

CHIEF EXECUTIVE'S REPORT ON DRAFT PLAN CONSULTATION NOVEMBER 2021



DRAFT
WATERFORD CITY AND
COUNTY DEVELOPMENT PLAN
2022-2028



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PART 1 INTRODUCTION TO CHIEF EXECUTIVE'S REPORT

1.0 Introduction

The purpose of this report is to provide a description of the Draft Development Plan Public Consultation process undertaken as part of the review of the Waterford City, Dungarvan Town and Waterford County Development Plans, and preparation of a new Waterford City and County Development Plan (CCDP) to come into effect in 2022.

The Council are at an advanced stage in the process of reviewing and preparing a new City and County Development Plan for the period 2022 – 2028. The process of reviewing the current Development Plans and preparation of the new Plan formally commenced back in July 2020 with an eight-week Pre-Draft public consultation phase. A public consultation document was prepared and widely circulated, and three online webinars were held, covering strategic issues such as environment and heritage, community and placemaking, economy and business. Submissions were invited, and the Executive prepared a Chief Executive's Report summarising these submissions and making recommendations on what should be contained in the Draft Plan. A special Council meeting was held with the Elected Members of the Council and a number of Directions were issued requesting strategic matters to be addressed in the Draft Plan.

A Chief Executive's Draft Plan was then prepared and circulated to the elected members in November 2020. This was considered and amended by the elected Members at a series of online workshops with Elected Members. At a meeting held on the 31st May it was deemed to be the Draft Plan. This Draft Plan was then placed on public display from the 18th June to 30th August (both dates inclusive).

The various restrictions in place arising from the COVID-19 pandemic created some challenges in terms of the display, however all statutory requirements were met (See section 1.4 below for full details of Draft Plan Consultation process). The use of an online consultation portal was positively received.

A total of **479** submissions were received and overall the level of engagement was high and included much positive commentary. To put this figure in context the number of submissions received at Draft Plan Consultation Stage on the Waterford City Development Plan 2013 – 2019 was 51, and on the Waterford County Development Plan 2011 - 2017 was 280. Therefore the number of submissions received during this Draft Plan Stage was an increase of 58% on the combined number received during the same public consultation period for the current development plans.

Taking into account the submissions received at pre-draft stage and at this draft plan stage it is clear that the citizens of Waterford care strongly about what happens in the County. Whilst many of the issues raised related to the Draft City and County Development Plan, there were also a high number of issues raised that related to other operational areas or matters more appropriate to Local Area Plans or other service area Plans.

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.

1.1 Format of this Report

The Chief Executive's Report on the Draft Waterford City and County Development Plan 2022-2028 consists of four main parts.

Part 1: Introduction to Chief Executive's Report Introduction and Overview; Format of report; Legislative Background; and Outline of Draft Plan Consultation Process.
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 and the Chief Executive's response and recommendation and Summary of the Issues raised by 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. A summary of the issues raised, and the recommendations made by the Southern Regional Authority (SRA). The response of the chief executive to the issues raised, taking account of any directions of the members of the authority, 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 of the Government or of any Minister of the Government and, if appropriate, any observations made by the Minister for Arts, Heritage, Gaeltacht and the Islands. A summary of the issues raised broken down by way of reference to the chapters and appendices of the Draft Plan The Executive's response and any recommendations
Part 4: Appendices to the Chief Executive's Report Appendix 1. Land Use Mapping; Appendix 2 List and summary of all submissions; Appendix 3. List of Prescribed Authorities and other Bodies consulted; Appendix 4. Chief Executive's Draft Plan Errata; Appendix 5. Commonly Used Acronyms; and Appendix 6. Copy of Public Notice of the Preparation of the Draft Waterford City and County Development Plan 2022-2028.

It must be noted that any changes to the Draft Plan and associated appendices resulting from the CE's response and recommendation and the final decision of the Council will be fully detailed and set out at material amendments stage.

1.2 Statutory Context and Purpose of the Chief Executive’s Report

Under Section 12(4) (a) of the Act, the Chief Executive as part of the Development Plan process, is required to prepare a report on the submissions and observations received during the public consultation process of the Draft Plan, not later than 22 weeks after giving notice that the Development Plan is to be reviewed. The report must be submitted to the Elected Members of the Planning Authority for their consideration by 22nd November 2021.

According to Section 12(4)(b) of the Act the Chief Executive’s Report must include the following:

- List the persons or bodies who made written submissions/observations, as well as any person or bodies consulted. (Appendix 2 & 3)
- Summarise the issues raised and recommendations, submissions and observations made by the Office of the Planning Regulator and the Southern Regional Assembly (Please refer to Part 3 Section 3.0, 3.1 of this report)
- Summarise the submissions and observations made by any other persons (Please refer to Part 3 Section 3.2 of this report)
- Give the opinion of the Chief Executive on the issues raised and recommendations, taking account of 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 of the Government or of any Minister of the Government.

1.3 Legislative Background for the making of the City and County Development Plan:

On 1st June 2014, Waterford City & County Council was established following the amalgamation of Waterford City Council and Waterford County Council.

The three existing development plans within the amalgamated Council area, Waterford City Development Plan 2013 – 2019, Waterford County Development Plan 2011 – 2017, and the Dungarvan Town Development Plan 2012 – 2018, consequently had their lifetime extended, as per Section 11A of the Act, and remain in effect until a new single, unitary Development Plan is prepared.

Section 11B the Act requires Local Authorities which have been subject to amalgamation, in this instance Waterford City & County Council, to commence the preparation of a development plan for the amalgamated administrative area within 6 months of the making of the Regional Spatial & Economic Strategy.

In accordance with Section 11 (1)(a) of the Act, the review of the existing Development Plans and preparation of a new Development Plan by the planning authority is required to be strategic in nature for the purposes of developing:

- (a) the objectives and policies to deliver an overall strategy for the proper planning and sustainable development of the area of the Development Plan, and
- (b) the core strategy, and

(c) shall take account of the statutory obligations of any local authority in the area and any relevant policies or objectives for the time being of the Government or of any Minister of the Government.

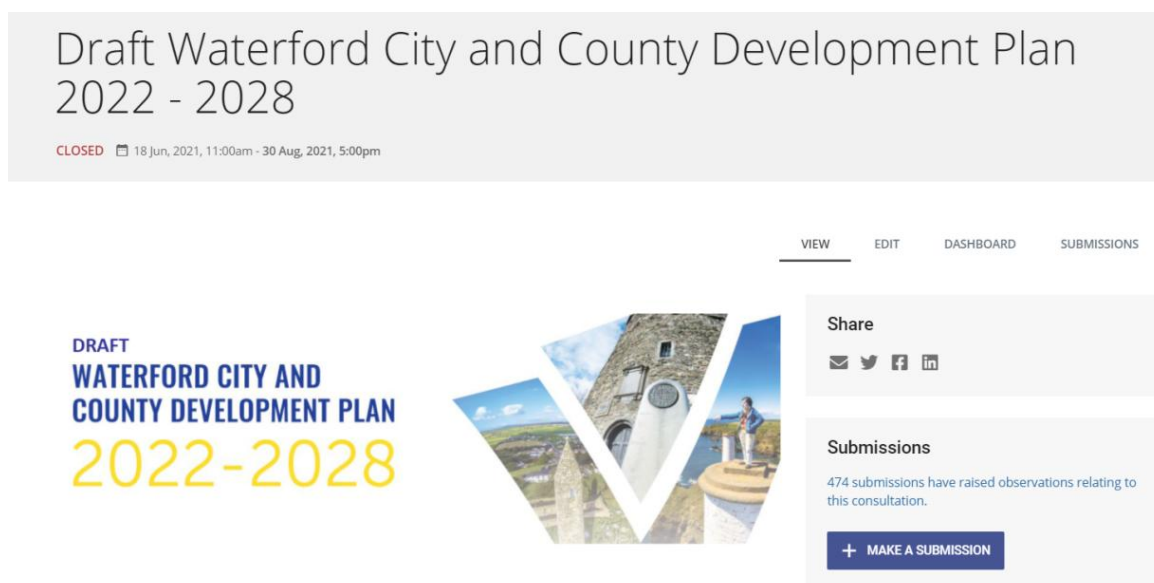
1.4 Overview of the Draft Consultation Process:

The Draft Plan was on public display from 18th June to 30th August 2021. The Draft Plan 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 **479** 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 a result of the ongoing restrictions in relation to Covid-19, the Forward Planning team availed once more of the dedicated consultation portal, **consult.waterfordcouncil.ie**, that was used during the Issues 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 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 in both English and Irish, as well as all relevant Draft Development Plan documentation.

The Council utilised Facebook and Twitter to notify the public of that the Draft Plan was on public display. The Facebook and Twitter posts had a collective “reach” of 52,126 users during the pre consultation period.

(B) Publicity and social media

The statutory notice of the Preparation of the Draft Waterford City and County Development Plan was placed in the Munster Express on the 15th June 2021, and the Dungarvan Leader on the 15th June 2021.

This notice announced that Waterford City and County Council was preparing the Draft Waterford City and County Development Plan 2022 - 2028. The notice 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 Appendix 6 of this report.

The preparation of the Draft Waterford City and County Development Plan was also advertised on the Council’s social media platforms between 18th July and 30th August 2021 which reached a total of 55,087 engagements. There were 10 Facebook posts that generated 44,106 impressions with a 4.5% engagement rate and 11 no. Twitter posts that gained 8,020 impressions and a 1.4% engagement rate. There were also 4 LinkedIn Posts that gained 2,961 impressions and a 4.73% engagement rate. Six YouTube videos which detailed the recordings of the webinars (refer to (A) Online) were also uploaded online.

The Draft Development Plan and associated documentation was available for review and purchase, by appointment only, 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.

(C) Public Consultation Events:

Six separate, themed public online webinar sessions were advertised and held over six evenings on the 20th – 22nd and 27th – 29th July 2021, via Eventbrite and Zoom. The webinars were advertised by radio (28 slots) and as paid Facebook events and also via regular Facebook, Twitter and Linkendin, and through the PPN process. Elected Members of the Council were also invited by email, to attend the meetings. Each webinar had a separate theme, and included contributions from various departments within the Council. The webinars were structured as follows:

<p>Title: Strategic Vision, Population, Housing, Employment and Education Time: 7 – 8.30pm Date: Tuesday 20th July</p> <ul style="list-style-type: none">1 – 7:00pm – 7:10pm ‘Introduction/ What is a Development Plan’2 – 7:10pm – 7:20pm ‘Policy overview and strategic direction’3 – 7:20pm – 7:30pm ‘Overview of Draft Development Portal and Draft Maps’4 – 7:30pm – 8:20pm ‘Q&A’5 – 8:20pm – 8:30pm ‘Conclusion’
<p>Title: Environment, Heritage, Conservation, Tourism and Amenity Time: 7 – 8.30pm Date: Wednesday 21st July</p> <ul style="list-style-type: none">1 – 7:00pm – 7:10pm ‘Introduction/ What is a Development Plan’.2 – 7:10pm – 7:20pm ‘Policy overview and strategic direction’.3 – 7:20pm – 7:30pm ‘Overview of Draft Development Portal and Draft Maps’.4 – 7:30pm – 8:20pm ‘Q&A’.5 – 8:20pm – 8:30pm ‘Conclusion’.

Title: Transportation, Climate Change, Infrastructure and RegenerationTime: 7 – 8.30pm Date: Thursday 22nd July

1 – 7:00pm – 7:10pm ‘Introduction/ What is a Development Plan

2 – 7:10pm – 7:20pm ‘Policy overview and strategic direction’

3 – 7:20pm – 7:30pm ‘Overview of Draft Development Portal and Draft Maps’

4 – 7:30pm – 8:20pm ‘Q&A’

5 – 8:20pm – 8:30pm ‘Conclusion’

Title: Local Placemaking - Waterford Metropolitan AreaTime: 7 – 8.30pm Date: Tuesday 27th July

1 – 7:00pm – 7:10pm ‘Introduction/ What is a Development Plan’

2 – 7:10pm – 7:20pm ‘Place making Policy overview and highlighting key specific development objectives for the area’,

3 – 7:20pm – 7:30pm ‘Overview of Draft Development Portal and Draft Maps’

4 – 7:30pm – 8:20pm ‘Q&A’

5 – 8:20pm – 8:30pm ‘Conclusion’

Title: Local Placemaking - Comeragh Municipal DistrictTime: 7 – 8.30pm Date: Wednesday 28th July

1 – 7:00pm – 7:10pm ‘Introduction/ What is a Development Plan’

2 – 7:10pm – 7:20pm ‘Placemaking Policy overview and highlighting key specific development objectives for the area’

3 – 7:20pm – 7:30pm ‘Overview of Draft Development Portal and Draft Maps’

4 – 7:30pm – 8:20pm ‘Q&A’

5 – 8:20pm – 8:30pm ‘Conclusion’

Title: Local Placemaking - Dungarvan/Lismore Municipal DistrictTime: 7 – 8.30pm Date: Thursday 29th July

1 – 7:10pm – 7:10pm ‘Introduction/ What is a Development Plan’

2 – 7:10pm – 7:20pm ‘Placemaking Policy overview and highlighting key specific development objectives for the area’

3 – 7:20pm – 7:30pm ‘Overview of Draft Development Portal and Draft Maps’

4 – 7:30pm – 8:20pm ‘Q&A’

5 – 8:20pm – 8:30pm ‘Conclusion’

The events were semi-formal in nature, and members of the public were invited to ask in person or send in any queries which arose during the course of the presentations via the webinar chat function. Queries were subsequently responded to during the Q&A session following the presentations.

