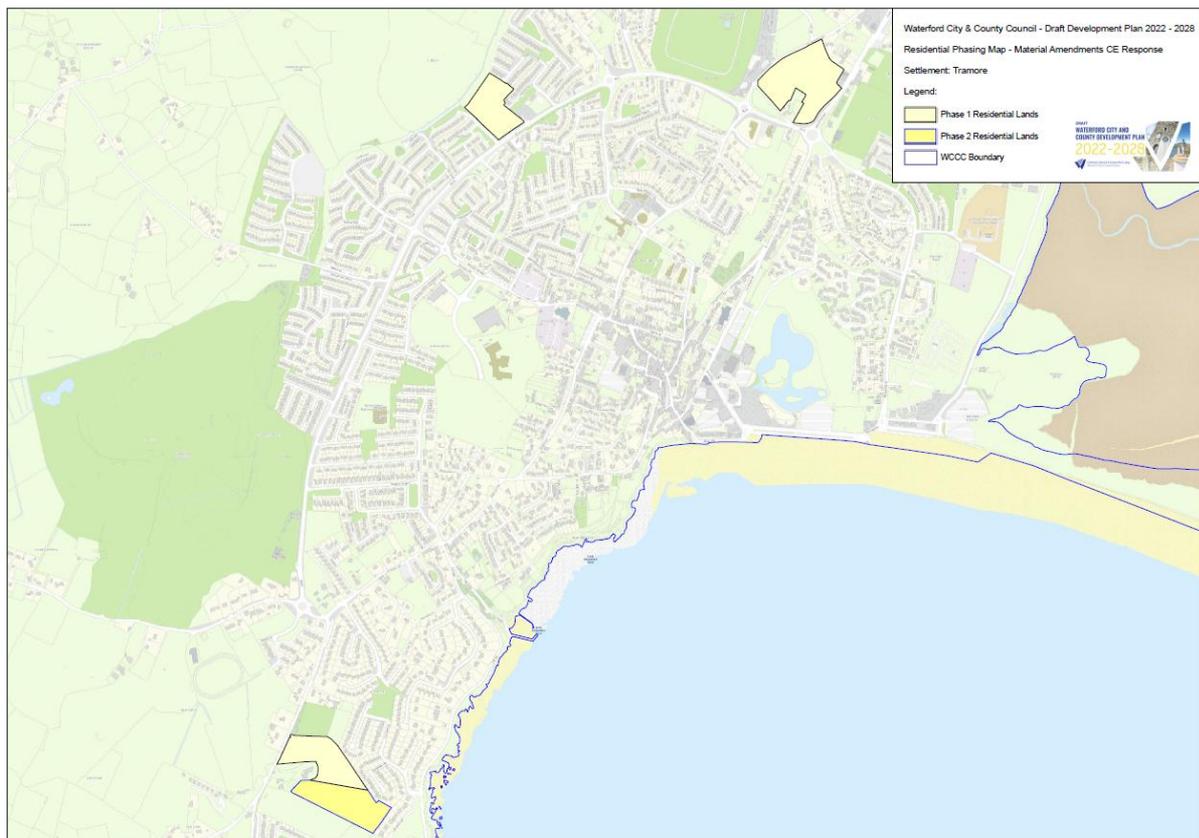
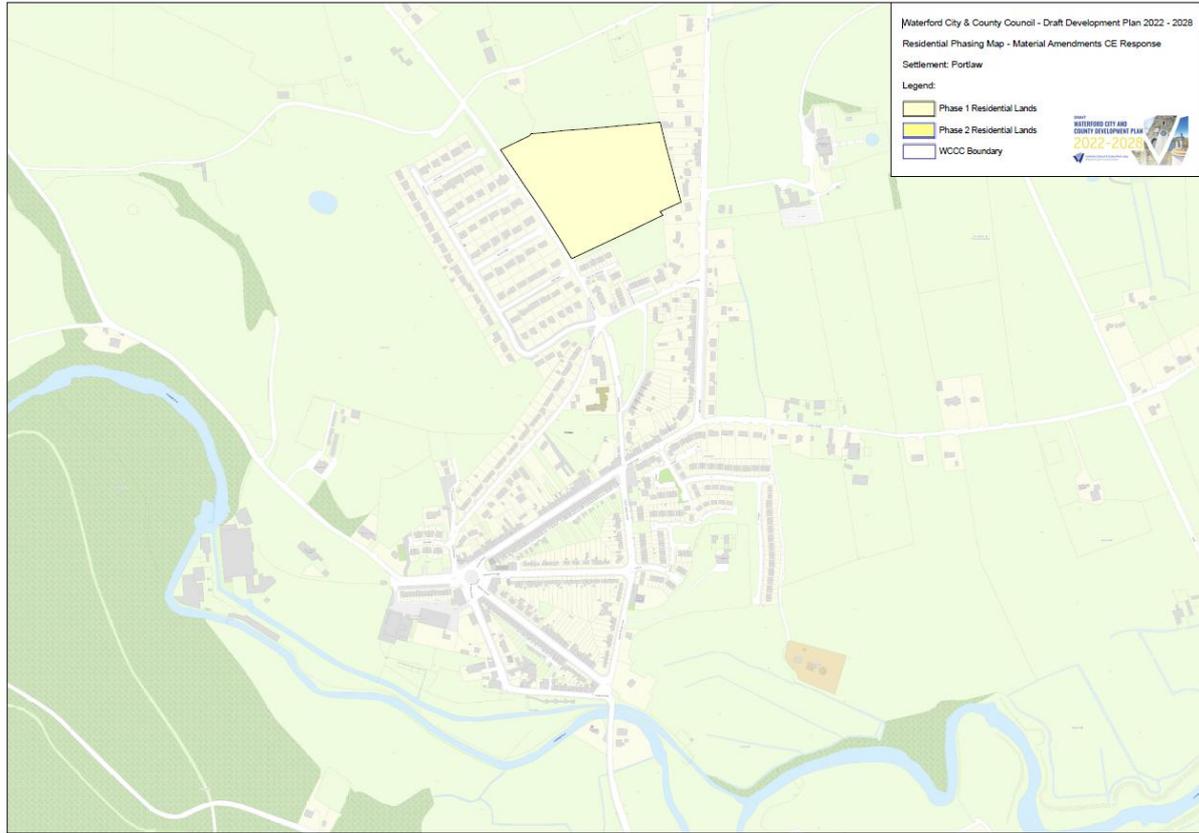
<u>Settlement</u>	<u>Tier 1 Total (Hectare)</u>	<u>Tier 2 Total (Hectare)</u>
<u>An Gaeltacht na nDéise (inc Sean Phobal)</u>	<u>3.97</u>	<u>3.38</u>
<u>Clonmel</u>	<u>1.93</u>	<u>0</u>
<u>Dungarvan</u>	<u>19.46</u>	<u>14.01</u>
<u>Dunmore East</u>	<u>6.78</u>	<u>0</u>
<u>Lismore</u>	<u>3.07</u>	<u>0</u>
<u>Portlaw</u>	<u>4.65</u>	<u>0</u>
<u>Tramore</u>	<u>9.86</u>	<u>3.07</u>
<u>Waterford city (Total)</u>	<u>114.43</u>	<u>65.46</u>
<u>Total R1 Tier 1 Lands</u>	<u>164.14</u>	<u>85.91</u>
-	-	-

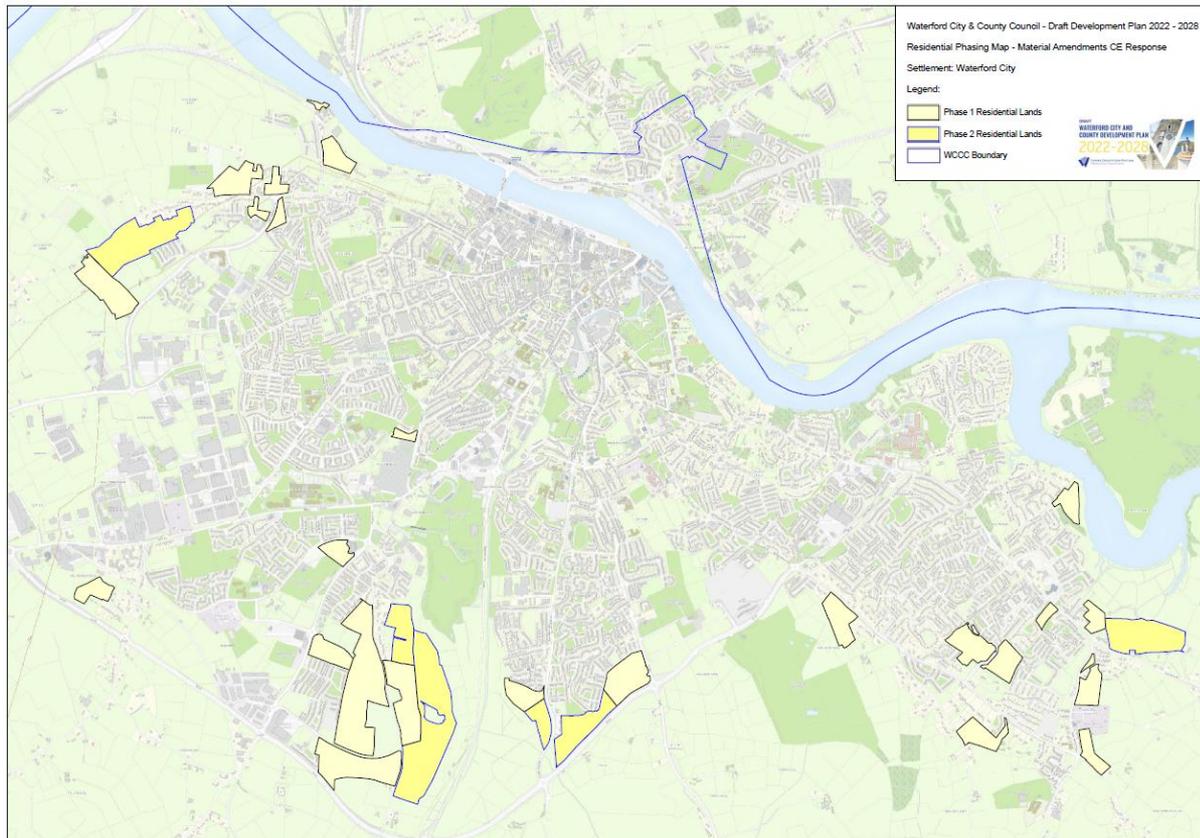
City Neighbourhoods	Tier 1 Total (Hectare)	Tier 2 Total (Hectare)
<u>City Northwest</u>	<u>21.24</u>	<u>14.12</u>
<u>City Southwest</u>	<u>50.57</u>	<u>29.85</u>
<u>Scared Heart / Ballytruck/ Kilcohen / Williamstown</u>	<u>19.42</u>	<u>10.48</u>
<u>Dunmore Road / Farron / Ballinakill</u>	<u>2.91</u>	<u>0</u>
<u>Dunmore Road / Knockboy / Blenheim</u>	<u>19.38</u>	<u>11.01</u>
<u>Ferrybank</u>	<u>0</u>	<u>0</u>
<u>City Centre</u>	<u>0</u>	<u>0</u>
<u>Larchville / Lisduggan / Lismore Park</u>	<u>0.91</u>	<u>0</u>
Waterford City (Total)	114.43	65.46











SRA Observation 2

The amended Table 6.0 relating to water and waste water infrastructure does not include population targets which are required to assess water and wastewater infrastructure capacity and assimilative environmental capacity.

CE Response and Recommendation

The comments as set out in the submission are noted and it is recommended that a modified version of table 6.0 be included in the development plan. The details of the modified table are set out in the response and recommendations to Chapter 6 of the draft plan as they relate to the submission by Irish Water (Submission ref. no. WFD-C3-6).

SRA Observation 3

The Material Alteration to support renewable energy as set out in Appendix 7 is welcomed. It is advised that the planning authority should ensure that the proposed Material Alteration meets the requirements of the 'Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change' (Department of Housing, Planning, Community and Local Government July 2017) and, in particular, Section 4 which relates to the specific planning policy requirement under Section 28(1C) of the Act when making, reviewing, varying or amending a development plan, or a local area plan, with policies or objectives that relate to wind energy developments.

CE Response and Recommendation

The comments as set out in the submission are noted and it is recommended that a modification to the renewable energy targets be included in the development plan. The details of the modified targets and associated text are set out in response to the submission by Wind Energy Ireland and Dept of Environment, Climate and Communications, ref. no's. WFD-C3-170 & WFD-C3-118. These can be found in the response and recommendation to Appendix 7 of the draft plan in this Report.

3.2 CE's response to issues raised in the written submissions received by other persons

3.2.1 Chapter 1 – Waterford and the Development Plan

URN	Moderation Summary	Chief Executive Response and Recommendation
WFD-C3-118	The submission notes that the Climate Action Plan 2021 has been published and request that the Draft Plan be updated to reflect same where possible (and the revised ambition and targets therein).	<p>The CE notes the content of the submission and the relevant Sections shall be updated accordingly.</p> <p>Recommendation: Minor modification to MA 10 as follows:</p> <p>1.7.3 National Policy (10) Insert text to the end of Section 1.7.3, ‘National Policy’ (page 14) as follows:</p> <ul style="list-style-type: none"> ● “Waste Action Plan for a Circular Economy 2020 – Ireland’s National Waste Policy 2020-2025 (Department of Environment, Climate Action and Communications (DECC))” ● <u>Department of the Environment, Climate and Communications (2021) - Climate Action Plan 2021 – Securing our Future</u>
WFD-C3-164	The submission requests that the Material Alteration be amended to include reference to ‘Housing for All – a New Housing Plan for Ireland’ (September 2021) and the ‘Climate Action Plan’ (November 2021).	<p>The CE notes the content of the submission and the relevant Sections shall be updated accordingly.</p> <p>Recommendation: Minor Modification to MA 10 as follows:</p> <p>1.7.3 National Policy (10) Insert text to the end of Section 1.7.3, ‘National Policy’ (page 14) as follows:</p> <ul style="list-style-type: none"> ● “Waste Action Plan for a Circular Economy 2020 – Ireland’s National Waste Policy 2020-2025 (Department of Environment, Climate Action and

		<p><u>Communications (DECC))”</u></p> <ul style="list-style-type: none">• <u>Department of the Environment, Climate and Communications (2021) - Climate Action Plan 2021 – Securing our Future</u>• <u>Department of Housing, Local Government and Heritage (2021) - Housing for All – a New Housing Plan for Ireland</u>
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3.2.2 Chapter 2 – Spatial Vision and Core Strategy

Note: To search each land use zoning material amendments please visit our Material Amendment consultation portal (link below). Type the unique identification number (UID) into the search box and you will be brought to the proposed MA zoning

<https://storymaps.arcgis.com/stories/8ba9007befde40fda0b7f6efc002b8f6>

URN	Moderation Summary	Chief Executive Response and Recommendation
WFD-C3-3	The submission queries the inclusion of additional lands in Lemybrien. It is stated that these lands are in a location subject to a 100kph speed limit and this zoning objective requires review in order to ensure compliance with National Planning Guidelines.	The content of the submission is noted. Comments relating to these lands are detailed in the response and recommendation to the submission by the OPR (submission ref. no, WFD-C3-172) as set out in Section 3.1 of this report. No further recommendation on foot of this submission.
WFD-C3-4	The submission relates to lands at Killosera, Dungarvan which are proposed to be zoned for Tourism Uses. The submission requests that the zoning objective is adjusted to facilitate 'open for consideration of the local housing need to relevant land owners'.	It is noted that the submission relates to the rezoning of an area of land which did not constitute a Material Alteration in the Material Alterations Report on Draft Waterford City and County Development Plan 2022 – 2028 dated the 3 rd of March 2022. Furthermore, the provisions sought in the submission have been addressed previously in Material Amendment 156 as set out in the report of the 3 rd of March 2022. No further recommendation on foot of this submission.
WFD-C3-5	The submission requests that the land use zoning maps are updated to reflect the planning history of the site and permitted site layout.	The content of the submission is noted which seeks to align the land use zoning maps with development permitted on a site at railway Gardens, Lismore. The land use zoning maps are based on the contemporary land use pattern as developed rather than a proposal which may or may not be developed in time. Should development take place on the lands during the lifetime of the development plan this will be reflected in the next cycle of the city and county development plan. No further recommendation on foot of

URN	Moderation Summary	Chief Executive Response and Recommendation
		this submission.
WFD-C3-7	The submission requests that Waterford City and County Council retain the residential zoning on lands in Duckspool (SHD site) as set out in the in the Dungarvan Town Plan 2012-2018, in order to ensure that much-needed local housing and community sports facilities can be delivered in the locality.	The lands at Duckspool have been zoned for high amenity use (HA) in the draft development plan. It is noted that the submissions relate to the rezoning of an area of land which did not constitute a Material Alteration in the Material Alterations Report on Draft Waterford City and County Development Plan 2022 – 2028 dated the 3 rd of March 2022. As such it is considered that any change to the land use zoning would fall outside the provisions of the Planning and Development Act 2000, as amended and would therefore be inappropriate. It is therefore recommended that no modification be made to the land use zoning for the lands.
WFD-C3-8 WFD-C3-9 WFD-C3-10 WFD-C3-11 WFD-C3-13 WFD-C3-14 WFD-C3-15¹ WFD-C3-16 WFD-C3-17 WFD-C3-18 WFD-C3-19 WFD-C3-20 WFD-C3-21 WFD-C3-22 WFD-C3-23 WFD-C3-24 WFD-C3-25	WFD-C3-62 WFD-C3-64 WFD-C3-65 WFD-C3-66 WFD-C3-67 WFD-C3-68 WFD-C3-69 WFD-C3-71 WFD-C3-72 WFD-C3-74 WFD-C3-75 WFD-C3-77 WFD-C3-79 WFD-C3-80 WFD-C3-90 WFD-C3-97 WFD-C3-98	The CE notes the rises raised. Recommendation: Please see submission summary and CE response and recommendation to WFD-C3-7 above.

¹ Submission No. WFD-C3-15 has been used to append multiple identical submissions. Please see Appendix 1 of the CE Report on Material Amendment for a full list of written submission received.

URN	Moderation Summary	Chief Executive Response and Recommendation
<p>WFD-C3-26 WFD-C3-27 WFD-C3-28 WFD-C3-29 WFD-C3-30 WFD-C3-31 WFD-C3-34 WFD-C3-35 WFD-C3-36 WFD-C3-37 WFD-C3-38 WFD-C3-40 WFD-C3-41 WFD-C3-42 WFD-C3-43 WFD-C3-44 WFD-C3-45 WFD-C3-46 WFD-C3-47 WFD-C3-48 WFD-C3-50 WFD-C3-51 WFD-C3-52 WFD-C3-54 WFD-C3-55 WFD-C3-58 WFD-C3-60 WFD-C3-61</p>	<p>WFD-C3-99 WFD-C3-101 WFD-C3-103 WFD-C3-104 WFD-C3-106 WFD-C3-109 WFD-C3-112 WFD-C3-114 WFD-C3-116 WFD-C3-125 WFD-C3-126 WFD-C3-127 WFD-C3-143 WFD-C3-147 WFD-C3-150 WFD-C3-156 WFD-C3-161 WFD-C3-166 WFD-C3-168 WFD-C3-169 WFD-C3-174 WFD-C3-176 WFD-C3-177 WFD-C3-178 WFD-C3-180 WFD-C3-181 WFD-C3-184 WFD-C3-185</p>	
<p>WFD-C3-12 WFD-C3-63 WFD-C3-108 WFD-C3-121 WFD-C3-146</p>	<p>The submission (petition) supports the proposed re-zoning of lands at Duckspool for conservation use and objects to the proposed SHD at this location.</p>	<p>The content of the submission is noted which supports the land use zoning proposals for the Duckspool area as set out in the draft development plan. No further recommendation on foot of this submission.</p>

URN	Moderation Summary	Chief Executive Response and Recommendation
WFD-C3-153 WFD-C3-154 WFD-C3-155 WFD-C3-175		
WFD-C3-183	<p>The submission notes that the Plan and its material alterations, has scope for quite a lot of residential development in the Duckspool area across the road from the site for which the SHD application was made.</p> <p>Material alterations 219, 211, 228 & 222 are welcomed as it is providing much needed housing on a site that is not subject to flooding or a natural reserve.</p>	<p>The content of the submission is noted. Comments relating to these lands are detailed in the response and recommendation to the submission by the OPR (submission ref. no, WFD-C3-172) as set out in Section 3.1 of this report. No further recommendation on foot of this submission.</p>
WFD-C3-33	<p>The submission requests the rezoning of land at Ballyogarty, Co. Waterford on the R677 to be zoned for residential purposes.</p>	<p>It is noted that the submission relates to the rezoning of an area of land which did not constitute a Material Alteration in the Material Alterations Report on Draft Waterford City and County Development Plan 2022 – 2028 dated the 3rd of March 2022. As such it is considered that any change to the land use zoning would fall outside the provisions of the Planning and Development Act 2000, as amended and would therefore be inappropriate. No further recommendation on foot of this submission.</p>
WFD-C3-53	<p>The submission requests that lands at the former Tramore CBS site that are to be transferred to the Dept of Education are re-zoned accordingly.</p> <p>The submission requests the rezoning of land at at the former Tramore CBS site from Community (CI) to Residential (R1).</p>	<p>The content of the submission is noted. The change which underpins this material alteration was derived by way of a resolution of the council at the special plenary meeting of the 11th of February 2022. No further recommendation on foot of this submission.</p>
WFD-C3-73	<p>The submission raises an objection to a proposal to 'the proposed alteration of land in Ref 24 - Site Name: Gracedieu (LIHAF)' for the following reasons impact on wildlife, loss of privacy, increase in traffic and if unfinished estates were built out it would provide for sufficient housing need.</p>	<p>It is noted that the submission relates to the rezoning of an area of land which did not constitute a Material Alteration in the Material Alterations Report on Draft Waterford City and County Development Plan 2022 – 2028 dated the 3rd of March 2022. As such it is considered that any change to the land use zoning would fall outside the provisions of the Planning and Development Act 2000, as amended and</p>

URN	Moderation Summary	Chief Executive Response and Recommendation
		would therefore be inappropriate. No further recommendation on foot of this submission.
WFD-C3-78	The submission raises an objection to MA No. 342 which proposes to rezone lands at Watersgate, Bilberry from High Amenity/Green Belt (HA) to New Residential (R1).	The content of the submission is noted. The lands in question are zoned for mixed use development in the current Waterford City development plan and have been utilised over a period of years to support construction activity on adjacent lands. The lands were also previously occupied by a dwelling house and as such there is limited value to be derived by retaining an amenity zoning on the lands. No further recommendation on foot of this submission.
WFD-C3-81 WFD-C3-82 WFD-C3-83 WFD-C3-84 WFD-C3-85 WFD-C3-86 WFD-C3-93 WFD-C3-94 WFD-C3-100 WFD-C3-102	This submission is in support of submission no. WFD-C3-78 which raises an objection to MA No. 342 which proposes to rezone lands at Watersgate, Bilberry from High Amenity/Green Belt (HA) to New Residential (R1).	The contents of the submissions are noted. The lands in question are zoned for mixed use development in the current Waterford City development plan and have been utilised over a period of years to support construction activity on adjacent lands. The lands were also previously occupied by a dwelling house and as such there is limited value to be derived by retaining an amenity zoning on the lands. No further recommendation on foot of this submission.
WFD-C3-122	This submission is in support of MA No. 342 which proposes to rezone lands at Watersgate, Bilberry from High Amenity/Green Belt (HA) to New Residential (R1).	The content of the submission is noted. The lands in question are zoned for mixed use development in the current Waterford City development plan and have been utilised over a period of years to support construction activity on adjacent lands. The lands were also previously occupied by a dwelling house and as such there is limited value to be derived by retaining an amenity zoning on the lands. No further recommendation on foot of this submission.
WFD-C3-88	The submission supports Proposed Amendment 214 which rezones the subject site in Dungarvan/Ballinroad to TM Tourism' whose objective is 'To provide for tourist uses.	The content of the submission is noted. No further recommendation on foot of this submission.

URN	Moderation Summary	Chief Executive Response and Recommendation
WFD-C3-91	The submission is made in respect of MA No. 56. It seeks that the land to the East of Garranbane NS be zoned for Community Infrastructure (CI) to accurately reflect the CE's response and recommendation in the CE's Report from the public consultation phase on the Draft Plan.	The content of the submission is noted. It is considered that the land use zoning maps relating to the Material Amendments Report (3 rd of March 2022) did not reflect accurately the response and recommendation of the CE as set out in the report. As such it is considered that the current submission seeks to ensure that this error is corrected and that the lands adjacent to the school (MA 56) be identified for community infrastructure (CI) use. It is recommended that the error be duly corrected.
WFD-C3-95	The submission is made in respect of MA No. 246. It seeks that lands at Horsequarter, Dunmore East, Co. Waterford should be zoned New Residential (R1).	The content of the submission is noted. The lands referred to in the submission are partially located within MA 246 and as such no modification can be made to the draft plan on lands outside the area referred to in the MA. The lands within the MA area are zoned for existing residential development, reflecting the fact that this is a small infill area of land within a wider residential area which is considered appropriate. No further recommendation on foot of this submission.
WFD-C3-97	The submission also supports the zoning of Residential Lands in Ballinroad - MA Ref 211	The content of the submission is noted. Comments relating to these lands are detailed in the response and recommendation to the submission by the OPR (submission ref. no, WFD-C3-172) as set out in Section 3.1 of this report. No further recommendation proposed.
WFD-C3-113	The submission is made in respect of MA No. 214. It raises an objection to the lands Kilgrovan Dungarvan being zoned for Tourism purposes.	The content of the submission is noted. The lands have been identified for future tourism development to support the broader tourism potential for county Waterford and more specifically the role of Dungarvan as a Key Town as designated in the RSES. The lands are located in close proximity to Clonea and other beach amenities and are accessible to both Dungarvan and Waterford Greenway. No further recommendation on foot of this submission.
WFD-C3-120	The submission requests the Planning Authority to reverse its decision to rezone lands at Knockboy to Strategic Reserve (SRR).	The content of the submission is noted. The amendments to the draft plan were provided in response to the

URN	Moderation Summary	Chief Executive Response and Recommendation
	<p>It seeks that the lands should be retain as New Residential (R1) across the entirety of the landholding to reflect the extant permission on the lands for 343 residential units, as per the original Draft Development Plan.</p>	<p>submission by the OPR at the time with a particular emphasis on aligning the core strategy and the land use zoning provisions of the draft development plan. In a manner consistent with the sequential approach to compact growth as underpinned by the NPF and RSES, it was considered appropriate that the land use zoning be amended. No further comment has been made in relation to these by the OPR in the most recent submission on the material alterations (see response and recommendation to WFD-C3-172 of this report). The provisions of material alteration MA 155 also refer and provide scope for the development of land zoned as SRR in the draft plan. No further recommendation on foot of this submission.</p>
WFD-C3-129	<p>The submission is made in relation to MA No. 223. It requests that the proposal to dezone our lands adjoining An Cromptán is completely unjustified for the following reasons:</p> <ul style="list-style-type: none"> • The CE Report issued in November 2021 recommended no alteration to our clients' lands, yet the Material Alterations is proposing to dezone the lands in their entirety. • MA no. 3664 should be rejected and all of our clients' lands adjoining An Cromptán should be retained as Residential Reserve. • The submission of the OPR does not justify the Material Alterations to the Draft CDP or the de zoning of our lands. 	<p>The content of the submission is noted. The amendments to the draft plan were provided in response to the submission by the OPR at the time with a particular emphasis on aligning the core strategy and the land use zoning provisions of the draft development plan. In a manner consistent with the sequential approach to compact growth as underpinned by the NPF and RSES, it was considered appropriate that the land use zoning be amended. No further comment has been made in relation to these by the OPR in the most recent submission on the material alterations (see response and recommendation to WFD-C3-172 of this report). No further recommendation on foot of this submission.</p>
WFD-C3-130	<p>The submission welcomes Material Alteration 328 at The Paddocks, Grantstown. The inclusion of additional lands as part of the 'R1 –New Residential' zoning objective will positively contribute to the completion of this housing estate</p>	<p>The content of the submission is noted. No further recommendation on foot of this submission.</p>
WFD-C3-136	<p>The submission requests that the proposed zoning for the lands at Gallwey's Hill should revert to Town Core or New Residential.</p>	<p>The content of the submission is noted. The submission refers to a recent planning application on the site and the level of public opposition to the potential loss of views and</p>

URN	Moderation Summary	Chief Executive Response and Recommendation
		amenity which would likely result. The decision of the planning authority to refuse planning permission also referred to the potential traffic hazard and possible impact on coastal zones in terms of cliff instability resulting from excavation (An Bord Pleanála has yet to determine an appeal on the site). It is considered that the issues identified in the previous CE Report and in the planning history on the site would support the zoning of the lands for amenity uses. No further recommendation on foot of this submission.
WFD-C3-139	This submission is in support of the proposed material amendment no. 215 and 217 to zone lands at Páirc na gCapall Shandon, Dungarvan toR1, New Residential, Phase 1.	The content of the submission is noted. Comments relating to these lands are detailed in the response and recommendation to the submission by the OPR (submission ref. no, WFD-C3-172) as set out in Section 3.1 of this report. No further recommendation proposed.
WFD-C3-140	<p>The submission welcomes many material alterations which have come about in response to issues raised by the SRA on the draft development plan. The submission identifies however that the amended core strategy fails to account for the population aspirations to grow Waterford as a 'Regional City of Scale' by and additional 50-60% persons by 2040. Taking cognisance of this, the following modifications are recommended to the Core Strategy:</p> <ol style="list-style-type: none"> 1. Residential land use zoning for the Waterford metropolitan area should reflect the population targets for the metro area set out in Table 2.0 of the draft plan. 2. Table 2.2 Core Strategy should be amended so as to identify 2 additional columns for target population for 2022 and 2028, with the data drawn from Table 2.0 of Chapter 2. 3. Housing target units set out in Table 2.2 be renamed minimum housing target units to further reinforce the ambition of the NPF, RSES and MASP. 	The content of the submission is noted and a response and recommendation are provided in Section 3.1 of this report. No further recommendation proposed.

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	It is noted that these population targets are absent from the HNDA/HST Appendix 3 of the draft plan.	
WFD-C3-144	Abbeyside / Ballinacourty GAA Club urgently require the Residential Zoning be retained on their juvenile pitch as proposed in MA 211 (UID 3669). The club is hugely dependent on this zoning to reactivate the development proposals to provide better facilities to meet the training and playing needs of the club, into the future.	The content of the submission is noted. Comments relating to these lands are detailed in the response and recommendation to the submission by the OPR (submission ref. no, WFD-C3-172) as set out in Section 3.1 of this report. No further recommendation proposed.
WFD-C3-148	The submission seeks to reinstate the Residential zoning on c1.3Ha of greenfield land at Somerville, Tramore, which has been changed from "New Residential" in the CE Report to "High Amenity" at Material Alterations Stage. It is stated that the site is fully serviced, compliant with National Planning Guidelines, close to Tramore Centre and shovel ready.	The content of the submission is noted. The change which underpins this material alteration was derived by way of a resolution of the council at the special plenary meeting of the 11 th of February 2022. No further recommendation on foot of this submission.
WFD-C3-149	The submission is made in respect of MA No. 362. It seeks that the Planning Authority should reverse its decision to rezone lands at Knockboy, Passage Cross, Co. Waterford from New Residential (Phase 1& 2) in the Current City Plan to Strategic Reserve, Open Space and High Amenity in the Material Amendments to the Draft Plan.	The content of the submission is noted. The amendments to the draft plan were provided in response to the submission by the OPR at the time with a particular emphasis on aligning the core strategy and the land use zoning provisions of the draft development plan. In a manner consistent with the sequential approach to compact growth as underpinned by the NPF and RSES, it was considered appropriate that the land use zoning be amended. No further comment has been made in relation to these by the OPR in the most recent submission on the material alterations (see response and recommendation to WFD-C3-172 in Section 3.1 of this report). The provisions of material alteration MA 155 also refer and provide scope for the development of land zoned as SRR in the draft plan. No further recommendation on foot of this submission.
WFD-C3-151	The submission relates to MA No. 333 and highlights that the extent of community zoned land zoned in Kilbarry is far greater than that which is required to accommodate the school &	The content of the submission is noted. The area of land zoned for CI community infrastructure reflect the quantum (3.7 ha) of land currently zoned in the city development

URN	Moderation Summary	Chief Executive Response and Recommendation
	<p>creche. The submission requests that the excess lands be reverted back to New Residential (R1) Zoning in line with the land actually required for the school & creche, to avoid any restrictions on future phases of residential.</p>	<p>plan for such use and amenity use located between the Kilbarry Road and Lacken Road which is being relocated to facilitate a more appropriate neighbourhood layout. No further recommendation on foot of this submission.</p>
WFD-C3-164	<p>The submission seeks further consideration be given to the target density (35uph) assumed for Waterford City and Suburbs in the Core Strategy and potential for achieving higher densities as relevant to support compact urban growth. The emphasis and level of detail afforded to regeneration opportunities across the City and County is supported.</p>	<p>The content of the submission is noted and the target density of 35 uph is identified for the purposes of calculating the core strategy and associated quantum of land required to facilitate the minimum housing targets set out in the core strategy. As such the density figure does not preclude lower and higher densities within developments across the city and the DM Standards and policy objectives support such a transport-orientated approach to development. No further recommendation on foot of this submission.</p>
WFD-C3-167	<p>The submission requests clarification with regards to housing and population targets in Section 2.13 Target Population Growth.</p>	<p>The content of the submission is noted and the modification below will clarify the error in the narrative of section 2.13 of the draft plan (MA 21). In addition, reference should be made to the recommendation set out in Section 3.1 of this report regarding the core strategy.</p> <p>Recommendation: The following modification is proposed to paragraph two of MA No. 21/ Section 2.13 Target Population Growth to read as follows:</p> <p>“2.13 Target Population Growth The population growth target of 4,800 minimum housing target of 3,169...”</p>
WFD-C3-172	<p>Submission makes 4 key recommendations as follows:</p> <p>Recommendation 1: Reinstate population targets into the Core Strategy Table 2.2.</p>	<p>The content of the submission is noted. Comments based on the content of the submission are detailed in Section 3.1 of this report. No further recommendation proposed.</p>

URN	Moderation Summary	Chief Executive Response and Recommendation
	<p>Recommendation 2: Remove R1 New Residential zoning objective for parts of land at Monang, Dungarvan not designated as Strategic Reserve under MA 213.</p> <p>Recommendation 3: The following residential zoning provisions are contrary to recommendation no. 4 of teh OPR submission on teh Draft Development Plan, are inconsistent with the Core Strategy and the principles of compact growth, sequential zoning, sustainable development and transport strategy and the development plan should be made without same. Relevant MAs are:</p> <ul style="list-style-type: none"> • MA 211 Dungarvan & Ballinroad • MA 215 Dungarvan & Ballinroad • MA 217 Dungarvan & Ballinroad • MA 218 Dungarvan & Ballinroad • MA 222 Dungarvan & Ballinroad • MA 225 Dungarvan & Ballinroad • MA 284 - Tramore • MA 295 - Tramore • MA 305 - Tramore • MA 243 Dunmore East • MA 231 Dunmore East • MA 241 Dunmore East • MA 204 Clonmel Environs • MA 270 Portlaw • MA 193 An Rinn • MA 201 Cappoquinn • MA 281 – Tallow • MA 205 – Crooke • MA 251 Lemybrien <p>Recommendation 4: Pursuant to NPO 57 and The Planning</p>	

URN	Moderation Summary	Chief Executive Response and Recommendation
	<p>System and Flood Risk Management Guidelines for Planning Authorities 2009, the Planning Authority is requested to make the development plan without the following MA:</p> <ul style="list-style-type: none"> • MA 342 (Waterford City) • MA 244 (Dunmore East) • MA 268 (Portlaw) • MA 273 (Portlaw) • MA 302 (Tramore) • MA 306 (Tramore) • MA 316 (Tramore) 	
WFD-C3-173	<p>This submission details support for proposed material alternations 211, 219, 222 and 228 (shown on the zoning map as UID ref 90, 3669, 3670 and 3653) at Duckspool/Abbeyside north of the L3168. The submission also raises its opposition to the Duckspool to reverse the green zoning proposed for the Duckspool flood plain site, south of the L3168.</p>	<p>The content of the submission is noted. Comments relating to these lands are detailed in the response and recommendation to the submission by the OPR (submission ref. no, WFD-C3-172) as set out in Section 3.1 of this report. No further recommendation on foot of this submission.</p>
WFD-C3-187	<p>The submission states its support with MA No. 332 to zone land to High Amenity (HA) at Gracedieu, Waterford City.</p>	<p>The content of the submission is noted. No further recommendation on foot of this submission.</p>
WFD-C3-188	<p>The submission outlines its support for the proposed zoning of land at Newtown, Tramore for New Residential (R1) purposes. The submission sets out a number of reasons why these lands should remain zoned for R1 purposes.</p>	<p>The content of the submission is noted. Comments relating to these lands are detailed in the response and recommendation to the submission by the OPR (submission ref. no, WFD-C3-172) as set out in Section 3.1 of this report. No further recommendation on foot of this submission.</p>