These meetings were recorded each evening and made available for viewing on Youtube and on the public consultation portal. The table below displays the number of views each video received.

Webinar Title	No. of views ¹
Strategic Vision, Population, Housing, Employment and Education	142
Environment, Heritage, Conservation, Tourism and Amenity	96
Transportation, Climate Change, Infrastructure and Regeneration	55
Local Placemaking - Waterford Metropolitan Area	52
Local Placemaking - Comeragh Municipal District	39
Local Placemaking - Dungarvan/Lismore Municipal District	82

¹ No of views via the Council’s YouTube channel as per 01.11.2021

(D) Radio

A total of 28 No audio advertisements were made on WLR (Waterford Local Radio) between 18th June and 30th August to promote the consultation process and public meetings.

(E) Print Media

A total of 4 No print articles ran in local newspapers between 18th June and 30th August to promote the Draft Plan, consultation process and public meetings.

Waterford City and County Council wishes to express its appreciation to all those who made submissions/observations and/or attended the online webinar/ information events.

1.5 Overview of issues raised at the Public and Stakeholder meetings

Planning staff engaged in a number of key stakeholder meetings, in order to ascertain the viewpoints of individual sectoral groups with regards to the Draft Development Plan. The meetings undertaken reflect a collaborative approach undertaken by the Council which strives to engage all ages and sectors within our community and incorporate the findings which will assist in providing for an all-inclusive society.

1.6 Public and Stakeholder Meetings

Stakeholder Discussions: Planning staff held discussions with a number of key stakeholders including WIT, Waterford and Dungarvan Chambers, PPN, OPR and SRA in order to better inform the development plan. The issues raised are reflected in the details of the written submissions received and set out in this report.

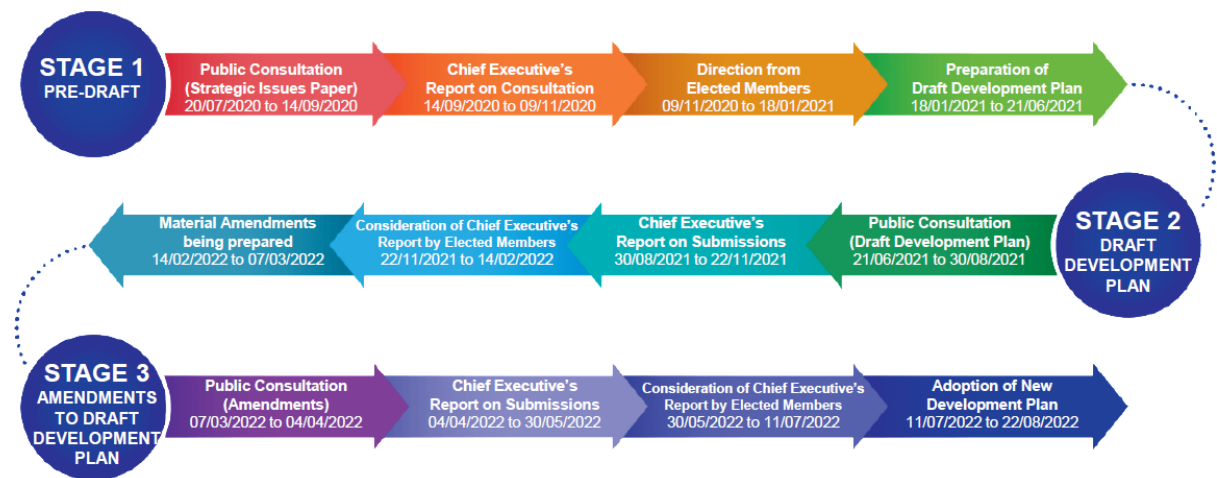
1.7 Next Steps

Chief Executive's Report will be submitted to the Members of Waterford City and County Council on/ before Monday 22nd November 2021 for their consideration. Members have 12 weeks to consider this report and the submissions received, taking account of the statutory obligations of the local authority and any relevant policies of the Government. This report will be circulated to the Elected Members to facilitate consideration of the report. It should be noted that in your deliberations and consideration that the following be taken into account –

*(aa) Following consideration of the draft plan and the report of the [chief executive] under paragraph (a) where a planning authority, after considering a submission of, or observation or recommendation from the Minister made to the authority under this section [or from the Office of the Planning Regulator made to that planning authority under section 31AM] or from a [regional assembly] made to the authority under section 27B , **decides not to comply with any recommendation** made in the draft plan and report, it shall so inform [the Office of the Planning Regulator and] the Minister or [regional assembly] , as the case may be, as soon as practicable by notice in writing which notice shall contain **reasons for the decision**.*

Where, following the consideration of the Draft Development Plan and the Chief Executive 's report , it appears to the members of the authority that the draft should be accepted or amended, subject to subsection (7), they may, by resolution, accept or amend the draft and make the development plan accordingly.

Following the consideration of this Chief Executive's Report by the Elected Members and accepting of the Draft Plan and making amendments to the Draft City and County Development Plan, a 3-week period is allotted by the Act for the preparation of the amendments to the Draft Waterford City and County Development Plan 2022 - 2028. The amendments only will be put on public display for a period of four (4) weeks and made available for the Public to view and make further submissions on if required.



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 **479** 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. Provision of a municipal swimming pool for Dungarvan and West Waterford (78 No submissions)
2. Submission which relate solely to Gaelcholaiste Phort Lairge (19 No submissions).
3. Submissions which relate solely to the objection in relation to a request for rezoning of land at Faithlegg, Co. Waterford (18 No submissions).
4. Submissions which relate solely to the support of the proposed rezoning of Bookie Woods, Upper Branch Road, Tramore (15 No submissions).
5. Submissions which relate solely to the Gaeltacht, including Submission WFD-C1-201 from Údarás na Gaeltachta, a statutory body.

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 Table 2 Written Submissions Received.

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-C2-)	Prescribed Authority
18	Land Development Agency (LDA)
92	Transport Infrastructure Ireland (TII)
116	Department of Housing, Local Government and Heritage (DHLGH)
201	Údarás na Gaeltachta
252	Southern Region Waste Management Plan Lead Authority
270	Fáilte Ireland National Tourism Development Authority (FI)
311	Southern Regional Assembly (SRA)
322	Dept. of Education and Skills (DES)
329	Irish Water (IW)
351	Coillte
355	National Transport Authority (NTA)
363	Office of the Planning Regulator (OPR)

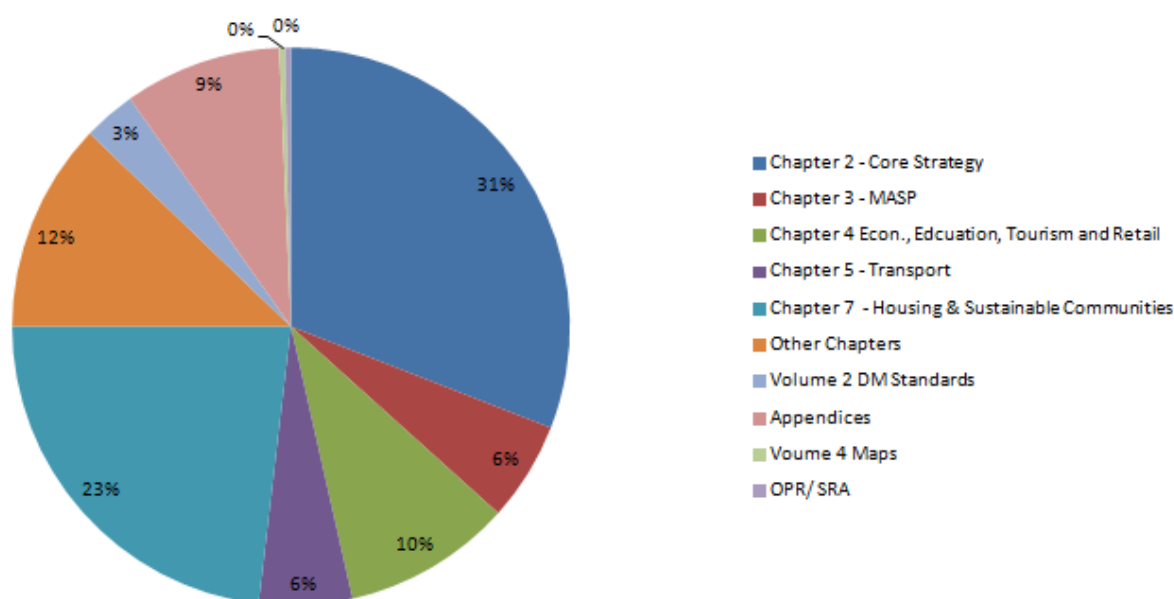
2.1 Summary and Analysis of Issues Raised by Topic, and Chief Executive Opinion and Recommendation

This section of the report addresses in detail the main issues raised from the submissions during the Draft Plan public consultation period. This will largely be undertaken, using the main chapter and section headings as set out on the consultation portal and in the Draft Development Plan.

Notwithstanding, it must be recognised that many submissions, whilst possibly submitted under just one topic/ issue heading, were in fact multi and cross-sectoral in nature.

The pie chart diagram below illustrates the cross sectoral breakdown of written submissions received, based on the main topic headings as set out in the Draft Plan.

Breakdown of Moderation Summaries on Draft Plan Submissions



As is highlighted in the above diagram, the matters relating to ‘Core Strategy’, ‘Housing and Sustainable Communities’, ‘Economy, Employment, Education’, and ‘Transportation and Mobility’, relate to more than half of the submissions made. Given the cross-sectoral nature of many submissions.

2.1.1 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"> Greater emphasis in the vision and strategy relating to health and wellbeing of communities and individuals and infrastructure to support more active communities. Amendments to the development plan outcomes designed around the UN SDGs. Better demonstration of alignment 	<ul style="list-style-type: none"> Some changes have been made to the broad vision statement to reflect the submissions where relevant. Revised illustrations to portray alignment between NPF/RSES and the higher level vision and strategies have been provided. Strategic plan outcomes have been amended.

Section	Main Issues Raised	Recommended Amendments
	<p>between the vision, strategic outcomes and policy objectives.</p> <ul style="list-style-type: none"> • Greater emphasis on the circular economy in terms of waste management and high level support for renewable energy. • Text changes to the vision statement to reflect aspirations for the city and county. 	
Chapter 2		
Spatial Vision & Core Strategy	<ul style="list-style-type: none"> • Amendments sought to the Core Strategy and housing targets. • Amendments sought to the settlement hierarchy and associated text. • Additional narrative to support the role of Dungarvan/Ballinroad as a key Town. • Amendments to land use zoning provisions to include tiered approach to zoning. • Identification of urban and rural regeneration sites. • Methodology sought for identification for rural area types. • Additional and enhanced mapping sought. • Submissions have sought the rezoning of lands for certain purposes, mainly for residential use during the plan period. 	<ul style="list-style-type: none"> • The core strategy and housing targets have been aligned along with an updated Housing Strategy and HNDA. • The settlement classifications have been amended. • Additional narrative support for the role of the Key Town. • A new appendix 21 has identified regeneration potential across the county and city. • Residential land use zoning has been reassessed in terms of the quantum required to support the Housing Strategy and land parcels have been tiered as either 1 of 2 having regard to the sequential town centre first approach. • Rural areas have been duly reclassified. • Additional clarity has been given to core strategy maps. • Land use zoning maps have been amended to reflect the comments of submissions where deemed appropriate.
Chapter 3		
	<ul style="list-style-type: none"> • Submissions have sought the rezoning of lands for certain purposes, mainly for residential use during the plan period. • Further detailed consideration should be given to how the South Quays and City North West Neighbourhood should be planned for in particular. • Time bound commitment to deliver Joint Retail Strategy. • Potential for additional regeneration sites. • Delivery sought of the Strategic 	<ul style="list-style-type: none"> • Land use zoning maps have been amended to reflect the comments of submissions where deemed appropriate. • Commitments given to developing further regeneration strategies and Local Area Plans during the lifetime of the Development Plan. • Commitment to deliver the Joint Retail Strategy in year 1 of the Development Plan lifetime. • A total of 30 regeneration sites identified.

Section	Main Issues Raised	Recommended Amendments
	<p>Integrated Framework Plan (SIFP) for Waterford Harbour.</p> <ul style="list-style-type: none"> Some transport policy objectives to be amended. 	<ul style="list-style-type: none"> Delivery of SIFP to be incorporated in Wide Open Space and Recreation Strategy (W City 19) Transport policy objectives have been amended where necessary.
Chapter 4		
Economy	<ul style="list-style-type: none"> Greater policy support for the role of Social Enterprise Acknowledge the important role of the Extractive industry in the Construction Industry. Strengthening the role and status of the Waterford Port and surrounding industrial lands and supporting potential for renewable energy. Provide stronger reference to the 'Circular Economy'. Promotion of Gteic – The National Network of digital hubs throughout the Gaeltachta. Support for shellfish production industry & improved water quality. Support the development of infrastructure required for the construction of offshore renewable energy developments. Importance of the role of Local Enterprise Offices (LEOs) play in local economies. Importance of 'Quality of Life' in attracting enterprise and workers/residents to Waterford. 	<ul style="list-style-type: none"> Section 4.4 and supporting Objectives amended. Role of Extractive Industry acknowledged. Supported through Objectives ECON 10 & UTL 13. Additional reference added to promote the Circular Economy. Additional reference added to promote Gteic. Supported through Objectives ECON 12 & ECON 16. Objective UTL 13 modified to include support for necessary infrastructure. Vital role of LEOs recognized in Objective ECON 08. 'Quality of Life' is an intrinsic element to the 'Vision' and '8 High Level Goals of the Plan'.
Education	<ul style="list-style-type: none"> Game changing role of new TUSE as a key growth changer for Waterford and the broader region. Importance of a full time University Campus presence within the city centre and opportunities for campus development in the North Quays. Potential for Satellite Campus potential for Dungarvan. Identified Dept of Education Schools Requirements - Two new primary schools in Waterford City, site required for Gaelcholaiste Phort Lairge. Strong public support for permanent Gaelcholaiste in Ballygunner. Support for Traveller Education Projects. 	<ul style="list-style-type: none"> Numerous text and Policy amendments on foot of TUSE submission. Section 4.11 and Objective EDU02 amended to reflect potential campus development opportunities. The Draft Plan has reserved lands for a new school in Kilbarry, Education zoned lands in Ferrybank will form part of a new local area plan for Ferrybank/Belview by Kilkenny City and County Council. The Draft Plan has zoned the site Gaelcholaiste Phort Lairge in Ballygunner for Education use which would allow for the construction of a permanent school at this site.

Section	Main Issues Raised	Recommended Amendments
Tourism	<ul style="list-style-type: none"> • A more detailed and robust Tourism Section, is requested by Fáilte Ireland to ensure that all aspects of tourism policy are captured in a clear and robust manner within the Development Plan. A number of suggested text/policy amendments are submitted. • Improved water treatment facilities are essential to secure Blue Flag Status to beaches along the Copper Coast. • The potential of Portlaw as a tourism centre should be recognised in the plan. • Maximise the use of the coastal area from Helvick to Clonea. • Support for linking Bilberry to Waterford (Grattan Quay) by rail as a tourist attractor. • Lack of a 5 Star Hotel in the County. • Need to upgrade 'first impressions' of the City's South Quays. • Promotion of the night-time economy. • Promotion of Cultural Tourism in Gaeltacht na nDéise. 	<ul style="list-style-type: none"> • The Council will continue to support such projects and Dept of Education programmes. • A fully revised Tourism Section with Policy Objectives is incorporated in Section 4.10 of the Plan. • The Council will continue to work with Irish Water to ensure water quality is maintained/ improved. • A number of amendments are made to strengthen reference to Portlaw in the Plan including a key Flagship Tourism project to develop a greenway to Portlaw. • Objective ECON 21 amended to promote Sustainable Tourism in Dungarvan as a Key Destination Town, Objective BGI09 is amended to support the 'The Irish Sea Way' program. • New Objective BG1 xx is incorporated in support. • Revised Objective ECON 23 supports the development of a variety of accommodation types which can improve the economic potential of increased visitor revenue. • Objective WCITY 11 seeks to improve the experience of visitors and residents in the city centre. • New Objective WCITY xx in Section 3.4.1 to support the night-time economy where it will enhance the character and function of the area. • Addressed in Policy Objective ECON 14.
Retail	<p>Opportunities for retail in Waterford City include the following:</p> <ul style="list-style-type: none"> • Tourism & Heritage Area — Create Wrap Around Retail Experience in Viking Triangle. • Cultural Area — Enhance Area by Promoting Street/Market Trade. • Retail Core — Delineate further between High Street and Outlet Experience. • Flexibility required in Zoning objectives to allow sites to be brought forward in the County's towns and settlements for convenience retail development over 	<ul style="list-style-type: none"> • Proposals generally supported, some suggestions fall outside remit of CDP. • Table 3.3 in Section 3.6.5 amended to promote the revitalisation of vacant / derelict properties / shop units as a priority in areas outside the City Core. • Development of Outlet Centres to accord with Retail Planning Guidelines and CDP Retail Strategy and will be assessed on their merits. • Development of supermarkets etc to accord with Retail Planning Guidelines (sequential approach) and

Section	Main Issues Raised	Recommended Amendments
	the lifetime of the Plan.	CDP Retail Strategy and will be assessed on their merits.
Chapter 5		
Transport Objectives	<ul style="list-style-type: none"> Inclusion of Knockhouse Road Objective was considered to be at odds with the previous external professional assessments of the road objectives for the locality. 	<ul style="list-style-type: none"> Amend Policy Objective Trans 50 to remove road objective for Knockhouse Road
Public Transport	<ul style="list-style-type: none"> Submissions sought greater emphasis on integration between public transport and active transport links. The issue of safety, particularly for women and children was raised as a concern. Modal Share Targets. 	<ul style="list-style-type: none"> .Inclusion of additional text on inter-modal integration in Transport Modes Table on Page 119 of the Draft Plan. Amend Transport and Mobility Strategic Objective No.3 to include the following text 'infrastructure should be designed to be universally accessed, sustainable and safe, particularly for women and children (Please see 'Travelling in a Woman's Shoes' TII 2020). Modal Share Ambitions were included in reply to the OPR Submission (WFD-C2-363).
Rail	<ul style="list-style-type: none"> Submission sought that the enhanced sustainable regional connectivity between the South East Regional City of Waterford, the Key Town of Wexford and Port of Waterford-Rosslare Europort for passenger or freight services 	<ul style="list-style-type: none"> Expand Policy Objective Trans 22 to include commuter towns such as Carrick On Suir, New Ross, Wexford Town and Rosslare Town/Port.
Chapter 6		
Water Services	<ul style="list-style-type: none"> Provision of clean water for Dunhill Village and Community. Wastewater treatment capacity in Portlaw. Provision of a waste water treatment facility for Bunmahon. Irish Water set out a baseline in terms of network extensions, wastewater capacity, wastewater networks (Drainage Area plans), water treatment/source capacity and water networks. 	<ul style="list-style-type: none"> Objectives UTL02 & UTL03 seek to collaborate with Irish Water to ensure the provision of water services infrastructure and compliance with Drinking Water Regulations. Irish Water are the responsible body. Objective UTL 02 states that the Council will "...collaborate with Irish Water, to ensure the timely delivery and provision of water services. Comments/recommendations of IW taken on board. Table 6.0 Water and Wastewater Capacity Assessment replaced in Section 6.2.
Drainage	<ul style="list-style-type: none"> Strategic Road Drainage capacity protected Strengthen SUDS measures on roads. 	<ul style="list-style-type: none"> Objective UTL 09 modified.
Waste	<ul style="list-style-type: none"> Stronger reference/policy to the 	<ul style="list-style-type: none"> Objective UTL 17 modified.

Section	Main Issues Raised	Recommended Amendments
	Circular Economy	
Renewable Energy	<ul style="list-style-type: none"> Promotion of wind energy projects particularly offshore and associated infrastructure called for. On shore facilities for maintenance and operation for servicing off shore wind developments are essential. Support for a range of renewable energy projects. Protection of vulnerable areas from wind energy projects. 	<ul style="list-style-type: none"> In response to the submission from the OPR a revised wind energy designations map is now developed Objective UTL 13 modified.
ICT/Communications	<ul style="list-style-type: none"> Improvement of Broadband in the County would be welcomed. Concerns re the development and siting of telecommunications masts/infrastructure. 	<ul style="list-style-type: none"> The Council supports the National Broadband Plan. Objective UTL 16 refers. Proposals assessed on their own merits, with regard to relevant national planning policy & CDP landscape character assessment etc.
Chapter 7		
Housing	<ul style="list-style-type: none"> Identify suitable city centre locations for student accommodation. The draft development plan did not refer to mews and townhouse type developments. 	<ul style="list-style-type: none"> Policy Objective after H22 modified. Policy Objective H 01 on Page 150 amended.
Sustainable Communities	<ul style="list-style-type: none"> Submissions calls for the rewording of Policy Objective SC33 with regards to the provision of a 25m community pool in Dungarvan/ West Waterford. Waterford Sports Partnerships (WSP) requested that Sport be strengthened in the Draft Plan. 	<ul style="list-style-type: none"> . Amend Policy Objective SC 33 maximum accessibility to the residents of Waterford to swimming facilities. Specific Development Objective for Dungarvan 'DGD015' for a new sustainable 25m community swimming pool facilities in Dungarvan/West Waterford Region. In relation to WSP please see CE response to WFD-C5-372
Chapter 8		
Circular Economy	<ul style="list-style-type: none"> Expand on designing for sustainability with the Circular Economy 	<ul style="list-style-type: none"> Policy Objective Place 10 (Page 182) amended.
Chapter 9		
Climate Change	<ul style="list-style-type: none"> Submissions included a number of measures to be included in the draft plan to tackle climate change and movement towards zero carbon. 	<ul style="list-style-type: none"> Amend Policy Objective CA01 to read as follows: 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 Plan 2021 and Low Carbon Development Act.

Section	Main Issues Raised	Recommended Amendments
Chapter 10		
Geological Heritage	<ul style="list-style-type: none"> • Recognition of value of Copper Coast Geopark; • Reference to datasets available from Geological Survey Ireland and in particular coastal vulnerability mapping. 	<ul style="list-style-type: none"> • Amend wording of policy G02 to highlight value Copper Coast Geopark. • Additional text to be included at the end of paragraph 1 on page 213 and wording amendments to C&M01 and C&M03.
Comeragh Mountains	<ul style="list-style-type: none"> • Promotion of access to the natural environment. 	<ul style="list-style-type: none"> • Inclusion of two additional policies on page 221 on outdoor recreation and access to the natural environment.
Walking Trails and Public Rights of Way	<ul style="list-style-type: none"> • Walking Trails and list of Proposed Rights of Ways. 	<ul style="list-style-type: none"> • Table10 presented in a separate Appendix to the Plan with illustrating maps.
Chapter 11		
Built Heritage	<ul style="list-style-type: none"> • Department of Housing Local Government and Heritage requested that the Sites and Monuments Record (SMR) be updated. 	<ul style="list-style-type: none"> • New Appendix 22 of SMR added.
Regeneration and Reuse	<ul style="list-style-type: none"> • Impact on wildlife from restoration works on historic structures and requirement for ecological assessment. 	<ul style="list-style-type: none"> • Inclusion of additional policy to requiring ecological Impact Assessment and biodiversity enhancement measures. • In repair works to existing or design of new developments.
DM Standards		
	<ul style="list-style-type: none"> • Aggregates/mineral extraction • World Health Organisation's 2018 Environmental Noise Guidelines for the European Region in policy objective UTL 14 of the draft Plan should be removed; • Discrepancy in Table 5, car parking standards; • Amendments required to Section 5.5 - development proposals affecting national roads; • Amendments to ensure road network drainage regimes safeguarded for national road drainage purposes'. • Design of urban sites to be focused on compact growth , increased density, higher buildings where appropriate; • "Residential/ student" is not included as a use type under the provisions of 	<ul style="list-style-type: none"> • Policy Objective DM 34 within Volume 2 amended. • Amend Policy Objective ULT 14 on Page 144 to state that developments must comply with the Wind Energy Development Guidelines (2006), or any subsequent update/ review of these). • Car Parking Table 5 amended; • Amendment made to zoning matrix – previous omission; • Amendments to Table 5.5 and DM 16 as suggested; • Amendments made to Objective DM 53 • Amendments as per OPR submission WFD-C2-363 – compact growth, taller buildings promoted in City/Regen sites;

Section	Main Issues Raised	Recommended Amendments
	the Draft Plans Zoning Matrix <ul style="list-style-type: none"> Traveller Accommodation to be quantified and identified and to be open for consideration in the same areas as 'Residential' in zoning matrix. 	<ul style="list-style-type: none"> Amendment made to zoning matrix as requested; CE's response to the OPR (see submission number WFD-C2-363) sets out the locations of Traveller accommodation sites in Waterford.
Appendices		
Specific Development Objectives	<ul style="list-style-type: none"> Request for various SDOs regarding open space, community facilities, active travel routes, 	<ul style="list-style-type: none"> New SDOs regarding open space, community facilities, active travel routes,
Appendix 11 Tree Preservation Orders	<ul style="list-style-type: none"> Proposals for additional TPOs. 	<ul style="list-style-type: none"> Include St.John's College Wood as a site of Local Biodiversity Interest. Include trees at Corbally, Pickardstown and the Cove, Tramore as Tree Preservation Orders to Appendix 11.
Appendix 11 Geological Heritage Sites	<ul style="list-style-type: none"> Corrections to list of Geological Heritage Sites. 	<ul style="list-style-type: none"> Correction to geological listing of Ballyquin Shore and inclusion of 2 additional GH sites -Comeraghs and Copper Coast.