3.2.3 Chapter 3 – Waterford City and MASP

URN	Moderation Summary	Chief Executive Response and Recommendation
WFD-C3-117	This submission welcomes the updated W City 08 Joint Retail Strategy and W City 19 Citywide Amenity/ Recreation and BGI Strategy.	The content of the submission is noted. No further recommendation on foot of this submission.
WFD-C3-159	The submission is written in support of proposed High Amenity Zonings in the Gracedieu Area, Waterford City	The content of the submission is noted. No further recommendation on foot of this submission.
WFD-C3-164	The submission requests that the footnote to Table 3.1 on Page 26 of the MA Report is updated to expressly refer to ‘higher densities’ and taller buildings. This change is suggested as it may help in avoiding ambiguity in implementing the plan as in some cases, higher densities can be achieved without taller buildings.	<p>The content of the submission is noted and the following minor modification is recommended to the footnote to Table 3.1 of MA No.24 to read as follows:</p> <p>“Footnote: Sites with potential to accommodate taller buildings (Above 4 floors in height) and higher densities are identified by a green highlight.”</p>
WFD-C3-167	The submission requests that the NTA be mentioned as a key stakeholder in the implementation of the Waterford City Decarbonising Zone under Policy Objective W City 20.	<p>The content of the submission is noted and the following modification is proposed to policy objective W City 20/ MA No. 34:</p> <p>“W City 20 In order to ensure Waterford City fulfils its role as the Regional Capital and regional driver of change in terms of economic and population growth in a manner that is sustainable in terms of reducing our carbon emissions in line with our international targets, we will collaborate with key stakeholders such as CARO, SEAI, EPA, DECC, WIT (TUSE), Kilkenny Co. Co., the SRA, NTA and other business operators and representative groups such as Waterford Chamber to fully devise and implement actions to achieve the Waterford City Decarbonising Zone. We will support and facilitate projects which contribute towards achieving the carbon emission reduction targets.”</p>

3.2.4 Chapter 4 – Economy, Education, Tourism and Retail

URN	Moderation Summary	Chief Executive Response and Recommendation
WFD-C3-2	The submission relates to Waterford's SEVESO sites and requests updating text to reflect current legislation.	<p>The CE notes the issues raised. Minor modifications are recommended to address legislative updates.</p> <p>Recommendation: Minor modification to MA No. 51 as follows:</p> <p>Amend Paragraph 2 in Section 4.9 'SEVESO Directive/ Major Accidents' (Page 99) as follows:</p> <p>"The Seveso II Directive 96/82/EC Seveso III Directive 2012/18/EU is an EU Directive to prevent major accidents involving dangerous substances and to limit the consequences of such accidents on people, property and the environment. It applies to establishments where dangerous substances are or may be present in specified threshold quantities. In Irish law, the current regulations through which the Directive is transposed is the 'European Communities, Control of Major Accidents Regulations' S.I. no 74, 2006 Chemicals Act (Control of Major Accident Hazards involving Dangerous Substances) Regulations 2015; S.I. 209 of 2015.</p> <p>At present there are no industries which are established Seveso Directive sites within Waterford City and county, however Stafford's Wholesale Ltd. T/A Stafford's Bonded, Lockheed Avenue, Airport Business Park is a Designated Lower Tier Seveso III Establishment and Waterford Trans-Stock located in Ferrybank/ Kilkenny County Trans-stock Warehousing and Cold Storage Ltd., Christendom, Ferrybank, Co Waterford is a Designated Upper Tier Seveso III Establishment under the Directive. With regard to such</p>

URN	Moderation Summary	Chief Executive Response and Recommendation
		sites, consultation distances are established within which there is an obligation to consult with the Health and Safety Authority and Waterford City and County Fire service, in respect of any development proposals.”
WFD-C3-57	<p>1) It is noted that the Department’s title should be referenced as the Department of Education (not the Department of Education and Skills).</p> <p>2) The Department welcomes Draft Resolutions 15 and 31 which seek to zone small additional parcels of land adjoining the sites of two established schools (namely Scoil Réalt na Mara RN 20556M in Dunmore East and Scoil Náisiúnta na Rinne RN 17295Q) in order to future-proof their expansion.</p> <p>3) The Department re-affirms its previous request , to protect lands adjoining existing schools be adopted as a general policy. The reason being if all adjoining lands beside schools in growth settlements gets developed, their options for expansion/refurbishment may be severely impeded when the specific need does inevitably emerge. It is stated that The Department has absolutely no desire to sterilize large areas of land adjoining schools. The Dept asks that a proportionate approach be adopted and that Waterford City and County Council considers the future-proofing needs of the schools in its area, particularly in the growth settlements</p> <p>4) It is requested that Policy Objective SC 15, is re-worded t o refer to new Dept Guidelines in order to allow flexibility to school authorities to make their own decisions around the use of the facilities outside of school hours.</p>	<p>The CE notes the submission received.</p> <p>Recommendation:</p> <ol style="list-style-type: none"> 1. The text within the Plan shall be updated to reference the ‘Department of Education’ throughout. 2. Noted and welcomed. No further Amendments. 3. While the merits of the request are noted, it is not considered appropriate to apply a ‘buffer zone’ to schools where no specific need for expansion has been identified. <ul style="list-style-type: none"> • In the case where adjoining lands are zoned for residential use, the expansion of any adjoining school can be facilitated under the zoning matrix. • Where adjoining lands are to be developed for residential development, Amendment 95 – Policy Objective H17 requires the submission of a ‘Social Infrastructure Audit’ which would identify any such deficiencies and seek to rectify the deficiency /phase development as necessary. • Appendix No. 2 Specific Development Objectives PODO9 (5) requires that: <ul style="list-style-type: none"> ‘Development proposals will not prejudice the future development of land in its vicinity and the expansion of public amenities or community land uses such as schools. In order to avoid a situation where permitted residential development may sterilise other development proposals during the lifetime of the development plan we may specify the lifetime of a permission having regard to

URN	Moderation Summary	Chief Executive Response and Recommendation
		<p>program for implementing the development identified in the proposal’.</p> <p>Recommendation: No change.</p> <p>4. Minor modification to MA No. 107 as follows: “SC 15 Childcare and Educational Facilities</p> <p>It is the policy of the Council to have new primary and secondary schools located at the heart of our neighbourhoods and communities. This will be achieved by working in collaboration with the Department of Education and Skills and with local communities ensuring the timely provision of school sites to service new development. A policy of shared and multi-use of school/community sports facilities will be promoted. <u>The use of school buildings and facilities outside of normal school hours shall be operated in accordance with Department of Education Guidelines and the provisions of the Planning Acts.”</u></p>
WFD-C3-92	<p>The submission requests that Table 4.0 Strategic Employment Location as highlighted in MA No. 38 be edited as follows:</p> <ul style="list-style-type: none"> > That Belview should be specifically mentioned where reference is made to the Port of Waterford. > That Waterford Industrial Estate is identified as a Strategic Development Area’ where ‘Strategic regional and rural enterprise sites for campus-style/ space intensive uses to strengthen local employment base’ is identified. <p>The submission further requests MA No. 39 - ECON 1 bullet point 3 make reference to IDA to read as.....‘Work closely with the Southern Regional Assembly, neighbouring Local Authorities, WIT, the Chamber’s, the IDA and other agencies to build and maintain a</p>	<p>The CE welcomes the support for proposed Amendments No 38 - Table 4.0, MA 39 ECON 01 and MA 43 ECON 09. The suggested text amendments are considered to be reasonable and minor in nature.</p> <p>Recommendation:</p> <ol style="list-style-type: none"> 1. Minor modification to MA No. 38 Table 4.0 as follows: <ol style="list-style-type: none"> a) Include the <u>Waterford Industrial Estate, Cork Road</u> within the ‘Strategic regional and rural enterprise sites...’ b) Include The Port of Waterford <u>including Belview Port</u> within the ‘Commercial and research synergies...’

URN	Moderation Summary	Chief Executive Response and Recommendation
	shared evidence base and monitoring framework to guide and enable the sustainable growth of our economy and communities.’	<p>2. Minor Modification to MA No. 39 – ECON 01 bullet point 3 to make reference to the IDA as follows:</p> <ul style="list-style-type: none"> • Work closely with the Southern Regional Assembly, neighbouring Local Authorities, WIT, the Chamber’s, <u>the IDA</u> and other agencies to build and maintain a shared evidence base and monitoring framework to guide and enable the sustainable growth of our economy and communities.
WFD-C3-119	The submission supports MA 237 - Tourism Zoning in Dunmore East. The owners of the holiday park aim to expand their Sustainable Tourism product on the lands beside our their existing tourism facilities.	<p>The CE welcomes the support for proposed MA No 237.</p> <p>Recommendation: No change.</p>
WFD-C3-137	<p>The submission requests that references to the TUSE are amended within the Plan to the its new official name The South East Technological University, abbreviated as SETU.</p> <p>In the vision statement (p.3), it is requested that “learn” is added to the sentence to reflect the importance of education and learning to the city.</p>	<p>The CE notes and welcomes the submission. The Plan shall be updated with references to the TUSE to its new official name ‘The South East Technological University’, abbreviated as SETU.</p> <p>Recommendation:</p> <ol style="list-style-type: none"> 1. Update all references to the TUSE within the Plan to its new official name The South East Technological University, abbreviated as SETU 2. Minor modification to MA No. 1 as follows: “By 2028, Waterford City and County will have continued to grow and will be evolving to become an even more attractive, prosperous, resilient, and sustainable place, anchored by Waterford City and Metropolitan area as the Regional Capital, a University and Learning City, and an economic driver for the region. It will be the best city and county in which an excellent place to live, <u>learn</u>, visit and do business.”

URN	Moderation Summary	Chief Executive Response and Recommendation
WFD-C3-165	The submission welcomes the proposed MA No. 49 which offers additional support for the key policy objectives of the Southern Regional Spatial and Economic Strategy (RSES). However, it considers it fails to translate to a useable renewable energy strategy for the reasons outlined above and below.	<p>The CE welcomes the support for MA 49. The other main issues raised in the submission are dealt with in the Amendments to Chapter 6 and Appendix 7.</p> <p>Recommendation No change.</p>
WFD-C3-179	The submission refers to the demand for schools places and the lack of housing in the area. The submission would like to see a phased system and housing policy identified in the development plan to overcome this demand in the school environment	<p>The CE notes the contents of the submission.</p> <p>The quantum, location and phasing of lands identified for residential development have been developed in accordance with National and Regional Planning Guidelines and implemented in the Plan through the Core Strategy and the Housing Strategy.</p> <p>The CE responds to the submissions at Draft and Amendments Stages from the Office of the Planning Regulator (WFD-C2-363 & WFD-C3-172) and the Southern Regional Assembly (WFD-C2-311 & WFD-C3-140) set out the reasoning and methodology for the sequential development of residential lands.</p> <p>Submissions have been received from the Department of Education at Draft (WFD-C2-322) and Amendments Stages (WFD-C3-57) which have identified the school place requirements over the Plan period. The recommendations of these submissions have been incorporated into the Plan.</p> <p>Recommendation No change.</p>

3.2.5 Chapter 5 – Transport and Mobility

URN	Moderation Summary	Chief Executive Response and Recommendation
<p>WFD-C3-3</p>	<p>1. The submission refers to the special requirements of the tolling scheme N25 Waterford Bypass PPP Scheme and the financial implications of any proposed additional crossings of the River Suir.</p> <p>2. The TII considers that further editing is required for cross-referencing should ensure applicants/developers are fully aware of the provisions of official policy concerning access to national roads at the earliest stages of project development to ensure consistency with the provision of official policy.</p> <p>3. The TII advises that text is checked to ensure that references to the Design Manual for Roads and Bridges (DMRB) is correct within the Plan.</p>	<p>1. The CE notes the content of the submission in terms of possible future additional river crossings and the contractual agreement relating to the N25 Waterford Bypass PPP Scheme.</p> <p>Recommendation No change</p> <p>2. It is considered that due reference is paid to the Spatial Planning and National Road Guidelines for Planning Authorities (2012) in Section 5.9, Section 6.4 and Section 6.6, ULT 12, ULT 12. However, with regards to Section 7.11, Section 5.21 and 5.24 greater cross references should be added to read as follows:</p> <p>Recommendation: It is recommended to make a minor modification to Chapter 7, Section 7.11 Housing in Rural Villages and the Open Countryside by adding the following text after paragraph 3 on Page 158 of the Draft Development Plan as follows: <u>“Due regard will be made to the Spatial Planning and National Roads Guidelines for Planning Authorities 2012, relating to development affecting National Primary and Secondary roads, including motorways and associated junctions.”</u></p> <p>It is recommended to make a minor modification to proposed DM Standards - Section 5.21 Electricity and Other Cables on Page 34/35 by adding the following text to the end of the section:</p>

URN	Moderation Summary	Chief Executive Response and Recommendation
		<p>“Due regard will be made to the Spatial Planning and National Roads Guidelines for Planning Authorities 2012, relating to development affecting National Primary and Secondary roads, including motorways and associated junctions.”</p> <p>It is recommended to make a minor modification to proposed DM Standards - Section 5.24 Renewable Energy Development on Page 37/38 by adding the following text to paragraph 2:</p> <p>“In addition, potential applicants are advised to consult with the Department of Arts, Heritage and the Gaeltacht, The Forestry Service, The Irish Aviation Authority, Transport Infrastructure Ireland and the Spatial Planning and National Roads Guidelines for Planning Authorities 2012 and other statutory and non-statutory bodies in the area which may require special protection.”</p> <p>3. It is noted that the Design Manual for Roads and Bridges (DMRB) has been subsumed into TII Publications.</p> <p>Recommendation</p> <p>It is recommended to make a minor modification to proposed DM Standards – Section 8.6 on Page 54 to read as follows:</p> <p>“Waterford City & County Council will require that all new developments proposing a new entrance or a significantly intensified existing access point onto the county’s road network comply with the latest NRA Design Manual for Roads & Bridges Standards TII Publications Volume Contents and Alpha-Numeric Index to the NRA Design</p>

URN	Moderation Summary	Chief Executive Response and Recommendation
		<p>Manual for Roads and Bridges (including Erratum No. 1 dated June 2015). Listed in the table below are the general minimum sightline requirements the Council will require to be provided:...”</p>
<p>WFD-C3-56</p>	<p>The submission highlights that since the previous development plan was published there have been important policy developments which are relevant to accessible and integrated public transport. The Department of Transport (DoT) considers these should be reflected in the proposed Plan. These are set out below:</p> <ol style="list-style-type: none"> 1) National Disability Inclusion Strategy (NDIS) 2017-2022; 2) United Nations Convention on the Rights of Persons with Disabilities (UNCRPD); 3) DMURS Interim Advice Note – Covid-19 Pandemic Response (References in the draft Plan to the 2019 version of DMURS should be replaced with references to the 2020 DMURS Interim Advice Note – Covid-19 Pandemic Response. DoT notes reference to DMURS 2019 in Ref 1.7.4, Section 28 Ministerial Guidelines on page 8 of Material Alterations report). 4) To make public transport fully accessible to people with disabilities requires a ‘whole journey approach’ which refers to all elements that constitute a journey from the starting point to destination. 5) Publication by the National Transport Authority (NTA) of its ‘Local Link Rural Transport Programme Strategic Plan 2018 to 2022 (DoT notes the reference to Local Link in 5.6 Transport, Section Bus. (page 57 of Material Alterations)). 	<p>1. & 2.: The CE Note the context of the submission in relation to the National Disability Inclusion Strategy (NDIS) 2017 – 2022 and the United Nations Convention of the Rights of Persons with Disabilities (UNCRPD) which Ireland ratified in 2018.</p> <p>Recommendation: Minor modification to Policy Objective Uni Des 02 on page 180 of the draft plan to read as follows:</p> <p>“Require all new developments, including proposals for public realm enhancements incorporate principles of universal design.</p> <p>The Council will require the submission of an ‘Accessibility Audit²’, carried out by a suitably qualified and competent person, in residential developments of 15+ units (or less depending on the site context), commercial and/or mixed use schemes in order to ensure that all roads and streets, parking areas, pavements and pedestrian crossings, buildings, facilities, open spaces, amenities etc. are fully accessible by all users.”</p> <p>Minor modification to proposed MA No. 95/ Section 7.6 Housing Type and Tenure Mix Policy Objective H17 ‘Housing Mix’ as follows:</p> <p>“H17 Housing Mix...</p>

² National Disability Authority Excellence in Universal Design documents entitled ‘Shared Space, Shared Surfaces and Home Zones from a Universal Design Approach for the Urban Environment in Ireland’ and ‘Building for Everyone: A Universal Design Approach’ should be used as a reference.

URN	Moderation Summary	Chief Executive Response and Recommendation
		<ul style="list-style-type: none"> Require that the housing mix in any new development has regard to the provisions of ‘Housing Options for Our Ageing Population, Policy Statement’, (2019) or any update thereof, and makes provision for appropriate residential accommodation for older people and persons with disabilities in line with the Centre for Excellence in Universal Design – Universal Design Guidelines (2015) or any update thereof for Homes in Ireland and for wheelchair users in line with the Irish Wheelchair Association Best Practice Access Guidelines (2020) or any update thereof. The Council will require where different tenures are provided that these will be integrated and designed to create tenure neutral homes and spaces, where no tenure type is disadvantaged;...” <p>Minor modification to DM Standards Section 2.5.2 Universal Access on page 4 as follows:</p> <p>“Part M of the Building Regulations sets out standards to ensure that buildings are accessible and usable by everyone, including older people, people with disabilities and people with children. The Technical Guidance Document in relation to Part M provides guidance on the access requirements for public buildings and for residential dwellings. The Council will seek to encourage the implementation of best practice standards and principle of universal access with regard to access in both indoor and outdoor environments.</p> <p>All development must comply with Policy Objective H17 and Uni Des 02 as well as having regard to the Centre for Excellence in Universal Design – Universal Design</p>

URN	Moderation Summary	Chief Executive Response and Recommendation
		<p><u>Guidelines (2015) or any update thereof for Homes in Ireland, 'Shared Space, Shared Surfaces and Home Zones from a Universal Design Approach for the Urban Environment in Ireland', 'Building for Everyone: A Universal Design Approach' and for wheelchair users in line with the Irish Wheelchair Association Best Practice Access Guidelines (2020) or any update thereof.</u></p> <p>Minor modification to Policy Objective DM 06 in Section 3.4.1 Mix of Dwelling Types to read as follows:</p> <ul style="list-style-type: none"> • "...Details of existing and permitted unit types within a 10-minute walk of the proposed development. • A breakdown of the proposed unit type and size, including the percentage split between 1/2/3+ bed units which, in the case of apartments (and duplexes), shall be in accordance with the "Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities" (2009), and "Sustainable Urban Housing Design Standards for New Apartments", or any subsequent amendment/ revision of these. • <u>A minimum of 20% of dwellings in new residential developments of five dwellings or more must be designed to be Lifetime Homes, suitable to accommodate or are adaptable to provide accommodation for people with disabilities and older people. Planning applications will be required to demonstrate compliance with this objective and to show an accessible route to the residential units from the boundary of the property. Proximity and access to local services must also be considered relative to the units which are accessible.</u> • Site and/ or floor plans that clearly identify proposed units that:

URN	Moderation Summary	Chief Executive Response and Recommendation
		<ul style="list-style-type: none"> • Are designed and located having regard to the needs of older people and/or persons with a disability. • Are designed having regard to the concept of lifetime adaptable and/or multigenerational homes. • A statement outlining how the scheme has been designed for the needs of older people/ or persons with a disability and or lifetime homes.” <p>3. The CE notes the content of the submission in relation to DMURS Interim Advice Note – Covid-19 Pandemic Response which was published on the DMURS website in 2020.</p> <p>Recommendation: Minor modification to H02 General Housing Policy Objective “... <ul style="list-style-type: none"> • Is designed in accordance with the applicable guidance and standards of the time: <ul style="list-style-type: none"> • Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009); • Delivering Homes, Sustaining Communities (2007) • Urban Design Manual A Best Practice (2009); • Permeability Best Practice NTA (2015); and, • Design Manual for Urban Roads (DMURS) (2013) <u>(2020) or any update thereof.</u> • <u>National Disability Inclusion Strategy (NDIS) 2017-2022.</u> • <u>United Nations Convention on the Rights of Persons with Disabilities (UNCRPD).</u>” </p> <p>Minor modification to the following section in relation to</p>

URN	Moderation Summary	Chief Executive Response and Recommendation
		<p>updating DMURS (2020) or any update thereof:</p> <ul style="list-style-type: none"> • 1.6 UN Agenda 2030: The Development Plan and its Outcomes (D) on page 11 of the draft plan. • 1.7.4 Section 28 Ministerial Guidelines on page 16 of the draft plan. • 5.0 Setting the Scene: Transport Policy Context on page 111 of the draft plan. • Policy Objective Trans 33 Road and Street Network Policy Objective in Section 5.8 Roads and Street Network on page 122 of the draft plan. • 5.9 Motorway and National Roads • Policy Objective Trans 47 Regional and Local Roads/Urban Streets Policy Objective on page 126 of the draft plan. • Policy Objective Place 03 Legislative Placemaking Policy Objectives on page 178 of the draft plan. • 8.4 Access for All/ Universal Design • Policy Objective Place 09 Safe Places Policy Objective on page 182 of the draft plan. • DM Standards Vol 2 Table 1 on page 9 • DM Standards Vol 2 Section 8.8 and Policy Objective DM 45 on page 56 <p>Minor modification to Section 8.1 Legislative and Placemaking Policy Context on page 178 of the draft plan to read as follows:</p> <p>“... ”</p> <ul style="list-style-type: none"> • Design Manual for Urban Roads (DMURS) (2013) (2020) or any update thereof. • National Disability Inclusion Strategy (NDIS) 2017-2022. • United Nations Convention on the Rights of Persons with Disabilities (UNCRPD).

URN	Moderation Summary	Chief Executive Response and Recommendation
		<ul style="list-style-type: none"> • The National Cycle Manual (2011);...” <p>4. The CE notes the content of the submission with regards to the ‘whole journey approach’. It is considered that this could be further strengthened within the draft plan.</p> <p>Recommendation: Minor modification to proposed MA No. 61/ Policy Objective Trans 01 as follows:</p> <p>“...Designing and develop permeable links for walking and cycling in new development areas and retrospectively implement <u>accessible</u>, safe walking and cycling facilities and infrastructure into existing neighbourhoods, particularly at peripheral locations of our urban areas, where feasible and practicable. This will be done through the provision of appropriate segregated footpaths and cycle lanes <u>This will be done through the provision of appropriate pedestrian and cycle facilities. All work to the public realm must take into account the ‘whole journey approach’ which refers to all elements that constitute a journey from the starting point to destination. All developments must ensure that universal design approach to the built environment is taken into account, including but not limited to footpaths, tactile paving, cycle paths, roads, pedestrian crossing points, town greenways and bus stops/shelters.</u>”</p> <p>5. The CE notes the content of the submission in relation to the ‘Local Link Rural Transport Programme Strategic Plan 2018 to 2022’. This has been updated in the MA Report.</p> <p>Recommendation: No change</p>

URN	Moderation Summary	Chief Executive Response and Recommendation
<p>WFD-C3-89</p>	<p>The submission highlights the following</p> <ol style="list-style-type: none"> 1. Additional active travel routes for Waterford City. 2. It seeks that reference to ‘Ireland’s Government Road Safety Strategy 2021–2030’, and 3. Developments of permeability measures in Tramore, Dungarvan and Waterford should be a priority and be included in Chapter 5 Transport and Mobility of the Plan. 	<p>The CE notes the contents of the submission.</p> <p>Recommendation:</p> <ol style="list-style-type: none"> 1. Minor modification to proposed MA No. 175/ Map 3 of the Draft Development Plan to include the following routes as proposed active travel and/ or public transport routes: <ul style="list-style-type: none"> • Waterford Institute of Technology to City Centre Green Route. • Inner Ring Road (R709) Cycle Infrastructure Design. • Bilberry to CC Cycle Route. • Williamstown Road Walking and Cycling Scheme. 2. Minor modification to Policy Objective Trans 09 on Page 117 of the Draft Plan by adding the following text to the end of the policy: <p>“...including the Natura 2000 Network– and have regard to ‘Ireland’s Government Road Safety Strategy 2021–2030’.”</p> 3. Minor modification to proposed MA No. 60/ Strategic Objective No. 3 on Page 111 of the Draft Plan and Page 51 of the MA Report to read as follows: <p>“Provide public and active transport infrastructure and services to meet the needs of neighbourhoods, towns, villages and rural areas in facilitating the “10 minute” city and town concept, to achieve this development of permeability measures in Tramore, Dungarvan and Waterford will be a priority of this Development Plan. Such infrastructure should be designed to be universally accessed, sustainable and safe particularly for women and children and have appropriate lighting (Please see ‘Travelling in a Woman’s Shoes’ TII 2020).”</p>

URN	Moderation Summary	Chief Executive Response and Recommendation
WFD-C3-135	The submission welcomes the broad continued support for the railway in the MA report. However, the submission seeks that policy objective Trans 22 be updated and requests that the reference to New Ross be removed from the policy objective.	The CE notes the content of the submission. Recommendation No change
WFD-C3-164	The submission requests additional clarification and targets for modal change over the period to 2028.	The CE notes the content of the submission with regards to Modal Change over the period to 2028. It is worthwhile noting that MA No. 68 has introduced a significant amendment to Section 5.4 'Achieving Modal Change'. This section relates to the monitoring and implementation of sustainable transport and modal share ambitions to measure the Council's actions in addressing climate change and promoting sustainable travel modes. As such the modal share baseline and target projections will assist to actively deliver a significant modal shift from private car transport to greener modes (walking and cycling) and sustainable modes (bus and rail) in relation to both new development and existing built-up areas. This section has also been welcomed by the OPR and the NTA. Recommendation No change
WFD-C3-167	<ol style="list-style-type: none"> 1. The submission requests that the final sentence of Policy Objective Trans 01 be revised to remove the reference to segregated infrastructure, and proposes the following wording: 'This will be done through the provision of appropriate pedestrian and cycle facilities'. 2. The submission recommends that the wording of Policy Objective Trans 04 would merit further consideration, to clarify that ABTA is a process and LTPs are an output of that process. 3. The submission requests that the word 'metropolitan' be used instead of 'metro' when referring to Bus in the Transport Mode Table. 4. The submission requests that Section 5.9 Motorways and National 	The CE notes and welcomes the submission to the MA Report on the Draft Plan by the NTA. Recommendation: 1. Minor modification to proposed MA No. 61/ Policy Objective Trans 01 'Integration of Land Use and Planning Transport' by revising the reference to segregated infrastructure as follows: "...Designing and develop permeable links for walking and cycling in new development areas and retrospectively implement <u>accessible</u> , safe walking and cycling facilities

URN	Moderation Summary	Chief Executive Response and Recommendation
	<p>Roads would merit further consideration, in particular the statement that ‘The Council will support the upgrade of this National Route to Motorway’. Such consideration should aim to ensure its compatibility with the National Development Plan 2021-2030, the National Investment Framework for Transport in Ireland and the Regional Spatial and Economic Strategy for the Southern Region.</p> <p>5. The submission seeks that the wording of the introductory text of Policy Objective Trans 50 should be revised to replace the reference to ‘sustainable transport projects’ with reference to ‘Road Proposal/Improvement Schemes’.</p>	<p>and infrastructure into existing neighbourhoods, particularly at peripheral locations of our urban areas, where feasible and practicable. This will be done through the provision of appropriate segregated footpaths and cycle lanes <u>This will be done through the provision of appropriate pedestrian and cycle facilities. All work to the public realm must take into account the ‘whole journey approach’ which refers to all elements that constitute a journey from the starting point to destination. All developments must ensure that universal design approach to the built environment is taken into account, including but not limited to footpaths, tactile paving, cycle paths, roads, pedestrian crossing points, town greenways and bus stops/shelters.”</u></p> <p>2. Minor modification to proposed MA No. 64/ Policy Objective Trans 04 ‘WMATs and LTPs’ as follows:</p> <p>“It is a Policy Objective to prepare Local Transport Plans (LTPs) (<u>using the</u> Area Based Transport Assessments (ABTAs) <u>method</u>) in tandem with the preparation of Local Area Plans (LAPs) and also prepare <u>ABTAs LTPs</u> for key strategic land banks within adopted LAPs, if required, subject to the availability of funding and in accordance with the NTA and TII Guidance Note on Area Based Transport Assessments 2018 or any subsequent updates thereof. The Council will prepare LAPs and LTPs for Dungarvan and Tramore within one year of adoption of the Development Plan.”</p> <p>3. Minor modification to proposed MA No. 68/ Section 5.6 Public Transport – Transport Mode Table as follows:</p>

URN	Moderation Summary	Chief Executive Response and Recommendation
		<p>“Bus services are the backbone of the regional and Metro <u>metropolitan</u> public transport system and investment will be focused on improving connectivity between Waterford and Regional settlements and enhancing the reliability and the level of service within key settlements. Integrating transport solutions between rail, regional/ metro <u>metropolitan</u> bus, and active travel will also be supported...”.</p> <p>4. Minor modification to proposed MA No.72/ the text in paragraph 2 of Section 5.9 ‘Motorway and National Roads’ to read as follows:</p> <p>“The Council will support the upgrade of this National Route <u>as set out in the RSES RPO 24b, RPO 30,</u> to Motorway. However, in the intervening period the primary safety hazards that will develop into the future along this route is likely to be the right-hand turning movements at junctions and overtaking manoeuvres along the route.”</p> <p>5. Minor modification to proposed MA No. 73/ Trans 50 ‘Regional and Local Roads/ Urban Streets’ 126 as follows:</p> <p>“It is an objective to support the following <u>sustainable</u> transport priorities across Waterford County and in the Waterford Metropolitan Area subject to their consistency with the recommendations of the WMATS or any future LTPs and or County Transport Plan, the outcome of environmental assessments and the planning process including mitigation under SEA/AA as appropriate:...”</p>

3.2.6 Chapter 6 – Utilities Infrastructure, Energy and Communications

URN	Moderation Summary	Chief Executive Response and Recommendation
<p>WFD-C3-6</p>	<p>The submission provides an updated Table 6 to be incorporated into the Plan outlining Irish Water's ability to meet the population targets as set out in the Plan.</p> <p>Irish Water have commented that Developer Provided Infrastructure such as private wells or waste water treatment plants should generally not be considered by the Planning Authority. Relevant text and Objectives should be updated in this regard.</p>	<p>The CE welcomes and notes the content of the submission from Irish Water. Please find a list of addition/correction below.</p> <p>Recommendation: Minor modification to proposed MA No. 76/ Section 7.6 Water Services Table 6.0 Water and Wastewater Capacity Assessment with a new Table 6: Water and Wastewater Capacity Assessment – Settlements in Waterford County. Please see Appendix 4 Table 6: Water and Wastewater Capacity Assessment – Settlements in Waterford County for new table.</p> <p>Minor modification to point 1 of the fourth paragraph in MA No. 80/ Section 6.9 Utility, Energy & Communication Policy Objectives – Policy Objective UTL 06 to read as follows:</p> <p>“...I. Where the proposed development exceeds the capacity of the existing treatment plant, the developer shall provide for the upgrade of the treatment plant and connection to the public network. This may be best achieved in settlements such as Lemybrien where the existing ICW can be extended as a low tech/low risk design solution. (Note from table 1 attached the Irish Water proposal to upgrade the WWTP in Lemybrien as part of the STVGP)...</p> <p>III. Where no, or inadequate, public waste-water treatment facilities exist, serviced sites may be supported. In such instances, serviced site developments on 0.20 hectares (½ acre) plots with individual treatment systems will be</p>

URN	Moderation Summary	Chief Executive Response and Recommendation
		<p>required as a temporary measure, until such time as waste65 water facilities become available. The serviced sites must be designed to permit the subdivision of each of the 0.20 hectare plots into two 0.10 hectare sites once adequate services become available. The residual land can then be developed for additional serviced sites in the future. Risk and maintenance lies with the individual home owner. Planning permission may be granted on the condition that private drainage infrastructure may be used temporarily, with the requirement to connect to public drainage infrastructure when it becomes available. <u>Note: As per Section 5.3 of the Draft Water Services Guidelines for Planning Authorities, 'Alternative solutions such as private wells or waste water treatment plants should not generally be considered by planning authorities.'</u></p> <p>Minor modification to 1st bullet point of MA No. 81/ Policy Objective UTL 08 'Protection of Water Resources' as follows:</p> <p>“...•Supporting the preparation <u>and implementation</u> of Drinking Water Protection Plans <u>and Source Protection Plans</u> by Irish Water, to protect sources of public water supply, in accordance with the requirements of the Water Framework Directive;...”</p> <p>Minor modification to proposed MA No. 153/ Section 9.4 Waste Water Treatment Infrastructure - Option 3 to read as follows:</p> <p>“...In all cases, it is recommended that prospective developers would enter into pre planning discussions with the Planning Section and would liaise with the Water</p>

URN	Moderation Summary	Chief Executive Response and Recommendation
		<p>Services Section to ensure that their proposals for wastewater treatment are acceptable to the Council. The detailed design of any such alternative developer provided infrastructure to service new development within our settlements should meet the technical requirements of Irish Water.</p> <p><u>Note: As per Section 5.3 of the Draft Water Services Guidelines for Planning Authorities, 'Alternative solutions such as private wells or waste water treatment plants should not generally be considered by planning authorities. Irish Water will not retrospectively take over responsibility for developer provided treatment facilities or associated networks, unless agreed in advance.' The opportunity may arise for the development to connect into the network in the future however, the developer provided treatment facility would not be taken over.</u>"</p> <p>Minor modification to bullet point 2 of MA No. 154/ 9.8.2 Surface Water and Sewer Drainage/ Flooding DM Policy Objective DM 53 to read as follows:</p> <p><u>"...•Discharge rainwater to the combined sewer only where there is no other option available to deal with the rain fall management."</u></p>
WFD-C3-105	The submission highlights that the Renewable Energy Targets as set out in MA No. 78 has restricted the potential wind energy generation by utilising a percentage of national population for its calculations and states that it does not appear to make use of the opportunities.	<p>The CE notes the content of this submission. This issue has been clarified in the CE Response and Recommendation to WFC-C3-6 above.</p> <p>Recommendation: See response to WFC-C3-6.</p>
WFD-C3-118	The submission provides detailed commentary with regards in relation to MA No. 78 Renewable Energy in particular Table 6.2. The submission list the following concerns:	The CE notes and welcomes the submission by the Department of the Environment, Climate and Communications.