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

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.

**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.

Submission Ref WFD-C2-363

The submission from the OPR commends the draft Plan on its adherence to key elements of the NPF and RSES, its neighbourhood strategy, regeneration assessment and policy objectives to deliver MASP, the settlement typology, placemaking, extensive work in preparing land use zoning maps for a significant number of settlements, the rural housing strategy and the details provided in Appendix 14 (Infrastructure Capacity), Appendix 15 (Settlement Local Service Inventory), Appendix 16 (Implementation and Monitoring) and 17 (Tiered Approach to Zoning). The submission identifies a number of recommendations and observations that require consideration by the Planning Authority. These individual issues are set out hereunder along with the response and recommendation of the Chief Executive to each.

OPR Recommendation 1 – Core strategy population and housing targets

In accordance with Section 10(2A) of the *Planning and Development Act 2000* (as amended), and having regard to the *Section 28 Guidelines: Housing Supply Target Methodology for Development Planning* (2020) and the *Guidance Note on Core Strategies* (2010), the planning authority is required to review the Core Strategy and to revise as necessary to:

- (i) comply with the requirements of the *Section 28 Guidelines: Housing Supply Target Methodology for Development Planning* (2020) and Appendix 1 of the accompanying Ministerial Letter to Local Authorities of 18/12/20;
- (ii) provide a single core strategy table for the county as a whole which clearly identifies population growth, and housing targets specific to the plan period; and
- (iii) provide the required details (aggregate population projections and housing allocation) for (a) level 4 rural towns, (b) level 5 rural villages, and (c) the open countryside outside villages and towns in accordance with s.10(2A)(f).

[*Development Plans, Guidelines for Planning Authorities, Consultation Draft, August 2021* (Appendix A of the submission) provides a useful reference and illustrative example of a core strategy table.] The planning authority may also consider it necessary to review the draft Housing Strategy and Housing Needs Demand Assessment in light of the finalisation of the Housing Supply Target in accordance with the methodology as per (i) above.

CE Response & Recommendation

The comments regarding the deviation between the Guidelines referenced in the submission and the draft plan are noted. Having given further consideration to the housing target figure for the period of the Development Plan it is recommended that the core strategy be reviewed and associated tables restructured to align with the methodology outlined in the submission and the consultation draft *Development Plans: Guidelines for Planning Authorities* published in August of this year. The amended core strategy table is set out below while an additional narrative is also set out to identify aggregate population for rural areas in line with Section 4.4. of the afore mentioned Guidelines. In this regard the amended table is considered to be consistent with SPPR DPG 5 of the draft Guidelines.

The amended core strategy table which will replace tables 2.2 and 2.3 of the draft Plan and a new narrative text to replace sections 2.12, 2.13 and 2.14 of the draft Plan are set out hereunder.

2.12 Waterford City & County Population Targets

To give some clarity to the calculations on which the population target data in the Core Strategy Table is based, the following should be noted:

- Waterford Metro Area Population: Table 4.1 of the NPF and Table 1 of Waterford MASP (SRSES), NPO 3(b);
- Dungarvan and Clonmel Environs Key Town Population: NPO 9, Table 3.2 SRSES, NPO 3(c),
- Waterford County Population: Table 3.2 SRSES, NPO 3(c) and Appendix 1 SRSES,
- Housing Supply Target Methodology for Development Planning: Guidelines for Planning Authorities DHLGH (DEC 2020), and
- Housing Need and Demand Assessment & Housing Strategy (Appendix 3 of this draft Plan)

The achievement of the national strategic outcomes is a principle goal of the Development Plan, in particular the population targets for Waterford City and County. To achieve this level of employment and population growth, the Development Plan charts a path by way of its a vision, its strategic outcomes, its policy objectives and a structure to monitor plan implementation in order to secure investment in infrastructure and services and to support communities, employment and amenities required to make Waterford a place where people call home.

2.13 Target Population Growth

Table 2.2 identifies the population and housing unit target as envisaged for Waterford City and County in the SRSES, NPF, Section 3(a) and (b) of the Implementation Roadmap for the National Planning Framework and the Housing Supply Target Methodology for Development Planning: Guidelines for Planning Authorities DHLGH (DEC 2020), the as described above. These figures have been further adapted to facilitate a more linear progression in reaching our 2031 target, in order to enable time to address constraints to implementing development across the city and county.

The population growth target of 4,800 will ensure that Waterford City has the capacity to develop in its role as a regional economic driver for the wider city region as envisaged in the NPF/SRESE, while the growth identified for Dungarvan, Tramore, other towns/villages and rural areas will facilitate the sustainable growth of these areas over the lifetime of the Development Plan.

TABLE 2.2: Core Strategy Table											
Settlement		Population & Housing				Land Zoning Required					
Settlement Class	Settlement Type	Census 2016 Pop	Census 2016 (%)	Housing Target Units	Housing Target (%)	Existing Zoning (ha)	Zoned land required (ha)	Target residential density (UPH)	Minimum 50% / 30% infill lands (ha)	Remaining 50% / 70% (non infill) (ha)	Shortfall /Excess of Zoned Land
1	Regional City										
	Waterford City & Suburbs	48,216	41.57	3,169	66.0	254.36	90.6	35	45.3	45.3	209.1
2	Key Town										
	Dungarvan/Ballinroad	10,388	8.96	330	6.9	72.61	11.0	35	3.3	7.7	64.9
	Clonmel Environs	925	0.80	29	0.6	40	1.0	35	0.3	0.7	39.3
3A	Large Urban Town (>1500 Pop) Large										
	Tramore	10,381	8.95	261	5.4	44.04	7.5	35	2.2	5.2	38.8
3B	Urban Towns (>1500 Pop)										
	Dunmore East	1,808	1.56	43	0.9	76.6	1.7	25	0.5	1.2	75.4
	Portlaoigh	1,742	1.50	42	0.9	7.04	1.7	25	0.5	1.2	5.9
	Lismore	1,374	1.18	33	0.7	5.93	1.3	25	0.4	0.9	5.0
	Gaeltacht na nDéise	499	0.43	20	0.4	32.48	1.0	20	0.3	0.7	31.8
	Large Rural Towns (<1500 Pop)			350	7.3			20			
4A	Rural Nodes/Other Rural Areas			516	10.9						
5	Overall Total	116,162		4,824	100.0	533.06	115.7				

2.14 Housing Land Requirement

Table 2.2 identifies the quantum of land required to facilitate the delivery of the population growth targets 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.
- 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 east of the Colligan River in the general Shandon area (between the Shandon Road, The Colligan River and the Cappelquin 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 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, north of Mountfield 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.

To support the zoning amendments required on foot of the OPR submission, it is recommended that the following specific development objective be included as an amendment in Appendix 2 of the draft Plan:

All settlements: Housing developments shall be designed and constructed so as to facilitate future vehicular access to adjacent lands zoned for R1 or SRR and where feasible permeability links to existing housing areas/public streets should be provided for active modes such as cycling and walking.

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), and by a wide range of mechanisms, including under Part V of the Planning and Development Act 2000 (as amended).

A recent significant change to Part V arrangements under the Affordable Housing Act 2021 is to increase the Part V contribution for new housing developments from up to 10% for social housing to a mandatory 20% requirement of new developments of 5 or more houses, at least half of which must be applied to social housing provision and up to half of which may be applied to affordable and cost rental housing.

All proposed residential developments, or mixed used development with a residential component, shall have regard to, and comply with, the provisions of the Council's Housing Strategy (Appendix 3 of the Development Plan) and Part V of the Planning and Development Act, 2000 (as amended). In this regard, an applicant for new development will be required to engage with the Planning Authority at an early stage of the planning process to ascertain any specific requirements in relation to their Part V obligation.

While the Housing Strategy has found that the identified social and affordable housing requirement is equivalent to c.30% of the total anticipated households in County Waterford over the Plan period, the NPF warns against the intensification of social housing in areas that are already dense with social housing and advocates for the development of diverse neighbourhoods with a balance of public and private housing to create healthy communities.

In order to mitigate against undue segregation of tenure type, new developments should avoid an over proliferation of a single housing tenure by providing a balanced mix of private, affordable, social and cost rental housing to accommodate the needs of a mixed and balanced community. In this regard, applicants shall be required to have regard to both the existing and permitted house types and tenures within the surrounding and adjoining neighbourhoods and/or district and clearly demonstrate how the proposed development will add to the housing mix of the area.

In areas where the relevant deprivation rate is below -3.0 as set out in Table 5.12 of the Housing Strategy & HNDA (Appendix 3) the preference of the Council is to promote a higher rate of private, affordable and cost rental housing as opposed to the provision of an excess of social housing in these areas.

In addition, all development proposals with a residential component, shall comply with the policies set out in this chapter with regard to providing appropriate housing choice, location, mix and tenure.

Social Housing and Part V Policy Objectives

H 08	The Council will secure the provision of appropriate accommodation to meet the housing needs of all households, including social, <u>affordable and cost rental</u> housing, in a manner consistent with the Housing Strategy and in accordance with Part V of the Planning & Development Act 2000 (as amended). We will also apply changes to the Act in terms of affordable housing provision during the life of the Development Plan. All housing units delivered by way of Part V should be integrated into the overall development in terms of
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location, design and build quality.

7.6 Housing Type & Tenure Mix

The Planning and Development Act 2000, as amended, requires Development Plans to take into account the need to ensure that an appropriate mixture of house types, sizes and tenures is developed to reasonably match the requirements of different categories of households and the demographics of an area.

The Housing Strategy & HNDA undertaken as part of the Development Plan formulation process (refer to Appendix 3) provides a detailed analysis of the demographic and housing requirements in Waterford. It highlighted that whilst Waterford has a high level of retired families; it has displayed an increase in the inter-censal period 2011 – 2016 of the 40 - 46 age cohort, an increase in children under five. This provides an indication of the need to plan and cater for all ages across the family life-cycle, and an associated requirement for a variety of residential types and sizes to provide adaptability, flexibility, and choice of residential options, and to create sustainable and liveable neighbourhoods and communities.

Providing an appropriate mix of house types creates neighbourhoods for people of different ages, social background, lifestyles and promotes inclusion and quality of life. Encouraging good housing mix also allows people the choice and opportunity to remain in a given area while availing of accommodation that caters to their changing needs at particular stages of their life. This concept is explained as the 'Lifecycle Approach' and is a core objective underpinning the Department of Environment, Heritage and Local Government guidelines 'Delivering Homes, Sustaining Communities' (2007). This approach helps foster a greater sense of community and fosters increased social inclusion.

Figure 5.5 of the Housing Strategy & HNDA (Appendix 3) identifies that housing will be needed to provide for the household sizes set out in Table xx below during the period of the Development Plan 2022-2028. Applications for residential development will be required to demonstrate how the development will contribute to meeting these housing requirements.

Table XX

Year	2022		2023		2024		2025		2026		2027		2028		
Household Size	No	%	No	%	No	%	No	%	No	%	No	%	No	%	Total
1-person	<u>124</u>	<u>26.7</u>	<u>192</u>	<u>26.8</u>	<u>225</u>	<u>26.9</u>	<u>218</u>	<u>27.0</u>	<u>215</u>	<u>27.1</u>	<u>215</u>	<u>27.3</u>	<u>115</u>	<u>27.3</u>	<u>1304</u>
2-person	<u>140</u>	<u>30.1</u>	<u>216</u>	<u>30.2</u>	<u>253</u>	<u>30.3</u>	<u>245</u>	<u>30.4</u>	<u>242</u>	<u>30.4</u>	<u>241</u>	<u>30.5</u>	<u>129</u>	<u>30.6</u>	<u>1466</u>
3-person	<u>76</u>	<u>16.5</u>	<u>118</u>	<u>16.4</u>	<u>137</u>	<u>16.4</u>	<u>131</u>	<u>16.3</u>	<u>129</u>	<u>16.3</u>	<u>128</u>	<u>16.2</u>	<u>68</u>	<u>16.1</u>	<u>787</u>
4-person	<u>71</u>	<u>15.3</u>	<u>110</u>	<u>15.2</u>	<u>128</u>	<u>15.2</u>	<u>123</u>	<u>15.2</u>	<u>120</u>	<u>15.1</u>	<u>120</u>	<u>15.1</u>	<u>64</u>	<u>15.1</u>	<u>736</u>
5+persons	<u>53</u>	<u>11.4</u>	<u>80</u>	<u>11.2</u>	<u>92</u>	<u>11.1</u>	<u>89</u>	<u>11.0</u>	<u>86</u>	<u>10.9</u>	<u>86</u>	<u>10.8</u>	<u>45</u>	<u>10.8</u>	<u>531</u>
Total	<u>464</u>	<u>100</u>	<u>716</u>	<u>100</u>	<u>835</u>	<u>100</u>	<u>806</u>	<u>100</u>	<u>792</u>	<u>100</u>	<u>790</u>	<u>100</u>	<u>421</u>	<u>100</u>	<u>4824</u>

In relation to the mix and type of apartments within large developments, the Sustainable Urban Housing: Design Standards for New Apartments (2018) set out the need for development to provide a mix of types/sizes and we will apply these design standards to support the building of resilient residential developments. In this regard we will seek to move away from the traditional single housing tenure type in housing developments and developers will be required to have regard to the HNDA when designing housing mix and tenure.

Housing Mix Policy Objectives

H 17	<p>We will encourage the establishment of attractive, inclusive and sustainable residential communities in existing built up areas and new emerging areas by:</p> <ul style="list-style-type: none"> • Ensuring a suitable variety and mix of housing and apartment types, and sizes/tenures is provided in individual developments to meet the lifecycle adaptation of dwellings and the differing needs and requirements of people and families. • Having regard to current demographic, social and market needs and changes throughout the City and County, in accordance with the provisions of the Housing Strategy and Housing Need Demand Assessment (HNDA) and any future Regional HNDA; • <u>Require the submission of a report outlining:</u> <ul style="list-style-type: none"> · <u>How the proposed development contributes to meeting the future housing requirements as set out in Table xx,</u> · <u>How the proposed development has had regard to both the existing and permitted house types and tenures within the surrounding and adjoining neighbourhoods and/or district</u> · <u>How the proposed development will contribute positively to the housing mix of the area.</u> • Require that the housing mix in any new development has regard to the provisions of 'Housing Options for Our Ageing Population, Policy Statement', (2019), and makes provision for appropriate residential accommodation for older people; • Facilitating the provision of 'self-build' / serviced sites opportunities <u>where feasible</u>.
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Amendment to Volume 2 – Development Management Standards:

3.3 Part V Housing Requirements

Through social housing schemes and capital investment programmes (through voluntary, public and private sectors), the Council will seek to ensure that all persons have affordable accommodation suitable to their social and personal needs, and in line with the policies set out in 'Delivering Homes – Sustaining Communities Statement on Housing Policy' (DoEHLG 2007). Social housing will also be required to be delivered as part of new private housing in line with the provisions of Part V of the Planning and Development Act 2000 (as amended).

Under the new Urban Regeneration and Housing Act 2015 (commenced on 1st September 2015), Part V of the Planning & Development Act provides that not more than 10% of land zoned for a residential use or a mixture of residential and other uses shall be reserved for the provision of social housing. Section 97 of the Planning & Development Act also provides that a Part V agreement shall not be required in the following instances for new development;

- Consisting of the provision of 9 or fewer houses, or
- For housing on land of 0.1 hectares or less

Before applying for planning permission in respect of a residential development, and in accordance with the above Part V exemption threshold, an applicant/ developer may apply to the Planning Authority for a Part V Certificate of Exemption from the requirements of Section 96 of the Act.

Where Part V – Section 96 of the Act does apply to a particular development, provisions are in place for applicants/developers in meeting their Part V requirements. Planning legislation no longer allows for the provision of an agreed monetary payment to the Planning Authority for Part V compliance, or the transfer

~~of land or serviced sites at other locations to the Planning Authority, as a mechanism for Part V agreements.~~

~~Applicants/developers are advised to consult with the Housing Department of Waterford City & County Council, prior to making a planning application, in order to assess the Part V requirement in their specific case.~~

Social and Affordable housing will be provided by Waterford City and County Council as the Housing Authority, Approved Housing Bodies (AHBs), and by a wide range of mechanisms, including under Part V of the Planning and Development Act 2000 (as amended).

A recent significant change to Part V arrangements under the Affordable Housing Act 2021 is to increase the Part V contribution for new housing developments from up to 10% for social housing to a mandatory 20% requirement of new developments of 5 or more houses, at least half of which must be applied to social housing provision and up to half of which may be applied to affordable and cost rental housing.

All proposed residential developments, or mixed used development with a residential component, shall have regard to, and comply with, the provisions of the Council's Housing Strategy (Appendix 3 of the Development Plan), Section 7.3 of Volume 1 and Part V of the Planning and Development Act, 2000 (as amended). In this regard, an applicant for new development will be required to engage with the Planning Authority at an early stage of the planning process to ascertain any specific requirements in relation to their Part V obligation.

OPR Recommendation No. 2: Zoning for residential use

Having regard to section 10(2A) and 10 (2C) (b) (ii) of the *Planning and Development Act 2000* (as amended), the requirement for compact growth in accordance with National Policy Objective 3, and the approach to zoning required under National Policy Objective 72 (a-c), the planning authority is required to:

- (i) review the quantum of land zoned for residential or a mixture of residential and other uses in the core strategy (table 2.3) to ensure consistency with the housing supply targets, as required under the section 28 *Housing Supply Targets Methodology for Development Planning Guidelines for Planning Authorities* (December, 2020), having regard to current guidelines relating to residential density;
- (ii) review density assumptions used to estimate the quantity of zoned land arising from the Housing Supply Targets in the revised Core Strategy having regard to the recommended residential densities for large towns, small towns and villages in the *Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities* (2009); and
- (iii) where the potential housing unit yield of zoned land exceeds that required to meet the projected housing supply target, the planning authority is required to re-prioritise/ phase, re-zone, or where that is not sufficient, to remove zoning objectives for residential development in settlements unlikely to deliver required housing over the plan period having regard to the principles of sequential approach to zoning (Recommendations 3 and 4), compact growth (Recommendation 5), and flood risk management (Recommendation 12).

[*Development Plans, Guidelines for Planning Authorities, Consultation Draft, August 2021* (Appendix A) provides a useful reference and illustrative example for the presentation of this information in the core strategy table.]

CE Response and Recommendation

The planning authority notes the need to align the quantum of land use zoning for residential/mix of residential and other uses so as to be consistent with the housing target projection referred to in Recommendation 1 above. In doing so due regard has been had to the relevant density requirements and the relevant context of the lands zoned. As can be seen from the amended core strategy table provided in

response to this submission, there has been a significant realignment of the core strategy housing target with the quantum of land required to be zoned and a rationalisation of the quantum of land currently zoned for residential/mix of residential and other uses in the Waterford City, Waterford County and Dungarvan Town development plans and the Tramore, Lismore and Portlaw local area plans. This has been achieved predominantly through a process of prioritising, phasing and rezoning having regard to the principles of the sequential approach to zoning and compact growth.

In reviewing land use zoning provisions relating to residential/mix of residential and other uses as set out in the draft Plan, it has been necessary to identify some capacity of regeneration sites to assist in delivering the core strategy through the mechanism of Additional Provisional lands having regard to the need to provide local choice in development land availability and to avoid unnecessary restrictions in the supply of land for the housing market. Where this has been deemed necessary, a full assessment is provided in a manner consistent with Section 4.4.3 of the Development Plans: Guidelines for Planning Authorities, consultation draft, (August 2012).

Amendments to zoning maps are set out in the accompanying maps to this report while a new narrative text as set out hereunder on regeneration sites and phasing of residential lands will be included as a sub section in section 2.14 of the draft plan.

2.14.1 Regeneration

Across our settlements some scope for regeneration exists and to this end relevant brownfield sites are identified in Appendix 21 with additional sites also identified in Table 3.1. These regeneration sites have been identified for their capacity to deliver regenerative, compact and sequential growth in the larger settlements while in the rural settlements they provide serviced sites as possible alternatives to one-off housing in the open countryside. As also detailed in Appendix 21 there are significant impediments to all these lands coming to market during the lifetime of the Development Plan, including site assembly and displacement of existing uses, and as such it is considered that where these lands come to the market they can be considered as Additional Provisional lands for the purposes of the core strategy.

OPR Recommendation No. 3: Tiered approach to zoning

Having regard to NPO 72a, NPO 72b and NPO 72c, the planning authority is required to elaborate and expand upon its infrastructural assessment and tiered approach to zoning, as necessary, to fully address the status of all lands proposed to be zoned under the plan in accordance with the methodology for a tiered approach to land zoning under Appendix 3 of the NPF, relating to existing development services, i.e. road and footpath access including public lighting, foul sewer drainage, surface water drainage, water supply and/or additional service capacity.

The inclusion of a reasonable estimate of the full cost of delivery of the required infrastructure to the identified zoned lands, as required, in addition to the identification of tier 1 and tier 2 lands on the land use zoning maps would assist the implementation of the plan and provide important information to all stakeholders.

CE Response and Recommendation

The additional clarity requested in the submission is considered reasonable and the land use zoning maps for Waterford City, Dungarvan/Ballinroad and Tramore have been revised to clearly identify tier 1 and tier 2 lands in a manner consistent with Appendix 3 of the NPF. In addition Appendix 17 Tiered Approach to Zoning will be updated to include reference to road and footpath access, public lighting and estimates of full costs of delivery of such required infrastructure where possible. In addition the new text set out below is proposed to be inserted as a sub section to section 2.14 of the draft Plan.