URN	Moderation Summary	Chief Executive Response and Recommendation
	<p>1. The revised Climate Action Plan 2021 and the Climate Action and Low Carbon Development (Amendment) Act, 2021 has been published and the submission requests that the Draft Plan be updated to reflect same where possible (and the revised ambition and targets therein);</p> <p>2. The 2030 Renewable Energy targets which are based on Waterford’s “proportion of national population as per Census 2016” (footnote no. 6). The Department request that the final plan clarifies how projected population growth to 2030 and existing and future energy consumption are accounted for in these figures. The submission further request that the Council considers the capacity of locally available renewable energy resources, rather than existing population, as a more appropriate determinant of any potential contribution to the State’s energy requirements and targets, as determined by available land, energy generation potential and environmental designations. They state that this would be in line with the increased ambition of the actions set out in the Climate Action Plan 2021 – which also should be appropriately referenced in the proposed additional text (page 62 of alterations document); and</p> <p>3. The rationale for the targeted onshore wind capacity for 2030 being less than the combined operational and currently permitted capacity should be clearly set out, with particular reference to the increased ambition for renewable energy set out in the Climate Action Plan.</p> <p>4. The Department notes the Council's allocation of offshore renewable energy capacity will, however, be resolved nationally and work on this is in progress through the development of the second Offshore Renewable Energy Development Plan (OREDPII). It is not appropriate, therefore, to include offshore energy targets in a City/County Development Plan until such time as that work is complete.</p>	<p>Recommendation:</p> <p>1. Minor modification to the following section in the Draft Plan and MA Report in relation to updating Climate Action Plan (2019) to Climate Action Plan (2021) or any update thereof:</p> <ul style="list-style-type: none"> • MA No. 78/ Section 6.6 Renewable Energy – Paragraph 3; • MA No. 96/ Policy Objective H18 – Paragraph 2; • Draft Development Plan Section 1.4 Environmental Assessment and Climate Change – Paragraph 4; • Section 5.0 Setting the Scene: Transport Policy Context – bullet point no. 3; • Section 5.14 Car Parking ‘ Electric Vehicles (EVs) – Paragraph 4: The national Climate Action Plan (2021) or any update there of has ambitious targets for the uptake of electric vehicles (EVs), with a target of having 935,600 945,000 EVs on the road by 2030, including 840,000 845,000 cars, 95,000 light commercial vehicles and 600 low-emission 1,500 electric buses (i.e. not diesel only). <p>Minor modification to the following section in the Draft Plan and MA Report in relation to updating reference to the Climate Action and Low Carbon Development Act to Climate Action Plan (2019) to Climate Action and Low Carbon Development (Amendment) Act, 2021</p> <ul style="list-style-type: none"> • MA No. 78/ Section 6.6 Renewable Energy – Paragraph 4; • MA No. 83 – Policy Objective UTL 10 Flooding/ SFRA – bullet point 4;

URN	Moderation Summary	Chief Executive Response and Recommendation
		<ul style="list-style-type: none"> • MA No. 118 – Policy Objective CA 01 Regulatory Framework and Climate Action; • Draft Development Plan Section 9.1 Climate Action – Paragraph 1. <p>2. Minor modification to proposed MA No. 78/ Section 6.6 to Paragraph 3 on page 62 of the MA Report to read as follows:</p> <p>“Further to the details in Table 6.1, it is important in terms of meeting future energy demands, enhancing our energy security and meeting our ever increasing carbon emission reduction targets that we provide scope and support for new developments within the renewable energy sector i.e. wind, solar, hydro, ocean and bio energy. In this regard Table 6.2 identifies the quantum of renewable energy to be developed locally to ensure we play our part in delivering on national renewable energy⁶ and carbon emission reduction targets as per the Climate Action Plan 2021 in addition to the 2030 targets, a new wind energy map has been prepared which is proposed to be included in a new appendix 2 to the Renewable Energy Strategy (Appendix 7 of the Development Plan).</p> <p><u>The targets set out in Table 6.2 are based on Waterford’s capacity to locally deliver on available renewable energy resources, in meeting our potential contribution to the State’s energy requirements and targets, as determined by available land, energy generation potential and environmental designations. This approach is considered to be in line with the increased ambition of the actions set out in the Climate Action Plan 2021.”</u></p>

URN	Moderation Summary	Chief Executive Response and Recommendation
		<p>Minor modification to proposed MA No. 78/ Section 6.6 – Footnote 6 on page 62 of the MA Report to read as follows:</p> <p>“Based on our proportion of National population as per Census 2016 <u>With respect to meeting the County’s share of national renewable energy targets and having regard to the national target of 15.5GW and of this the wind energy targets being up to 8 GW of on-shore wind energy and at least 5 GW off shore (source: Climate Action Plan, 2021 or any update thereof). County Waterford should endeavour to deliver 2.64% of the on-shore growth requirement (Waterford comprising 2.64% of the land mass of the Republic of Ireland), which equates to +211.20 MW.”</u></p> <p>3. Modification to proposed MA No. 78/ Section 6.6 Table 6.2 Renewable Energy Targets 2030 on page 63 of the MA Report to align with the increased ambitions for renewable energy targets as set out in the Climate Action Plan 2021 and to include Waterford’s share of estimates of additional national renewable electricity targets as defined by the % of national land area represented by the county.</p>

URN	Moderation Summary	Chief Executive Response and Recommendation																														
		<p style="text-align: center;">Table 6.2 Renewable Energy Targets 2030</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">Source</th> <th style="text-align: center;">Operational (MW)</th> <th style="text-align: center;">Permitted Undeveloped (MW)</th> <th style="text-align: center;">Target 2030 (MW)</th> <th style="text-align: center;">Shortfall (MW)</th> <th style="text-align: center;">Note</th> </tr> </thead> <tbody> <tr> <td>On shore</td> <td style="text-align: center;">62.87</td> <td style="text-align: center;">34.85</td> <td style="text-align: center;">211.20</td> <td style="text-align: center;">113.48</td> <td>Note 1</td> </tr> <tr> <td>Solar</td> <td style="text-align: center;">0.00</td> <td style="text-align: center;">220.70</td> <td style="text-align: center;">345.70</td> <td style="text-align: center;">125.00</td> <td></td> </tr> <tr> <td>Other, including auto production solar PV, CHP and hydro</td> <td style="text-align: center;">4.68</td> <td style="text-align: center;">0.00</td> <td style="text-align: center;">76.40</td> <td style="text-align: center;">71.72</td> <td></td> </tr> <tr> <td>Total</td> <td style="text-align: center;">67.55</td> <td style="text-align: center;">255.55</td> <td style="text-align: center;">633.30</td> <td style="text-align: center;">310.20</td> <td>Note 2</td> </tr> </tbody> </table> <p>Note 1: Climate Action Plan 2021 target of 8GW onshore for 2030 based on Waterford land mass of 2.64% of Republic of Ireland. The Climate Action Plan 2021 states that 13.2 MW (5.57%) of this 2030 Waterford target will be delivered through local community-based projects, subject to competition as appropriate.</p> <p>Note 2: These targets are considered to be minimum targets.</p> <p>Note 3: There is a significant off-shore wind capacity that will go towards meeting the national renewable energy targets to 2030.</p> <p>4. The accepted that Waterford’s allocation of offshore renewable energy capacity will be resolved nationally and work on this is in progress through the development of the second Offshore Renewable Energy Development Plan (OREDPII). Therefore reference to offshore energy targets in Table 6.2 Renewable Energy Targets 2030 has been removed.</p>	Source	Operational (MW)	Permitted Undeveloped (MW)	Target 2030 (MW)	Shortfall (MW)	Note	On shore	62.87	34.85	211.20	113.48	Note 1	Solar	0.00	220.70	345.70	125.00		Other, including auto production solar PV, CHP and hydro	4.68	0.00	76.40	71.72		Total	67.55	255.55	633.30	310.20	Note 2
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WFD-C3-123	<p>1. The ESB welcomes the inclusion of the new Policy Objective UTL 24 Electricity Infrastructure (MA 89), that outlines support for the development of a safe and reliable supply of electricity to serve existing and future demand.</p> <p>2. The ESB supports Proposed Amendment No. (84), that strengthens Policy Objective UTL 13 Renewable Energy. It is recommended that the following additional text is included in support of Objective UTL 13 given that Waterford City & County has access to Gas Network:</p> <p><i>“It must also be recognised that natural gas, particularly renewable and indigenous gas, will continue to have a role to play in the transition to a low carbon economy. As such, renewable energy developments may require support from such sources in times of high energy demand.”</i></p>	<p>The CE welcomes and notes the content of the submission for the ESB. In relation to point 3 it is felt that the transition to a low carbon economy could be strengthened.</p> <p>Recommendation: Minor modification to proposed MA No. 84/ Policy Objective UTL 13 ‘Renewable Energy ’ as follows:</p> <p>“It is the policy of Waterford City and County Council to promote and facilitate a culture of adopting energy efficiency/ renewable energy technologies and energy conservation and seek to reduce dependency on fossil fuels thereby enhancing the environmental, social and economic benefits to Waterford City and County. <u>It must also be recognised that other sources of electricity</u></p>																														

URN	Moderation Summary	Chief Executive Response and Recommendation
		<p><u>generation such as natural gas, particularly renewable and indigenous gas, will continue to have a role to play in the transition to a low carbon economy. As such, renewable energy developments may require support from such sources in times of high energy demand.</u> This will be achieved by:...”</p>
WFD-C3-140	<p>The amended Table 6.0 does not include population targets which are required to assess water and wastewater infrastructure capacity and assimilative environmental capacity</p>	<p>The CE notes the content of this submission. This issue has been clarified in the CE Response and Recommendation to WFC-C3-6 above.</p> <p>Recommendation: See response to WFC-C3-6.</p>
WFD-C3-141	<p>The submission states that MA's to the Draft Plan amendments severely limit the existing and future potential of the County. The Plan does not comply with the requirements of the Climate Action and Low Carbon Development (Amendment) Act 2021, the Climate Action Plan 2021 and contravenes Special Planning Policy Requirement (SPPR) No. 2 of the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change (Dept of Housing, Planning, Community and Local Government) July 2017.</p> <p>The submission requests that, under the Climate Action and Low Carbon Development (Amendment) Act 2021, that Waterford County Council must update its onshore wind targets in table 6.2 and fundamentally revise the supporting wind energy map, in order to deliver an appropriate increase in ambition for onshore wind relative to the previous wind energy strategy for the county.</p>	<p>The CE notes the content of the submission. It is considered that the issues raised have been covered in the CE Response and Recommendation to WFD-C3-118.</p> <p>Recommendation: See response to WFD-C3-118.</p>
WFD-C3-165	<p>1. The submission requests that Table 6.2 as outlined in MA No. 78 and references inter alia the Climate Action Plan 2019 which has been overtaken now by the Climate Action Plan 2021; as such this reference should be updated.</p> <p>The submission queries if the targets set out in Table 6.2 in relation</p>	<p>The CE notes the contents of this submission.</p> <p>Recommendation: 1. The CE notes the content of the submission. It is considered that the issues raised have been covered in the</p>

URN	Moderation Summary	Chief Executive Response and Recommendation
	<p>to onshore wind energy of 142.72MW by 2030 is achievable or not is given the uncertainty delivered by other aspects of the proposed Material Alterations and lack of an updated Renewable Energy Strategy for the County.</p> <p>2. The submission seeks a minor change to MA No. 80 in relation to Policy Objective UTL 13 Renewable Energy with the insertion of 'but is not limited to'. This is outlined below: <i>"...This infrastructure includes but is not limited to construction facilities, storage and lay-down areas, cable landfalls, onshore cable routing to substations, port and harbour infrastructure and coastal operations and maintenance bases, as well as use, reuse or repowering of existing infrastructure where appropriate."</i></p>	<p>CE Response and Recommendation to WFD-C3-118.</p> <p>Recommendation: See response to WFD-C3-118.</p> <p>2. Minor modification to bullet point 2 of MA No. 84/ Policy Objective UTL 13 'Urban Waste Water Treatment Regulations'(Page 140) as follows</p> <p>"...• Facilitating and encouraging, where appropriate, proposals for renewable energy generation, transmission and distribution and ancillary support infrastructure facilities including the necessary infrastructure required for the development of offshore renewable energy developments developed fully in accordance with the Waterford Renewable Energy Strategy, the wind energy designation map (Appendix 2 of the RES), the Waterford Landscape and Seascape Character Assessment undertaken to inform this Development Plan, and the National Wind Energy Guidelines, or any subsequent update/ review of these The Council recognizes and supports the role that the County can play in facilitating the onshore infrastructure required for the construction, operation and maintenance of offshore wind farm developments. This infrastructure includes but is not limited to construction facilities, storage and lay-down areas, cable landfalls, onshore cable routing to substations, port and harbour infrastructure and coastal operations and maintenance bases, as well as use, reuse or repowering of existing infrastructure where appropriate."...</p>
WFD-C3-170	<p>The submission states that the Material Amendments to the Draft Plan has reduced the overall ambition of the Waterford CDP as it relates to onshore wind, while the CAP 2021 has increased by 10%.</p>	<p>The CE notes the content of the submission. It is considered that the issues raised have been covered in the CE Response and Recommendation to WFD-C3-118.</p>

URN	Moderation Summary	Chief Executive Response and Recommendation
	<p>The submission requests that table 6.2 be revised with a view to increasing its onshore wind targets in line with the Climate Action Plan 2021. This revision should be carried out in conjunction with revising the wind energy map proposed in amendment No. 176.</p> <p>The WEI submission states that the proposed 2030 target, which are, 'based on the county's proportion of national population as per census 2016' are an unsuitable basis for an onshore wind target and if this approach was taken by local authorities, the national target could not be met. They further state that a target based on population is not an analysis of the potential of the Draft Plan's policies, objectives and wind energy map; nor it is an analysis of its potential contribution to meet national targets over its effective period.</p>	<p>Recommendation: See response to WFD-C3-118.</p>
WFD-C3-189	<p>The submission sets out the following with regards to the MA on the Draft Plan:</p> <ul style="list-style-type: none"> ➤ Under the Climate Action and Low Carbon Development (Amendment) Act 2021 will put Waterford City & County Council in contravention of its obligations as a relevant body; ➤ Does not allow Waterford City & County Council to align with national policy and set targets in the Climate Action Plan 2021; ➤ Does not put suitable onshore wind energy targets in place for the county and doesn't designate suitably positioned or amounts of area for wind energy. ➤ Contravenes Special Planning Policy Requirement (SPPR) No. 2 of the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change (Dept. of Housing, Planning, Community and Local Government) July 2017. 	<p>The CE notes the content of the submission. It is considered that the issues raised have been covered in the CE Response and Recommendation to WFD-C3-118.</p> <p>Recommendation: See response to WFD-C3-118.</p>
WFD-C3-190	<p>The submission raises 6 No. points in relation to wind energy:</p> <ol style="list-style-type: none"> 1. The excluded upland area has been greatly increased without prior consultation with stakeholders. The practice of giving and then taking away is neither fair nor equitable. 	<p>The CE notes the content of the submission. It is considered that the issues raised have been covered in the CE Response and Recommendation to WFD-C3-118.</p>

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	<p>2. The quantum of land in the county available for wind energy appear to relate to "our proportion of National population as per census 2016". Determining land available to onshore wind targets on a prorate basis of population means that populous counties like Dublin can never meet their requirements. This concept is flawed.</p> <p>3. The planning process is robust and the decision to accept or reject projects should be subject to site specific consultation and decisions: not arbitrary local authority opaque decisions with unknown behind-the-scenes influencers .</p> <p>4. Not enough consideration is given to the opinions of the local population especially the hill farmers who live and work in a disadvantaged area and who should be given the opportunity to participate in the considerable benefits that wind energy now offers to communities - subsidised energy, substantial community funds which can be used for things like infrastructure development, third level education, house insulation etc.</p> <p>5. Based on this draft proposal , once residential exclusion zones (set back) are applied, It is likely that the actual quantum of land available for onshore wind energy will be small and insufficient to meet national targets. This study does not seem to have been done by the Local Authority. If it were to be done it might throw up surprising result. Excluding transitional upland sites like the eastern end of the Knockmealdown Mountains will potentially exclude wind development in County Waterford. This should not be accepted nor is it acceptable.</p> <p>6. Under the current proposals landowners such as ourselves will be disadvantaged. The actual county development plan regarding wind energy should not be changed without good transparent reasons.</p>	<p>Recommendation: See response to WFD-C3-118.</p>

3.2.7 Chapter 7 – Housing and Sustainable Communities

URN	Moderation Summary	Chief Executive Response and Recommendation
<p>WFD-C3-124</p>	<p>The submission is a copy of the CIF submission on the Draft Plan:</p> <p>1) The submission provides background and context to housebuilding in Ireland. In that context it highlights that there is a national requirement for "c.35,000 new dwellings per annum until 2030", an average of 928 houses a year for Waterford County, which is envisaged to be a "key economic driver for the Southeast" would appear to be a conservative estimate.</p> <p>2) The submission highlights that a shortage in land supply will have a direct impact on land prices and a corresponding impact on the viability of development and house prices. It requests that Waterford City & County Council should consider a method of delivering infrastructural requirements (Water, roads etc) themselves thus opening up more suitable lands for development</p> <p>3) The submission highlights that to deliver on Policy Objective H01 'compact urban growth' the Council will need to incorporate active land management measures or initiatives to contribute to the commercial viability of the development of infill / brownfield sites. A viability assessment of all key Brownfield and Infill sites should be considered.</p> <p>4) The submission is concerned that restrictions in the quantum of zoned lands has the potential to result in a lack of land supply, with negative consequences on the capacity of the construction industry to deliver affordable housing. It submits that the draft plan should avoid being overly prescriptive with regards to assigning population allocations and corresponding restrictions on the extent of lands required for settlements.</p> <p>5) The submission notes that "Residential" is not included as a use type under the provisions of the Draft Plans Zoning Matrix. It submits that this may result in potential legal issues when proposing residential development on lands not zoned residential as part of a mixed use development. Similarly, there is no provision under the zoning matrix</p>	<p>The CE notes the content of the submission. The submission is a copy of the previous CIF submission on the Draft Plan.</p> <p>1) As derived in Section 4.0 of updated Appendix 3: HNDA – The projected housing demand for the 6 year development plan period as calculated using the methodology outlined in Section 28 guidelines (Housing Supply Target Methodology for Development Planning - Guidelines for Planning Authorities (2020)) is 4,824, providing an annual average housing demand for County Waterford of 804 units'.</p> <p>This quantum is in accordance with OPR Recommendation on the Draft Plan - See submission WFD-C2-363 & WCCC Response.</p> <p>Recommendation: No change.</p> <p>2) The issue has been addressed in the CE Report on the Draft Plan. The Council has and will continue to utilise Local Infrastructure Housing Activation Fund (LIHAF) funding to open up strategic sites where there are infrastructural deficits identified that can be addressed by the Council eg Kilbarry, Carrickphierish. Irish Water are the responsible body for the delivery and operation of all public water and wastewater services in the country.</p>

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	to facilitate student accommodation	<p>Recommendation: No change.</p> <p>3) Issue is addressed in Policy H05.</p> <p>Recommendation: No change.</p> <p>4) The issue has been addressed in the CE Report on the Draft Plan. There is a significant quantum of residentially zoned land and regeneration/opportunity sites available within the city and other settlements to cater for the housing supply target assigned in the core strategy and settlement strategy.</p> <p>Recommendation: No change.</p> <p>5) The issue has already been addressed in MA 158 – Table 11 Zoning Matrix.</p> <p>Recommendation: No change.</p>
WFD-C3-158	<p>Conradh na Gaeilge submit a number of overarching Policy measures in order to strengthen the speaking and promotion of the Irish language and the retention of native Irish speakers in their own community through the provision of housing.</p> <p>Material Amendments:</p> <p>1) To insert in addition to 1.3.3 ‘To ensure that the Council provide the relevant support to the Gaeltacht Service Town, an additional person is employed in the Council to coordinate the Council’s services and to work in conjunction with the Language Planning Officer’</p> <p>2) To insert in addition to ECON 14 ‘To employ a Gaeltacht Officer to</p>	<p>The CE notes the submission received.</p> <p>The Council is committed to ensuring that the unique needs of Gaeltacht na nDéise are considered when determining proposals for housing development in the Gaeltacht area as defined in the Development Plan in order to ensure that the viability of the Gaeltacht as a linguistic community is protected. See Objectives H34, H35 & ECON 14 ‘An Gaeltacht’.</p>

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	focus primarily on Gaeltacht na nDéise’	<p>A number of the overarching Policy Issues raised by Conradh na Gaeilge fall outside the scope of the Development Plan including the two specific proposals to employ additional staff.</p> <p>Recommendation: No change.</p>
WFD-C3-162	<p>The CCLPL support the proposed Material Changes to Policy Objective SC 15 Childcare and Educational Facilities and Objective H17 Housing Mix which requires a 'Social Infrastructure Audit.</p> <p>The CCLPL draws attention to the recently published Review of Early Learning and Care (ELC) and School Age Childcare (SAC) Operating Model in Ireland Report December 2021 and the recommendations therein and that the Childcare Facilities Guidelines for Planning Authorities June 2001 currently are being revised.</p> <p>It is stated that alignment of policy at national and local level is essential to ensure that effective and efficient planning, development, capital investment and provision of early learning and care and school age childcare infrastructure is provided to address the needs of children and families in local communities throughout the city and county of Waterford.</p>	<p>The CE notes the submission received.</p> <p>The requirement for the submission of a ‘Social Infrastructure Audit’ within Policy Objective H17 (MA 95) will assist in the alignment of supply and demand in Childcare Facilities where new residential and mixed use proposals are submitted. See also CE Response to WFD-C3-164 which sets out some guidance for the content of Social Infrastructure Audits which should include an assessment of childcare facilities in the area.</p> <p>It is noted that the Childcare Facilities Guidelines for Planning Authorities June 2001 currently are being revised. These will be implemented by the Planning Authority once published.</p> <p>Recommendation:</p> <ol style="list-style-type: none"> 1. Minor Modification to Policy Objective SC 14 as follows: <p>“We will encourage the provision of childcare facilities in appropriate locations, including residential areas, city/town centres, district and neighbourhood centres, in areas of employment and educational establishments in accordance with national policy and the Department of the Environment, Heritage and Local Government Planning</p>

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		<p>Guidelines on Childcare Facilities: Guidelines for Planning Authorities (DoEHLG, 2001) and any other relevant statutory guidelines which may issue during the period of this Plan.</p> <p>We will require as part of planning applications for new large scale residential, public community, commercial, retail and <u>mixed-use</u> developments that provision be made for appropriate purpose built childcare facilities where such facilities are deemed necessary by the Planning Authority and by Waterford Childcare Committee Coiste <u>Cúram Leanaí Phort Láirge (CCLPL)</u>. “</p> <p>2. Minor modification to Volume 2 DM Standards Section 5.17 Childcare Facilities as follows: “The provision of childcare facilities is subject to the Child Care Act and the Child Care (Pre-School Services) Regulations 1996. The regulation of pre-school childcare services is set out in the Child Care Act 1991 (Early Years Services) (Amendment) Regulations 2016. The Council will seek to facilitate the provision of childcare facilities in appropriate locations throughout the City and County, and may require their provision in new large scale residential, public community, commercial, retail and <u>mixed-use</u> developments in accordance with the provisions of the DoEHLG ‘Childcare Facilities Guidelines for Planning Authorities’ (2001) <u>or any updated Guidelines thereof. As a general rule a minimum of 20 childcare spaces shall be provided for every 75 new residential units. A childcare facility within a new development shall be sited at or near the entrance/exit to the proposed development so as to allow for ease of access, drop off / pick up points. The provision of Childcare facilities should be designed in</u></p>

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		<p>accordance with the Universal Design Guidelines for Early Learning and Care Settings 2019 (or any updates thereof) and the requirements of the Coiste Cúram Leanaí Phort Láirge (CCLPL).”</p>
<p>WFD-C3-164</p>	<p>1. The submission requests that reference to the Land Development Agency (LDA) is made in the first paragraph of Section 7.3 of Chapter 7 and Section 3.3 of the DM Standards in the context of affordable housing delivery in accordance with its statutory remit under the Land Development Agency Act (2021) and as cross-referenced within the Government’s ‘Housing for All’ Plan.</p> <p>2. The submission is made in respect MA No. 95 - Policy Objective H17 ‘Housing Mix’. It seeks that ‘Footnote 7’ is omitted as it conflicts with wider ambitions within the Plan on facilitating delivery of a mix of homes and creating sustainable communities. It further requests that the requirement for schemes to demonstrate consistency with the HNDA be revised to demonstrate that the schemes have ‘had regard’ to the HNDA on the basis the HNDA is a strategic-level, county-wide strategy where there is insufficient granular data to support its rigid application on a site-by-site basis. It concludes by requesting that the requirement for residential schemes to be supported by a Social Infrastructure Audit (SIA) is revised to establish a minimum threshold where the requirement applies (e.g. all residential schemes of 50 or more homes), include guidance on the scope of the analysis required as part of each audit, and remove any obligation for schemes to be restricted pending delivery off-site social infrastructure where other parties have a statutory responsibility to deliver the relevant social infrastructure.</p> <p>3. The submission is made in respect of MA No. 94. In relation to Figure 5.5 and supporting text it requests that flexibility is required in applying such projections on a scheme-by-scheme basis owing to limitations underpinning the data including the absence of differentiation</p>	<p>The CE notes the submission received.</p> <p>1. The relevant text shall be amended to recognise the role of the LDA as a provider of affordable housing.</p> <p>Recommendation:</p> <p>a) Minor modification to MA 92 as follows: Modify paragraph 1 of Section 7.3 ‘Social Housing and Part V’ and Policy Objective H08 ‘Social Housing and Part V’ (Page 152) as follows:</p> <p>7.3 Social Housing and Part V “Social and Affordable housing will be provided by Waterford City and County Council as the Housing Authority, Approved Housing Bodies (AHBs), The Land Development Agency, and by a wide range of mechanisms, including under Part V of the Planning and Development Act 2000 (as amended).”</p> <p>Minor Modification to MA 141 as follows: (141) Amend Text within Section 3.3 ‘Part V Housing Requirements’ (Page 8 of Vol 2 DM Standards) as follows:</p> <p>3.3 Part V Housing Requirements “Social and Affordable housing will be provided by Waterford City and County Council as the Housing Authority, Approved Housing Bodies (AHBs), The Land Development Agency, and by a wide range of mechanisms, including under Part V of the Planning and Development</p>

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	<p>between urban and rural parts of the County and limitations associated with census data on correlation between household size and bedrooms. The emphasis could instead be on creating and supporting an appropriate mix of dwelling sizes to sustain balanced and inclusive communities.</p>	<p>Act 2000 (as amended).”</p> <p>2. Notwithstanding the comments of the LDA in relation to the specific requirements of potential residents for one-bed units, it remains the preference of the Council that the housing needs of ‘one person households’ as identified in Table XX are met through the provision of two bed houses/apartments <u>where possible</u> in order to support the development of lifetime homes and to facilitate changing household circumstances. <u>This does not preclude the provision of one bed units where it is deemed to be appropriate and demonstrated to be required.</u></p> <p>Recommendation: No change to footnote 7 associated with MA 95.</p> <p>3. The comments are considered to be reasonable and text shall be amended accordingly.</p> <p>Recommendation: Minor modification to MA 95 as follows: Modify Policy Objective H17 ‘Housing Mix’ bullet point 3 as follows: “ ...</p> <ul style="list-style-type: none"> • Require the submission of a report demonstrating consistency with which shall have regard to the HNDA and Housing Strategy with particular reference to: <ul style="list-style-type: none"> • How the proposed development contributes to meeting the future housing requirements as set out in Table xx, • How the proposed development has had regard to both the existing and permitted

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		<p>house types and tenures within the surrounding and adjoining neighbourhoods and/or district,</p> <ul style="list-style-type: none"> • How the proposed development will contribute positively to the housing mix and adaptability of the area, • The number/percentage of housing units to be made available for purchase by owner occupiers.” <p>4. The comments submitted are generally considered to be reasonable. It is considered appropriate to align the requirement for a Social Infrastructure Audit (SIA) with the requirement for the submission of a Design Statement as specified in Policy Objective “Place 10 Safe Places’ i.e (15 + residential units (or less depending on the site context). Guidance on the scope of the analysis required as part of each audit shall be incorporated as a footnote.</p> <p>Recommendation: Modify MA No. 95/ Policy Objective H17 ‘Housing Mix’ bullet point 7 as follows: “... <ul style="list-style-type: none"> • Require the submission of a ‘Social Infrastructure Audit’³ <u>for developments of 15 + residential units (or</u> </p>

³ A “Social Infrastructure Audit” assesses the overall impact a new development will have on the infrastructure which is key to the functioning of the community. This is generally assessed based on the percentage increase of population that a development once completed will bring to the community where the development is planned to occur. The audit shall detail that the potential increase in population that would arise from the proposed development, and take in account other new (permitted and proposed) developments in the area that are intended to be serviced by existing facilities. While not an exhaustive list these generally include the following infrastructure:
· Community facilities (open spaces, playgrounds, community halls, sports facilities).
· Education (childcare facilities, primary schools, secondary schools);
· Health (primary health care, care homes, doctor surgery, G.P, dentist facilities, pharmacy etc);
· Transport (bus routes, cycle routes, green infrastructure, road networks, pedestrian pathways, permeability links).

URN	Moderation Summary	Chief Executive Response and Recommendation
		<p><u>less depending on the site context</u>) identifying the social and community facilities in the area (or any deficiency thereof) in order to ensure that they are sufficient to provide for the needs of the future residents. Where deficiencies are identified, proposals will be required to either rectify the deficiency, or suitably restrict or phase the development in accordance with the capacity of existing or planned services.”</p>
<p>WFD-C3-171</p>	<p>The submission requests that appropriate residential zoning is applied to lands in Ballynalhessery South, Dungarvan in order to allow family members build and live in the locality.</p>	<p>The CE notes the issue raised.</p> <p>The issue of rural housing is considered to be adequately addressed within Section 7.11.2 (Housing in the Open Countryside) of the Plan. The rural housing policy in the Plan is consistent with Section 28 Ministerial Guidelines on Sustainable Rural Housing and the National Planning Framework. Any applicant must comply with Policy Objective H27 and demonstrate a genuine economic, social or local need to live in a rural area. Any planning application for rural housing is assessed on its own merits.</p> <p>Recommendation No change.</p>

3.2.8 Chapter 9 – Climate Action, Biodiversity and Environment

URN	Moderation Summary	Chief Executive Response and Recommendation
<p>WFD-C3-49, WFD-C3-96, WFD-C3-107 WFD-C3-115 WFD-C3-128 WFD-C3-134 WFD-C3-138 WFD-C3-142 WFD-C3-152 WFD-C3-160</p>	<p>The submission calls for the conservation of the native Irish honey bee, <i>Apis mellifera mellifera</i> in Waterford City and County. The submission seeks that WCCC support the Honeybee Strategy Plan, which seeks to protect the native Irish Honey Bee, which is an integral part of the All Ireland Pollination Plan, will be encouraged where possible.</p>	<p>The CE notes the content of the submission.</p> <p>Section 9.6 of the Draft Plan states “The Council are committed to improving work practices and implementing policies that deliver benefits for pollinator habitats”.</p> <p>Policy BD03 states “All proposed development will be considered in terms of compliance with the standards and legal requirements of the following where they apply including the All-Ireland Pollinator Plan (2021).</p> <p>Table 1 – General Standards for New Residential Development in Urban Areas includes “Applicants will be required to demonstrate High quality landscaping (including tree planting), that make use of a diverse range of species of plants – consistent with the National Pollinator Plan”</p> <p>Development Management Standards for site boundaries state: “Planting schemes shall be informed by the All-Ireland Pollinator Plan 2021-2026 and supporting guidelines, such as Pollinator Friendly Planting Code, and Hedgerows for Pollinator available on Pollinators.ie.”</p> <p>It is considered the Draft Development Plan supports a comprehensive range of policies and objectives for habitat protection and encouragement of green infrastructure that in turn will protect food sources for bee species including the native honeybee.</p>

URN	Moderation Summary	Chief Executive Response and Recommendation
		<p>More specific project based objectives for <i>Apis mellifera mellifera</i> are more appropriate for inclusion in the Waterford Heritage and Biodiversity due to be reviewed in 2023. Notwithstanding this it is felt that Policy Objective BH09 could be strengthened to include specific mention of the <i>Apis mellifera mellifera</i> (Irish Native Honey Bee).</p> <p>MA No. 119 relates to the support of the All Ireland Pollinator Plan and the recommendation below seeks to enhance the role the native honey bee plays as a pollinator.</p> <p>Recommendation: Minor modification to Policy Objective BH09 Building Adaptation on page 228 of the draft plan to read as follows:</p> <p>“It is the policy of the Council to request an ecological impact assessment where development may have an adverse impact on protected wildlife species such as bats, nesting birds <u>and the <i>Apis mellifera mellifera</i>/ native Irish honeybee</u>. The incorporation of biodiversity enhancement measures shall be a requirement in conservation repair works to existing buildings and design of new developments.”</p>
WFD-C3-59	This submission seeks that Coumaraglin Mountain, Knockavanna, Milk Hill, Bleantis Mountain And Bleantis And Glenananne be included in the High Quality River Water protection area as it is considered that these areas feed the Colligan River and provide vital water resources to Dungarvan and the wider area.	<p>The CE notes the content of the submission.</p> <p>The extent of the Blue Dot Catchments is informed by scientific assessment by the EPA and LAWPRO. The section of the Colligan and Araglin rivers identified in this area is between Scart Bridge and Lackandarra Bridge (N-S) and Coum Bridge to the east and Lackadarra and Knockanpower Lower to the west. All development</p>

URN	Moderation Summary	Chief Executive Response and Recommendation
		<p>proposals within Blue Dot Catchment will be subject to assessment for impacts on objectives under the Water Framework Directive and the third River Basin Management Plan as per policies in WQ01 and WQ02 of the Draft Plan. Any amendments to the Blue Dot catchment areas as identified by the EPA and LAWPRO will be incorporated to Waterford City and County Council's WAT Maps GIS to inform such WFD Screening Assessments.</p> <p>Recommendation: No change.</p>

3.2.9

Chapter 10 – Landscape, Coast/ Marine and Blue Green Infrastructure

URN	Moderation Summary	Chief Executive Response and Recommendation
<p>WFD-C3-163</p>	<p>The submission requests the following: Natural Heritage in the area of the mountains of Bleantasour, Knockavannia, Baracree and Glenaneane be included in the adjacent SPA. The area from Coumaraglin to Knockavannia must be included in the adjacent Natural Heritage Area. The area of Bleantasour, Knockavannia, Baracree and Glenaneane must be included in the Blue Dot High Quality River Catchment area. The mountainous area from Knockavannia in the north to Scartnadriny in the south forms part of the Comeraghs and should be afforded the same protections.</p>	<p>The CE notes the content of the submission received. Designation of Special Protection Areas is the remit of the National Parks and Wildlife Service of the Department of Housing, Local Government and Heritage under the Birds and Habitats Regulations 1997 (as amended). Designation of a SPA requires certain criteria to be met including; population size and density i.e. an area used regularly by 1% or more of the all Ireland population of a species listed in Annex 1 of the Birds Directive, Species Range, Breeding Success, History of Occupancy, Multi Species Areas Naturalness and Severe Weather Refuges. The Planning and Development Act does not provide for designation of Natura 2000 Sites. Section 10 (2) (c) of the Planning and Development Act 2000 (as amended) requires Development Plans to include objectives for the conservation and protection of the environment including the conservation and protection of European sites. Sections 9.6 and 9.7 of the Draft Plan detail a comprehensive range of policies for protection of the Natura 2000 Network in Waterford including BD 09. Identification of geological heritage sites is the remit of Geological Survey Ireland and the geological interest of the wider area is noted. This area is identified as being of highest landscape sensitivity in the Landscape Character Assessment of the Draft Plan and Chapter 10 of the Plan sets out a range of policies for protection of landscape character and sensitivity. Designation of Natural Heritage Areas is the remit of the National Parks and Wildlife Service of the Department of Housing, Local Government and Heritage under the Wildlife Act (2000). The extent of the Blue Dot Catchments is informed by</p>

		<p>scientific assessment by the EPA and LAWPRO. The section of the Colligan and Araglin rivers identified in this area is between Scart Bridge and Lackandarra Bridge (N-S) and Coum Bridge to the east and Lackadarra and Knockanpower Lower to the west. All development proposals within Blue Dot Catchment will be subject to assessment for impacts on objectives under the Water Framework Directive and the third River Basin Management Plan as per policies in WQ01 and WQ02 of the Draft Plan. Any amendments to the Blue Dot catchment areas as identified by the EPA and LAWPRO will be incorporated to Waterford City and County Council's WAT Maps GIS to inform such WFD Screening Assessments.</p> <p>This area is identified as being of highest landscape sensitivity in the Landscape Character Assessment of the Draft Plan and Chapter 10 of the Plan sets out a range of policies for protection of landscape character and sensitivity. The strategic objective for protection of landscape is to "Protect our sensitive landscapes and seascapes which contribute to the distinctiveness of Waterford as a place and its people".</p> <p>Recommendation: No change.</p>
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3.2.10 Volume 2 Development Management Standards

URN	Moderation Summary	Chief Executive Response and Recommendation
WFD-C3-120	The submission supports the MA No. 155 of Section 11.2 of the DM Standards which allows for modifications and extensions to extant permissions on Strategic Residential Reserve Lands, to be retained in the final Development Plan to be adopted later this year.	The CE notes the comments in relation to MA 155. Recommendation No change.
WFD-C3-164	<p>1. The submission seeks further clarification is requested on what constitutes ‘increased building heights and densities’ in relation to the Material Alteration which confirms public open space should be provided at a minimum rate of 15% of the total site area save in developments where increased building heights and densities are proposed. It also submitted that the requirement needs to be flexible to account for the regeneration of the key regeneration/infill sites listed in Appendix 21 and other such sites that may come forward during the plan period where it may not always be possible to make such provision due to constrained urban sites and the requirement to provide a mix of uses. It is also queried if the use of ‘maximum’ in the material alteration should read ‘minimum’.</p> <p>2. The submission states that the Proposed Alteration seeks to increase the car parking standard per dwelling in areas outside Designated Town Centres from 1 to 2 spaces.</p> <p>It requests that this proposal be reconsidered as this could have negative implications on wider sustainability objectives and targets within the Plan and a general transition towards more active travel and a low carbon society.</p>	<p>The CE notes the issues raised. See also CE responses to WFD-C3-164 MA 22 & MA24 in relation to ‘increased building heights and densities’</p> <p>Recommendation:</p> <p>1. Minor modification to MA 142: Modify Text within Table 1 – General Standards for New Residential Development (Pages 9- 14 of Vol 2 DM Standards) - Bullet Point 1 as follows:</p> <p>“... Public Open Space</p> <ul style="list-style-type: none"> Public open space should be provided at a minimum rate of 15% of total site area, save in developments where increased building heights and densities are considered appropriate proposed such as those specified in Volume 1: Table 3.1 and within Appendix 21: Regeneration and Opportunity Sites and the application of the maximum minimum rate is considered to be inappropriate. The open space should be designed so as to complement the residential layout and be informally supervised by residents. The spaces should generally be centrally located within groupings, and be visually and functionally accessible, of a suitable gradient, useable and overlooked by a maximum number of dwellings. Incidental pieces of unusable land shall not