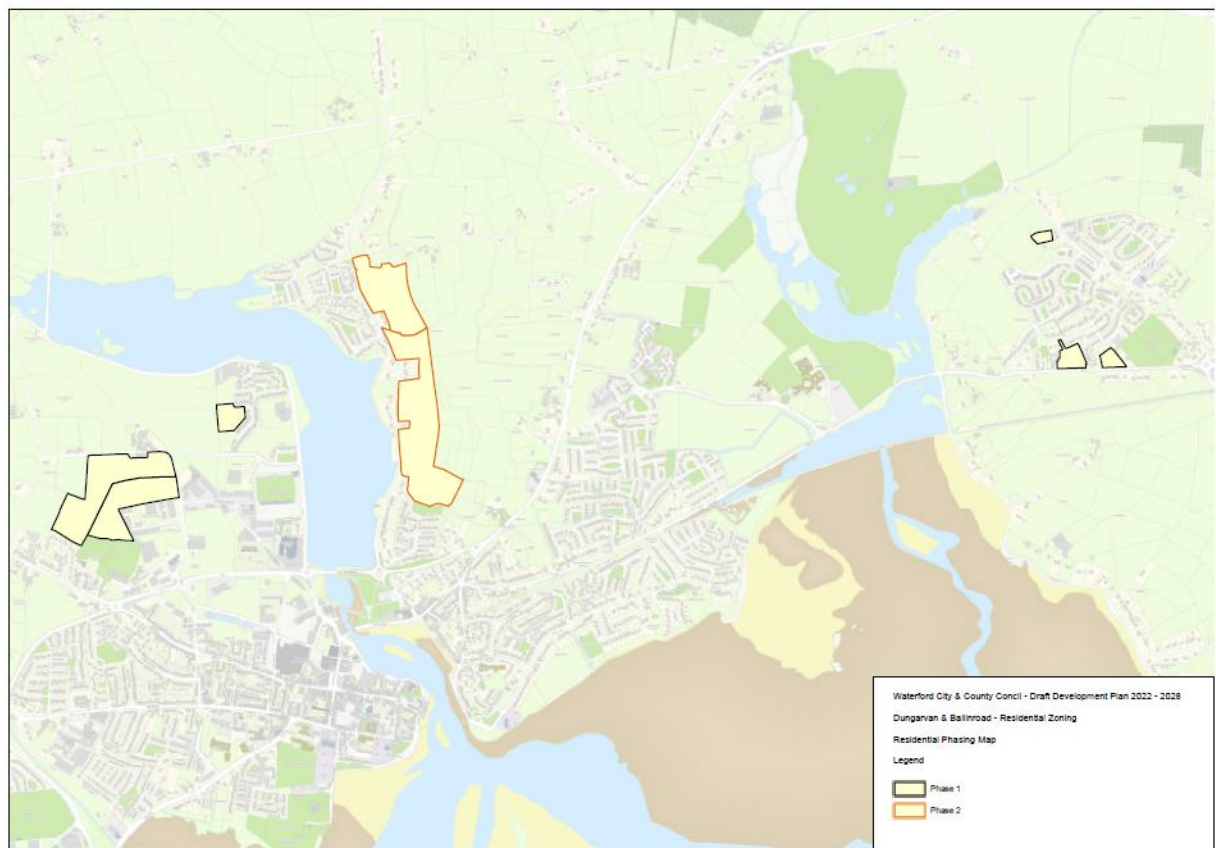
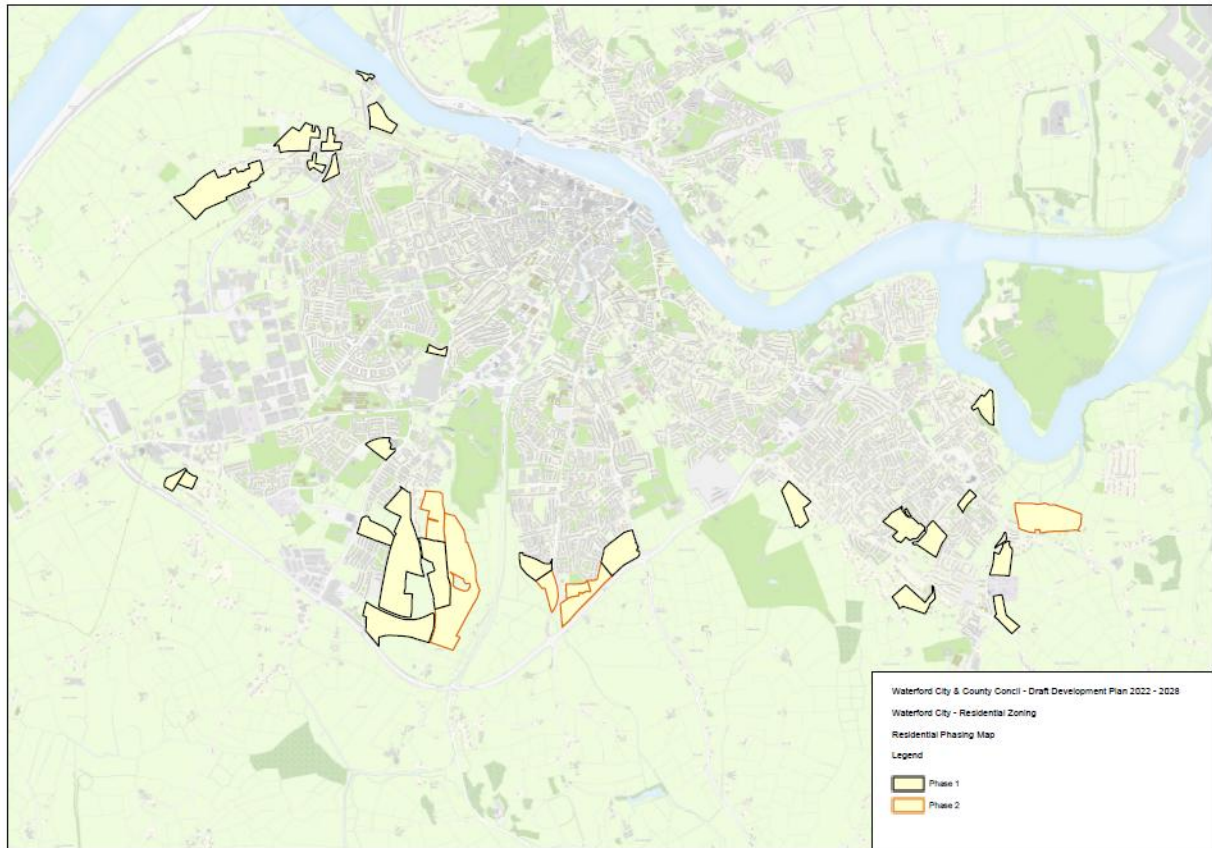
14.2 Tiered Approach to Zoning

Section 6 and SPPR DPG 7 of the consultation draft Development plans: Guidelines for Planning Authorities (August 2021) identifies how lands which are suitable for residential development can be sequenced/phased or prioritised in the Development Plan. This sequential approach develops further the Tiered Approach to Zoning and gives due cognisance to the principles of compact growth and utilisation of existing infrastructure as set out in the NPF and RSES.

The draft Development Plan has identified the relevant sequence and tiering for lands zoned for new residential development across the main urban centres of Waterford City, Dungarvan and Tramore. While the land use zoning maps identify the location of phase 1 & 2 lands, Table 2.3. identifies the quantum of phase 1 & 2 lands relevant to each urban location and the notional housing units that could be delivered in each. While the phasing methodology for Tramore is focussed on a single core area, recognition is given to the role and function of Ballinroad in considering the phasing for Dungarvan while the neighbourhood strategy for Waterford City has influenced the spatial pattern of phase 2 lands across the built footprint of the city.

Location	Tier 1(ha)	Tier 2 (ha)	Housing Units
<u>City North West</u>	<u>27.3</u>	<u>n/a</u>	<u>955</u>
<u>City South West</u>	<u>50.4</u>	<u>27.7</u>	<u>2,733</u>
<u>Sacred Heart/ Ballytruckle/ Kilcohan</u>	<u>19.3</u>	<u>10.4</u>	<u>1,039</u>
<u>Dunmore Road/ Farronshoneen/ Ballinakill</u>	<u>2.9</u>	<u>n/a</u>	<u>101</u>
<u>Dunmore Road/ Knockboy/ Blenheim</u>	<u>17</u>	<u>10.7</u>	<u>970</u>
<u>Larchville/ Lisduggan/ Lismore Park</u>	<u>1.0</u>	<u>n/a</u>	<u>35</u>
<u>Ferrybank</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>
<u>City Centre</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>

The land use zoning provisions of the draft Plan have been refined to identify phase 1 and phase 2 lands in certain settlements (Waterford City and Dungarvan/Ballinroad). Save for the phase 2 lands identified in the maps below, the remainder of lands zoned for new residential development (R1) in the draft Plan are phase 1. It is recommended that the maps below be included as amendments to section 2.14.2 of the draft plan.



Appendix 17 has been amended to quantify infrastructural deficit where relevant in terms of the phases and tiered residential land and the updated appendix is attached to this report.

OPR Recommendation No. 4: Sequential approach to zoning

Having regard to the national and regional objectives for compact growth NPO 3c and RPO 34 & 35, the requirement under the *Development Plans, Guidelines for Planning Authorities* (2007) that a sequential approach to the zoning of lands is applied, the planning authority is required to review the zoning of residential land with a view to prioritising / phasing or removing less preferable lands not required to meet the housing demand arising from the Core Strategy estimated in accordance with Recommendation 2, with particular regard to the following :

- (i) Waterford city – Phasing of the larger ‘New / Proposed Residential’ land banks on the outskirts of the City (Kilbarry and Carrickphierish) to prioritise development of land closest and most accessible to the city centre should be considered. Consideration should also be given to ‘New / Proposed Residential’ zoning of land less preferably located in the Knockboy (North), Knockboy (Greene), Ballygunner (WCCC) in order to prioritise development in the more favourable locations and avoid suburban sprawl on the edge of the city;
- (ii) Dungarvan – Indicate objectives for phased delivery to ensure that the amount of ‘New / Proposed Residential’ lands indicated in the draft development plan align with the core strategy including in relation to the following areas Monang (Phasing), Estuary Heights (West) and Glebe and reviewing such lands identified at Duckspool in the context of more developable lands inside the N25 and more proximate to the town and social and other infrastructure. (The Office notes that taking account of Section 3.2 and Table 6 of the Natura Impact Report, the draft Plan would appear to have removed lands that had been previously zoned for housing in the Dungarvan Town Council development plan, 2012 – 2018, south of the N25 bypass near Duckspool for reasons concerning feeding grounds for Brent Geese. The draft Plan documentation is not clear on the scientific basis for the removal of such lands, which would appear to be the subject of current planning application activity and the planning authority is requested to clarify the scientific basis for its decision to remove such lands and to indicate whether it is aware of any other locations where this issue has arisen);
- (iii) Tramore - ‘New / Proposed Residential’ phasing and prioritising zoning to align with housing supply targets. The proposed zonings in Newtown and Newtown Glen should be omitted as they are not consistent with the sequential approach to development and represent continued sprawl and expansion of the town southwards along the coast;
- (iv) Dunmore East - The proposed ‘New / Proposed Residential’ zoning in Knockacurrin comprises in excess of 13 ha, which far exceeds the total land requirement for Dunmore East consistent with the Core Strategy (stated in Table 2.3 as 4 ha). This zoning should be omitted as it is not consistent with the sequential approach to development and represents continued sprawl and expansion of the town. Consideration should also be given to phasing/ prioritising or de-zoning ‘New / Proposed Residential’ zoning in Auskurra Little having regard to the need identified in the revised Core Strategy;
- (v) Lismore – The quantum of ‘New / Proposed Residential’ zoned land should be reviewed in order to align with the need identified in the revised Core Strategy;
- (vi) Portlaw – The proposed ‘New / Proposed Residential’ in Knockane is less preferably located in terms of the sequential approach and should be omitted; and
- (vii) Gaeltacht na nDéise – significantly reduce the extent of New / Proposed Residential’ lands in Mweelahorna which are significantly in excess of the projected housing demand in the Core Strategy.

CE Response and Recommendation

The content of this recommendation has been considered along with that of recommendation 1, 2 &

3. The land use zoning maps have been amended for each of the settlements mentioned having regard to the content of the submission and amended core strategy table and housing unit target for the city and county identified in response to recommendation 1 above. With regard to the specific references to the relevant settlements the following should be noted:

- i. The land use zoning map for Waterford City has been revised to prioritise the development of lands in a sequential manner, focussed around the neighbourhood strategy and associated centres. As such additional tiering provisions have been identified on the relevant maps. That being said, it is noted that there has been significant public and private investment in infrastructure to service lands in Carrickphierish and Kilbarry and their respective communities and planning permissions have been granted for developments in this area. Remaining uncommitted lands in Kilbarry and along the Carrickphierish road fall within the built footprint of the City. The development of these city neighbourhoods has been a long term objective of Waterford City and County Council. Note is also made of S.1.3.2 Appendix A of the Development Plan: Guidelines for Planning Authorities (consultation draft) August 21 in terms of the core strategy relating to Waterford City and delivering regeneration.
- ii. With regard to Dungarvan, the review of the quantum and phasing of land zoned for residential development has resulted in a shift back towards consolidation of Dungarvan in the short term. While the OPR submission suggests a move to developing within the N25, given the availability of development land this is not wholly possible. Notwithstanding, regeneration sites have been identified in a new Appendix 22 attached to this report. The amended residential land use zoning proposes to bring forward the development of the Shandon area to commence during the lifetime of the Development Plan while additional phase 2 lands have been identified at Monang.
- iii. The recommendation regarding the lands in the Newtown area of Tramore is noted and relevant changes have been made to the land use zoning provisions for this area. Additional lands have been identified for development to the rear of Mountfield to facilitate the change in land use zoning at Newtown.
- iv. The recommendation regarding the zoning of land at Knockacurrin in Dunmore East is noted along with the comments regarding the phasing/dezoning of land at Asakurra Little and changes reflecting these comments have been duly made.
- v. The recommendation relating to the quantum of land zoned in Lismore is noted and changes reflecting these comments have been duly made.
- vi. The recommendations relating to the quantum of land zoned in Portlaw and the lands at Knockane are noted. Changes reflecting these comments have been duly made.
- vii. The recommendation relating to the significant reduction in the quantum of land zoned at Mweelahorna is noted. Changes reflecting these comments have been duly made while additional lands have been zoned for new residential development at Cnocán an Phaoraigh Uachtarach.