		<p>be considered to fulfil or partially fulfil the 15% requirement; for example narrow tracts of open space, which are difficult to manage, will not be acceptable.”</p> <p>2. Minor modification to MA (150) Table 5 – Car-parking standards as follows:</p> <p><u>House/Dwelling:</u> 0 spaces in Designated Town Centre Area 2 spaces per dwelling in all other areas In multi unit applications, 1 visitor car space per 4 dwellings may be required</p> <p><u>Flat/Apartments</u> Car space per unit Waterford City Centre * 1 visitor car space per 4 apartments</p> <p>All suburban locations in Waterford City and other main urban centres in the Count, the requirement is 1.5 spaces per unit. In all cases, 1 visitor car space per 4 apartments</p> <p><u>House/Dwelling/Apartment:</u></p> <p><u>Waterford City Centre/Urban Town Centres/Neighbourhood Centres - (unless deemed to be required on a site by site basis):</u> <u>0 spaces required</u></p> <p><u>In all other areas in the City - (unless not deemed to be required on a site by site basis):</u> <u>1-2 bedrooms: 1 space</u></p> <p><u>In all other areas in the County - (unless not deemed to be required on a site by site basis and excluding apartment</u></p>
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		<p><u>developments):</u> <u>1-2 bedrooms: 1 space</u> <u>3 bed +: 2 spaces</u></p> <p><u>For every 4 residential units provided with only 1 space, 1 visitor space shall be provided in addition.</u></p> <p><u>*Parking areas should be designed in accordance with Section 4.4.9 of the DMURS Guidelines. A mix of on-street and in-curtilage parking is encouraged in residential settings.</u></p>
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3.2.11 Appendix 2: Specific Development Objectives

URN	Moderation Summary	Chief Executive Response and Recommendation
<p>WFD-C3-70</p>	<p>This submission requests that the 'Tramore Green Ring Route' (TRDO12) be expanded to the Glen Rd to Monvoy Valley as an area designated for walking and cycling only. In addition to connecting the Glen Rd and Monvoy Valley, it seeks to connect – and protect -the Garraun Stream which runs through Monvoy, to the Backstrand.</p>	<p>The CE notes and welcomes the submission by Tramore Eco Group.</p> <p>It is noted that the SDO TRDO12 only partially includes the proposed Green Ring Route and omits a key area of high biological importance such as Glen Road, Monvoy Valley and the Garraun Stream, that could be preserved and in doing so provide an amenity to enhance engagement with nature and promote health and wellbeing as well as a sustainable transport route. It is therefore considered necessary to amend the text of the SDO TRDO12.</p> <p>Recommendation:</p> <p>Amend MA No. 159/ Appendix 2 Specific Development Objectives as follows:</p> <p>“TRDO12: ● DO12 To support the development of a Green Ring Route around Tramore that links existing and proposed sites of biodiversity or natural amenity <u>and develop extensions from this route as opportunities arise such as connecting the Glen Road to Monvoy Valley and the Garraun Stream to the Backstrand. Any such connections would be subject to appropriate environmental assessment.</u> The route will follow, following paths, cycle paths and roads already in place and includes suggestions for new safe and sustainable transport routes (Indicative route set out in Transport Map 3 however this will be addressed in more detail through the Local Transport Plan for Tramore).”</p>
<p>WFD-C3-</p>	<p>The submission considers WCDO25 to be most baffling /contradictory</p>	<p>The CE notes the content of the submission.</p>

URN	Moderation Summary	Chief Executive Response and Recommendation
111	<p>proposal in relation to the locality. It questions 'who again is looking for access to the Knockhouse Road?'. It further states that the CE has already dismissed a similar proposal in the original draft plan for access to the Knockhouse Road. The submission raises a number of question in relation to the above SDO:</p> <ul style="list-style-type: none"> > Is the line of this proposed road shown on any of the maps being currently presented to the public as part of this process? If not why not? > What is the reason for proposing a roadway in this section of the document? Do the NTA know about this proposal? > Is this road being considered as part of the WMATS process? > Whose land will it cross? Will compulsory purchase be required? <p>The submission concludes by asking the Council Members to reject this proposed alteration until such time as it is clearly explained and presented to the public and the reasons for inclusion here justified.</p> <p>The submission requests that WCDO26 be relocated to the currently zoned residential land between the Knockhouse Road, Gibbet Hill Road, west of Sherlock Walk and East of De La Salle GAA Club . The residents group believe that the relocation to of this lower density zoning would aid the smoother transistion from the higher density levels of the newer schemes to the older rural / ribbon developments and help to avoid overlooking issues and changing the ambience of the area. The relocation may also be of benefit to De La Salle GAA Club and the Community Zoned Lands in that location.</p>	<p>The SDO WCDO25 is an indicative specific objective and outlines that the Council would support in principal new access to the lands north of the Carrickpherish Road for development purposes.</p> <p>It must be noted that the Carrickpherish and Gracedieu will be subject to a Local Area Plan and a Local Transport Plan which will consider the completion of Neighbourhood 1 and the sustainable development of Neighbourhood 2 and the challenges and opportunities which exist across the broader area. This will be informed by public consultation with all communities with an interest in the development of the area.</p> <p>Recommendation: No change.</p>

3.2.12 Appendix 7: Renewable Energy Strategy

URN	Moderation Summary	Chief Executive Response and Recommendation
WFD-C3-105	The submission also highlights anomalies in the change of land designations with regards to current Preferred Areas to Exclusion Areas and other current Exclusion Areas to Preferred Areas and the elimination of strategic areas. It states that here will be a dramatic reduction in the land available for onshore wind farms compared to the current Development Plan.	The CE notes the content of the submission. It is considered that the issues raised have been covered in the CE Response and Recommendation to WFD-C3-170 and WFD-C3-189. Recommendation: See response to WFD-C3-170 and WFD-C3-189.
WFD-C3-123	The ESB supports the updated plan led approach to the Wind Energy Strategy Map that identifies the most suitable locations for wind energy development.	The CE notes the content of the submission and welcomes the ESB support for the updated and plan led wind energy strategy map. Recommendation: No change
WFD-C3-140	The Material Alteration to support renewable energy as set out in Appendix 7 is welcomed. It is advised that the planning authority should ensure that the proposed Material Alteration meets the requirements of the 'Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change' (Department of Housing, Planning, Community and Local Government July 2017) and, in particular, Section 4 which relates to the specific planning policy requirement under Section 28(1C) of the Act when making, reviewing, varying or amending a development plan, or a local area plan, with policies or objectives that relate to wind energy developments.	The CE notes and welcomes the submission on Appendix 7 by the SRA. It is considered that the Wind Energy Strategy as set out in Chapter 6 and Appendix 7 of the Draft Plan as well as the revised Wind Energy Policies set out in Chapter 6 of the MA Report above meet the requirements of the SPPRs of the 2017 Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change and the SPPRs set out in the Draft Revised Wind Energy Development Guidelines December 2019. Recommendation: No change.
WFD-C3-141	The submission states that the rationale for proposed wind energy map is unclear / impenetrable and inhibits the ability of the public to comment fully on the considerations upon which it is based.	The CE notes the content of the submission. It is considered that the issues raised have been covered in the CE Response and Recommendation to WFD-C3-170 and

URN	Moderation Summary	Chief Executive Response and Recommendation
	<p>It requests that the Council revise fundamentally the wind energy map and particularly the proposed 'no go' as it is not evidence based and fails to positively designate lands in the County that are suitable in our view and in terms of planning precedent in the County and across the Country, for wind farm development.</p>	<p>WFD-C3-189.</p> <p>Recommendation: See response to WFD-C3-170 and WFD-C3-189.</p>
<p>WFD-C3-165</p>	<p>The submission seeks clarity with regards to MA No. 176 and requests the Council to provide for an evidence based rationale for the update to LCA and Wind Energy Map.</p>	<p>The CE notes the content of the submission. It is considered that the issues raised have been covered in the CE Response and Recommendation to WFD-C3-170 and WFD-C3-189.</p> <p>Recommendation: See response to WFD-C3-170 and WFD-C3-189.</p>
<p>WFD-C3-170</p>	<p>The submission highlights that the proposed wind energy map results in an overall decrease in area for potential wind energy developments. It states that this is particularly problematic in the areas of transitional farmed and forested foothills landscapes. These areas host wind farms across the country and indeed in Waterford, proving well suited for such developments.</p> <p>The submission requests that the Council revise the wind energy map to ensure appropriate land designations have been provided to align with the requirements of the CAP 2021.</p>	<p>The CE notes the content of the submission.</p> <p>A number of the points raised in relation to the submission have been covered in the CE Response and Recommendation to Submission No. WFD-C3-189. The methodology used to create the new Wind Energy Map is considered to be in line with the Wind Energy Planning Guidelines (2006).</p> <p>The preferred area outlined in the draft RES has increased from the 1999 WS (preferred + strategic). This is partly due to a reclassification of Open for Consideration (OFC) area to Preferred area. Therefore, OFC area has decreased in the draft RES.</p> <p>No Go or Exclusion area has increased in the draft RES. This is due to a number of factors:</p> <ul style="list-style-type: none"> • The capture the Blackwater and Bride Rivers. • The reclassified in the north west of the county due to

URN	Moderation Summary	Chief Executive Response and Recommendation
		<p>changes arising from the review of the LCA map and to align with neighbouring local authority wind energy strategies of County Cork and Tipperary.</p> <ul style="list-style-type: none"> • The capture of areas west of the Comeragh Mountain due to changes arising from the review of the LCA map, associated infrastructural deficits with regards to road access and to align with neighbouring local authority. • Waterford Airport Laser Beam Critical Flight Zone in the east of the County. <p>With regards to the comments in the submission in relation to eliminating wind farm development on peat soils based on Carbon release, irrespective of the condition of the peatland it is considered from a biodiversity perspective Waterford peatlands are recognised for their range of ecosystems services from carbon capture to water retention and biodiversity for flora and fauna. This is identified through the range of nature conservation designation applied to peatland sites from the Comeragh Mountains SAC to Wetlands of National Importance at Knockmealdown, Boghaghbaun, Boggaghduff, Bohernagore West, Curraghdyrick Lower, Glenaknockaun East, Glenaknockaun West, Knockanask and Tooraharaheen and wetlands of regional importance e.g. Monyarha Bog as surveyed in 2015 and listed for protection in Appendix 11 of the Draft Development Plan. These areas comprise wet and dry heath and blanket bog habitats and as per biodiversity policies contained in Chapter 9 of the Draft Development Plan and environmental objectives contained in the SEA Environmental report the facilitation of wind energy development in these area would represent policy divergence from these objectives for biodiversity in the</p>

URN	Moderation Summary	Chief Executive Response and Recommendation
		<p>plan.</p> <p>The draft WEP has been updated in line with Section 28 Guideline, is subject increased mapping accuracy (OSI prime2), updated LCA mapping and aligns with neighbouring local authorities WEPs.</p> <p>Recommendation: No change.</p>
WFD-C3-182	<p>The submission states that need for energy independence is an issue of growing concern given current worldwide events and the war in Ukraine. The submission queries whether the area available for onshore wind development is sufficient to achieve Government targets of 80% renewable energy by 2030.</p>	<p>The CE notes the content of the submission. It is considered that the issues raised have been covered in the CE Response and Recommendation to WFD-C3-170 and WFD-C3-189.</p> <p>Recommendation: See response to WFD-C3-170 and WFD-C3-189.</p>
WFD-C3-186	<p>The submission queries the method of calculation of Renewable Energy Targets and Waterford's ability to meet Climate Action Plan Targets. It is also stated that further detail should be included to explain how wind energy mapping was arrived at.</p>	<p>The CE notes the content of the submission. It is considered that the issues raised have been covered in the CE Response and Recommendation to WFD-C3-170 and WFD-C3-189.</p> <p>Recommendation: See response to WFD-C3-170 and WFD-C3-189.</p>
WFD-C3-189	<p>The submission sets out a number of issues in relation to MA No. 176.</p> <ol style="list-style-type: none"> 1. The relationship between the LCA and wind energy classifications is unclear. 2. The maps included in the MA Report are of poor quality. 3. The rationale as to why previous classifications areas have changed in the New Wind Policy. 4. The New Wind Map CDP should include a 'medium' landscape sensitivity classification and a corresponding 'open to consideration' wind energy classification at these locations to account for the gradual change between the contrasting landscapes sensitivities and wind 	<p>The CE notes the content of the submission received.</p> <ol style="list-style-type: none"> 1. The relationship between the Landscape Character Assessment (LCA) and the WEP is set out below. <p>In developing the updated wind energy map for the MA Report the Planning Authority followed the methodology set out in the 2006 Wind Energy Planning Guidelines issues by the DEHLG. Chapter 3 of these guidelines set out a step by step approach for the identification of suitable locations</p>

URN	Moderation Summary	Chief Executive Response and Recommendation
	energy designations.	<p>for wind energy development. Step 3 requests that wind energy mapping and the landscape evaluation and sensitivity analysis should be overlaid together with the built and natural heritage, archaeology and amenity designations in the Development Plan along with existing settlements within the functional area of the local authority.</p> <p>A revised LCA Map was prepared for the MA Report following review of submissions including that from the Office of the Planning Regulator from Draft Plan stage. The draft map involved refinement of boundaries and extent of areas classified as high sensitivity reflecting changes in land cover and management with a resulting increase in land area classified as low sensitivity. Areas classed as low sensitivity are generally lands used for agriculture and forestry and below the 200m contour. Wetland areas and rocky outcrops particularly in the east of the county are classified as high sensitivity. The extent of the most sensitive classification along the coastal zone was refined to reflect scenic amenity value as realised from routes and viewing points closest to the coastline. Errors and omissions in list of protected views were corrected.</p> <p>The update to the LCA map resulted in some areas being reclassified on the wind energy map from 'open to consideration' to 'exclusion' and from 'exclusion' to 'preferred' areas.</p> <p>Another rational for the above classification change is the inclusion of the Waterford Airport Laser Beam Critical Flight Zone in the east of the County which is now an exclusion zone. In the previous Wind Strategy Map</p>

URN	Moderation Summary	Chief Executive Response and Recommendation
		<p>commissioned in 1999 it was classed as preferred. Map two on page 114 of the MA Report shows that areas have been reclassified in the north west of the county and west of the Comeragh Mountain. This is due to changes arising from the review of the LCA map, infrastructural deficits with regards to road access and to align with neighbouring local authority wind energy strategies of County Cork and Tipperary.</p> <p>It must be noted that the 2006 Wind Energy Guidelines for Planning Authorities does not provide for a 'medium' landscape sensitivity classification to allow for the gradual change between the contrasting landscapes sensitivities and wind energy designations. The concept of a buffer is important in terms of supporting a gradual transition between sensitive areas.</p> <p>Recommendation: Minor modification to MA No.84/ UTL 13 Renewable Energy by adding an additional bullet point 3 to read as follows:</p> <p><u>“...The Wind Energy Designation Map and the Landscape and Seascape Character Assessment Map identify different landscape character areas and associated landscape sensitivities. These designations encompass the concept of buffers between areas of sensitivity which vary across the different landscape character types and their different locations. These buffers allow for a gradual change between contrasting landscape sensitivities and associated wind energy designations to be considered, as necessary, when determining any development proposal;...”</u>”</p>

3.2.13 Appendix 12: Airport Masterplan

URN	Moderation Summary	Chief Executive Response and Recommendation
WFD-C3-2	The submission relates to Waterford's SEVESO sites and requests updating text to reflect current legislation.	<p>The CE notes the content of the submission. A minor modification is proposed to MA 182 to reflect the correct name and address of the upper tier Seveso III Establishment.</p> <p>Recommendation: Minor modification to MA 182 as follows:</p> <p>1.3 Airport and Business Park Development</p> <p>Insert the following text at the end of Section 1.3 'Airport and Business Park Development' (Page 5 of Appendix 12 Airport Masterplan) as follows:</p> <p>"The Business Park area has since been increased with a number of permissions granted in the last Plan period. The total area of the Business Park is 138.6 hectares. To date, a variety of uses have been permitted within the park. Given the strategic context of the Airport and associated Business Park, there is a need to ensure the strategic and appropriate focus of the type of development which is permitted into this area.</p> <p>Stafford's Wholesale Ltd. T/A Stafford's Bonded, Lockheed Avenue, Airport Business Park is a Designated Lower Tier Seveso III Establishment and Waterford Trans Stock located in Ferrybank/ Kilkenny County Trans-stock Warehousing and Cold Storage Ltd., Christendom, Ferrybank, Co Waterford is a Designated Upper Tier Seveso III Establishment under the Directive. With regard to such sites, consultation distances are established within which there is an obligation to consult with the Health and Safety Authority and Waterford City and County Fire service, in respect of any development proposals."</p>

WFD-C3-131	Dublin Airport, daa, Head Office, Dublin Airport, Co. Dublin, has no comment to make in respect of the Material Alterations to the Draft City and County Development Plan 2022-2028,	The CE notes the response. Recommendation No change.
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3.2.14 Appendix 13 Strategic Flood Risk Assessment (SFRA)

URN	Moderation Summary	Chief Executive Response and Recommendation
<p>WFD-C3-32</p>	<p>The submission welcomes the material alterations 23, 82, 83 and 162 in particular. The submission also notes discrepancies between flood maps in the SFRA and the interactive mapping tool. The following comments pertain in particular:</p> <ol style="list-style-type: none"> 1. While commentary has been included in the Material Alterations to require the application of a sequential approach to development management, it is considered that additional plan making justification tests are required to address some land use zoning provisions. In these cases avoidance of zoning for highly vulnerable land uses is recommended. In addition, there are some instances of overlapping of land use zoning and flood zones. Particular reference is made to some land use zoning provisions in Dungarvan, Dunmore East, Gaeltacht na nDéise, Portlaw, Tramore and Waterford City. 2. The draft plan should support flood relief schemes in Aglish, Ballyduff and Dungarvan & Environs as outlined in the previous OPW submission while a register of key flood risk infrastructure should also be included in the draft plan. 	<p>The CE notes and welcomes the submission by the Office of Public Works.</p> <p>In response it should be noted that the inconsistency between the interactive draft development plan mapping and the SFRA has been corrected and the interactive mapping is being updated to reflect the full set of flood extent data included in the SFRA. Furthermore, reference should also be made to the response and recommendation to the submission by the OPR (submission ref. no. WFD-C3-172) in this report which also deals with issues raised by the OPW.</p> <p>Recommendations:</p> <ol style="list-style-type: none"> 1. The land use zoning for the areas identified in the submission have been reconsidered and redrafted as necessary to ensure no transgression of the land use zone into the relevant floodzone. Furthermore, new plan making justification tests have been included in the SFRA (Appendix 13 of the draft plan). The details of this recommendation are set out in the response and recommendation relating to the OPR submission. 2. To provide support for proposed flood relief schemes the following minor modification is recommended for inclusion as the final section in policy objective UTL 10 (already amended under Material Amendment 83): <ul style="list-style-type: none"> "• <u>We will support the development of new flood relief schemes by the OPW, in particular those at Aglish, Ballyduff and Dungarvan & Environs while protecting public investment in flood relief schemes as detailed in section 4.4.3 of the SFRA (Appendix 13).</u>"

3.2.15 Appendix 19 Strategic Environmental Assessment (SEA)

URN	Moderation Summary	Chief Executive Response and Recommendation
WFD-C3-1	<p>The submission requests that the Draft Plan align with national commitments on climate change mitigation and adaption plans as well as being consistent with higher level plans and programmes. The submission further states that where further changes to the Draft Plan are proposed, these should be screened for likely significant effects in accordance with SEA Regulations and states that when the plan is adopted that an SEA Statement be prepared.</p>	<p>A Climate Action Plan will be prepared by Waterford City and County Council in 2022 and will be consistent with national and European climate targets. Policy CA01 of the Draft Plan sets out “To support and implement the policies of the Waterford Climate Adaptation Strategy in collaboration with Waterford Climate Action Team the Climate Action Regional Office (CARO), and review/replace the strategy pursuant to the provisions of the Climate Action and Low Carbon Development Act.”</p> <p>The SEA process including screening of any further amendments and preparation of a SEA Statement shall be completed in accordance with the SEA Regulations.</p> <p>Recommendation: No change.</p>

3.2.16 Appendix 21 Regeneration and Opportunity Sites

URN	Moderation Summary	Chief Executive Response and Recommendation
WFD-C3-111	<p>The submission seeks to remove the Regeneration/ Opportunity Site OPS 24 ' Neighbourhood Centre, Carrickphierish' from Appendix 21 as its inclusion as a Regeneration Area is only being done so as to preordain the type of development that may be constructed on it; ie High Density High Rise.</p>	<p>The CE notes the content of this submission.</p> <p>This site has been identified as a key development site dating back to the Waterford City Council Action Plan for the North-West Suburbs was prepared in 1999. In the current Waterford City Development Plan 2013-2019 it is envisaged that the site be the centre for of a larger neighbourhood centre and community and recreational facilities. The draft plan continues to support the development of a neighbourhood centre at this site. As it is envisaged that this site will form the centre for the wider neighbourhood it is considered that higher densities are appropriate and would constitute proper planning and sustainable development.</p> <p>Recommendation: No change.</p>
WFD-C3-133	<p>The submission relates to Opportunity Site DTOS06 at Fire Station Road, Shandon (Dungarvan Town) - MA No. 186. The Vision for the site states that 'Development on this site should be mixed use high density with emphasis on tourism (hotel), commercial, retail and residential uses'</p> <p>It is noted not all of the future uses identified for the site in the Vision are permitted in principle or open for consideration in the zoning matrix. It is requested that the Plan/Matrix is amended accordingly to allow for the proposed uses.</p>	<p>The CE notes the content of the submission and considers it necessary to add additional text to the general policy objective for regeneration sites at the start of Appendix 21 to resolve the issue of conflicting uses between the zoning matrix and the regeneration vision.</p> <p>Recommendation: Minor modification to MA No. 91/ Regeneration and Active Land Management – Policy Objective H05 Regeneration Policy Objectives by adding additional text to the end of the policy: “...<u>Development proposals which are not fully consistent with the provisions of the land use zoning matrix (Table 11) will be considered on their own merits where it can be demonstrated that the proposed development is consistent with the ‘Vision’ for the site, and is in accordance with the proper planning and</u></p>

URN	Moderation Summary	Chief Executive Response and Recommendation
WFD-C3-145	<p>The submission requests that the Vision for the Opportunity Site DTOS01 be expanded to contain an explicit reference to the future development of town centre/anchor retail as part of any future development proposal on the lands. It suggests that an additional bullet point be added to read as follows:</p> <p>> Development can include an anchor retail store in accordance with the Retail Strategy.</p>	<p><u>sustainable development of the area.</u>"</p> <p>The CE notes the content of the submission and the request to add an additional bullet point to the vision statement for the SDO to include a reference that development on the site can include an anchor retail store in accordance with the Retail Strategy.</p> <p>Any development on this site will be assessed on its merits and particular reference to anyone type of development is not considered appropriate in the vision statement.</p> <p>Recommendation: No change.</p>
WFD-C3-157	<p>The submission requests that Appendix 21 be revised as follows:</p> <ul style="list-style-type: none"> • Either remove any potential yield calculation for this site or in the alternative to identify the potential yield at the site based on a potential density of at least 100 No. units per hectare, which would be of the order of 290 No. units. • We also request that Appendix 21 should be revised to include a provision in the Vision for this site that it has potential to accommodate taller buildings. • Finally, for consistency with Table 3.1 please amend the 'name' of the site in Appendix 21 to read the same as Table 3.1. i.e. Gasworks Site / Johnstown Business Park 	<p>The CE notes the content of the submission.</p> <p>Recommendation: Minor modification to MA No. 186/ Appendix 22 Waterford City and County Regeneration and Opportunity Site OPS 13 – Gasworks Site, The Waterside to read as follows:</p> <p>"OPS 13 – Gasworks Site / <u>Johnstown Business Park</u>, The Waterside</p> <ul style="list-style-type: none"> • Create a mixed use high-density development on the site with an emphasis on commercial and residential city living; • Create an attractive waterside mixed use development; • Future developments shall comprise a high quality design, fine grained active frontage blocks providing a strong built edge; • The site has potential to accommodate taller building(s) and has a <u>potential yield of c. 136 units potential housing yield.</u>"
WFD-C3-164	<p>The submission suggests that some of the regeneration objectives and site-specific criteria require greater flexibility to support the delivery of the sites. It is suggested that these sections could instead be termed aspirations/ considerations' albeit with less</p>	<p>The CE notes the content of the submission and agrees that greater flexibility is needed to support the delivery of the sites. It must be noted that Policy Objective H05 has been updated on foot of Submission No. WFD-C3-133. However, it is felt that</p>

URN	Moderation Summary	Chief Executive Response and Recommendation
	<p>prescription as per the comments above.</p>	<p>additional text should be added to the 'General Objectives for Regeneration' at the start of Appendix 21.</p> <p>Recommendation: Minor modification to MA No. 186/ Waterford City and County Regeneration and Opportunity Site by adding additional text to the 'General Objectives for Regeneration' at the start of Appendix 21 to read as follows:</p> <p><u>“...●The vision statement for each opportunity site should be read in conjunction with Policy Objective H05 'Regeneration Policy Objectives'.</u> “</p> <p>The CE notes the suggestion in relation to OPSO8 (St. Otteran's Hospital) that the map be updated to incorporate the primary care centre and associated car park at the centre of the site and areas of open space within the HSE's ownership.</p> <p>Recommendation: Minor modification to MA No. 186/ Waterford City and County Regeneration and Opportunity Site - OPSO8 (St. Otteran's Hospital) to incorporate the primary care centre and associated car park at the centre of the site and areas of open space within the HSE's ownership.</p>

URN	Moderation Summary	Chief Executive Response and Recommendation
		 An aerial photograph of a residential area with a large, irregularly shaped area highlighted in red. The highlighted area is located in the upper-middle portion of the map, covering several blocks of houses and a larger open space. The surrounding area shows typical suburban housing with streets, lawns, and some trees.

PART 4 APPENDICES TO CHIEF EXECUTIVE’S REPORT

APPENDIX 1 List of Written Submissions received (in numerical order)

URN	Author
WFD-C3-1	Environmental Protection Agency
WFD-C3-2	Health and Safety Authority
WFD-C3-3	Transport Infrastructure Ireland
WFD-C3-4	John O Donnell
WFD-C3-5	Lismore and Economic and Social Community Group
WFD-C3-6	Irish Water
WFD-C3-7	Cashel Veronica Corby
WFD-C3-8	Andrew Corby
WFD-C3-9	Richard Dunford
WFD-C3-10	Robyn Corby
WFD-C3-11	Fionnuala Wall
WFD-C3-12	Eoin McNamara
WFD-C3-13	Irene Clark
WFD-C3-14	Sinead Gough
WFD-C3-15	Tom Leahy John Curry Gavin Whelan Anne Whelan Tracey Hogan Niamh Curry David Nolan Josephine Curry Seán Curry Brian Enright Brendan Ormonde Eóin Tallon Kate Kenefick Audrey Murray Marian Frewen Kate Heffernan Paul Heffernan Clare Murphy Tomas Gough Eileen Heffernan Grace Heffernan Jamie Mills Michael Dunford Ann Ryan Jim Ryan Emma Ryan Gary Cantwell

URN	Author
	Kate Veale
	Aisling Fennell
	Gerard Curry
	Mary Power
	Helen Moore
	Jean Burke
	Esther McGuckian
	Claire Whyte
	Siobhán Kirwam
	Katie Kiely
	Dermot O'Neill
	Beth Gardner
	June Whyte
	Hannah O'Connell
	Claire Power
	Helena Barry
	Paul Kennedy
	C Collins
	Donal O'Donoghue
	Lorna Murphy
	B Duff
	Clodagh Dwyer
	Anthony Dwyer
	Gerry Cantwell
	Gearóid Coffey
	Thomas Duggan
	Kellie Duggan
	Mosse Joyce
	Edith Brophy
	Noel McGregor
	John Flynn
	Shirley Flynn
	Philip Harty
	Shane Flavin
	Patrick Power
	Kenneth O'Donnell
	Ray Burke
	Eoin Deam
	Nina Fee
	Kate M Heffernan
	Sarah Mullaney
	Cara Mullaney
	Nicola Fennell

URN	Author
	Lorraine Lonergan
	L Walsh Kett
	Tracey Fennell
	Jade Queally
	Kim O'Beirne
	Patrick Casey
	Gráinne Costelloe
	Aoife Brazil
	Sheena Kelly
	Niamh Power
	Donal Dalton
	Crohan McGregor Junior
	Gavin Crotty
	Brigid Duggan
	Orla Dunne
	Aoife Murray
	Karen Frewen Hickey
	Elma Keane
	Nuala Rohan
	Richie Rohan
	Gillian Rohan
	Gillian Curran
	Ciaran Curran
	Cora Murray
	Kellyann Hogan
	Aoibhe Woring
	Eimier Gallagher
	Emma Murray
	Chloe Fennell
	Abbie Dunphy
	Annie Fitzgerald
	Rebecca Casey
	Brid McMaugh
	Laura Cusack
	Karen McGrath
	Katie Murray
	Laura Mulcahy
	Megan Dunford
	Chris McGovern
	Tony Ryan
	Kieran Hallahan
	Henry O'Keeffe
	Alex Robertson

URN	Author
	Martin Power
	E Kinsella
	R O'Brien
	Thomas Cummins
	Clodagh McGovern
	Eamon Byrne
	Ben Dunford
	Kieran Devine
	Jennifer Devine
	Ann Fitzgerald
	Mary Byrne
	Alice O'Connor
	Kealan Kiely
	Michael Dunford
	Biddy Dunford
	Nuala Fahey
	Emer Radley
	Mairéad Pléamonn
	Úna & Stephen Ryan
	M McGrath
	Alison Dunford
	Alan Kinsella
	John Fahey
	James Walsh
	Sarah Duffy
	Kathleen Lynch
	Patrick Lynch
	Aoife Walsh
	Aine Kinsella
	Fionn Walsh
	Nora Kinsella
	Brigid Walsh
	Kevin Walsh
	Paul Walsh
	Dermot Dee
	Catriona Crowe
	Liam Crowe
	Jenny Hallahan
	Debra Beresford
	Pauline Beresford
	Yevgeniy Chizhikov
	B Beresford
	Mary Cahill

URN	Author
	Geraldine Barry
	Eleanor Casey
	Catherine Condon
	Shane Moloney
	Aimee Moloney
	Louise Moloney
	Mark Moloney
	John Moloney
	Melisa Walsh
	Patrick Walsh
	Cait Walsh
	Paul Curran
	Colleen Fahey
	Ger Hickey
	Matthew Hickey
	Roisin Fahey
	Tom Byrne Jnr.
	Edward Cullinan
	Thomas Byrne
	Kieran Byrne
	Lorraine Byrne
	Paul Byrne
	Breda Byrne
	Deirdre Fahey
	Mary Fahey
	Tomas Fahey
	Paudie Fahey
	David Crowther
	Kelvin Troy
	Catherine Curran
	Olivia Curran
	Kevin Curran
	Eamonn Curran
	Lawrence Curran
	Maurice Walsh
	Liam Dalton
	Kevin Walsh
	Sheila Curran
	John Nugent
	Paudie White
	Martin Curran
	Tessie Nugent
	Tom Power

URN	Author
	Peter Lynch Mary & Tony Rodgers Joe O'Riordan George Young Celine Quealy Isabel Quealy Peter Quealy Marty Kiely Patrick Cummins Jamie Cummins Teresa Cummins
WFD-C3-16	Michael Cass
WFD-C3-17	Michelle Roche
WFD-C3-18	Noel Quinn
WFD-C3-19	Munster Hockey Ireland
WFD-C3-20	Colin Moynihan
WFD-C3-21	lauren mcgregor
WFD-C3-22	Crohan McGregor
WFD-C3-23	Edel Curry
WFD-C3-24	Eve Power
WFD-C3-25	Helen Mcgregor
WFD-C3-26	james veale
WFD-C3-27	Mary O Donnell
WFD-C3-28	Mary Byrne
WFD-C3-29	Tom Queally
WFD-C3-30	Hannah Power
WFD-C3-31	Mairead Wall
WFD-C3-32	Office of Public Works
WFD-C3-33	Eamonn Flynn
WFD-C3-34	Jason Radley
WFD-C3-35	Pat Frisby
WFD-C3-36	Crea Frisby
WFD-C3-37	Ann Dunford
WFD-C3-38	Jody Hynes
WFD-C3-40	Enda Kirwan
WFD-C3-41	Gráinne Dee
WFD-C3-42	Aisling Mullaney
WFD-C3-43	Waterford Ladies Gaelic Football Association
WFD-C3-44	Catriona Crowe
WFD-C3-45	Liam Crowe
WFD-C3-46	Nóirín Kelly
WFD-C3-47	Sheena McGuckian

URN	Author
WFD-C3-48	Freddy McGuckian
WFD-C3-49	Native Irish Honey Bee Society
WFD-C3-50	Marissa Tobin
WFD-C3-51	Darragh Power
WFD-C3-52	Aoife Nagle
WFD-C3-53	Vincent Howard
WFD-C3-54	Robert Cass
WFD-C3-55	Shauna Coakley
WFD-C3-56	Department of Transport
WFD-C3-57	Department of Education
WFD-C3-58	Caragh McCarthy
WFD-C3-59	Elizabeth Alderton
WFD-C3-60	Pat Sullivan
WFD-C3-61	Aoife Moloney
WFD-C3-62	Katie Murray
WFD-C3-63	Seamus O'Mahony
WFD-C3-64	Rosie Murphy
WFD-C3-65	Kenneth Murphy
WFD-C3-66	Zuzana Costin
WFD-C3-67	nuala hogan
WFD-C3-68	Jason Radley
WFD-C3-69	Therese Holland
WFD-C3-70	Tramore Eco Group
WFD-C3-71	Shona Curran
WFD-C3-72	Mark Beer
WFD-C3-73	aidan dunne
WFD-C3-74	Frank Heffernan
WFD-C3-75	West Waterford Athletics Club
WFD-C3-76	Brendan Kissane
WFD-C3-77	Grainne Enright
WFD-C3-78	philip murphy
WFD-C3-79	Declan O'Callaghan
WFD-C3-80	Cathal Curran
WFD-C3-81	Tracey Murphy
WFD-C3-82	Jamie Coady
WFD-C3-83	Maria Hajder
WFD-C3-84	Daniel Fink
WFD-C3-85	Kasia Bacela
WFD-C3-86	Daniel Fink
WFD-C3-87	Ruden Homes Ltd.
WFD-C3-88	Stonemont Ltd.
WFD-C3-89	Waterford City and County Council

URN	Author
WFD-C3-90	Grace Heffernan
WFD-C3-91	Garranbane N.S.
WFD-C3-92	Industrial Development Authority Ireland
WFD-C3-93	Mary Walsh
WFD-C3-94	Ray Crowley
WFD-C3-95	Kathleen Jones
WFD-C3-96	East Waterford Beekeepers Association
WFD-C3-97	Garranbane N.S.
WFD-C3-98	Kailyn ODonnell
WFD-C3-99	Joseph Curtin
WFD-C3-100	Sean Cuddy
WFD-C3-101	Roisin Ní Churraoidhín
WFD-C3-102	Gary Hearne
WFD-C3-103	Kathryn Casey
WFD-C3-104	Aimee Kiely
WFD-C3-105	Lynne Glasscoe
WFD-C3-106	Sarah Landers
WFD-C3-107	Anne Hennessy
WFD-C3-108	Tournore Park Residents Group
WFD-C3-109	Martina Landers
WFD-C3-110	Tournore Court Residents Association
WFD-C3-111	Gracedieu Residents Group
WFD-C3-112	Dan Casey
WFD-C3-113	Tim Foley
WFD-C3-114	Roisin Briggs
WFD-C3-115	EWBA
WFD-C3-116	Saoirse Hayes
WFD-C3-117	Kilkenny County Council
WFD-C3-118	Department of Environment Climate and Communications
WFD-C3-119	Alan Skehan
WFD-C3-120	McGill Planning Ltd.
WFD-C3-121	Lisa Dolan
WFD-C3-122	Diarmuid Woods
WFD-C3-123	Electricity Supply Board
WFD-C3-124	Construction Industry Federation South East Branch
WFD-C3-125	Geraldine Hayes
WFD-C3-126	Peter Burke
WFD-C3-127	Freida McGrath
WFD-C3-128	Damien Mac Aodha
WFD-C3-129	Wayne Kingston
WFD-C3-130	Glenveagh Homes
WFD-C3-131	Gary Mackin

URN	Author
WFD-C3-133	Ziff Investments
WFD-C3-134	Colette O'Connell
WFD-C3-135	Iarnród Éireann / Irish Rail
WFD-C3-136	Richard Godsil
WFD-C3-137	Waterford Institute of Technmology
WFD-C3-138	P.J. Curran
WFD-C3-139	Karen & Donal Dempsey Dempsey
WFD-C3-140	Southern Regional Assembly
WFD-C3-141	Future Energy Ireland
WFD-C3-142	Colette O'Connell
WFD-C3-143	Aoife Kirwan
WFD-C3-144	Seán Ó Donnabháin
WFD-C3-145	McGill Planning Ltd.
WFD-C3-146	Yevgeniy Chizhikov
WFD-C3-147	Roisin Tobin
WFD-C3-148	Billy Moore
WFD-C3-149	Fewer Harrington and Partners
WFD-C3-150	Jenny Hallahan
WFD-C3-151	Stephanie Taheny
WFD-C3-152	Colette O'Connell
WFD-C3-153	Debra Besesford
WFD-C3-154	Pauline Beresford
WFD-C3-155	B Besford
WFD-C3-156	Darragh McGrath
WFD-C3-157	Gas Networks Ireland
WFD-C3-158	Conradh na Gaeilge
WFD-C3-159	Martin Doyle
WFD-C3-160	Colette O'Connell
WFD-C3-161	Orla Dunne
WFD-C3-162	Coiste Cúram Leanáí Phort Láirge
WFD-C3-163	Judy Alderton
WFD-C3-164	The Land Development Agency
WFD-C3-165	Orsted
WFD-C3-166	Kieran O'Connor
WFD-C3-167	National Transport Authority
WFD-C3-168	Clare Byrne
WFD-C3-169	Angie Morrissey
WFD-C3-170	Wind Energy Ireland
WFD-C3-171	Patrick & Sheila Norris
WFD-C3-172	Office of the Planning Regulator
WFD-C3-173	Neil Renton
WFD-C3-174	Helen McGrath

URN	Author
WFD-C3-175	Lara Gough
WFD-C3-176	Caoimhe McGrath
WFD-C3-177	David Walsh
WFD-C3-178	Sean McGrath
WFD-C3-179	Scoil Gharbháin
WFD-C3-180	Siobhan Lonergan
WFD-C3-181	Gillian Mcgrath
WFD-C3-182	Críostóir Ó Faoláin
WFD-C3-183	Eoin Cunningham
WFD-C3-184	Lisa McGrath
WFD-C3-185	Claire McGrath
WFD-C3-186	Sharon Devereux
WFD-C3-187	James Power
WFD-C3-188	Peter Thomson Planning Solutions
WFD-C3-189	Michael O'Connor
WFD-C3-190	charles keane

APPENDIX 2 List of Prescribed Authorities and other Bodies consulted

An Bord Pleanála
An Comhairle Ealaíon
An Taisce
Cork Co.Co.
Dublin Airport Authority
Eirgrid
Environmental Protection Agency (EPA)
ESB
Failte Ireland (FI)
Health & Safety Authority
Health Service Executive (HSE)
Heritage Council
Inland Fisheries Ireland
Irish Water
Kilkenny Co. Co.
Office of Planning Regulator (OPR)
Southern Regional Assembly
The Commissioners (OPW)
The Minister Dept Ag, Food & Marine
The Minister Dept Arts, Heritage & Gaeltacht
The Minister Dept Business, Enterprise & Innovation (Forfás)
The Minister Dept Communication, Climate Action & Env
The Minister Dept Ed & Skills
The Minister Dept Housing, Planning and LG
The Minister Dept of Culture, Heritage & Gaeltacht
The Minister Dept Trans, Tourism & Sport
The Minister Dept of Defence
The Minister Dept Children & Youth Affairs
Tipperary Co. Co.
Transport Infrastructure Ireland (former NRA)
Wexford Co. Co.

Additional Stakeholders

Age Friendly Ireland
Bus Éireann
Climate Action Regional Office
Construction Industry
Federation (CIF)
Centre For Excellence in Universal Design
Dungarvan Chamber
Enterprise Ireland
Gas Networks Ireland
Geological Survey of Ireland
Housing Agency

Iarnrod Eireann
Industrial Development Authority
Irish Aviation Authority
Keep Ireland Open
Land Development Agency
Local Authority Waters Programme
Local Link
National Biodiversity Data Centre
National Disability Authority
National Transport Authority
Port of Waterford
Public Participation Network
Sea Fisheries Protection Authority
SENER
Údarás na Gaeltachta
Waterford Airport
Waterford Chamber
Waterford Civic Trust
Waterford Institute of Technology
Waterford
Leader
Partnership
WCCC
Stakeholders
LEO Waterford CCC
Community Waterford CCC
Waterford Sports Partnership

APPENDIX 3 Chief Executive's Draft Plan Errata

Appendix 2

WCDO2 - ● DO2 To support the animation of the South Quays to identify possible bespoke uses such as the utilising of the former port crane structure as part of new master plan for the south quays.

Removal of duplicated SDO for Waterford City:

~~WCDO18 ● DO18 – The development of these lands will be subject to the preparation of a more detailed integrated masterplan for the landholding prior to any development progressing. Any such masterplan should identify how the proposal will be incorporated into the broader recreation and open space strategy referred to in policy objective W City 19.~~

APPENDIX 4 Irish Water Table 6: Water and wastewater capacity assessment - Settlements in Waterford County

Table 6: Water and Wastewater Capacity Assessment – Settlements in Waterford County

NB: Capacity assessments are subject to change – population targets are subject to change.

Table 6.0 Water and Wastewater Capacity Assessment – Settlements in Waterford County (Source: Irish Water April 2022)							
<u>Settlement:</u>	<u>CSO population 2016</u>	<u>Draft CDP 2022-2028 - Population target to 2028:</u>	<u>Revised population ambitions for Material Alteration</u>	<u>Water Resource Zone (WRZ):</u>	<u>Water source/treatment capacity update:</u>	<u>WWTP:</u>	<u>Wastewater treatment capacity update:</u>
<u>Waterford City & suburbs</u>	<u>53,504</u>	<u>70,088</u>	<u>62,382</u>	<u>East Waterford & South Kilkenny</u>	<u>Currently it is envisaged that capacity is available to cater for proposed population targets in Draft CDP.</u>	<u>Belview WWTP</u>	<u>Currently it is envisaged that capacity is available to cater for proposed population targets in Draft CDP. Irish Water is soon to commence a feasibility study for the Belview WWTP; this study will take the form of an assessment of capacity and discharge requirements for the WWTP and will take approximately 2 years to complete.</u>
<u>Dungarvan (Key Town) & Ballinroad</u>	<u>10,388</u>	<u>11,864</u>	<u>11,864</u>	<u>Dungarvan & Deelish/Ballynacourty</u>	<u>Currently it is envisaged that capacity is available to cater for proposed population targets in Draft CDP. IW has a project at concept design stage to provide new reservoir and new water treatment plant.</u>	<u>Dungarvan WWTP</u>	<u>Currently it is envisaged that capacity is available to cater for proposed population targets in Draft CDP.</u>
<u>Tramore</u>	<u>10,381</u>	<u>11,549</u>	<u>11,549</u>	<u>East Waterford Regional</u>	<u>Currently it is envisaged that capacity is available to cater for proposed population targets in Draft CDP. Storage requirements are being assessed through the National Water Resource Plan Full Options Assessment process, which is due to be completed in Q3 2021.</u>	<u>Tramore WWTP</u>	<u>Currently it is envisaged that capacity is available to cater for proposed population targets in Draft CDP.</u>

<u>Dunmore East</u>	<u>1,808</u>	<u>2002</u>	<u>2,002</u>	<u>East Waterford Regional</u>	<u>Currently it is envisaged that capacity is available to cater for proposed population targets in Draft CDP. Storage requirements are being assessed through the National Water Resource Plan Full Options Assessment process, which is due to be completed in Q3 2021.</u>	<u>Dunmore East WWTP</u>	<u>Currently it is envisaged that capacity is available to cater for proposed population targets in Draft CDP.</u>
<u>Portlaw</u>	<u>1,742</u>	<u>1929</u>	<u>1,929</u>	<u>Portlaw</u>	<u>Limited capacity available, options for improving capacity are being assessed through the National Water Resource Plan Full Options Assessment process, which is due to be completed in Q3 2021.</u>	<u>Portlaw WWTP</u>	<u>Currently it is envisaged that capacity is available to cater for proposed population targets in Draft CDP.</u>
<u>Lismore</u>	<u>1,374</u>	<u>1521</u>	<u>1,521</u>	<u>LCB Lismore</u>	<u>Currently it is envisaged that capacity is available to cater for the proposed population targets in the Draft CDP.</u>	<u>Lismore WWTP</u>	<u>Currently it is envisaged that capacity is available to cater for proposed population targets in Draft CDP.</u>
<u>Cappoquin</u>	<u>699</u>	-	-	<u>LCB Cappoquin</u>	<u>Currently it is envisaged that there is capacity available, but population targets are unknown.</u>	<u>Cappoquin WWTP</u>	<u>Currently it is envisaged that there is capacity available, but population targets are unknown.</u>
<u>Kilmacthomas</u>	<u>834</u>	-	-	<u>Kilmacthomas</u>	<u>Limited capacity available.</u>	<u>Kilmacthomas WWTP</u>	<u>Currently it is envisaged that there is capacity available, but population targets are unknown.</u>
<u>Tallow</u>	<u>946</u>	-	-	<u>Tallow</u>	<u>Limited capacity available.</u>	<u>Tallow WWTP</u>	<u>Currently it is envisaged that there is capacity available, but population targets are unknown.</u>
<u>Passage East & Crooke</u>	<u>827</u>	-	-	<u>East Waterford Regional</u>	<u>Currently it is envisaged that there is capacity available, but population targets are unknown.</u>	<u>Passage East WWTP & Crooke WWTP</u>	<u>Currently it is envisaged that there is capacity available, but population targets are unknown.</u>

Baile na nGall / An Rinn (incl Sean Phobal) An Deise	499	-	583	Dungarvan	Currently it is envisaged that there is capacity available, but population targets are unknown.	Baile na nGall WWTP	Currently it is envisaged that there is capacity available, but population targets are unknown.
Stradbally	438	-	-	Stradbally	Currently it is envisaged that there is capacity available, but population targets are unknown.	Stradbally WWTP	Currently it is envisaged that there is capacity available, but population targets are unknown.
Ardmore	434	-	-	Ardmore Monea	Limited capacity available, and further assessment ongoing.	Ardmore WWTP	Currently it is envisaged that there is capacity available, but population targets are unknown.
Cheekpoint	318	-	-	East Waterford Regional	Currently it is envisaged that there is capacity available, but population targets are unknown.	Cheekpoint WWTP	Currently it is envisaged that there is capacity available, but population targets are unknown.
Aglis	333	-	-	Aglis/Curraheen	Currently it is envisaged that there is capacity available, but population targets are unknown.	Aglis WWTP	Currently it is envisaged that there is capacity available, but population targets are unknown.
Villiarstown	276	-	-	Villiarstown	Currently it is envisaged that there is capacity available, but population targets are unknown.	Villiarstown WWTP	Currently it is envisaged that there is capacity available, but population targets are unknown.
Kilmeaden	259	-	-	Ballyduff/Kilmeaden	Currently it is envisaged that there is capacity available, but population targets are unknown.	Ballyduff Lower WWTP	Currently it is envisaged that there is capacity available, but population targets are unknown.
Kill	271	-	-	Ballylaneen	Currently it is envisaged that there is capacity available, but population targets are unknown.	Kill WWTP	Currently it is envisaged that there is capacity available, but population targets are unknown.
Lemybrien	192	-	-	Kilrossanty	Currently it is envisaged that capacity is available, but population targets are unknown	Lemybrien WWTP	Small Towns and Villages Growth Programme has announced an investment in this WWTP; which will facilitate an upgrade to cater for the capacity as outlined in the CDP ambitions within the lifetime of the plan.

Dunhill	216	-	-	Dunhill/Ballynageera	No capacity available, options for improving capacity are being assessed through the National Water Resource Plan Full Options Assessment process, which is due to be completed in Q3 2021.	Dunhill WWTP	Currently it is envisaged that there is capacity available, but population targets are unknown.
Clashmore	252	-	-	Clashmore/Coolbo	Currently it is envisaged that there is capacity available, but population targets are unknown.	Clashmore WWTP	Currently it is envisaged that there is capacity available, but population targets are unknown.
Ballymacarbr	138	-	-	y/Knockalish	Very limited capacity available, options for improving capacity are being assessed through the National Water Resource Plan Full Options Assessment process, which is due to be completed in Q3 2021.	y WWTP	Currently it is envisaged that there is capacity available, but population targets are unknown.

APPENDIX 5 Commonly Used Acronyms

AA: Appropriate Assessment	LAWPRO Local Authority Waters Programme
ABP An Bord Pleanála	LCA Landscape Character Assessment
ABTA: Area Based Transport Assessment	LCDC: Local Community Development Committee
ACA: Architectural Conservation Area	LDA Land Development Agency
BUG Bicycle User Group	LIHAF Local Infrastructure Housing Activation Fund
CARO: Climate Action Regional Office	LTP Local Transport Plans
CAP Climate Action Plan	MASP: Metropolitan Area Strategic Plan
CCDP: City and County Development Plan	MSMEs Micro, Small and Medium Enterprises
CPO: Compulsory Purchase Order	NBS Nature Based Solutions
CSO: Central Statistics Office	NDP: National Development Plan
DCCAIE Department of Communications, Climate Action and Environment	NHA: Natural Heritage Area
DCHG: Department of Culture, Heritage and the Gaeltacht	NMPF: National Marine Planning Framework
DES: Department of Education and Skills	NPF: National Planning Framework
DHPLG: Department of Housing, Planning and Local Government (previously DHPCLG, DECLG, DEHLG)	NPO: National Policy Objective
DMURS: Design Manual for Urban Roads and Streets	NPWS: National Parks and Wildlife Service
DTTaS: Department of Transport, Tourism and Sport	NSO: National Strategic Outcome
EIA: Environmental Impact Assessment	NTA: National Transport Authority
EIAR: Environmental Impact Assessment Report	NZEB: Nearly Zero Energy Building
EPA: Environmental Protection Agency	OPC Older People's Council
ESB: Electricity Supply Board	OPR: Office of the Planning Regulator
EU: European Union	OPW: Office of Public Works
EV: Electric Vehicle	PA Planning Authority
FDI Foreign Direct Investment	PDA: Planning and Development Act, 2000 (as amended)
FI Fáilte Ireland	PLUTS Planning Land Use Transportation Strategy
GAA: Gaelic Athletic Association	PPN: Public Participation Network
GBI Green Blue Infrastructure	RMP: Record of Monuments and Places
GHG Greenhouse Gases	RPO: Regional Policy Objective
GI: Green Infrastructure	RRDF Rural Regeneration and Development Fund
GZT General Zoning Types	RSES: Regional Spatial and Economic Strategy
HNDA: Housing Need and Demand Assessment	RPS: Record of Protected Structures
ICW Integrated Constructed Wetland	SAC: Special Area of Conservation
IDA Industrial Development Authority	SDGs Sustainable Development Goals
IPI Irish Planning Institute	SDZ: Strategic Development Zone
IW Irish Water	SEA: Strategic Environmental Assessment
KCC: Kilkenny County Council	SEAI: Sustainable Energy Authority of Ireland
LA Local Authority	SFRA: Strategic Flood Risk Assessment
LAP: Local Area Plan	SHD: Strategic Housing Development

SMART Specific Measurable Achievable
Relevant Time
SIP Strategic Issues Paper
SRWMPLA Southern Region Waste
Management Plan Lead Authority
SPA: Special Protection Area
SRA: Southern Regional Assembly
STEM Science, technology, engineering, and
mathematics
SUDS: Sustainable Urban Drainage Solutions
TEN-T: Trans European Transport Network
TII: Transport Infrastructure Ireland
TUSE: Technological University for the South
East
UHW: University Hospital Waterford
UN: United Nations
UNESCO: UN Educational, Scientific and Cultural
Organization
URDF: Urban Regeneration and Development
Fund
WCCC: Waterford City and County Council
WCQ Waterford Cultural Quarter
WHO World Health Organisation
WIT: Waterford Institute of Technology
WMASP: Waterford Metropolitan Area Strategic
Plan
WMATS: Waterford Metropolitan Area
Transportation Strategy
WNQ Waterford City North Quays
WWETB Waterford and Wexford Education and
Training Board
WWTP: Wastewater Treatment Plants

APPENDIX 6 Copy of Public Notice of the Preparation of the Draft Waterford City and County Development Plan 2022-2028



Comhairle Cathrach & Contae Phort Láirge
Waterford City & County Council

Notice of Material Alterations to the Draft Waterford City and County Development Plan 2022-2028

SECTION 12 PLANNING & DEVELOPMENT ACTS 2000 (AS AMENDED) PLANNING AND DEVELOPMENT REGULATIONS 2001 (AS AMENDED) PLANNING AND DEVELOPMENT (STRATEGIC ENVIRONMENT ASSESSMENT) REGULATIONS 2004-2011

Notice is hereby given that the Members of Waterford City and County Council, having considered the Draft Waterford City and County Development Plan 2022-2028 and the Chief Executive's Report in respect of the submissions received, have resolved in accordance with Section 12(6) and (7) of the Planning and Development Acts 2000-2020, that the Draft Plan be amended. The proposed amendments constitute Material Alterations to the Draft Waterford City and County Development Plan 2022-2028. The Waterford City and County Development Plan 2022 - 2028 will replace the following statutory development plans:

- **Waterford City Development Plan 2013 - 2019 (as extended);**
- **Waterford County Development Plan 2011-2017 (as extended); and**
- **Dungarvan Town Development Plan 2012 - 2018 (as extended).**

The new development plan will be the first unitary plan for the entire functional area of Waterford City and County Council as heretofore provided for under the above stated development plans and local areas plans for the settlements of Lismore, Portlaw and Tramore.

It has been determined that the alterations require full Strategic Environmental Assessment (SEA), and certain Material Alterations require stage 2 Natura Impact Assessment (AA). In accordance with Section 12(7)(aa) of the Planning and Development Acts 2000 (as amended), the determinations, a copy of the proposed Material Alterations to the Draft Plan, the SEA Environmental Report (incl. Strategic Flood Risk Assessment (SFRA)) and the AA Report will be available for public inspection from **Thursday 3rd March to Friday 1st April 2022**, inclusive, at the following locations:

- Online at <http://consult.waterfordcouncil.ie>;
- Customer Care Office, Bailey's New Street, Waterford, X91 XH42 and Customer Care Office, Civic Offices, Davitt's Quay, Dungarvan, Co. Waterford. X35 Y326 during the hours Monday to Friday, 9:30am to 4pm (open through lunch) and subject to Covid - 19 restrictions and arrangements in

place at the time.

Observations or submissions regarding the Material Alterations to the Draft Development Plan and/or SEA Environmental Report and/or AA Report are invited from members of the public and other interested parties during the period **Thursday 3rd March to Friday 1st April 2022 inclusive**. Please make your submission by one medium only as follows:

- Online by registering on <https://consult.waterfordcouncil.ie>, or
- In Writing marked "Material Alterations to the Draft City and County Development Plan" to the Planning Department, Waterford City and County Council, Menapia Building, The Mall, Waterford City.

Please note that **late submissions will not be accepted**.

All submissions should include your name and a contact address, a map (where appropriate) and, where relevant, details of any organisation, community group or company etc., which you represent. All submissions will be made available for public viewing on the Council's consultation website consult.waterfordcouncil.ie during the plan-making period and will form part of the Chief Executive's Report to be presented to the Council.

We will retain your data for no longer than is necessary for the purpose of preparing the Waterford City and County Development Plan 2022 – 2028 and in accordance with Waterford City and County Council's retention policy and the relevant data protection legislation.

**Signed,
Michael Quinn,
Director of Service,
Economic Development and Planning,
Waterford City and County Council.**

APPENDIX 7 Strategic Flood Risk Assessment for the Waterford City and County Development Plan 2022-2028



Strategic Flood Risk
Assessment for the
Waterford City and County
Development Plan 2022-2028

Final Report (Draft)

April 2022



Comhairle Cathrach & Contae Phort Láirge

JBA Project Manager

Elizabeth Russell
24 Grove Island
Corbally
Limerick
Ireland

Revision History

Revision Ref / Date Issued	Amendments	Issued to
Rev 2 / 16/07/2019	Initial Issue	Waterford City and County Council
Rev 3 / 09/10/2019		Waterford City and County Council
Rev 4 / 11/05/2021		Waterford City and County Council
Rev 5 / 10/06/2021	To support Draft Development Plan	Waterford City and County Council
Rev 6 / 15/06/2021	Minor updates	Waterford City and County Council
Rev 7 / 22/11/2021	To support CE report	Waterford City and County Council
Rev 8 / 22/02/2022	Incorporating MA	Waterford City and County Council
<u>Rev 9 / 27/04/2022</u>	<u>Awaiting final zonings</u>	<u>Waterford City and County Council</u>

Contract

This report describes work commissioned by Hugh O'Brien, on behalf of Waterford County Council, by a letter dated 23rd June 2015. Elizabeth Russell of JBA Consulting carried out this work.

Prepared by Elizabeth Russell BSc MSc CEnv MCIWEM C.WEM
Project Manager

Reviewed by Jonathan Cooper BEng MSc DipCD CEng C.WEM
C Dir F Inst D MICE MCIWEM MIEI
Managing Director

Purpose

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JBA is aiming to reduce its per capita carbon emissions.



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Abbreviations

AEP	Annual Exceedance Probability
AFA.....	Area for Further Assessment
CFRAM.....	Catchment Flood Risk Assessment and Management
DoEHLG	Department of the Environment, Heritage and Local Government
DTM.....	Digital Terrain Model
FRA	Flood Risk Assessment
FRMP	Flood Risk Management Plan
GIS	Geographical Information System
HEFS.....	High End Future Scenario
ICPSS.....	Irish Coastal Protection Strategy Study
LA	Local Authority
LAP.....	Local Area Plan
mOD	Meters above Ordnance Datum
MRFS	Medium Range Future Scenario
OPW	Office of Public Works
OS	Ordnance Survey
PFRA.....	Preliminary Flood Risk Assessment
SAC	Special Area of Conservation, protected under the EU Habitats Directive
SFRA.....	Strategic Flood Risk Assessment
SPR	Standard percentage runoff
SUDS.....	Sustainable Urban Drainage Systems
Tp	Time to Peak

1 Study Background

JBA Consulting was appointed by Waterford City and County Council (WCCC) to carry out the Strategic Flood Risk Assessment (SFRA) for the Waterford County Development Plan 2022-2028.

This report details the SFRA for the county and has been prepared in accordance with the requirements of the DoEHLG and OPW Planning Guidelines, The Planning System and Flood Risk Management¹; these guidelines were issued under the Planning and Development Act 2000, as amended, and recognise the significance of proper planning to manage flood risk.

[The SFRA has been reviewed and updated to have regard to the proposed Material Alterations to the County Development Plan.](#)

1.1 Scope of Study

Under the "Planning System and Flood Risk Management" guidelines, the purpose for the SFRA is detailed as being *"to provide a broad (wide area) assessment of all types of flood risk to inform strategic land-use planning decisions. SFRAs enable the LA to undertake the sequential approach, including the Justification Test, allocate appropriate sites for development and identify how flood risk can be reduced as part of the development plan process"*.

The Waterford City and County Development Plan 2022-2028 (DP) will be the key document for setting out a vision for the development of the county during the plan period.

It is important that the DP fulfils the requirements of the document "The Planning System and Flood Risk Management Guidelines for Planning Authorities" (OPW/DoEHLG, 2009) which states that flood risk management should be integrated into spatial planning policies at all levels to enhance certainty and clarity in the overall planning process.

In order to ensure that flood risk is integrated into the DP, the main requirements of this document are to:

- Produce flood zone mapping.
- Prepare a Stage 2 - Flood Risk Assessment of County Waterford in particular in relation to location and type of zoning and land-use proposals. Where required, undertake a Stage 3 Detailed FRA.
- Advise on zonings/land use-proposals, assess and report on any submissions received as part of both the preparation and the public consultation stage of the plan, as they relate to flood risk.

1.2 SFRA Approach

This study considers the development strategy that will form part of the Development Plan for County Waterford. The context of flood risk in Waterford is considered with specific reference to a range of flood sources, including fluvial, tidal, pluvial, groundwater, sewer and artificial reservoirs and canals.

A two-stage assessment of flood risk was undertaken, as recommended in 'The Planning System and Flood Risk Management' guidelines, for the area that lies within the development boundary of the Development Plan. The first stage is to identify flood risk and is based on a variety of data sources, which are detailed in Section 4. There are numerous settlements which have an extremely limited risk of flooding and development can be progressed without regard to fluvial or coastal flooding. However, historical records and recent events demonstrate that parts of the county have a risk of flooding and confirm that a proportion of zoned lands are at flood risk.

The second stage, and the main purpose of this SFRA report, is to appraise the adequacy of existing information, to prepare an indicative flood zone map, based on available data, and to highlight potential development areas that require more detailed assessment on a site specific level. The SFRA also provides guidelines for development within areas at potential risk of flooding, and specifically looks at flood risk and the potential for development within the county settlements.

2 The Planning System and Flood Risk Management Guidelines

2.1 Introduction

Prior to discussing the management of flood risk, it is helpful to understand what is meant by the term. It is also important to define the components of flood risk in order to apply the Principles of the Planning System and Flood Risk Management in a consistent manner.

The Planning System and Flood Risk Management: Guidelines for Planning Authorities, published in November 2009, describe flooding as natural processes that can occur at any time and in a wide variety of locations. Flooding can often be beneficial, and many habitats rely on periodic inundation. However, when flooding interacts with human development, it can threaten people, their property and the environment.

This Section will firstly outline the definitions of flood risk and the Flood Zones as a planning tool; a discussion of the principles of the planning guidelines and the management of flood risk in the planning system will follow.

2.2 Definition of Flood Risk

Flood risk is generally accepted to be a combination of the likelihood (or probability) of flooding and the potential consequences arising. Flood risk can be expressed in terms of the following relationship:

$$\text{Flood Risk} = \text{Probability of Flooding} \times \text{Consequences of Flooding}$$

The assessment of flood risk requires an understanding of the sources, the flow path of floodwater and the people and property that can be affected. The *source - pathway - receptor model*, shown below in Figure 2-1 illustrates this and is a widely used environmental model to assess and inform the management of risk.

Figure 2-1: Source Pathway Receptor Model

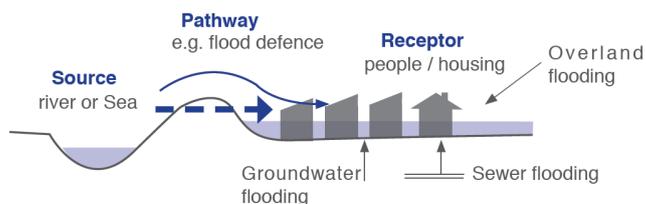


Fig. A1: Sources, pathways and receptors of flooding

Source: Figure A1 The Planning System and Flood Risk Management Guidelines Technical Appendices

Principal sources of flooding are rainfall or higher than normal sea levels while the most common pathways are rivers, drains, sewers, overland flow and river and coastal floodplains and their defence assets. Receptors can include people, their property and the environment. All three elements must be present for flood risk to arise. Mitigation measures, such as defences or flood resilient construction, have little or no effect on sources of flooding but they can block or impede pathways or remove receptors.

The planning process is primarily concerned with the location of receptors, taking appropriate account of potential sources and pathways that might put those receptors at risk.

2.3 Likelihood of Flooding

Likelihood or probability of flooding of a particular flood event is classified by its annual exceedance probability (AEP) or return period (in years). A 1% AEP flood indicates the flood event that will occur or be exceeded on average once every 100 years and has a 1 in 100 chance of occurring in any given year.

Return period is often misunderstood to be the period between large flood events rather than an average recurrence interval. Annual exceedance probability is the inverse of return period as shown in [Table 2-1](#)[Table 2-4](#).

Table 2-~~1~~4: Probability of Flooding

Return Period (Years)	Annual Exceedance Probability (%)
2	50
100	1
200	0.5
1000	0.1

Considered over the lifetime of development, an apparently low-frequency or rare flood has a significant probability of occurring. For example:

- A 1% flood has a 22% (1 in 5) chance of occurring at least once in a 25-year period - the period of a typical residential mortgage;
- And a 53% (1 in 2) chance of occurring in a 75-year period - a typical human lifetime.

2.3.1 Consequences of Flooding

Consequences of flooding depend on the hazards caused by flooding (depth of water, speed of flow, rate of onset, duration, wave-action effects, water quality) and the vulnerability of the receptors (type of development, nature, e.g. age of structure, of the population, presence and reliability of mitigation measures etc).

The Planning System and Flood Risk Management guidelines provide three vulnerability categories based on the type of development, which are detailed in Table 3.1 of the Guidelines, and are summarised as:

- Highly vulnerable, including residential properties, essential infrastructure and emergency service facilities;
- Less vulnerable, such as retail and commercial and local transport infrastructure;
- Water compatible, including open space, outdoor recreation and associated essential infrastructure, such as changing rooms.

2.4 Definition of Flood Zones

In the Planning System and Flood Risk Management guidelines, flood zones are used to indicate the likelihood of a flood occurring. These Zones indicate a high, moderate or low probability of flooding from fluvial or tidal sources and are defined below in Table 2-2. They do not take other sources of flood water, such as groundwater or pluvial, into account, so an assessment of risk arising from such sources should also be made.

It is important to note that the definition of the Flood Zones is based on an undefended scenario and does not take into account the presence of flood protection structures such as flood walls or embankments. This is to allow for the fact that there is a residual risk of flooding behind the defences due to overtopping or breach and that there may be no guarantee that the defences will be maintained in perpetuity.

Table 2-22-2: Definition of Flood Zones

Zone	Description
Zone A High probability of flooding.	This zone defines areas with the highest risk of flooding from rivers (i.e. more than 1% probability or more than 1 in 100) and the coast (i.e. more than 0.5% probability or more than 1 in 200).
Zone B Moderate probability of flooding.	This zone defines areas with a moderate risk of flooding from rivers (i.e. 0.1% to 1% probability or between 1 in 100 and 1 in 1000) and the coast (i.e. 0.1% to 0.5% probability or between 1 in 200 and 1 in 1000).
Zone C Low probability of flooding.	This zone defines areas with a low risk of flooding from rivers and the coast (i.e. less than 0.1% probability or less than 1 in 1000).

2.5 Objectives and Principles of the Planning Guidelines

The 'Planning System and Flood Risk Management' describes good flood risk practice in planning and development management. Planning authorities are directed to have regard to the guidelines in the preparation of Development Plans and Local Area Plans, and for development control purposes.

The objective of the 'Planning System and Flood Risk Management' is to integrate flood risk management into the planning process, thereby assisting in the delivery of sustainable development. For this to be achieved, flood risk must be assessed as early as possible in the planning process. Paragraph 1.6 of the Guidelines states that the core objectives are to:

- "avoid inappropriate development in areas at risk of flooding;
- avoid new developments increasing flood risk elsewhere, including that which may arise from surface run-off;
- ensure effective management of residual risks for development permitted in floodplains;
- avoid unnecessary restriction of national, regional or local economic and social growth;
- improve the understanding of flood risk among relevant stakeholders; and
- ensure that the requirements of EU and national law in relation to the natural environment and nature conservation are complied with at all stages of flood risk management".

The guidelines aim to facilitate 'the transparent consideration of flood risk at all levels of the planning process, ensuring a consistency of approach throughout the country.' SFRA therefore become a key evidence base in meeting these objectives.

The 'Planning System and Flood Risk Management' works on a number of key principles, including:

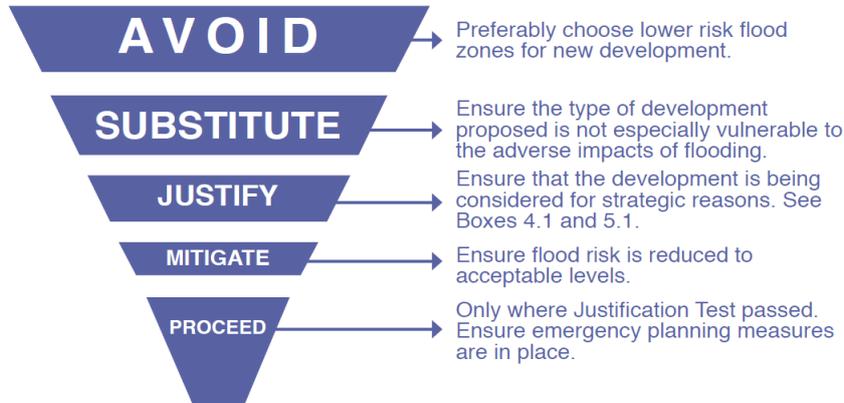
- Adopting a staged and hierarchical approach to the assessment of flood risk;
- Adopting a sequential approach to the management of flood risk, based on the frequency of flooding (identified through Flood Zones) and the vulnerability of the proposed land use.

2.6 The Sequential Approach and Justification Test

Each stage of the FRA process aims to adopt a sequential approach to management of flood risk in the planning process.

Where possible, development in areas identified as being at flood risk should be avoided; this may necessitate de-zoning lands within the plan boundary. If de-zoning is not possible, then rezoning from a higher vulnerability land use, such as residential, to a less vulnerable use, such as open space may be required.

Figure 2-2: Sequential Approach Principles in Flood Risk Management



Source: The Planning System and Flood Risk Management (Figure 3.1)

Where rezoning is not possible, exceptions to the development restrictions are provided for through the application of the Justification Test. Many towns and cities have central areas that are affected by flood risk and have been targeted for growth. To allow the sustainable and compact development of these urban centres, development in areas of flood risk may be considered necessary. For development in such areas to be allowed, the Justification Test must be passed.

The Justification Test has been designed to rigorously assess the appropriateness, or otherwise, of such developments. The test is comprised of two processes; the Plan-making Justification Test, and the Development Management Justification Test. The latter is used at the planning application stage where it is intended to develop land that is at moderate or high risk of flooding for uses or development vulnerable to flooding that would generally be considered inappropriate for that land.

Table 2-3 shows which types of development, based on vulnerability to flood risk, are appropriate land uses for each of the Flood Zones. The aim of the SFRA is to guide development zonings to those which are 'appropriate' and thereby avoid the need to apply the Justification Test.

Table 2-3: Matrix of Vulnerability versus Flood Zone

Vulnerability	Flood Zone A	Flood Zone B	Flood Zone C
Highly vulnerable development (Including essential infrastructure)	Justification Test	Justification Test	Appropriate
Less vulnerable development	Justification Test	Appropriate	Appropriate
Water-compatible development	Appropriate	Appropriate	Appropriate

Source: Table 3.2 of The Planning System and Flood Risk Management

The application of the Justification Test in the context of specific development sites within the variation settlements is discussed in Section 7.

2.7 Scales and Stages of Flood Risk Assessment

Within the hierarchy of regional, strategic and site-specific flood-risk assessments, a tiered approach ensures that the level of information is appropriate to the scale and nature of the flood-risk issues and the location and type of development proposed, avoiding expensive flood modelling and development of mitigation measures where it is not necessary. The stages and scales of flood risk assessment comprise of:

- **Regional Flood Risk Appraisal (RFRA)** – a broad overview of flood risk issues across a region to influence spatial allocations for growth in housing and employment and to identify

where flood risk management measures may be required at a regional level to support the proposed growth. This should be based on readily derivable information and undertaken to inform the Regional Planning Guidelines.