Amended land use zoning maps having regard to the OPR recommendations are accessible via the portal story maps by clicking here [here](#).

OPR Recommendation No. 5: Compact growth and regeneration

In order to ensure that the delivery of 50% of all new homes within Waterford City and suburbs, and 30% of all new homes targeted within other settlements takes the form of 'infill' or brownfield development within their existing built-up footprints, and for consistency with NPO 3 and RPOs 34-35, the planning authority is required to identify and quantify the zoned land within the county's settlements that will contribute to this target and include details of same in core strategy table.

In this context, the planning authority should have regard to the definition of brownfield and the range of infill development provided for under the *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas* (2009).

[*Development Plans, Guidelines for Planning Authorities, Consultation Draft, August 2021* (Appendix A) provides a useful reference and illustrative example for the presentation of this information in the core strategy table.]

CE Response and Recommendation

The comments of the OPR are noted and the amended core strategy table (Table 2.2 above) has identified how this recommendation has been addressed in the draft Plan.

OPR Recommendation No.6: Development Management Standards

In accordance with section 10(2A)(a) of the *Planning and Development Act 2000* (as amended), and having regard to NPO 3, 6, 13 and 35, the planning authority is required to:

- (i) amend residential density standard so that it is fully consistent with the residential densities set out in the *Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities* (2012) and *Circular NRUP 02/2021 Residential Densities in Towns and Villages*;
- (ii) provide relevant information to show that the draft Plan and Housing Strategy are consistent with the Specific Planning Policy Requirements (SPPRs) specified in the *Urban Development and Building Heights Guidelines for Planning Authorities* (2018) by more fully demonstrating consistency with SPPR 1; and
- (iii) review Table 1 – General Standards for New Residential Development in Urban Areas standards in Section 3.2 (Volume 2 'Development Management Standards') in particular open space, site coverage, plot ratio standards and minimum separation distances between opposing windows and instead focus on assessing individual development proposals on performance based criteria dependent on location and individual site characteristics in accordance with the provisions of NPO 13.

CE Response and Recommendation

- i. The residential density provisions of the draft Plan have been reassessed in terms of the Guidelines and Circular as referred to in the submission. These changes have also been incorporated into the amended core strategy table (Table 2.2 above).
- ii. Greater clarity is provided relating to SPPR 1 of the *Urban Development and Building Heights Guidelines for Planning Authorities* (2018) in an amendment to section 3.2 of the draft Plan. Furthermore, additional regeneration sites have been identified in table 3.1 along with an indication as to the capacity for taller buildings/higher densities on each and policy objective PLACE 10 has been amended to give greater direction to the appropriate design of taller buildings and higher densities.

Amended text to Section 3.2 reads as follows:

In order to fully support the provisions of the *Urban Development and Building Heights Guidelines for Planning Authorities* (2018), the Development Plan has adopted a proactive and flexible approach to securing compact regenerative urban growth through a combination of facilitating increased densities and building heights, while also being mindful of the quality of development and balancing amenity and environmental considerations. Where substantial regeneration capacity is available on any one site it will also be important to ensure that consideration is given to the provision of an appropriate mix of residential, commercial and employment uses, especially where block delivery sequencing can facilitate this form of balanced and resilient urban regeneration which supports urban communities.

Table 3.1 has been replaced by a new table which includes additional potential regeneration sites while also identifying the relevant sites which may be suitable for higher densities and taller buildings based on the following criteria:

- a) The provisions of WMATS and proximity to significant public transport infrastructure and/or trip generators;
- b) Site size and location relative to the city centre/neighbourhood/district centre;

- c) Proximity and orientation of the proposed site with regard to neighbouring land uses and the nature of the neighbouring use; and,
- d) Capacity to enhance amenity and placemaking at any location.

Ref No	Site Location	Site Area (Ha)	Issues to Note	Tier
OPS01	Saint Joseph's House Manor Hill	2.4	n/a	1
OPS02	Exchange Street Site	0.17	n/a	1
OPS03	Thomas Hill	0.20	n/a	1
OPS04	Jenkins Lane	0.47	Site assembly	1
OPS05	North Quays SDZ	11.68	Provision of enabling infrastructure	1
OPS06	Former Waterford Stanley Site, Bilberry	5	n/a	1
OPS07	John's College, The Folly	5.19	Trees of amenity value to be retained and reuse of protected structures	1
OPS08	St Otteran's, John's Hill	13.35	Reuse of protected structures	1
OPS09	Former Brooks Site, Newtown Road	1.5	Site assembly	1
OPS10	Glenville (Former Power Seeds) Dunmore Road	0.88	n/a	1
OPS11	Kilbarry	8.27	Site assembly and new access provision	2
OPS12	Former Waterford Crystal Site	14.9	Student accommodation, mixed commercial use /educational uses	2
OPS13	Gasworks Site/Johnstown Business Park	2.88	n/a	1
OPS14	Dock Road	1.84	Displacement of existing use	1
OPS15	Industrial land at Cleaboy/Keanes/ Skibereen Roads	8.12	Site clearance and displacement of existing use	2
OPS16	Tycor industrial complex	1.62	Displacement of existing land uses	2
OPS17	Former Ard Ri Hotel	7.71	Access and topography	1
OPS18	Tesco Ardkeen	1.27	Retaining adequate car parking	2
OPS19	South Quays	2.61	Preparation of design framework	1
OPS20	Spring Garden Alley	0.09	Site assembly	1
OPS21	Bolton Street	0.71	n/a	1
OPS22	Former Waterford Crystal Sports Campus	9.8	n/a	2
OPS23	Williamstown/ Outer Ring Road	13	n/a	2
OPS24	Neighbourhood Centre Carrickphierish	7.23	n/a	2
OPS25	District Centre Tramore Road	1.31	Retaining adequate car parking	2
OPS26	O'Byrne's Garage, The Glen	0.09	n/a	1
OPS27	Michael Street	1.43	n/a	1
OPS28	Ballybricken	0.73	Site assembly	1
OPS29	Lisduggan Shopping Centre	0.76	n/a	2
OPS30	The Glen	0.19	Site assembly	1

Footnote: Sites with potential to accommodate taller buildings (Above 4 floors in height) are identified by a green highlight.

The amendments to policy objective PLACE 10 are as follows:

Place 10	<p>All medium to-large scale and complex planning applications (15 + residential units (or less depending on the site context), commercial development over 500 sqm. or as otherwise required by the Planning Authority) shall submit a 'Design Statement' and shall be required to demonstrate how the proposed development addresses or responds to the design criteria set out in the 'Urban Design Manual - A Best Practice Guide' (DoEHLG, 2009) and incorporates adaptability of units and/or space within the scheme.</p> <p><u>In addition, where the development is proposed on a regeneration site or other site</u></p>
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	<p><u>identified as being suitable for taller buildings and higher densities (Table 3.1 of the Development Plan, landmark sites within newly developing city neighbourhoods or other such sites identified in Local Area Plans to be made during the lifetime of the Development Plan) the Design Statement will be required to demonstrate full compliance with the Specific Planning Policy Requirements of the Urban Development and Building Heights Guidelines for Planning Authorities (2018) or other such S 28 Ministerial Guidelines applicable at the time.</u></p>
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iii. Comments in the submission relating to Table 1 – General Standards for New Residential Development in Urban Areas standards in Section 3.2 (Volume 2 ‘Development Management Standards’) of the draft Plan are noted and necessary changes set out below have been made to the table to facilitate a more performance and qualitative based approach to development management requirements. In addition, amendments to the text in section 3.2 is proposed as set out hereunder:

Section 3.2

General Density Advice

~~In all cases, the Planning Authority will determine the appropriate density for new residential development on a case by case basis taking into account location and position of the respective relevant settlement in the settlement hierarchy, context with neighbouring development, overall layout & design, access to public transport and proximity to services in accordance with the ‘Sustainable Residential Developments in Urban Areas’ Planning Guidelines issued by DoEHLG.~~

~~In assessing applications for residential development, the Planning Authority will seek to implement the density standards set out in the ministerial guidelines ‘Sustainable Residential Developments in Urban Areas’ (DoEHLG 2009), the Specific Planning Policy Requirements (SPPR) of the Urban Development and Building Heights Guidelines for Planning Authorities (2018) and Circular Letter NRUP02/2021 along with and those provided in the Core Strategy of this Development Plan. In all instances the following will be taken into consideration: ~~where practical to do so, which in turn will take into account:~~~~

The following amended elements of Table 1 are proposed:

Public Open Space	<ul style="list-style-type: none"> • Public open space should be provided at a minimum rate of 15% of total site area, <u>save in developments where increased building heights and densities are proposed and application of the maximum rate is inappropriate.</u> 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 be considered to fulfill or partially fulfill the 15% requirement; for example narrow tracts of open space, which are difficult to manage, will not be acceptable. • Public open space on Institutional Lands should be provided at a minimum rate of 25% of total site area for residential development as per Policy Objective H23. • In addition to Public Open Space, provided by the Developer, communal open space must also be provided for apartments, and in some instances for houses, in accordance with the minimum standards set out in ‘Sustainable Urban Housing, Design Standards for New Apartments’ Section 28 Guidelines, (2018).
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	<p>Communal open space is for the exclusive use of the residents of the development and should be accessible, secure, and usable outdoor space which is inclusive and suitable for use by those with young children and for less mobile older persons.</p> <ul style="list-style-type: none"> All residential schemes must provide a minimum provision of public open space which has regard to the content of the Section 28 Guidelines 'Sustainable Residential Development in Urban Areas' (2009). The design and layout of the network of public open spaces should take into account, and make provision for, the need for level areas of sufficient size to accommodate informal sports activities for children. Narrow tracts of open space, which are difficult to manage, should not be acceptable. The Council shall require that areas dedicated for public open space in a planning application are transferred to the ownership of the Council where the development is taken in charge by the Council.
Maximum Site Coverage	<ul style="list-style-type: none"> Site Coverage is determined by dividing the total area of ground covered by buildings, by the total ground area within the site (i.e. footprint of development/Area of site). A maximum of 85%, or up to the existing site coverage (brownfield sites) will be allowed for urban areas, and 65% site coverage other areas in rural areas (one-off housing).
Maximum Plot Ratio	<ul style="list-style-type: none"> The plot ratio expresses the relationship between the total gross floor area of the building with the gross area of site (i.e. gross floor area/ gross site area) Generally, plot ratios of up to 2.5 2.0 are accepted in urban areas, however the Planning Authority will permit higher plot ratios to support more compact forms of development, where exceptional standards of design are achieved, <u>where compliance with S28 Ministerial Guidelines is demonstrated, and where appropriate within the context of the surrounds, and also in respect of strategic sites and general strategic planning.</u> A maximum plot ratio of 1.0 will apply for all other areas.
Minimum Separation Distance	<ul style="list-style-type: none"> Between directly opposing above ground floor windows (first floor), a separation distance of 22 meters should generally be observed for new, reciprocal overlooking housing, although this will also be informed by considerations such as typography, design, and housing type and mix. <u>A reduction in this 22 meter separation distance may be considered appropriate where there is an innovative design approach to house and site layout design.</u> Innovative dwelling types, such as houses which have their main sleeping and living areas on one side, and circulation and bathrooms on the other, may allow for a reduction in this standard. Any window proposed at ground floor level should not be less than 1m from the boundary it faces.

OPR Observation No. 1: Rural regeneration

Having regard to NPO 18 and NPO 16, the planning authority is requested to provide for a more proactive strategy for the regeneration of its rural settlements (Class 4(b), 4(c) and Class 5 inclusive). Consideration should be given to the inclusion of objectives to support and facilitate rural regeneration such as identifying areas (such as serviced sites) that will be promoted as attractive alternative to one-off housing in the open countryside; and utilising available statutory powers such as vacant, derelict site(s) and compulsory purchase powers. The inclusion of clear targets and provisions for monitoring and reviews of the strategy should also be considered.

CE Response and Recommendation

The content of observation No. 1 are noted and where possible regeneration/serviced sites have been identified across the range of settlements which will function as an alternative to one-off housing in the open countryside. These are fully detailed in new Appendix 21 and the CE response and recommendation relating to submission WFD-C2-311 (Southern Regional Assembly) should be noted.

OPR Recommendation No. 7: Rural housing strategy

The planning authority is required to revisit, in an evidence-based approach, the inclusion of the area to the south of Carrick-On-Suir within the designated 'other rural areas' as defined in Figure 2.2, 'Rural Housing Strategy' in the draft Plan to ensure consistency with national and regional objectives to regenerate and reverse the decline of small towns and villages (NPOs 6, 16, 18a and 18b).