- **Strategic Flood Risk Assessment (SFRA)** – an assessment of all types of flood risk informing land use planning decisions. This will enable the Planning Authority to allocate appropriate sites for development, whilst identifying opportunities for reducing flood risk. This SFRA will revisit and develop the flood risk identification undertaken in the RFRA, and give consideration to a range of potential sources of flooding. An initial flood risk assessment, based on the identification of Flood Zones, will also be carried out for those areas zoned for development. Where the initial flood risk assessment highlights the potential for a significant level of flood risk, or there is conflict with the proposed vulnerability of development, then a site specific FRA will be recommended, which will necessitate a detailed flood risk assessment.
- **Site Specific Flood Risk Assessment (SSFRA)** – site or project specific flood risk assessment to consider all types of flood risk associated with the site and propose appropriate site management and mitigation measures to reduce flood risk to and from the site to an acceptable level. If the previous tiers of study have been undertaken to appropriate levels of detail, it is highly likely that the SSFRA will require detailed channel and site survey, and hydraulic modelling.

3 Waterford City and County Study Area

3.1 Study Area

The study area is the whole of Waterford City and County, with a focus on a number of key settlements, which are identified in [Table 4-4](#) ~~Table 4-3~~. Of these settlements, Waterford City, Tramore, Aglish, Ballyduff, Tallow, Dungarvan and Ringphuca, Dunmore East and Ballymacarbry have been subject to detailed flood risk assessment through the Suir and the South-Eastern CFRAM studies. Furthermore, Waterford City has been subject to detailed assessment as part of the flood relief scheme design, and masterplanning flood risk assessment for the North Quays SDZ. A review of documents relating to both of these studies formed part of the SFRA for the City.

County Waterford covers an area of 1,839km² and includes a range of topographies, soil and rock types, water bodies and a coastal length of 147km. In west Waterford the limestone-floored valley of the Blackwater runs eastwards from the county boundary through Ballyduff and Lismore as far as Cappoquin where it turns abruptly south and cuts its way through several ridges of sandstone rock forming a steep-sided valley by Villierstown, Clashmore and Aglish and flowing into the Blackwater Estuary at Youghal. The River Bride flows north of Tallow and joins the Blackwater at Camphire. The upper Waterford tributaries of the Blackwater flow from the Knockmealdown Mountains which form the northern boundary of west Waterford. The eastern end of the Dungarvan valley contains the small Colligan River which empties into the estuary at Dungarvan and the Finnisk, a tributary of the Blackwater. A number of river valleys occur between Dungarvan and Bunmahon namely the Dalligan River, River Tay, River Mahon and Anne Stream. East Waterford is very low-lying and has a concentration of lakes and wetlands. Sheltered bays along this coastline provide some of the county's most extensive beaches at Passage East, Woodstown and Tramore. The County boundary between Waterford and South Tipperary is formed by the River Suir flowing by Clonmel, Carrick on Suir and Portlaw where it is joined by the River Clodiagh.

County Waterford is covered in the main by the South Eastern River Basin District, including the catchments of the rivers Mahon, Clodiagh, Suir and Waterford Estuary. West Waterford and the Blackwater River are within the South Western River Basin District.

3.2 Planning Policy

3.2.1 Southern Region Regional Spatial & Economic Strategy

The Regional Spatial & Economic Strategy (RSES) for the Southern Region includes a significant focus on sustainability and flood management, encapsulated in Water Resource and Flooding National Policy Objective (NPO) 57, which "*seeks to enhance water quality and resource management by:*

Ensuring flood risk management informs placemaking by avoiding inappropriate development in areas at risk of flooding in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities".

This policy objective is supported by a range of objectives which include implementation of the Flood's Directive and the Planning System and Flood Risk Management as well supporting capital investment in flood relied schemes and measures for managing flooding and coastal erosion.

3.2.2 Waterford County Development Plan 2011-2017 (as extended)

The Waterford County Development Plan was supported by an SFRA which undertook a high level review of available datasets and levels of flood risk. The impact of flood risk within the context of the County Development Plan and decisions regarding future directions of growth was recognised and was incorporated into the policies of the County Development Plan Section 8 (Environment and Heritage Chapter). These policies aimed to ensure that flood risk areas targeted for development will follow the sequential approach and will be planned, designed and constructed to reduce and manage flood risk and be adaptable to changes in climate.

Development Objectives for the settlements of Ballyduff West, Ballymacarbry, Cappoquin, Carrick on Suir, Cheekpoint, Clashmore, Clonmel Environs, Dungarvan Environs, Lismore, Pilltown and Tallow included the protection of the floodplain in those settlements.

The SFRA stated that as more up to date information and spatial data becomes available through Flood Risk Mapping, CFRAMS and the National Coastal Protection Strategy and where lands are

already zoned for housing or other vulnerable development in the flood risk areas identification of flood zones in relevant settlements will be applied through a Stage 2 Strategic Flood Risk Assessment applying the sequential approach and justification test as per the DoEHLG Guidelines (2009).

3.2.3 Waterford City Development Plan 2013-2019 (as extended)

The Waterford City Development Plan was also supported by an SFRA which included a stage 3 assessment of flood risk. The Justification Test was also applied to sites located within Flood Zones A and B. Where the Justification Test was not passed (sites on the periphery of the city), it was found that the majority of the site was within Flood Zone C and local risks could be mitigated through development management and a site specific Flood Risk Assessment.

3.2.4 Dungarvan Town Council Plan 2012-2018 (as extended)

Consideration of flood risk also formed part of the Dungarvan Town Council Plan, including production of a floodmap and environmental objectives as a result of SFRA. The plan did not include a screening of risk to specific development sites but did require development within areas shown to be at risk of flooding to undertake site specific flood risk assessment.

4 Identification of Flood Risk

4.1 Data Collection and Review

This section reviews the data collection and the flood history for the settlements so that any additional information on flooding can be included within this SFRA. It will confirm the extent of extreme flooding (through the Flood Zone mapping) key sources of flood risk.

There are a number of valuable sources of flood data for County Waterford, including major projects such as the CFRAM, and broadscale flood mapping such as the national PFRA study.

The sources of information from the previous iterations of the SFRAs have been reviewed and relevant updates have been made using the CFRAM flood mapping.

Table 4-14-4: Available flood risk data

Description	Coverage	Robustness	Comments on usefulness
Suir CFRAM Study	Areas for further assessment (AFAs), or settlements falling along modelled lengths, in County Waterford are: <ul style="list-style-type: none"> Waterford City (Model 9) Portlaw (model 7) Ballymacarbry (model 5D) 	Flood Zones and flood extents for current and future scenarios provided by OPW.	Very useful but undertaken at a catchment level. In general, CFRAM provided all information needed to apply the JT for Plan Making under the SFRA.
South Western CFRAM Study	Areas for further assessment (AFAs), or settlements falling along modelled lengths, in County Waterford are: <ul style="list-style-type: none"> Aglish Ballyduff Tallow 	Depth, velocity and risk to life, and defended areas are also available. Modelling is 'best of breed' and outputs will allow informed decisions on zoning objectives. Design water levels will inform decisions relating to raising land and setting finished floor levels.	Site specific FRAs will still be required for planning applications, but information on water levels can form the basis of decision in relation to finished floor levels. However, it is important to note that CFRAM outputs should not be relied upon without review and consideration of appropriateness to the site in question.
South Eastern CFRAM Study	Areas for further assessment (AFAs), or settlements falling along modelled lengths, in County Waterford are: <ul style="list-style-type: none"> Dungarvan and Ringphuca Dunmore East Tramore 	High, but does not include wave overtopping /breaking so doesn't represent storm damage.	In SFRA, used to define the tidal risk element of Flood Zone A and B, where CFRAM not available, or ICPSS indicates greater risk. For site specific FRA, where direct translation of tide levels inshore is appropriate (i.e. where the town is on the coast, not up an estuary) these levels can be used to set
Irish Coastal Protection Study (ICPSS)	Still water tidal extents for 200 year and 1000 year events for the whole coastline.		

Description	Coverage	Robustness	Comments on usefulness
			finished floor levels.
County Development Plan Flood Map (2011-2017)	Based largely on the on the PFRA with some adjustment following walkover and local knowledge. Covers nearly all rivers (including non-CFRAM) and included validation so used for development of base Flood Zones with validation for SFRA.	Low to Moderate	Not used as based data has been superseded.
National Indicative Fluvial Mapping (NIFM)	Produced by the OPW, these maps are 'predictive' flood maps for watercourse with a catchment area greater than 5km ² .	Moderate	Used for all watercourses not covered by CFRAM / ICPSS and replaces the County DP mapping discussed above.
OPW Preliminary Flood Risk Assessment (PFRA) flood maps - Fluvial	The PFRA was a national screening exercise that was undertaken by OPW to identify areas at potential risk of flooding. Fluvial, coastal, pluvial and groundwater risks were identified at an indicative scale.	Low	Superseded by the National Indicative Fluvial Mapping
PFRA Maps - Coastal		Moderate	This was based on ICPSS flood extents
PFRA Maps - Pluvial and Groundwater		Low	Not used as withdrawn by OPW. See GSI mapping.
Historical event outlines and point observations and reports	Various, taken from www.floodinfo.ie	Indicative	Used indirectly used to validate flood zones and identify non-fluvial and tidal flooding in the SFRA. Useful background information for site specific FRAs, but note the database is not exhaustive absence of a record does not necessarily mean absence of flood risk.
Arterial Drainage Benefitting land maps	Show land which would (or have) benefitted from a drainage scheme. This is not based on a 'design flood' (i.e. the events do not have a return period), but indicate low-lying, poorly drained land. It is not the same as lands which are protected by a flood relief scheme.	Low	Superseded by the data sources listed above, although may be used to cross check Flood Zones. Limited benefit to site specific FRAs.
Flood relief scheme details, including locations and	Defences in Waterford, Dungarvan, Portlaw and to the east of Tramore have all been included in the CFRAM modelling and	High (outputs from the CFRAM and/or detailed scheme design	Flood Zones are defined without the benefit of defences, but the benefits have been considered when establishing the

Description	Coverage	Robustness	Comments on usefulness
lengths, standard of protection and areas which are protected	defended areas defined.	documents provide this information).	specific risk to a site and considering the appropriateness of land zoning. Will be helpful in informing the site specific FRA, which will need an assessment of residual risks, and possibly breach analysis.
ICPSS Coastal Erosion Maps	National coverage, highlighting areas which area particularly vulnerable to coastal erosion.	Moderate	Erosion risks within settlements are generally low, so has not influenced the SFRA.

Table 4-24-2: Other Data Available

Description	Coverage	Robustness	Comment on usefulness
Alluvial Soil Maps	Full Study Area	Low	Used in the Regional FRA to provide initial assessment of risks. Not used in SFRA and little or no value to FRA.
Groundwater vulnerability maps	Broadscale, County wide	Moderate	Initial assessment of groundwater vulnerability. Provides a screening tool for use in FRA.
Historic Flood Records including photos, aerial photos and reports.	Broad, spot coverage	Various	Yes indirectly to validate Flood Zones & identify other flood sources. Review of such sources will be required for all site specific FRAs.

4.2 Flood Zone Map Development

As can be seen from [Table 4-2](#) ~~Table 4-2~~, a range of data, including hydraulic modelling and historical reports was used to inform this SFRA.

The OPW CFRAM maps were reviewed as part of the data collection exercise and have been used to inform the land use zonings contained in the Development Plan. Settlements covered with detailed mapping (termed High Priority Watercourses, or HPW) under the Suir, South-West and South-East CFRAM programmes are: Waterford City, Portlaw, Ballymacarbry, Aglish, Ballyduff, Dungarvan and Ringphuca, Dunmore East, Tallow and Tramore.

Medium Priority Watercourse (MPW) mapping also provided flood information for a number of other settlements within the county, and for the watercourse lengths between the urban settlements. Where HPW outputs were not available, MPW was used in preference.

For many of the other watercourses, the OPW's NIFM mapping was used. The least robust dataset used was the Flood Zone mapping from the previous County Development Plan. As detailed above, this was based on the PFRA with some localised changes made as appropriate.

Around the coast and to represent tidal inundation up estuaries, the ICPSS provided flood extents.

It should be noted that, regardless of the origin of the background data, the Flood Zone Maps have been developed as a spatial planning tool to guide WCC in making land zoning and development management decisions and it is recognised that site specific information may contradict the Flood

Zones, either to demonstrate a greater or lesser level of flood risk. However, the data has been deemed appropriate for the planning decisions being made at this stage of the plan making process.

In general, where HPW modelling has been carried out, flood levels and flows are available at selected node points along the watercourse. Once an appropriate level of validation has been undertaken as part of the site specific FRA, these flood levels may be used to form the basis of the development design.

For MPW and NIFM map outputs, water levels are not available, and the mapping provides an indicative extent only. Additional assessment through a Stage 3 FRA may be needed to demonstrate the level of flood risk.

[The Flood Zones can also be seen on the Waterford County Council interactive map viewer, where they are overlaid with the zoning objectives and other key datasets for the county.](#)

4.3 Unmapped Fluvial Risk

The Flood Zones have been derived for watercourse with a catchment area greater than 5km², which captures the majority of sources of fluvial flood risk in the Waterford settlements. However, there may be cases where a watercourse is been identified, either through mapping or through site visit and local knowledge, but due to the size of the catchment, the Flood Zone has not been delineated. In these cases, it is the responsibility of the applicant to undertake an appropriately detailed FRA and to then apply the sequential approach as the Plan Making Justification Test has not been satisfied in these cases.

4.4 Sources of Flooding

This SFRA has reviewed flood risk from fluvial, pluvial, tidal and groundwater sources. It also considers flooding from drainage systems, reservoirs and canals and other artificial or man-made systems as appropriate.

Flooding events have become more pronounced in Ireland, and County Waterford, in recent years. Low lying parts of Waterford City are prone to both river and tidal flooding and sometimes a combination of both when certain meteorological conditions arise, given its location on tidal estuary of the River Suir. This demonstrates the need to consider all sources of flood risk, alone and in combination, when considering development within the county.

Climate change risks also need to be considered at a strategic and site specific scale. Climate change is discussed in Section 5.8 in relation to incorporation of climate change into the flood risk assessment. A comment on the likely impacts of climate change, on a settlement basis, has been provided in Section 7.3.

4.4.1 Fluvial Flooding

Flooding from rivers and streams is associated with the exceedance of channel capacity during higher flows. The process of flooding from watercourses depends on numerous characteristics associated with the catchment including geographical location and variation in rainfall, steepness of the channel and surrounding floodplain and infiltration and rate of runoff associated with urban and rural catchments. Generally, there are two main types of catchments: large and relatively flat or small and steep, both giving two very different responses during large rainfall events.

In a large, relatively flat catchment, flood levels will rise slowly and natural floodplains may remain flooded for several days or even weeks, acting as the natural regulator of the flow. This is typical of the River Suir. In small, steep catchments local intense rainfall can result in the rapid onset of deep and fast-flowing flooding with little warning. Such "flash" flooding, which may only last a few hours, can cause considerable damage and possible risk to life.

The form of the floodplain, either natural or urbanised, can influence flooding along watercourses. The location of buildings and roads can significantly influence flood depths and velocities by altering flow directions and reducing the volume of storage within the floodplain. Critical structures such as bridge and culverts can also significantly reduce capacity creating pinch points within the floodplain. These structures are also vulnerable to blockage by natural debris within the channel or by fly tipping and waste.

Flood risk to specific settlements is discussed in Section 6 and has been used to inform the zoning objectives for the Development Plan.

4.4.2 Tidal and Coastal Flooding

County Waterford's southern boundary is formed by the Celtic Sea. There are numerous settlements along this coastal margin, including Baile na nGall, Heilbhc, Cheekpoint, Dungarvan, Dunmore East, Passage East, Portlaw and Waterford City.

The coastline of County Waterford is experiencing both erosion and deposition and some flooding through normal coastal processes. Parts of the coast in Waterford are low lying and vulnerable to flooding in the long-term from sea level rise and it is essential that current and future plans and development now do not create significant problems in the future. Continued investment needs to be made in research on long term options for the protection of coastal towns from long term sea level rise and increased storm activity.

A strategic level erosion risk assessment for the coastline has also been completed and predictive erosion maps prepared for the years 2030 and 2050. A review of the erosion risk maps shows that primary erosion risk areas identified included Tramore. In contrast to the assessment of coastal flood risk, the coastal erosion risk assessment along the south coast has indicated that there is generally little risk from erosion in the larger urbanised areas. This is primarily due to the fact that the urbanised coastline is mostly either naturally resilient or protected by man-made defences.

The Government has recently established an Inter-Departmental Group on Coastal Change Management to scope out an approach for the development of a national coordinated and integrated strategy to manage the projected impact of coastal change to our coastal communities, economies, heritage, culture and environment. The Inter-Departmental Group is jointly chaired by the Department of Housing, Planning and Local Government and the OPW and will bring forward options and recommendations for the Government to consider. Should these recommendations be available during the lifetime of the plan they will be given due consideration and assessed for impacts on the SFRA.

4.4.3 Flooding from Flood Defence Overtopping or Breach

Under the OPW's flood relief capital works programme, a number of flood relief schemes are completed, ongoing or planned. These are listed in Table 4-3. Where a scheme is ongoing or planned it is important that new development is cognisant of the works and do not impede or prevent the progression of the measures. There may also be minor works or other projects completed by Waterford County Council that are not listed in the table.

Table 4-3: County Waterford flood relief schemes

<u>Scheme location</u>	<u>Status</u>
<u>Aqlish</u>	<u>Ongoing</u>
<u>Ballyduff</u>	<u>Ongoing</u>
<u>Waterford City phase 1</u>	<u>Completed 2011</u>
<u>Waterford City phase 2, 3 and 4</u>	<u>Completed 2016</u>
<u>Dungarvan and Environs</u>	<u>Planned</u>
<u>Portlaw</u>	<u>Completed (non-OPW)</u>
<u>East of Tramore</u>	<u>Completed (non-OPW)</u>

~~There are a number of flood relief schemes in County Waterford, including walls and / or embankments in Waterford City, Dungarvan, Portlaw and an area to the east of Tramore. Completed The defences have been examined in more detail through the CFRAM Studies, which has included an assessment of physical condition, height and the standard of protection provided. The CFRAM also looked at the likelihood of a defence failing, and if considered significant, investigated the consequences through breach modelling.~~

The Waterford City Flood Alleviation Scheme consists of the containment of floodwaters in the John's River and the River Suir within their respective channels through the urban area of Waterford. The works protect the city from flooding from both rivers for events up to the 0.5% AEP in tidal areas, and up to 1% AEP in non-tidal areas. This has been achieved through the construction of

flood defences, in the form of concrete walls, glass walls, sheet piled walls, embankments, storm water pumps etc¹.

It should be noted that whilst existing development clearly benefits from the construction of defences, it is against sustainability objectives, and the general approach of the OPW, to construct defences with the intension of releasing land for development. It is also not appropriate to consider the benefits of schemes which have not been constructed, and which may only be at pre-feasibility or design stage.

Residual risk is the risk that remains after measures to control flood risk have been carried out. Residual risk can arise from overtopping of flood defences and / or from the breach from structural failure of the defences. Residual

The concept of residual risk is explained in 'The Planning System and Flood Risk Management Guidelines for Planning Authorities and Technical Appendices, 2009' as follows:

"Although flood defences may reduce the risk of flooding, they cannot eliminate it. A flood defence may be overtopped by a flood that is higher than that for which it was designed or be breached and allow flood water to rapidly inundate the area behind the defence. In addition, no guarantee can be given that flood defence will be maintained in perpetuity. As well as the actual risk, which may be reduced as a result of the flood defence, there will remain a residual risk that must be considered in determining the appropriateness of particular land uses and development. For these reasons, flooding will still remain a consideration behind flood defences and the flood zones deliberately ignore the presence of flood defences."

Overtopping of flood defences will occur during flood events greater than the design level of the defences. Overtopping is likely to cause more limited inundation of the floodplain than if defences had not been built, but the impact will depend on the duration, severity and volume of floodwater. However, and more critically, overtopping can destabilise a flood defence, cause erosion and make it more susceptible to breach or fail. Recovery time and drainage of overtopping quantities should also be considered. Overtopping may become more likely in future years due to the impacts of climate change and it is important that any assessment of defences includes an appraisal of climate change risks.

Breach or structural failure of flood defences is hard to predict and is largely related to the structural condition and type of flood defence. 'Hard' flood defences such as solid concrete walls are less likely to breach than 'soft' defence such as earth embankments. Breach will usually result in sudden flooding with little or no warning and presents a significant hazard and danger to life. There is likely to be deeper flooding in the event of a breach than due to overtopping.

The assessment of breach should be proportionate to the likelihood of the defence failing, taking into account the age, maintenance regime, construction type and the presence of any demountable or mechanically operated components.

Whilst it is important that residual risks are recognised and appropriate management measures put in place, it is also important to acknowledge the benefits that a flood relief scheme provides to those living and working behind it. In this regard, although 'The Planning System and Flood Risk Management Guidelines for Planning Authorities and Technical Appendices, 2009' requires flood zones to be undefended, consideration should be given to the benefit provided by flood defences, but only once the Justification Test has been applied and passed.

4.4.4 Pluvial Flooding

Flooding of land from surface water runoff is usually caused by intense rainfall that may only last a few hours. The resulting water follows along natural valley lines, creating flow paths along roads and through and around developments and ponding in low spots, which often coincide with fluvial floodplains. Any areas at risk from fluvial flooding will almost certainly be at risk from surface water flooding.

¹ Suir CFRAM Study Hydraulics Report, Final, July 2016

An overall strategy for the management of pluvial risk is presented, and should be implemented across all development proposals. This, and recommendations for the assessment of surface water risks, are provided in Section 5.4.

As a longer term strategy, it is recommended that surface water management plans be prepared for the larger settlements in County Waterford. These should consider the applicability of different SuDS techniques for managing surface water run-off at key development sites, and also identify where integrated and area based provision of SuDS and green infrastructure are appropriate in order to avoid reliance on individual site by site solutions.

4.4.5 Flooding from Drainage Systems

Flooding from artificial drainage systems occurs when flow entering a system, such as an urban storm water drainage system, exceeds its discharge capacity, it becomes blocked or it cannot discharge due to a high water level in the receiving watercourse.

Flooding in urban areas can also be attributed to sewers. Sewers have a finite capacity which, during certain load conditions, will be exceeded. In addition, design standards vary and changes within the catchment areas draining to the system, in particular planned growth and urban creep, will reduce the level of service provided by the asset. Sewer flooding problems will often be associated with regularly occurring storm events during which sewers and associated infrastructure can become blocked or fail. This problem is exacerbated in areas with under-capacity systems. In the larger events that are less frequent but have a higher consequence, surface water will exceed the sewer system and flow across the surface of the land, often following the same flow paths and ponding in the same areas as overland flow.

Foul sewers and surface water drainage systems are spread extensively across the urban areas with various interconnected systems discharging to treatment works and into local watercourses.

4.4.6 Groundwater Flooding

Groundwater flooding is caused by the emergence of water originating from underground and is particularly common in karst landscapes. This can emerge from either point or diffuse locations. The occurrence of groundwater flooding is usually very local and unlike flooding from rivers and the sea, does not generally pose a significant risk to life due to the slow rate at which the water level rises. However, groundwater flooding can cause significant damage to property, especially in urban areas and pose further risks to the environment and ground stability. Groundwater flooding is not considered to be a significant risk in Waterford; the OPW's PFRA study did not identify any groundwater flood risk locations.

4.5 Climate Change

In addition to the current level of flood risk (either fluvial or coastal), the SFRA has identified a number of settlements which could be at significantly greater risk when future (climate change) scenarios are considered. These settlements are mainly located along the coast, where between a 0.5m (medium range future scenario) and 1m (high end future scenario) rise in sea level should be allowed for, based on current OPW guidance. This appraisal has not included storm damage which occurs currently or may occur in the future; it is based on still sea levels only.

Where land is to be zoned for development, it is important that the long term viability of the area is understood and can be managed. In the main, this will involve moving zoning objectives inland, rather than targeting new development along the areas at high future risk of flooding.

As with the other areas of risk, the CFRAM and IPCSS both provided future flood extents for its AFAs and coastal margins. As sea level rise will have potentially damaging consequences, the impact of this for both the MRFS and HEFS should be understood for coastal settlements.

Where the OPW and WCCC are designing flood relief schemes for an area consideration will be given to the management of climate change risks within the scheme design. However, this may follow an adaptive approach whereby the defence height is based on current design levels but the foundations of the walls and embankments are designed to take additional loading should the defences be raised in the future.

4.6 Settlement Classification

The Flood Zones were overlaid on the settlement boundaries to allow a preliminary review to be made of those towns and villages which are removed from flood risk, or where flood risk can be managed through surface water and drainage system design.

A number of the higher tier settlements have zoning objectives and have been subject to detailed review. All other settlements will be indicated by reference by a settlement boundary but no specific zoning objectives (see [Table 4-4](#) [Table 4-3](#)). A number of criteria are specified with the Development Plan to determine the appropriateness of a site for a specific development, and one of these is the Flood Zone in which the site is located; the sequential approach shall be applied within those settlements to avoid development in areas of flood risk. In these cases, the Plan Making Justification Test has not been applied so it is not possible for the Development Management Justification test to be passed and all new development should be located in Flood Zone C, with the exception of minor development (Section 5.28 of the Planning Guidelines).

Of the settlements that have zoning objectives and showed some level of risk of flooding (from fluvial, groundwater or coastal sources) a more detailed assessment of the quality and coverage of the flood data available was made, including overlaying the current zoning objectives and considering the required level of intensification of development that will be required to meet the Core Strategy. A comment on all sources of flood risk has been provided in the following tables, although it is the fluvial and tidal risks which are the main focus of the Flood Zones and zoning objective review process.

Table 4-4-3: Settlement hierarchy and approach within SFRA

Class	Category	Place	Level of assessment with this SFRA
1	City-Metropolitan Area	Waterford City	Zoning objectives have been reviewed in light of the Flood Zone mapping.
2	Key Town	Dungarvan, including Ballinroad Clonmel Environs	Zoning objectives have been reviewed in light of the Flood Zone mapping.
3A	Large Urban Town	Tramore	Zoning objectives have been reviewed in light of the Flood Zone mapping.
3B	Urban Town	Dunmore East, Portlaw, Lismore	
4A	Rural Towns	Cappoquin, Kilmacthomas, Tallow, Ardmore, Gaeltacht na nDéise (inc Sean Phobal), Passage East/Crooke, Stradbally,	A screening of risk has been carried out within the settlement boundary. Plan Making Justification Test has not been applied or passed so the sequential approach shall be followed and development within Flood Zone A will be avoided, whilst in Flood Zone B only less vulnerable uses will be appropriate, subject to site specific FRA.
4B	Rural Villages	Aglish, Ballyduff Upper, Ballymacarbry, Bonmahon/Knockmahon, Cheekpoint, Clashmore, Clonea Power, Dunhill, Kill, Kilmeaden/Ballyduff, Lemybrien/Kilrossanty, Rathgormuck, Touraneena, Villierstown.	
5	Rural Nodes	Annestown, Ballylaneen, Ballymacaw, Butlerstown, Faithlegg, Fenor, Grange,	A screening of risk has been carried out with the settlement boundary. Plan Making

Class	Category	Place	Level of assessment with this SFRA
		Kilbrien, Knockanore, Mellary, Modeligo, Piltown, Whitechurch.	<u>Justification Test</u> has not been applied or passed so the sequential approach shall be followed and development within Flood Zone A will be avoided, whilst in Flood Zone B only less vulnerable uses will be appropriate, subject to site specific FRA.

5 Approach to Flood Management

5.1 The Strategic Approach

A strategic approach to the management of flood risk is important in County Waterford as the risks are varied and disparate, with scales of risk and scales of existing and proposed development varying greatly across the county.

Following the Planning Guidelines, development should always be located in areas of lowest flood risk first, and only when it has been established that there are no suitable alternative options should development (of the lowest vulnerability) proceed. Consideration may then be given to factors which moderate risks, such as defences, and finally consideration of suitable flood risk mitigation and site management measures is necessary.

It is important to note that whilst it may be technically feasible to mitigate or manage flood risk at site level, strategically it may not be a sustainable approach.

A summary of flood risks associated with each of the zoning objectives has been provided in Table 5-1, below. It should be noted that this table is intended as a guide to be used in the Plan Making stage, and should be read in conjunction with the detailed assessment of risks for each settlement. The Flood Risk Commentary indicates whether a certain land zoning, in Flood Zone A or B, will need to have the Plan Making Justification Test (JT) applied and passed.

When carrying out a site specific FRA, or when planning applications are being considered, it is important to remember that not all uses will be appropriate on flood risk grounds, hence the need to work through the Justification Test for Development Management on a site by site basis and with reference to Section 6. For example, the Town / Village Centre zoning objective is "to include for an integrated mix of residential, commercial, community and social uses" which have varying vulnerabilities and would not be equally permissible within Flood Zone A and B.

Table 5-15-4: Zoning objective vulnerability

USE	Zoning	Indicative Primary Vulnerability	Flood Risk Commentary
Residential	New Residential	Highly Vulnerable	JT required for within Flood Zone A and B.
	Residential		
	Residential: Strategic Reserve		
Urban/ Town	Town Core	Less / highly vulnerable	JT required for within Flood Zone A and B, and for highly vulnerable development in Flood Zone B.
	General Business		
	Regeneration		
Community Services and Infrastructure	Community Infrastructure	Less / highly vulnerable	JT required for within Flood Zone A and B, and for highly vulnerable development in Flood Zone B.
	Open Space and Recreation	Water compatible	JT not needed for water compatible uses, but consideration to be given to flood risks and sequential use of land.
	Transport and Utilities infrastructure	Less / highly vulnerable	JT required for within Flood Zone A and B, and for highly vulnerable development in Flood Zone B.
Rural	High Amenity	Water	JT not needed for water

USE	Zoning	Indicative Primary Vulnerability	Flood Risk Commentary
	Rural Village	compatible	compatible uses, but consideration to be given to flood risks and sequential use of land.
Employment	Special Industry	Less / highly vulnerable	JT required for within Flood Zone A and B, and for highly vulnerable development in Flood Zone B.
	Light Industry/ High Technology/ Manufacturing Campus Development	Less vulnerable	Appropriate use in Flood Zone B, but JT will be needed in Flood Zone A.
	Tourism	Less vulnerable	Appropriate use in Flood Zone B, but JT will be needed in Flood Zone A.
White lands	White lands	Water compatible / less / highly vulnerable	JT has not been applied and sequential approach to avoid development in areas at risk of flooding.

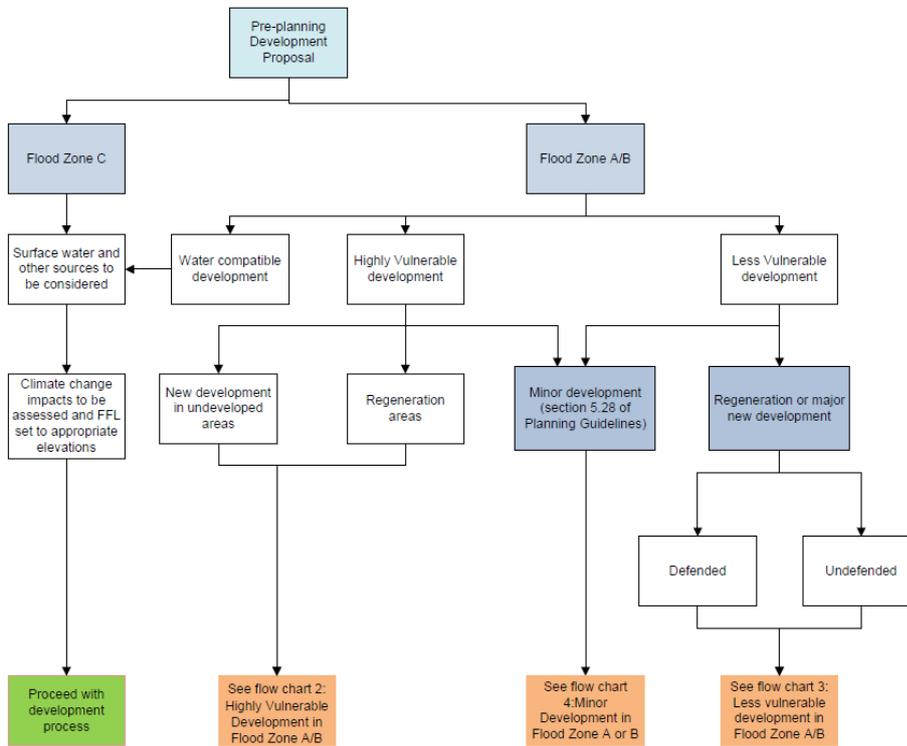
5.2 Development Scenarios and Flow Charts

To guide applicants and planning officials through the process of planning for and mitigating flood risk at a site level, the key features of a range of development scenarios have been identified (relating the flood zone, development vulnerability and presence or absence of defences). For each scenario, a number of considerations relating to the suitability of the development are summarised below. The scenarios identified are:

- Development wholly within Flood Zone C and Drainage Impact Assessment
- Minor developments in Flood Zone A or B
- Highly vulnerable development in Flood Zone A or B
- Less vulnerable development in Flood Zone A or B
- Water compatible uses in Flood Zone A or B
- Climate change

Each of these scenarios is also supported by a flow chart which summarises the decision-making process with regard to flood risk and different vulnerabilities of development. The flow charts are referenced through the following pages and are located in Appendix A, with Flow Chart 1 reproduced below.

Flow Chart 1: Development Management Process



It should be noted that this section of the SFRA applies only to land that has passed the Justification Test for Development Plans, and therefore Part 1 of the Justification Test for Development Management. Where this is not the case then further guidance, provided on a site by site basis, will be required from Waterford County Council and in accordance with Section 5.27 of the Planning Guidelines.

5.3 Requirements for a Flood Risk Assessment

Assessment of flood risk is required in support of any planning application. The level of detail will vary depending on the risks identified and the proposed land use. As a minimum, all proposed development, including that in Flood Zone C, must consider the impact of surface water flood risks on drainage design. In addition, flood risk from sources other than fluvial and tidal should be reviewed. The assessment may be a qualitative appraisal of risks, including drainage design. Alternatively, the findings of the CFRAM, or other detailed study, may be drawn upon to inform finished floor levels. In other circumstances a detailed modelling study and flood risk assessment may need to be undertaken. Further details of each of these scenarios, including considerations for the flood risk assessment are provided in the following sections.

For sites within Flood Zone A or B, a site specific "Stage 2 - Initial FRA" will be required and may need to be developed into a "Stage 3 - Detailed FRA". The extents of Flood Zone A and B are delineated through this SFRA. However, future studies may refine the extents (either to reduce or enlarge them) so a comprehensive review of available data should be undertaken once a SSFRA has been progressed.

Within the SSFRA the impacts of climate change and residual risk (including culvert/structure blockage) and more extreme scenarios (such as the 0.1% AEP fluvial and tidal event) should be considered and modelled or remodelled where necessary. Further information on the required content of the SSFRA is provided in the Planning System and Flood Risk Management Guidelines.

Any proposal that is considered acceptable in principle shall demonstrate the use of the sequential approach in terms of the site layout and design and, in satisfying the Justification Test (where required) the proposal will demonstrate that appropriate mitigation and management measures are put in place.

Although there are many locations where development may, in the future, benefit from a flood relief scheme, the assessment must progress on the basis of the current level of protection and any risks to the development itself or third party land must be managed as part of the development design.

5.4 Drainage impact assessment

All proposed development, including that in Flood Zone C, must consider the impact of surface water flood risks on drainage design. All development must pass through this stage before completing the planning and development process and should be accompanied by an appropriately detailed flood risk assessment, or drainage impact assessment, as appropriate.

Areas vulnerable to ponding are indicated on the OPW's PFRA mapping. However, this mapping is not exhaustive and more general consideration should be given to surface water management for development in low-lying areas which may act as natural ponds for collection of runoff.

The drainage design should ensure no increase in flood risk to the site, or the downstream catchment. Considerable detail on the process and design of SUDS is provided in the Greater Dublin Strategic Drainage Study (which in the absence of other guidance may be applied in County Waterford).

Where surface water attenuation forms part of the system, consideration should be given to the level of the outfall to the watercourse or sea. If this outfall will be below flood levels, an assessment of the additional storage required for the period when the outfall is submerged and free discharge is not possible, will need to be made. It is recommended that this is done on the basis of joint probability, with the worst case selected. For example, in a tidal situation this might be the 10% AEP tide with the 1% AEP rain storm and the 0.5% AEP tide with the 10% AEP rain event. Similar combinations of events should be tested for the fluvial situation.

For larger sites (i.e. multiple dwellings or commercial units) master planning should ensure that existing flow routes are maintained through the use of green infrastructure. Where possible, and particularly in areas of new development, floor levels should at a minimum be 300mm above adjacent roads and hard standing areas to reduce the consequences of any localised flooding. Where this is not possible, an alternative design appropriate to the location may be prepared.

5.5 Development in Flood Zone C

Where a site is within Flood Zone C, but adjoining or in close proximity to Flood Zone A or B, there could be a risk of flooding associated with factors such as future scenarios (climate change) or in the event of failure of a defence, blocking of a bridge or culvert. Risk from sources other than fluvial and coastal must also be addressed for all development in Flood Zone C. As a minimum in such a scenario, a flood risk assessment should be undertaken which will screen out possible indirect sources of flood risk. Where they cannot be screened out the FRA should present mitigation measures. The most likely mitigation measure will involve setting finished floor levels to a height that is above the 1% AEP fluvial or 0.5% AEP tidal flood level, with an allowance for climate change and freeboard, or to ensure a step up from road level to prevent surface water ingress. Design elements such as channel maintenance or trash screens may also be required. Evacuation routes in the event of inundation of surrounding land should also be detailed.

The impacts of climate change should be considered for all proposed developments. This is particularly important for development near areas at risk of tidal flooding. A development which is currently in Flood Zone C may be shown to be at risk when 0.5m is added to the extreme (0.5% AEP) tide. Details of the approach to incorporating climate change impacts into the assessment and design are provided in Section 5.8.

5.6 Development in Flood Zone A and B

Within Flood Zone A and B, potential development has been classed as either minor (typically extensions and changes of use) or major new development. When considering major development, whether the site is in Flood Zone A or B becomes important and will guide the approach to be taken.

5.6.1 Minor Developments

Section 5.28 of the Planning Guidelines on Flood Risk Management identifies certain types of development as being 'minor works' and therefore exempt from the Justification Test. Such development relates to works associated with existing developments, such as extensions, renovations and rebuilding of the existing development, small scale infill and changes of use. The assessment process for this form of development is provided in Flow Chart 4.

As the proposal relates to existing buildings, the 'Sequential Approach' and 'Justification Test' cannot apply, but an assessment of the risks of flooding should accompany such applications. This must demonstrate that the development would not increase flood risks by introducing significant numbers of additional people into the flood plain and/or putting additional pressure on emergency services or existing flood management infrastructure. The development must not have adverse impacts or impede access to a watercourse, floodplain or flood protection and management facilities. Where possible, the design of built elements in these applications should demonstrate principles of flood resilient design (See 'The Planning System and Flood Risk Management Guidelines for Planning Authorities Technical Appendices, 2009', Section 4 - Designing for Residual Flood Risk).

In many situations, the approach to deal with flooding would involve raising the ground floor levels above the level of extreme river levels. This is likely to cause problems for infill development sites and existing buildings. It is therefore recognised that some flexibility could be allowed, in limited circumstances and on a site by site basis, and depending on the level of risk presented. In these cases, the detailed design of the development should reflect the vulnerability of the site in terms of internal layout, materials, fixtures and fittings and internal layout. For high risk areas, less vulnerable uses are encouraged at ground floor levels. A site specific FRA will inform appropriate uses and detailed design and layout.

It should be noted that for residential buildings within Flood Zone A or B, bedroom accommodation is more appropriate at upper floor levels.

For commercial operations, business continuity must be considered, and steps taken to ensure operability during and recovery after a flood event for both residential and commercial developments. Emergency access must be considered as in many cases flood resilience will not be easily achieved in the existing built environment.

5.6.2 Highly vulnerable development

Highly vulnerable development in Flood Zones A or B needs to have passed both the Plan Making Justification Test and the Justification Test for Development Management. Development which is highly vulnerable to flooding, as defined in The Planning System and Flood Risk Management, includes (but is not limited to) dwelling houses, hospitals, emergency services and caravan parks. Such development has been divided into new builds and existing developed areas. The assessment process for this form of development is provided in Flow Chart 2.

5.6.2.1 New development

It is not appropriate for new, highly vulnerable development to be located on greenfield land in Flood Zones A or B, particularly outside the core of a settlement and where there are no flood defences. Such proposals do not pass the Justification Test. Instead, a less vulnerable use should be considered.

In some cases, land use objectives which include for a highly vulnerable use have been justified in the Development Plan. In the main, this would be town centre zonings, which allow for a mix of residential, commercial and other uses. In such cases, a sequential approach to land use within the site must be taken. This is illustrated in Flow Chart 2, and must consider the presence or absence of defences, land raising and provision of compensatory storage, safe access and egress in a flood and the wider development area.

5.6.2.2 Existing developed areas

In cases where development has been justified through the Plan Making process, the outline requirements for a flood risk assessment and flood management measures have been detailed in the following sections. Of prime importance are the requirement to manage risk to the development site and not to increase flood risk elsewhere. This should give due consideration to safe evacuation routes and access for emergency services during a flood event.

5.6.3 Less vulnerable development

This section applies to less vulnerable development in Flood Zone A which has passed the Justification test for development plans, and less vulnerable development in Flood Zone B, where this form of development is appropriate, and the Justification Test is not required.

Less vulnerable development includes retail, leisure and warehousing and buildings used for agriculture and forestry. This category includes less vulnerable development in all forms, including refurbishment or infill development, and new development both in defended and undefended situations. The assessment process for this form of development is provided in Flow Chart 3.

The design of less vulnerable development should generally begin with 1% AEP fluvial or 0.5% tidal events as standard, with climate change and a suitable freeboard included in the setting of finished floor levels.

The presence or absence of flood defences informs the level of flood mitigation recommended for less vulnerable developments in areas at risk of flooding. In contrast with highly vulnerable development, there is greater scope for the developer of less vulnerable uses to accept flood risks and build to a lower standard of protection, which is still high enough to manage risks for the development in question. However, any deviation from the design standard of 1%/0.5% AEP, plus climate change, plus freeboard, needs to be fully justified within the FRA.

5.6.4 Water compatible uses

Water compatible uses can include the non-built environment, such as open space, agriculture and green corridors. These uses do not require a flood risk assessment and are appropriate for Flood Zone A and B. However, there are numerous other uses which are classified as water compatible, but which involve some kind of built development, such as lifeguard stations, fish processing plants and other activities requiring a waterside location. The Justification Tests are not required for such development, but an appropriately detailed flood risk assessment is required. This should consider mitigation measures such as development layout and finished floor levels, access, egress and emergency plans. Climate change and other residual risks should also be considered within the SSFRA.

5.7 Checklist for Applications for Development in Areas at Risk of Flooding

This section applies to both highly and less vulnerable development in Flood Zone A and highly vulnerable development in Flood Zone B that satisfy the following:

- Meet the definition of Minor Development; or
- Pass the Justification Test for Development Plans and Justification Test for Development Management to the satisfaction of the Planning Authority.

The following checklist is required for all development proposals:

- The SSFRA be carried out by an appropriately qualified Engineer with relevant FRA experience (as deemed acceptable by the Planning Authority), in accordance the Waterford County SFRA and the Flood Risk Guidelines.
- Demonstration that the specific objectives or requirements for managing flood risk set out in this SFRA have been complied with, including an assessment of residual risks.
- Preparation of access, egress and emergency plans which are appropriate to the vulnerability of the development and its occupiers, the intensity of use and the level of flood risk.
- An assessment of the potential impacts of climate change and the adaptive capacity of the development.
- Compliance with C753 CIRIA SUDS guide, GDSDS and inclusion of SuDS.

5.8 Climate Change

Ireland's climate is changing and analysis of the potential impacts of future climate change is essential for understanding and planning. Climate change should be considered when assessing flood risk and in particular residual flood risk. Areas of residual risk are highly sensitive to climate change impacts as an increase in flood levels will increase the likelihood of defence failure. As laid out in the Climate Adaptation Strategy, new development should include consideration of climate change impacts on fluvial, pluvial and tidal source of flooding.

The Planning Guidelines recommend that a precautionary approach to climate change is adopted due to the level of uncertainty involved in the potential effects. Specific advice on the expected impacts of climate change and the allowances to be provided for future flood risk management in Ireland is given in the OPW draft guidance². However, this guidance is over 10 years old now and climate science, particularly in relation to sea level rise, has developed rapidly. There are many coastal related climate change impacts, these include:

- continued sea level rise;
- potentially more severe Atlantic storms, which could generate more significant storm surges and extreme waves;
- increased water depths lead to larger waves reaching the coast.

The OPW guidance recommended two climate change scenarios are considered. These are the Mid-Range Future Scenario (MRFS) and the High-End Future Scenario (HEFS). The allowances should be applied to the 1% AEP fluvial or 0.5% AEP tidal levels. Where a development is critical or extremely vulnerable (see Table 5-2) the impact of climate change on 0.1% AEP flows should also be applied, and greater climate change allowances tested for resilience purposes.

These climate change allowances are particularly important at the development management stage of planning and will ensure that proposed development is designed and constructed according to current local and national Government advice.

Table 5-25-2: Climate change allowances by vulnerability and flood source

Development vulnerability	Fluvial climate change allowance (increase in flows)	Tidal climate change allowance (increase in sea level)	Storm water / surface water
Less vulnerable	20%	0.5m (MRFS)	20% increase in rainfall
Highly vulnerable	20%	0.5m (MRFS)	
Critical or extremely vulnerable (e.g. hospitals, major sub-stations, blue light services)	30%	1.0m (HEFS)	

Note: there will be no discounting of climate change allowances for shorter lifespan developments.

Further work on the impacts of climate change on flood levels was undertaken as part of the various CFRAM Studies and the ICPSS. The studies provided flood extents for both fluvial and coastal risk, which are available on www.floodinfo.ie.

Assessment of climate change impacts can be carried out in a number of ways. For watercourses that fall within the ~~Western~~ CFRAM study areas, flood extents and water levels for the MRFS and HEFS have been developed. For other fluvial watercourses a conservative approach would be to take the 0.1% AEP event levels and extent as representing the 1% AEP event plus climate change. Where access to the hydraulic river model is readily available a run with climate change could be carried out, or hand calculations undertaken to determine the likely impact of additional flows on river levels. In a coastal or tidal scenario, a 0.5 or 1m increase to the 0.5% AEP sea level can be assessed based on topographic levels.

² OPW Assessment of Potential Future Scenarios, Flood Risk Management Draft Guidance, 2009

5.9 Flood Mitigation Measures at Site Design

For any development proposal in an area at moderate or high risk of flooding that is considered acceptable in principle (i.e. has passed the Plan Making Justification Test), the site specific FRA must demonstrate that appropriate mitigation measures can be put in place and that residual risks can be managed to acceptable levels. This may include the use of flood-resistant construction measures that are aimed at preventing water from entering a building and that mitigate the damage floodwater causes to buildings. Alternatively, designs for flood resilient construction may be adopted where it can be demonstrated that entry of floodwater into buildings is preferable to limit damage caused by floodwater and allow relatively quick recovery.

Various mitigation measures are outlined below and further detail on flood resilience and flood resistance are included in the Technical Appendices of the Planning Guidelines, The Planning System and Flood Risk Management³.

It should be emphasised that measures such as those highlighted below should only be considered once it has been deemed 'appropriate', to allow development in a given location or the Justification Test for Development Plans has been passed. The Planning Guidelines do not advocate an approach of engineering solutions in order to justify the development which would otherwise be inappropriate.

5.9.1 Site Layout and Design

To address flood risk in the design of new development, a risk-based approach should be adopted to locate more vulnerable land use to higher ground while water compatible development i.e. car parking (with appropriate flood management plan) and recreational space can be located in higher flood risk areas.

The site layout should identify and protect land required for current and future flood risk management. Waterside areas or areas along known flow routes can be used for recreation, amenity and environmental purposes to allow preservation of flow routes and flood storage, while at the same time providing valuable social and environmental benefits.

At an individual building level, assigning a water compatible use, such as open public realm, or less vulnerable use to the ground floor level, along with suitable flood resilient construction, is an effective way of raising vulnerable living space above design flood levels. It can however have an impact on the streetscape. The provision of safe access and egress is a critical consideration in allocating ground floor uses.

5.9.2 Ground levels, floor levels and building use

Modifying ground levels to raise land above the design flood level is a very effective way of reducing flood risk to the site. However, in most areas of fluvial flood risk, conveyance or flood storage would be reduced locally and could increase flood risk off site. There are a number of criteria which must all be met before this is considered a valid approach:

- Development at the site must have been justified through this SFRA based on the existing (unmodified) ground levels.
- The FRA should establish the function provided by the floodplain. Where conveyance is a prime function then a hydraulic model will be required to show the impact of its alteration.
- The land being given over to storage must be land which does not flood in the 1% AEP fluvial event (i.e. Flood Zone B or C).
- Compensatory storage should be provided on a level for level basis to balance the total area that will be lost through infilling where the floodplain provides static storage.
- The provision of the compensatory storage should be in close proximity to the area that storage is being lost from (i.e. within the same flood cell).
- The land proposed to provide the compensatory storage area must be within the ownership / control of the developer.
- The compensatory storage area should be constructed before land is raised to facilitate development.

³ The Planning System and Flood Risk Management Guidelines for Planning Authorities, Technical Appendices, November 2009

- Compensatory storage is generally not required for loss of floodplain in a tidal scenario, or in locations behind defences.

In some sites it is possible that ground levels can be re-landscaped to provide a sufficiently large development footprint. However, it is likely that in other potential development locations there is insufficient land available to fully compensate for the loss of floodplain. In such cases it will be necessary to reconsider the layout or reduce the scale of development or propose an alternative and less vulnerable type of development. In other cases, it is possible that the lack of availability of suitable areas of compensatory storage mean the target site cannot be developed and should remain open space.

Raising finished floor levels within a development is an effective way of avoiding damage to the interior of buildings (i.e. furniture and fittings) in times of flood. Finished floor levels should be assessed in relation to the specific development, but the minimum levels set out in Table 5-3 should apply. It should be noted that in certain locations it may be appropriate to adopt a more precautionary approach to setting finished floor levels, for example where residual risks associated with bridge blockage occur or the 0.1% AEP event is more extreme, and this should be specifically assessed in the SSFRA. It is also noted that typically finished floor levels should be set a minimum of 300mm above surrounding ground levels to prevent ingress of surface water.

Table 5-35-3: Recommended minimum finished floor levels

Scenario	Finished floor level to be based on
Fluvial, undefended	1% AEP flood + climate change (as Table 5-2) + 300mm freeboard
Tidal, undefended	0.5% AEP flood + climate change (as Table 5-2) + 300mm freeboard.
Fluvial, defended	1% AEP flood + 300mm freeboard. Climate change does not need to be included, provided it is included in the defence height or adaption plan for the scheme.
Tidal, defended	0.5% AEP flood + 300mm freeboard. Climate change does not need to be included, provided it is included in the defence height or adaption plan for the scheme.

5.9.3 Raised Defences

Construction of raised defences (i.e. flood walls and embankments) has traditionally been the response to flood risk. However, this is not a preferred option on an ad-hoc basis and where the defences to protect the development are not part of a strategically led flood relief scheme. Where a defence scheme is proposed as the means of providing flood defence, the impact of the scheme on flood risk up and downstream must be assessed and appropriate compensatory storage must be provided.

A site is considered to be defended if the standard of protection is 1% AEP (fluvial) or 0.5% AEP (tidal), within which a freeboard of at least 300mm is included. The FFL of the proposed development needs to include for the impacts of climate change and other residual risks, including overtopping in the 0.1% event, unless this has also been incorporated into the defence design. This may be assessed through breach analysis, overtopping analysis or projection of water levels across the floodplain.

5.9.4 Emergency Flood Response Plans

In some instances, and only when all parts both the Plan Making and Development Management Justification Tests have been passed, it may be necessary for an emergency flood response plan to be prepared to support other flood management measures within the context of a less vulnerable or water compatible development. An emergency response plan may be required to trigger the operation of demountable flood defences to a less vulnerable development, evacuation of a car park or closure of a business or retail premises.

The emergency plan will need to detail triggers for activation, including receipt of a timely flood warning, a staged response and to set out the management and operational roles and responsibilities. The plan will also need to set out arrangements for access and egress, both for pedestrians, vehicles and emergency services. The details of the plan should be based on an

appropriately detailed assessment of flood risk, including speed of onset of flooding, depths and duration of inundation.

However, just because it is possible to prepare an emergency plan does not mean this is advisable or appropriate for the nature and vulnerability of development and WCCC will not accept an emergency response plan as part of a residential development.

5.10 'Green Corridor'

It is recommended that, where possible, and particularly where there is greenfield land adjacent to the river, a 'green corridor', is retained on all rivers and streams. This will have a number of benefits, including:

- Retention of all, or some, of the natural floodplain;
- Potential opportunities for amenity, including riverside walks and public open spaces;
- Maintenance of the connectivity between the river and its floodplain, encouraging the development of a full range of habitats;
- Natural attenuation of flows will help ensure no increase in flood risk downstream;
- Allows access to the river for maintenance works;
- Retention of clearly demarcated areas where development is not appropriate on flood risk grounds, and in accordance with the Planning System and Flood Risk Management.

The width of this corridor should be determined by the available land, and topographically constraints, such as raised land and flood defences, but would ideally span the fully width of the floodplain (i.e. all of Flood Zone A).

6 Application of the Justification Test

Having reviewed the level of flood risk within the County and determined appropriate measures for assessing and managing risks to high and low vulnerability development in Flood Zones A, B and C, a more detailed assessment of sites and areas was carried out. The aim of this assessment was to apply the Plan Making Justification Test, taking into account circular PL02/2014 in relation to existing development. The tables in the following sections detail the assessment of risk in relation to all zoned land. The recommendations and observations have been adopted by Waterford City and County Council and used to inform the settlement zoning objectives which are detailed in the County Development Plan.

6.1 Risk to existing, highly vulnerable, development

Circular PL02/2014 states that *“In some instances, particularly in older parts of cities and towns, an existing land use may be categorised as a “highly vulnerable development” such as housing, be zoned for residential purposes and also be located in flood zone A/B. Additional development such as small scale infill housing, extension or changes of use that could increase the risk or number of people in the flood-prone area can be expected in such a zone into the future. In these instances, where the residential/vulnerable use zoning has been considered as part of development plan preparation, including uses of the Justification Test as appropriate, and it is considered that the existing use zoning is still appropriate, the development plan must specify the nature and design of structural or non-structural flood risk management measures prior to future development in such areas in order to ensure that flood hazard and risk to the area and to other adjoining locations will not be increased or, if practicable, will be reduced”.*

6.1.1 Settlements with Zoning Objectives

There are a number of such areas in the County identified on the Flood Zone maps, including existing housing and established development in Waterford City and Dungarvan. It is considered that it would be unrealistic to down zone these lands as they are fully developed and constitute core areas of the settlements.

In applying the Justification Test Part 3, consideration has been given to structural and non-structural measures which may be required prior to further development taking place. In most locations, future opportunities for development are likely to be limited to small extensions, infill houses or small commercial units and changes of use. As such, in most areas flood risk can be addressed through non-structural responses, such as requiring a site specific flood risk assessment which will identify appropriate mitigation measures such as retaining flow paths, flood resilient construction and emergency planning.

6.1.2 Settlements without Zoning Objectives

There are a number of such areas in the County identified on the Flood Zone maps, including existing housing and established development in settlements such as Ballinroad and Clonea Power, where existing residential development is within Flood Zone A and B. Several other settlements also show predicted flood risk to harbour or coastal areas. These settlements do not have specific zoning objectives and have not been subject to the Justification Test, but with careful planning the sequential approach can be applied.

In Aglish and Ballyduff Upper, flood risk is greater and non-structural (planning based) responses to major new development are not appropriate to the scale of risks. In these locations, structural measures, generally in the form of flood defences, will be required prior to future development occurring within Flood Zone A and B. Further detail on the specifics of the flood management measures in these locations are available in the various CFRAM Study reports.

The following sections provide more detail on flood risk to settlements within County Waterford and gives details of the outcome of the Justification Test where this is required.

7 Settlement Based Flood Risk Assessment

Within Waterford the various settlements have differing levels of flood risk and a screening exercise has been carried out to ensure an appropriate level of assessment is provided in each settlement.

7.1 Settlements in Flood Zone C

An initial screening of flood risk was undertaken to identify which settlements were located wholly within Flood Zone C. In the settlements listed below no fluvial or tidal flood risk was identified through the Flood Zone mapping, and development proposals should proceed following the approach laid out in Sections 5.4 and 5.5 to ensure all other sources of flood risk, including surface water, groundwater and unmapped drains, have been appropriately assessed and, where required, mitigated.

It should be noted that of the settlements listed below, only Lismore has land use zoning objectives and the others have a settlement boundary in place of land use zoning.

- Annestown
- Ballinroad
- Ballyduff
- Ballylaneen
- Ballymacaw
- Bawnfune
- Buttlerstown
- Crooke
- Faithleg
- Grange
- Kill
- Kilbrien
- Kilrossanty
- Knockanore
- Lismore
- Melleray
- Modeligo
- Piltown
- Rathgormack
- Stradbally
- Tooraneena
- Villerstown
- Whitechurch

7.2 Settlements in Flood Zone A and B

The sites below were identified as lying partly within Flood Zones A, B and C, and have zoning objectives detailed within the Development Plan. The following sections provide further detail of the risks within each of the listed settlements, including consideration of the need for the Plan Making and Development Management Justification Tests. It should be noted that in all cases, part of the settlement is also within Flood Zone C and for these areas, development proposals should proceed following the approach laid out in Sections 5.4 and 5.5 to ensure all other sources of flood risk, including surface water, groundwater and unmapped drains, have been appropriately assessed and, where required, mitigated.

- Clonmel Environs
- Dungarvan (inc Ballinroad)
- Dunmore East
- Gaeltacht na nDéise
- Portlaoigh
- Tramore
- Waterford

7.2.1 Waterford City and Environs

Waterford City benefits from existing defences on John's River and the right bank of the River Suir. The defences were recently completed and provide protection against the 0.5% AEP event, with a 500mm freeboard. A climate change allowance has not been built into the freeboard level. The 0.1% AEP event is also contained within the design crest height by virtue of the freeboard allowed, but for the formal standard of protection is the 0.5% AEP event. This means lands behind the defences remain in Flood Zone A.

Behind the defences is much of the town centre, mixed use zonings and a number of opportunity sites and areas with the potential for new or infill development. Although defended, residual risks to these developments need to be assessed, including defence overtopping and climate change impacts.

The North Quays SDZ has been subject to a recent SFRA, which proposed tidal risk be managed through raising FFL above 4.42m OD⁴.

⁴ Waterford North Quays Strategic Development Zone - Strategic Flood Risk Assessment, February 2018

The Justification Test is required for all opportunity sites and areas for potential development, whether located behind defences or not. This has been divided into five key areas, plus existing residential, and the Justification Test is provided below.

Climate change impacts have the potential to be high as Waterford is at risk from sea level rise. Although there is a freeboard of 500mm, this should not be confused with a climate change allowance. A climate change adaptation strategy is recommended for the city, which should be undertaken for the whole of the scheme rather than on a site by site basis. Climate change in the North Quays SDZ is to be addressed through FFL.

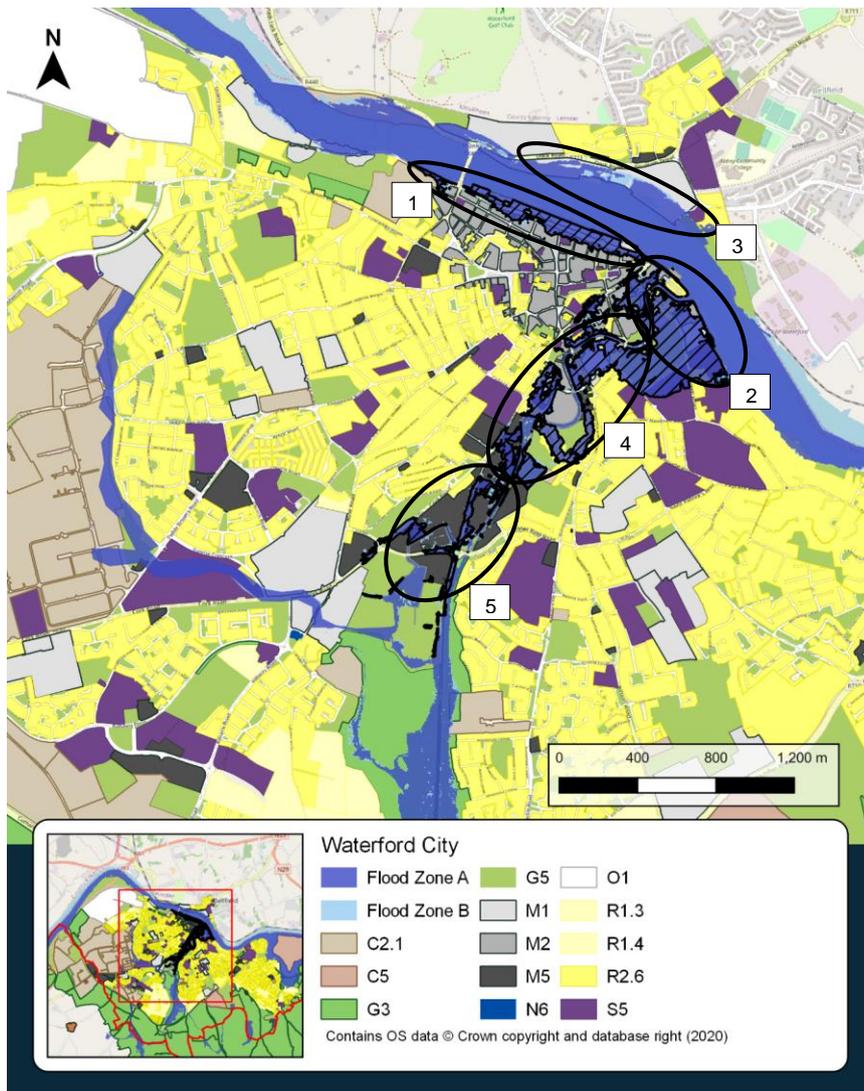


Figure 7-17: Waterford City and Environs Zoning

Table 7-17-4: Waterford City Justification Test table 1

Justification test for sites within Flood Zone A and / or B	Area 1 - Waterfront mixed use zoning (Carparking)	Area 2 - Waterfront mixed use zoning	Area 3 - North Quays
The urban settlement is targeted for growth	Yes	Yes	Yes
The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement	Lands in the city centre have a historic port use/car park use. The Draft Development Plan has identified that these lands have the capacity to deliver an area of significant amenity for the city centre along with limited commercial mixed uses. The development of this area will assist in achieving the principles of compact city centre first development as provided for in the NPF and RSES.	Lands to the east of the city centre are occupied by a mix of uses, dominated by open space and amenity of the Peoples Park, Water park School and sports fields and built out areas on the periphery of the city centre. Some regeneration and redevelopment lands are located within the floodzone which are either vacant or occupied by mixed commercial premises. The Draft Development Plan has identified that these lands have the capacity to deliver additional mixed use commercial development on brownfield lands and as such the development of this area will assist in achieving the principles of compact city centre first development as provided for in the NPF and RSES.	Lands in the city centre have a historic port use but have been vacant and underutilised for a number of years since the relocation of the Port of Waterford to Belview. The lands have been identified as an SDZ and a Planning Scheme has been prepared in this regard. The Planning Scheme and the Draft Development Plan both identify the potential of this area to deliver significant mixed use regeneration north of the River Suir and thereby contribute to achieving the concentric city as envisaged in the RSES and MASP. The development of this area will also assist in achieving the principles of compact city centre first development as provided for in the NPF and RSES.
Is essential to facilitate regeneration and / or expansion of the centre of the urban settlement.	The development of these lands will form an important element of the enhancement of amenity in the city centre and will assist in linking the north and south quays and lands east and west of the city centre along with relocation of car parking to a more appropriate out of centre or edge of centre location.	The development of these lands will be important in terms of facilitating additional commercial development on the edge of the city centre with possible above ground floor residential uses and associated car parking in support of enhancing the choice and availability of residential units close to the city centre.	The development of these lands will form an important element of the enhancement of amenity in the city centre and will assist in linking the north and south quays and creating a fulcrum north of the river on which to focus the concentric city as envisaged in the RSES and MASP.
Comprises significant previously developed and/ or under-utilised lands	Development opportunities are limited to brownfield sites which are either vacant, or underutilised.	Development opportunities are limited to brownfield sites which are either vacant, or underutilised.	Development opportunities are limited to brownfield sites which are either vacant, or underutilised.
Is within or adjoining the core of an	Redevelopment lands are located at	Redevelopment lands are located on the	Redevelopment lands are located on the

Justification test for sites within Flood Zone A and / or B	Area 1 - Waterfront mixed use zoning (Carparking)	Area 2 - Waterfront mixed use zoning	Area 3 - North Quays
established or designated urban settlement	the centre of the historic city core.	periphery of the historic city centre.	periphery of the historic city centre.
Will be essential in achieving compact and sustainable urban growth	The redevelopment of the brownfield sites will contribute to compact and sustainable growth in a way that will enable Waterford City to meet its designated function as set out in the NPF and RSES.	The redevelopment of the brownfield sites will contribute to compact and sustainable growth in a way that will enable Waterford City to meet its designated function as set out in the NPF and RSES.	The redevelopment of the brownfield sites will contribute to compact and sustainable growth in a way that will enable Waterford City to meet its designated function as set out in the NPF and RSES.
There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.	These undeveloped brownfield sites are the only vacant and undeveloped lands in the immediate vicinity of the city centre and as such their redevelopment will support the consolidation of Waterford City and enhancement of amenity and connectivity.	These undeveloped brownfield sites are the only vacant and undeveloped lands in the immediate vicinity of the city centre and as such their redevelopment will support the consolidation of Waterford City.	These undeveloped brownfield sites are the only vacant and undeveloped lands in the immediate vicinity of the city centre and as such their redevelopment will support the consolidation of Waterford City, delivery of the concentric city and enhancement of amenity and connectivity across the city and city centre.
A flood risk assessment to an appropriate level of detail has been carried out	Risks to this area are from direct inundation, based on tidal levels, from the Suir. The current car park use is surface level and considered water compatible, even within the mixed use zoning. The area is defended, and residual risks associated with this particular use are low. However, any change of use / new development in this area must be subject to SSFRA.	Risks to this area are from direct inundation, based on tidal levels, from the Suir. This area is currently developed and benefits from defences which protect against the 0.5% AEP tide (with adequate freeboard) and the 0.1% AEP tide (freeboard level unknown). SSFRA will be needed for future development here, following the flow charts for defended development.	Risks to this area are from direct inundation, based on tidal levels, from the Suir. The North Quays SDZ has been subject to a recent SFRA, which proposed tidal risk be managed through raising FFL above 4.42m OD ⁵ . Any development proposal will need to be supported by a SSFRA which should the FFL to ensure this is still appropriate, and also consider current climate science with regards to allowances for climate change.
Result	Pass	Pass	Pass
Recommendation for zoning	Retain current zoning and land use.	Retain current zoning and land use.	Retain current zoning and land use.

Table 7-27-2: Waterford City Justification Test table 2

Justification test for sites within Flood Zone A and / or B	Area 4 - Town centre and mixed use	Area 5 - Upstream mixed use development	Waterford City Suburban Kilcohan & Kings Channel Area 6
The urban settlement is targeted for growth	Yes	Yes	<u>Yes</u>
The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement	Lands to the south of the city centre running along the line of the John's River and the Manor to the Cork Road are occupied by a mix of uses including retail, business, open space/ amenity and older historic residential areas/ streets. As with other areas of the historic city, there are some regeneration and redevelopment lands located within the floodzone which are either vacant or occupied by mixed commercial premises. The development of these regeneration sites will assist in achieving the principles of compact city centre first development as provided for in the NPF and RSES.	Lands lying further south of Area 4 running along the line of the John's River and the Cork Road are occupied by a mix of uses including retail, business, open space/amenity and older historic residential areas/streets. The area is predominantly built out and any regeneration will require the displacement of existing uses.	<u>The lands are zoned for residential development in support of the residential function of the designated neighbourhoods within Waterford city as set out in section 3.3 of the development plan and will facilitate further consolidation of the neighbourhoods.</u>
Is essential to facilitate regeneration and / or expansion of the centre of the urban settlement.	The development of these lands will be important in terms of facilitating addition commercial development on the edge of the city centre with possible above ground floor residential uses and associated car parking in support of enhancing the choice and availability of residential units close to the city centre.	The development of these lands will be important in terms of facilitating addition commercial development with possible residential uses and associated car parking in support of enhancing the choice and availability of residential units close to the city centre.	<u>The zoning of the lands will facilitate the ongoing residential development across the city in a manner consistent with the Neighbourhood Strategy.</u>
Comprises significant previously developed and/ or under-utilised lands	Development opportunities are limited to brownfield sites which are either vacant, or underutilised.	Development opportunities are limited to brownfield sites which are either vacant, or underutilised.	<u>The lands are important to increasing the population across two city neighbourhoods and as such are underutilised.</u>
Is within or adjoining the core of an established or designated urban settlement	Redevelopment lands are located on the approach to the city centre and potential for redevelopment within the <u>Flood Zone A and</u>	Redevelopment lands are removed from the city centre but are located along a historic arterial route into the city. Potential for	<u>The lands form part of two city neighbourhoods.</u>

Justification test for sites within Flood Zone A and / or B	Area 4 - Town centre and mixed use	Area 5 - Upstream mixed use development	<u>Waterford City Suburban Kilcohan & Kings Channel Area 6</u>
	<u>B</u> is limited in terms of scale and opportunity.	redevelopment within the <u>Flood Zone A and B</u> is limited in terms of scale and opportunity.	
Will be essential in achieving compact and sustainable urban growth	The redevelopment of the brownfield sites will contribute to compact and sustainable growth in a way that will enable Waterford City to meet its designated function as set out in the NPF and RSES.	The redevelopment of the brownfield sites will contribute to compact and sustainable growth in a way that will enable Waterford City to meet its designated function as set out in the NPF and RSES.	<u>The development of the land will support and will be consistent with the preferred pattern of spatial growth for the city neighbourhoods as set out in Chapter 3 of the development plan.</u>
There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.	These undeveloped brownfield sites are located along the historic arterial route to the city centre. As such their redevelopment will support the consolidation of Waterford City in support of the RSES and MASP.	These undeveloped brownfield sites are limited in number and are located along the historic arterial route to the city centre. As such their redevelopment will support the consolidation of Waterford City in support of the RSES and MASP.	<u>The lands provide a suitable location to complete the development of city neighbourhoods and as such there are no suitable alternative lands available.</u>
A flood risk assessment to an appropriate level of detail has been carried out	Risks to this area are from a combination of fluvial and tidal risks arising from the Suir and John's River . This area is currently developed and benefits from defences which protect against the 1% AEP fluvial / 0.5% AEP tide (with adequate freeboard) and the 0.1% AEP event (freeboard level unknown). SSFRA will be needed for future development here, following the flow charts for defended development.	Risks to this area are from fluvial risks arising from John's River, with some influence of the Suir on the flood levels. This area is currently developed and benefits from defences which protect against the 1% AEP fluvial / 0.5% AEP tide (with adequate freeboard) and the 0.1% AEP event (freeboard level unknown). SSFRA will be needed for future development here, following the flow charts for defended development.	<u>Any future development in the vicinity of floodzones should be supported by a site-specific flood risk assessment, which may refine the flood extents in this area. The sequential approach should then be applied to ensure highly and less vulnerable development is located within Flood Zone C.</u>
Result	Pass	Pass	<u>Pass</u>
Recommendation for zoning	Retain current zoning and land use.	Retain current zoning and land use.	<u>Retain current land zoning.</u>

Table 7-37-3: Waterford City Justification Test table 3

Justification test for sites within Flood Zone A and / or B	Scattered areas of Existing residential	Ballybeg / Kilbarry
The urban settlement is targeted for growth	Yes	Yes
The zoning or designation of the lands for the particular use or	These scattered areas of development lands are predominantly under residential use with some commercial uses in and	Lands lying further south of Area 5 running partially along the line of the John's River and the Cork Road are occupied by a mix of uses

Justification test for sites within Flood Zone A and / or B	Scattered areas of Existing residential	Ballybeg / Kilbarry
development type is required to achieve the proper planning and sustainable development of the urban settlement	around the city centre/quays. It is likely that redevelopment will be confined to minor development types.	including retail, business, open space/amenity and older historic residential areas/streets. The lands are also zoned for regeneration uses and offer potential for development to support the expansion of WIT and improvement of this main artery into the city centre. Scope also exists for significant enhancement of general amenity and open space. The development of these regeneration sites will assist in achieving the principles of compact, sequential development as provided for in the NPF and RSES.
Is essential to facilitate regeneration and / or expansion of the centre of the urban settlement.	There is limited opportunity for minor development, small infill development or residential extensions.	The development of these lands will be important in terms of facilitating addition commercial development with possible residential uses and associated amenity areas car parking in support of enhancing the choice and availability of residential units and possible student accommodation on the main arterial access route to the city centre.
Comprises significant previously developed and/ or under-utilised lands	Development opportunities are limited to brownfield sites which are either vacant, or underutilised.	Development opportunities are limited to brownfield sites which are either vacant, or underutilised.
Is within or adjoining the core of an established or designated urban settlement	Redevelopment lands are removed from the city centre but are located along a historic arterial route into the city. Potential for redevelopment within the Flood Zone is limited in terms of scale and opportunity.	Redevelopment lands are removed from the city centre but are located along a historic arterial route into the city. Potential for redevelopment within the Flood Zone is limited in terms of scale and opportunity. This route will likely be a high capacity public transport corridor given its location between WIT and the city centre.
Will be essential in achieving compact and sustainable urban growth	The lands have been predominantly developed out to date with potential for only limited infill and minor development. Development will assist in achieving sustainable compact growth.	The redevelopment of the brownfield sites will contribute to compact and sustainable growth in a way that will enable Waterford City to meet its designated function as set out in the NPF and RSES.
There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.	The lands have been predominantly built out for residential uses. Redevelopment will however support the consolidation of Waterford City in support of the RSES and MASP.	These undeveloped brownfield sites are limited in number and are located along the historic arterial route to the city centre. As such their redevelopment will support the consolidation of Waterford City in support of the RSES and MASP.
A flood risk assessment to an appropriate level of detail has been carried out	Risks to this area are from a combination of fluvial and tidal risks arising from the Suir and John's River . This area is currently developed and benefits from defences which protect against the 1% AEP fluvial / 0.5% AEP tide (with adequate freeboard) and the	Risks to this area are indicated in the OPW's PFRA mapping, which indicates risk from the John River. It is recognised that this mapping is broadscale and indicative in nature. Development proposals should be accompanied by and appropriately detailed FRA. Once the Flood

Justification test for sites within Flood Zone A and / or B	Scattered areas of Existing residential	Ballybeg / Kilbarry
	0.1% AEP event (freeboard level unknown). Minor developments should be supported by an appropriately detailed SSFRA. Mayor future redevelopment will need to be informed by a detailed SSFRA and include application of the sequential approach.	Zones have been reviewed, and if appropriate refined, the sequential approach should be applied to locate development within Flood Zone C.
Result	Pass	Pass, subject to sequential approach.
Recommendation for zoning	Retain current zoning and land use.	Retain current zoning and land use

7.2.2 Dungarvan

The river and estuary in Dungarvan are wide, but flood extents are relatively contained, with the clear exception of the lands north of the town centre and the Duckspool area. Dungarvan and Environs have been listed as one of the settlements to benefit from the OPW's 10 year investment programme, but the timeframe for these works are unknown. It should be noted that although the Duckspool area benefits from some level of protection, this is through informal defences which are infrequently maintained and do not have a certified standard of protection. For the purposes of the SFRA this land is considered to be undefended.

There is some encroachment of Flood Zones A and B into lands zoned for new and existing residential development. In these areas new development here should be limited to Minor Development (Section 5.28 of the Planning Guidelines). There is also risk to some town centre lands (1). The Justification Test has been applied to these areas, along with the existing residential development to the east of Dungarvan (2). Where other lands, including mixed use, strategic reserve and residential zoned lands, lie within Flood Zone A and / B, the sequential approach shall be applied and development within Flood Zone A will be avoided, whilst in Flood Zone B only less vulnerable uses will be appropriate, subject to site specific FRA.

To the west of Dungarvan an area zoned for N6 (other networks and basic infrastructure / utilities, and is currently a petrol filling station with car dealership and shop (3) is partly within Flood Zone A and B. However, the building footprint is within Flood Zone C. Further development of this site should be focused within Flood Zone C.

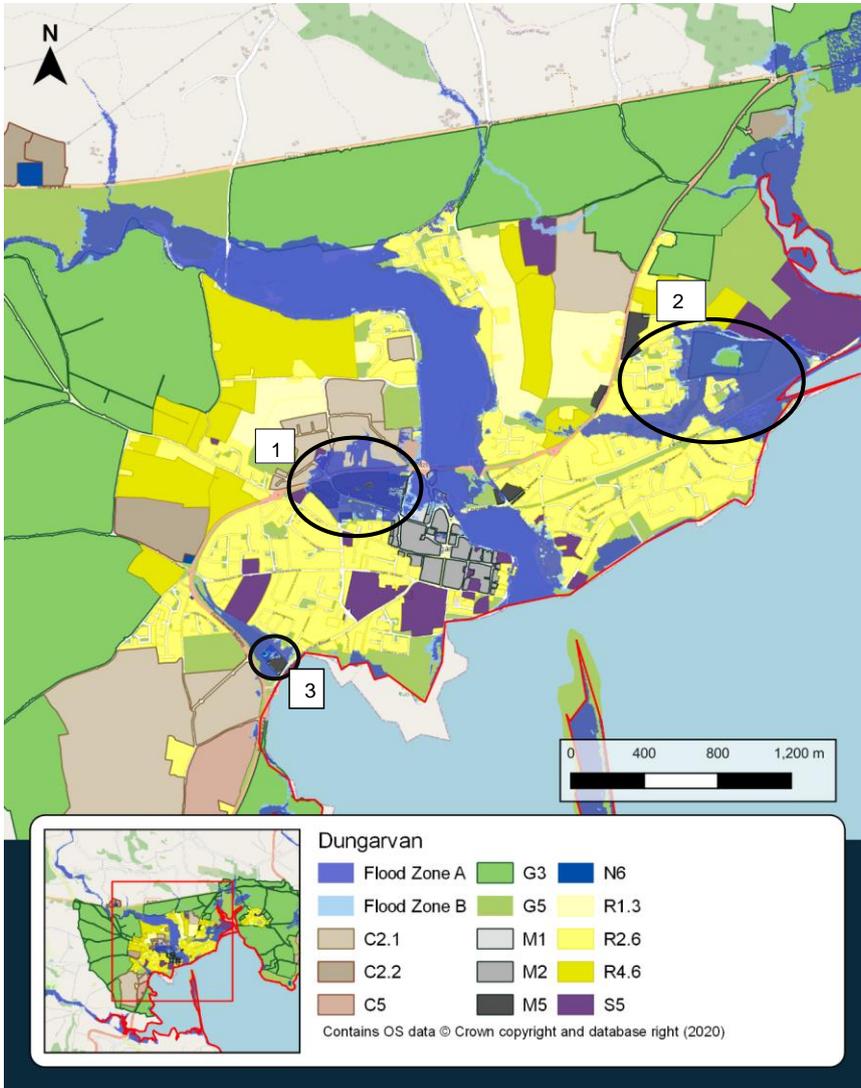


Figure 7-2: Dungarvan Zoning

Table 7-47-4: Dungarvan Justification Test

Justification test for sites within Flood Zone A and / or B	Area 1 - Town Centre, Mixed Use and Industrial	Area 2 - Existing Residential throughout Dungarvan (including Area 2)
The urban settlement is targeted for growth	Yes	Yes
The zoning or designation of the lands for the particular use or	Lands in the town centre consist predominantly of brownfield redevelopment sites and their development will assist in	With the exception of lands which have been identified for green belt/amenity purposes in the Draft Development Plan, the remaining lands have been

Justification test for sites within Flood Zone A and / or B	Area 1 - Town Centre, Mixed Use and Industrial	Area 2 – Existing Residential throughout Dungarvan (including Area 2)
development type is required to achieve the proper planning and sustainable development of the urban settlement	achieving the principles of compact town centre first development as provided for in the NPF and RSES.	developed out for residential development predominantly.
Is essential to facilitate regeneration and / or expansion of the centre of the urban settlement.	The development of these regeneration lands will form an important element of the town centre redevelopment and will link the town centre to the area around Shandon which is identified in the draft development plan as an area of future expansion close to the historic core of Dungarvan.	There is limited opportunity for development of small infill development or residential extensions only.
Comprises significant previously developed and/ or under-utilised lands	The majority of lands in the flood zone are currently developed for a mix of uses typical to a County Town (Key Town) the size of Dungarvan. The remaining undeveloped lands will contribute to the completion of the north western periphery of the town centre for predominantly mixed use commercial development.	The lands have been developed out to date with potential for only limited infill development.
Is within or adjoining the core of an established or designated urban settlement	The remaining undeveloped lands lie immediately adjacent to the town core.	The lands have been developed out to date with potential for only limited infill development.
Will be essential in achieving compact and sustainable urban growth	The redevelopment of the brownfield sites will contribute to compact and sustainable growth in a way that enabled Dungarvan to meet its designated function as set out in the NPF and RSES.	The lands have been developed out to date with potential for only limited infill development.
There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.	These undeveloped brownfield sites are the only vacant and undeveloped lands in the immediate vicinity of the town centre and as such their redevelopment will support the consolidation of the town, particularly between the N25 and the town centre.	The lands have been predominantly built out for residential uses. To avoid significant new development in Area 2, all lands identified for new residential development in Dungarvan lie outside the flood zone identified in Area 2.
A flood risk assessment to an appropriate level of detail has been carried out	Part of the town centre is shown to be within Flood Zone A and further examination of the CFRAM mapping shows this to be risk from tidal flooding, with depths of up to 1.5m possible in the 0.5% AEP event across lands to the south of the N25. As risk is largely tidal, mitigation measures including ground raising would be feasible and should be investigated as part of a site specific FRA, or local masterplan FRA; the FRA would need to demonstrate that risks could be managed within the development	Risk to this area is from tidally driven inundation which presents a risk to existing development. New development in this area should be limited to Minor Development (Section 5.28 of the Planning Guidelines). New, large scale development within Flood Zones A and B would be considered premature until a scheme has been completed.

Justification test for sites within Flood Zone A and / or B	Area 1 - Town Centre, Mixed Use and Industrial	Area 2 – Existing Residential throughout Dungarvan (including Area 2)
	<p>area and would need to consider residual risks including climate change and the 0.1% AEP tidal event. However, new development will also need to consider any flood relief scheme plans and ensure site specific mitigation does not impact on the scheme. Development proposals which cannot manage risks within their own boundary would be considered premature until a scheme has been completed.</p>	
Result	Pass	Pass
Recommendation for zoning	Retain current zoning and land use.	Retain current use for existing residential but no new development permitted.

7.2.3 Clonmel Environs

Flood Zone A covers a significant proportion of the settlement land, but the majority of land within Flood Zone A and B has been zoned for open space uses which are appropriate and should be maintained; this is supported by a development objective requiring 40m buffer between the river and development. There is a school site partially within Flood Zone A. This is a highly vulnerable use but is defended. Further development of the school will require a SSFRA to review residual risks and mitigation measures.

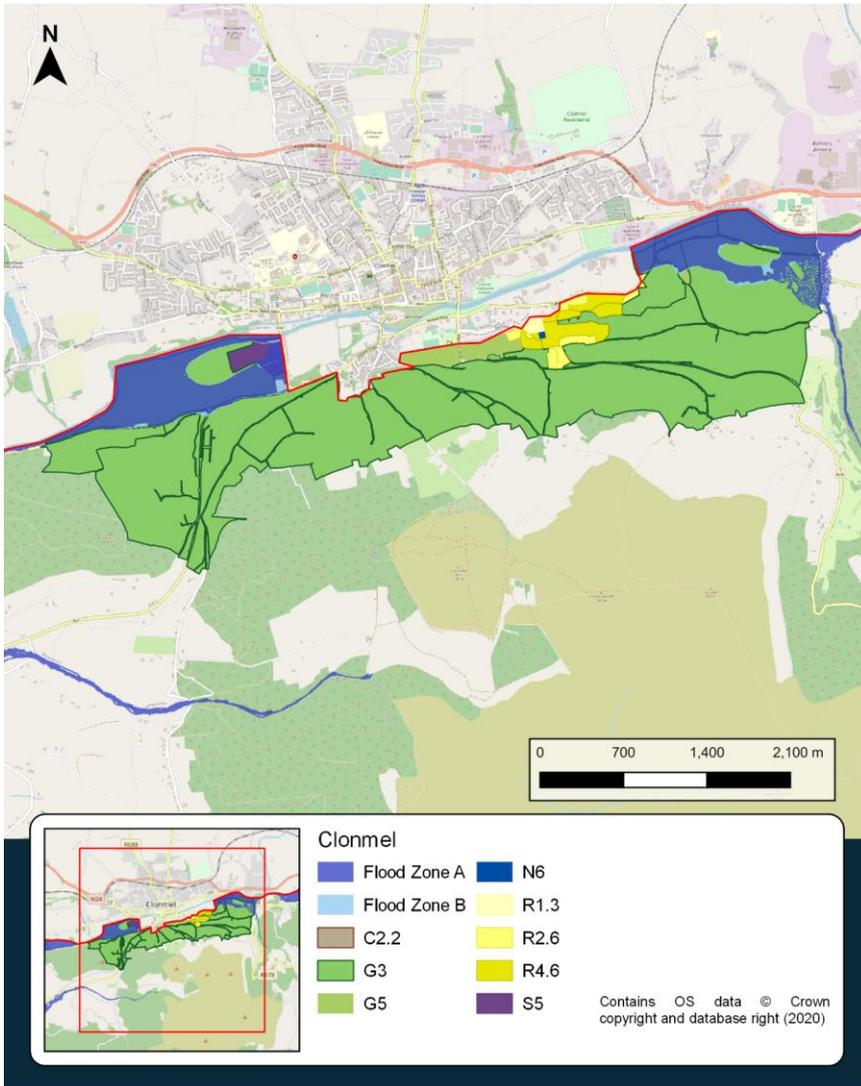


Figure 7-34: Clonmel Zoning

7.2.4 Tramore

The extents of flooding in Tramore are largely constrained to a narrow river corridor which has been zoned for water compatible open space use and is appropriate and should be maintained. In area 1, there is a larger extent of Flood Zone A across land zoned for Regeneration. A Justification Test has been carried out and passed. Part 3 of the Justification Test found it was likely that onsite mitigation could be provided to mitigate flood risk, and if not then development will be restricted to Flood Zone C.

Where there is a small overlap between Flood Zone A and B and lands zoned for highly or less vulnerable uses, the sequential approach shall be applied and development within Flood Zone A will be avoided, whilst in Flood Zone B only less vulnerable uses will be appropriate, subject to site specific FRA.

Risk from tidal flooding is also low, but proposed development along the coastline should include a flood risk assessment which considers the impact of climate change on sea levels for the 0.5% and 0.1% AEP events, and wave overtopping should also be taken into account.

Table 7-5: Tramore Justification Test

<u>Justification test for sites within Flood Zone A and / or B</u>	<u>Tramore - 2196</u>
<u>The urban settlement is targeted for growth</u>	<u>Yes</u>
<u>The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement</u>	<u>The lands are zoned for general business uses with a specific development objective to omit any ancillary residential development so as to avoid highly vulnerable uses being accommodated on the lands.</u>
<u>Is essential to facilitate regeneration and / or expansion of the centre of the urban settlement.</u>	<u>These lands are the only lands so zoned with potential to deliver additional employment which will further the aim of the development plan to move Tramore to a more self-sustaining town.</u>
<u>Comprises significant previously developed and/ or under-utilised lands</u>	<u>The lands have been underutilised historically and offer a significant opportunity to facilitate employment opportunities for the town.</u>
<u>Is within or adjoining the core of an established or designated urban settlement</u>	<u>Lands zoned for a mix of employment and commercial uses within the settlement have been largely developed out with potential for only limited infill development.</u>
<u>Will be essential in achieving compact and sustainable urban growth</u>	<u>Development on the lands will contribute towards delivering employment locally and a move towards a more self-sustaining model of growth for Tramore.</u>
<u>There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.</u>	<u>The main quantum of lands identified for employment uses have been built out and the lands concerned are appropriately located adjacent to the Regional Road R675 linking Tramore to Waterford City and the 360, 360A and 360X public transport route.</u>
<u>A flood risk assessment to an appropriate level of detail has been carried out</u>	<u>Given the shape and form of land within the zoning objective, it is likely that onsite mitigation could be provided, and if not, then development will be restricted to Flood Zone C.</u>
<u>Result</u>	<u>Pass</u>
<u>Recommendation for zoning</u>	<u>Retain the land use zoning provisions in support of commercial activity only.</u>

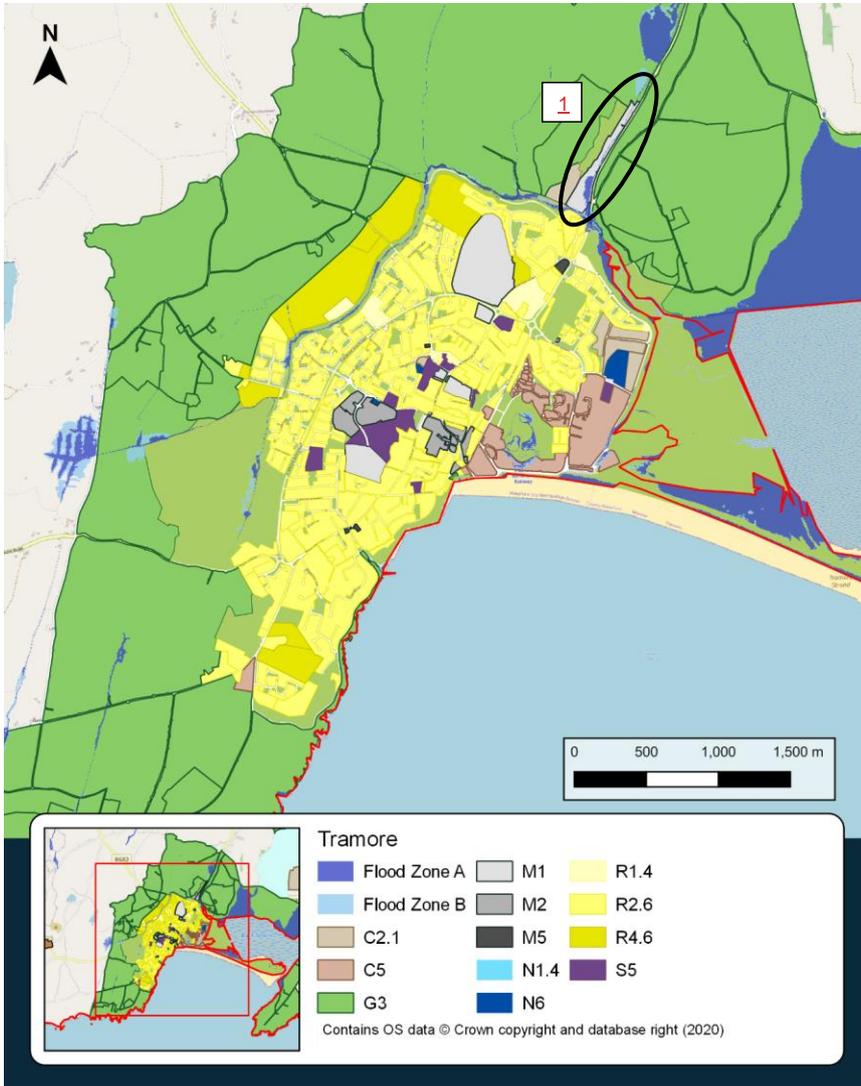


Figure 7-46: Tramore Zoning

7.2.5 Dunmore East

There some flood risk associated with the two watercourses in Dunmore East. Due to the steepness of the settlement, the flood extents are generally close to the watercourses. There is some inundation of lands at the junction of the two watercourses. Although zoned residential, this land is largely parkland / open space, and should be retained as such.

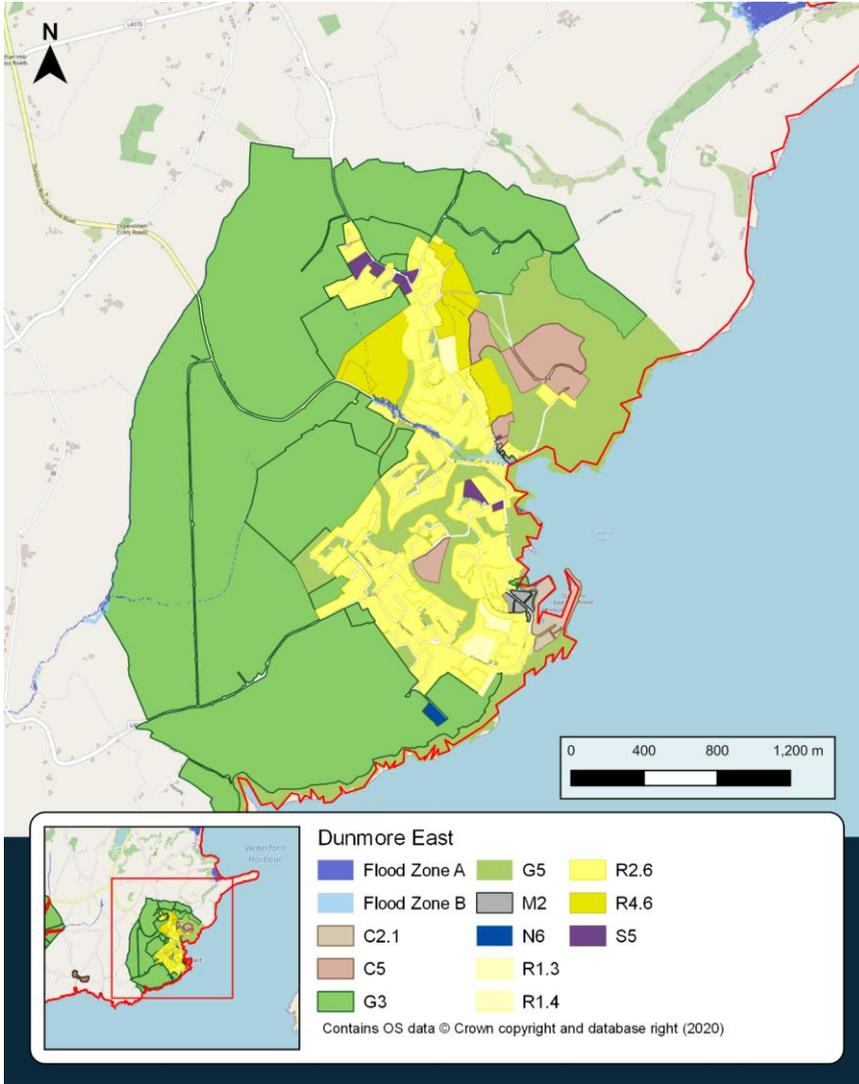


Figure 7-53: Dunmore East Zoning

There are areas ~~New Residential~~, Existing Residential, ~~Strategic Reserve and Industrial and~~, Enterprise and Employment zoning partially within Flood Zone A and B. Although the zoning has been retained to reflect the existing land use, highly or less vulnerable development within this settlement, and within Flood Zone A and B, has not passed the Justification Test for Development Plans; the sequential approach shall be applied and development within Flood Zone A will be avoided, whilst in Flood Zone B only less vulnerable uses will be appropriate, subject to site specific

FRA. Where there is existing residential development within Flood Zone A or B, works should be limited to minor development (Section 5.28 of the Planning Guidelines).

There is a watercourse which runs through an area of Strategic Reserve, but the flood extents are within bank so the development area is within Flood Zone C and does not require the application of the Justification Test.

7.2.6 Gaeltacht na nDéise

The primary source of flood risk in Gaeltacht na nDéise is from coastal sources. Within the area defined as Flood Zone A and B along the coast are two land parcels zoned for seaport / harbour. This is a water compatible use and can be retained. However, the sequential approach should be applied with respect to development within the harbour areas.

There is also a watercourse which passes through the eastern boundary of An Rinn. The extent of Flood Zone A from this watercourse crosses land zoned for Industrial, enterprise, employment and for mixed use. A Justification Test has been applied and passed, reflecting the existing land use. Any future development in the vicinity of this watercourse should be supported by a site specific flood risk assessment, which may refine the flood extents in this area. The sequential approach should then be applied to ensure highly and less vulnerable development is located within Flood Zone C.

Table 7-6: An Rinn Justification Test

<u>Justification test for sites within Flood Zone A and / or B</u>	<u>An Rinn – Industrial, Enterprise, Employment and Mixed uses</u>
<u>The urban settlement is targeted for growth</u>	<u>Yes</u>
<u>The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement</u>	<u>The lands are zoned for commercial employment uses and are in the main built out with little capacity to accommodate new operators and some capacity to facilitate expansion of existing activities.</u>
<u>Is essential to facilitate regeneration and / or expansion of the centre of the urban settlement.</u>	<u>The zoning of the lands will facilitate the ongoing commercial activities on the lands and the expansion of same as necessary.</u>
<u>Comprises significant previously developed and/ or under-utilised lands</u>	<u>The lands have been developed out to date with potential for only limited infill development.</u>
<u>Is within or adjoining the core of an established or designated urban settlement</u>	<u>The lands have been developed out to date with potential for only limited infill development.</u>
<u>Will be essential in achieving compact and sustainable urban growth</u>	<u>The commercial activity taking place on the lands and its future expansion is critical to supporting local employment in the Gaeltacht community.</u>
<u>There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.</u>	<u>The land use zoning reflects the pattern of existing development and is supportive of the continuation and possible consolidation of such use. There are no suitable alternative lands available.</u>
<u>A flood risk assessment to an appropriate level of detail has been carried out</u>	<u>Any future development in the vicinity of this watercourse should be supported by a site-specific flood risk assessment, which may refine the flood extents in this area. The sequential approach should then be applied to ensure highly and less vulnerable development is located within Flood Zone C.</u>
<u>Result</u>	<u>Pass</u>
<u>Recommendation for zoning</u>	<u>Retain current uses and associated land use zoning provisions to support commercial activity only.</u>

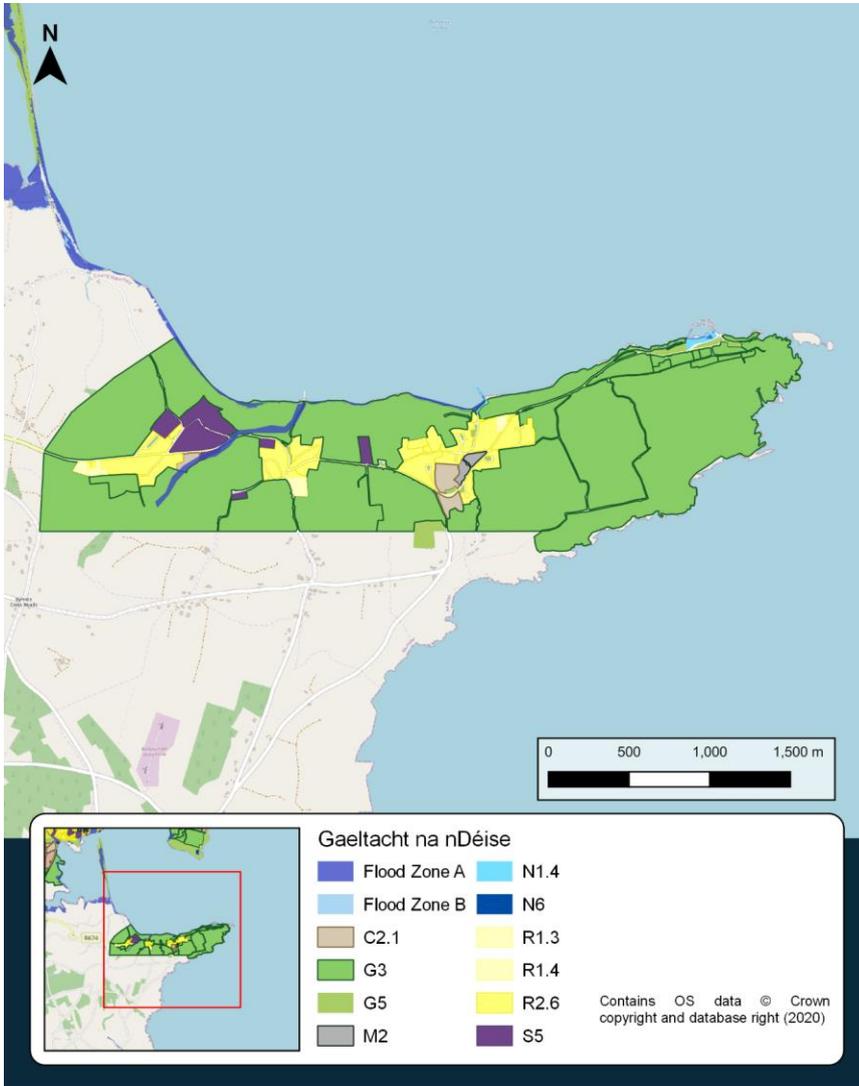


Figure 7-64 Gaeltacht na nDéise Zoning

7.2.7 Portlaw

Flood Zone A is extensive within Portlaw but is largely across land zoned for water compatible open space uses which is appropriate and should be retained. The watercourses, in the form of a mill system, flow through an area zoned for mixed use (1) Where there is a small overlap between Flood Zone A and B and existing residential development or the strategic reserve (2), the sequential approach shall be applied and development within Flood Zone A will be avoided, whilst in Flood Zone B only less vulnerable uses will be appropriate, subject to site specific FRA.

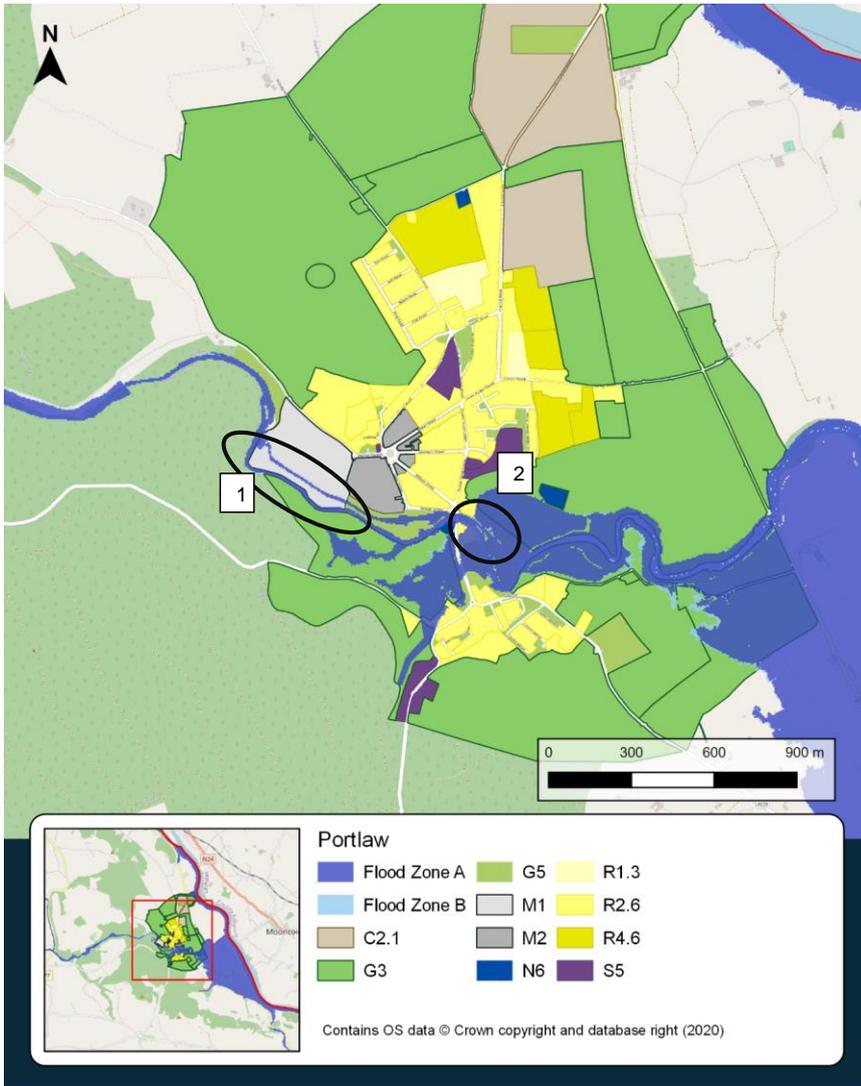


Figure 7-75: Portlaw Zoning

7.2.8 Rural Towns, Villages and Rural Nodes and Nodes

As part of the screening assessment, fluvial and/or tidal risk has been identified in a number of Rural Towns, Rural Villages and Rural Nodes and Rural Nodes. ~~These settlements are covered by the Rural Village (RV) zoning objective, which is to "protect and promote the character of the Rural Village and promote a vibrant community appropriate to available physical and community infrastructure".~~

- AGLISH
- Ardmore
- Ballyduff upper
- Ballymacarbry
- ~~Bunamahon - Bonamahon / Knockmahon~~
- Cappoquin
- Cheekpoint
- Clashmore
- Clonea ~~Power~~
- Dunhill
- Fenor
- Kilmacthomas
- Kilmeaden ~~/ Ballyduff~~
- Lemybrien ~~/ Kilrossanty~~
- Passage East
- Tallow

~~The Justification Test has not been applied, or passed, in these settlements. Therefore, These settlements have no settlement boundary and have the objective to "protect and promote the character of the Rural Village and promote a vibrant economy appropriate to available physical, community and infrastructure". In these settlements new, highly highly and less vulnerable development is not considered to have passed the Justification Test and should be avoided in Flood Zones A and B, and less vulnerable development should be avoided in Flood Zone A. be located in Flood Zone C. In Flood Zones A and B, only minor development (Section 5.28 as amended) and water compatible uses will be permitted, and will be subject to site specific flood risk assessment.~~

7.2.9 Open Countryside and White Land

All areas outside of the settlements listed in the hierarchy have been classed as white land in the settlement hierarchy of the Development Plan.

The Development Plan itself generally does not provide for land use zonings and the Plan Making Justification Test has not been applied or passed. Therefore, in line with the Flood Risk Guidelines, the sequential approach should be applied. In these areas new, highly and less vulnerable development should be located in Flood Zone C. In Flood Zones A and B, only minor development (Section 5.28 as amended) and water compatible uses will be permitted.

To support the assessment of site specific risk and application of the sequential approach, a Flood Zone map for the rural area has been prepared, covering all watercourses with a catchment area of greater than 5km². Where there are local watercourses present, but not included in the Flood Zone map, a site specific flood risk assessment should be carried out with a view to defining the Flood Zones and then applying the sequential approach.

7.3 Climate change risk identified

In addition to the current level of flood risk (either fluvial or coastal), this SFRA has identified a number of settlements which could be at significantly greater risk when future (climate change) scenarios are considered. These settlements are mainly located along the coast, where between a 0.5m (medium range future scenario) and 1m (high end future scenario) rise in sea level should be allowed for, based on current OPW guidance. This appraisal has not included storm damage which occurs currently, or may occur in the future. It is based on still sea levels only.

Settlements which have a medium to high level of climate change risk have been identified as:

- Ardmore
- Bunmahon / Knockmahon
- Cheekpoint
- Dunganven and Environs

- Dunmore East
- Passage East
- Portlaoigh
- Tramore
- Waterford City

In these settlements it is essential that the impacts of climate change, and in particular sea level rise are assessed for developments in Flood Zone A and B, and those in proximity to Flood Zone A and B, to ensure long term sustainability can be maintained. Guidance on climate change assessments is provided in Section 5.8.

8 SFRA Review and Monitoring

An update to the SFRA will be triggered by the six year review cycle that applies to Local Authority development plans. In addition, there are a number of other potential triggers for an SFRA review and these are listed in [Table 8-1](#) [Table 8-1](#).

There are a number of key outputs from possible future studies and datasets, which should be incorporated into any update of the SFRA as availability allows. Not all future sources of information should trigger an immediate full update of the SFRA; however, new information should be collected and kept alongside the SFRA until it is updated.

Additional information will arise from the OPW flood relief schemes in Dungarvan and Environs, Aghlish and Ballyduff. Not only will these studies revisit the CFRAM assessment, but once schemes are in place the definition of risk will change significantly for existing development, and possibly also for undeveloped lands.

The CFRAM Studies themselves also run on a six yearly cycle, so updates arising from future iterations and extensions of the CFRAM should be incorporated into SFRA updates.

Detailed, site specific FRAs may be submitted to support planning applications. Whilst these reports will not trigger a review of the Flood Zone maps or SFRA, they should be retained and reviewed as part of the next cycle of the Development Plan.

Table 8-18-4: SFRA Review Triggers

Trigger	Source	Possible Timescale
EU Floods Directive required review of the PFRA, the FRMPs and the flood maps	OPW	Six yearly cycle
Updates to predictive flood mapping	OPW	Unknown
OPW Flood Relief Scheme outputs	OPW	Unknown
Flood maps of other sources, such as drainage networks	Various	Unknown
Significant flood events	Various	Unknown
Changes to Planning and / or Flood Management Policy	DoEHLG / OPW	Unknown
Construction / completion of flood relief schemes	OPW / DLRCC	Unknown

Appendices

A Development Flow Charts



Offices at
Dublin
Limerick

Registered Office
24 Grove Island
Corbally
Limerick
Ireland

t: +353 (0) 61 345463
e: info@jbaconsulting.ie

JBA Consulting Engineers and
Scientists Limited
Registration number 444752

JBA Group Ltd is certified to:
ISO 9001:2015
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