CE Response and Recommendation

The content of the recommendation is noted as are the rural area designations of adjacent counties. The methodology to identify areas under urban influence has been revised to include a review of the following data:

- Census 2016 (POWCAR) data on commuting patterns;
- The Housing Strategy projections;
- Natura 2000 Sites;
- Topography/land cover, landownership and public road network; and,
- Census 2016 socio-economic and demographic data (Appendix 18).

The review has identified that the entire county of Waterford should be considered under strong urban influence. As such figure 2.2 and policy objective H28 are no longer required. The following amendment to the text of section 2.10 of the draft Plan is recommended:

~~To facilitate robust and clear planning decisions, and to provide a rational distinction between areas under urban influence i.e. within commuter catchments^[1] of cities and large towns, and other rural areas outside commuter catchments, figure 2.2 below identifies the extent of the commuter catchment reflecting policy objectives NPO 19 and RPO 27 of the NPF and SRSES respectively. reflecting policy objectives NPO 19 and RPO 27 of the NPF and SRSES respectively , an assessment of the following data has been undertaken:~~

- Census 2016 (POWCAR) data on commuting patterns;
- The Housing Strategy projections;
- Natura 2000 Sites;
- Topography/land cover, landownership and public road network; and,
- Census 2016 socio-economic and demographic data (Appendix 18).

~~This assessment has resulted in the identification of all county Waterford as being under urban influence and as such The NPF and the SRSES, through NPO 19 and RSO 27, require a clear distinction to be made between areas under urban influence^[2], i.e. those within the commuter catchment of cities and large towns and centres of employment, and 'elsewhere', and that the provision of single housing in the open~~

^[1] The standardised EU/OECD definition of a city region is where 15% of the workforce is employed in the principle city area. Where this is mapped it defines the city region commuting catchment or functional area.

^[2] The standardised EU/OECD definition of a city region is the commuter catchment from which at least 15% of the relevant city area workforce is drawn. This will vary from Census to Census, but has been expanding in recent years (Source: Appendix 4 'Reference' NPF Project Ireland 2040).

countryside should be based on considerations of economic, social or local housing need to live in a rural area, and siting and design criteria for rural housing in statutory guidelines and plans. Policy objectives in this regard are set out in section 7.11.2

Circular Letter PL2/2017, issued by the Department of Housing, Planning, Community and Local Government in May 2017, advised local authorities that the Sustainable Rural Housing Guidelines are currently being revised to ensure the rural housing policies and objectives contained in local authority Development Plans comply with Article 43 of the EU Treaty on the freedom of movement of citizens. It is worth noting that Development Plan rural housing policies may require future amendment by way of a variation of the Development Plan, on publication of the updated Sustainable Rural Housing Guidelines. ~~Having regard to the above national and regional policy, a rural typology has been undertaken for Waterford, which is consistent with national and regional policy. As required, this typology is premised largely on two area types: **Rural Areas under Urban Influence**^[3], and **Other Rural Areas**^[4]. The Rural Typology Map for Waterford (Figure 2.2) highlights the extent of lands which are encompassed within these defined areas, for the purposes of informing rural housing policy over the plan period. The map demonstrates the extent of daily commuting within Waterford, and between Waterford and adjacent counties, with a significant attraction to Cork City from the west of Waterford County.~~

2.10.1 Rural Area under Strong Urban Influence: The key Development Plan objectives in this area are, on the one hand, to facilitate the housing requirements of the local rural community, subject to satisfying site suitability and technical considerations, whilst on the other hand directing urban generated development to areas zoned and designated for housing in the adjoining villages and rural settlement nodes. We will manage sustainable growth in 'Rural Areas under Urban Influence', and facilitate the provision of single houses in the countryside based on the core considerations of economic, social or local need to live in a rural area, siting and design criteria for rural housing, and compliance with statutory guidelines and plans, having regard to the viability of smaller towns and rural settlements in a manner consistent with NPO 19 of the NPF.

~~**2.10.2 Other Rural Areas:** Areas classified as other rural areas comprise those areas not identified as under urban influence. In these areas NPO 19 of the NPF states that the provision of single housing in the open countryside may be facilitated subject to siting and design criteria as contained in statutory guidelines and plans, while having regard to the viability of smaller towns and rural settlements and normal planning and environmental conditions.~~

Further revitalisation of these areas will be achieved by implementing other Development Plan policy objectives which will enhance development opportunities by stimulating the regeneration e.g. through the promotion and support of economic development initiatives like agri-tourism, cottage type industries and local enterprise, as referred in Chapter 4. Our primary objective and aim will be to ensure real and long-term community consolidation and growth of our smaller towns, rural settlements and settlement nodes. Therefore, in both areas under Strong Urban Influence and Other Rural Areas, we will have regard to the viability of our smaller towns and rural settlement nodes in the implementation of rural housing policy.

It is recommended that the following amendments be made to section 7.11.2 of the draft Plan:

7.11.2 Housing in the Open Countryside

^[3] 'Rural Area under Strong Urban Influence': These areas will exhibit characteristics such as proximity to the immediate environs or close commuting catchment of large cities and towns, rapidly rising population, evidence of considerable pressure for development of housing due to proximity to such urban areas, or to major transport corridors with ready access to the urban area, and pressures on infrastructure such as the local road network.

^[4] 'Other rural areas': These areas will exhibit characteristics such as persistent and significant population decline as well as a weaker economic structure based on indices of income, employment and economic growth.

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

It is recognised that there is a continuing need for housing provision for some people to live and work in the open countryside. However, it is important to differentiate between rural areas located within the commuter catchment of our larger settlements (areas under urban influence) and those rural areas located outside of those catchments. Also, the NPF and the SRSES require that a clear distinction be made between areas under urban influence (i.e. those within the commuter catchment of cities and large towns and centres of employment) and other rural areas. Having regard to national and regional policy, a rural typology has been undertaken for Waterford (set out in Part 1 Chapter 2 Core Strategy) which is consistent with national and regional policy. This typology is premised largely on a single category: ~~two categories as follows:~~

Rural Area under Strong Urban Influence

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

The Council will manage sustainable growth in designated ‘Rural Areas Under Strong Urban Influence’ and facilitate the provision of single houses in the countryside based on the core consideration of demonstrable economic, social or local need to live in a rural area, siting and design criteria for rural housing and compliance with statutory guidelines^[5] and plans, having regard to the viability of smaller towns and rural settlements.

Other Rural Areas

~~In rural areas outside of significant urban influence the National Planning Framework states that the provision of single housing in the open countryside may be facilitated subject to siting and design criteria as contained in statutory guidelines and plans while having regard to the viability of smaller towns and rural settlements and normal planning and environmental conditions.~~

Having regard to relevant national and regional planning policy in this area, consideration of planning applications for development of individual rural housing in the open countryside will have regard to both the housing needs of the local population and the need to protect the amenities of our rural areas for future generations.

New Homes in the Open Countryside Policy Objectives	
H27	We will facilitate the provision of single housing in the countryside, in rural areas under urban influence, based on the core consideration of demonstrable economic, social or local need to live in a rural area, as well as general siting and design criteria ^[6] as set out in this plan and in relevant statutory planning guidelines, having regard to the viability of smaller towns and rural settlements.
H28	We will facilitate the provision of single housing in the countryside, in rural areas outside of significant urban influence, based on general siting and design criteria for rural housing as set out in this plan and in relevant statutory guidelines, having regard to the viability of smaller towns and rural settlements.

^[5] We will have due regard to any future revision of the Sustainable Rural Housing Guidelines for Planning Authorities including inter alia definitions relating to genuine housing need and vary the Development Plan as necessary.

^[6] Applicants for development should ensure proposals are consistent with design principles identified in rural housing design guidelines applicable across many local authorities such as the Cork Rural Design Guide 2003.

OPR Observation No. 2: Rural housing strategy map

The planning authority is requested to revisit its map in Figure 2.2 'Areas under Urban Influence' to accurately identify areas designated as 'under urban influence' and 'other rural areas'. This is necessary to avoid public confusion and to provide a robust framework for the interpretation and implementation of rural housing policy and monitoring of the core strategy.

CE Response and Recommendation

The content of the observation is noted as are the rural area designations of adjacent counties. The response to recommendation 7 above refers to this point.

OPR Recommendation No. 8: Traveller accommodation

Having regard to the requirements of section 10(2)(j) of the *Planning and Development Act 2000* (as amended), the planning authority is required to include objectives in the plan for the provision of accommodation for Travellers, and the use of particular areas for that purpose in accordance with the legislative requirements under section 10(2)(i) of the Act. This will include the identification of specific locations in the land use zoning maps for the county.

CE Response and Recommendation

The content of recommendation 8 is noted. In response it is considered that the provisions of policy objective H16 address the provision of traveller accommodation however it is recommended that the following specific development objectives relating to traveller accommodation be included in Appendix 2 for settlements where relevant. The locations will be mapped accordingly.

The following Specific Development Objectives are proposed for inclusion in Appendix 2:

[Waterford City: It is an objective to provide for traveller accommodation on lands at Bilberry, Williamstown, the Green Road, Carrickphierish and Kilbarry.](#)

[Dungarvan: It is an objective to provide for traveller accommodation on lands at Shandon.](#)

OPR Observation No.3: Quarries map

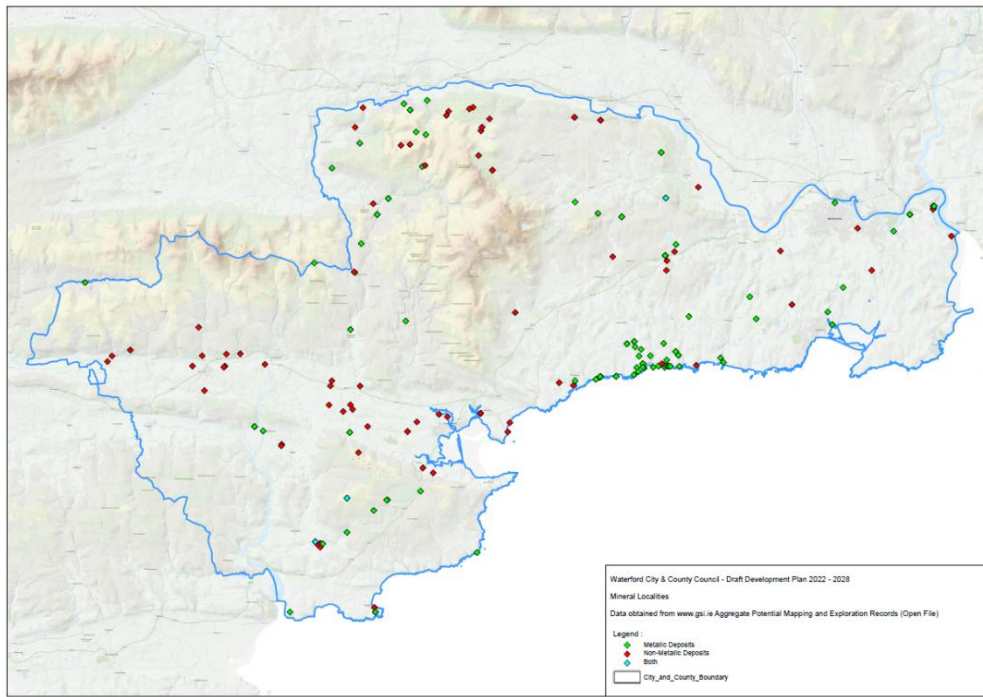
Having regard to the provisions of Quarries and Ancillary Activities, Guidelines for Planning Authorities (2004) and to the important role that extraction activities play in the rural economy, the planning authority is advised to prioritise the identification of major mineral deposits in the development plan, including through mapping as appropriate.

CE Response and Recommendation

The content of the observation are noted and it is recommended that the following text be included as paragraph 5 in section 4.7 of the draft Plan:

[The Council recognises that with appropriate care in initial site selection, process design and environmental monitoring, mineral extraction can be compatible with a wide range of appropriate adjacent land uses and habitats. Figure 4.1 identifies the location of significant aggregates across Waterford derived from the Geological Survey of Ireland aggregate potential mapping and exploration records. All new applications for quarries will be assessed having regard to DoEHLG Guidelines such as the "Quarries and Ancillary Activities, 2004" and Development Management DM 34, Volume 2 of the draft Plan.](#)

[Table 4.1 Aggregate Potential Map](#)



OPR Observation No. 4: Tourism

Having regard to the requirement under RSES RPO11 (f) to seek the sustainable development of tourism facilities that enhance diverse tourism roles for Key Towns the planning authority is advised to revise objective ECON 21 to incorporate the tourism role for the Key Town of Dungarvan.

CE Response and Recommendation

The content of the observation are noted. Taken in tandem with the submission by the Southern Regional Assembly (ref. no. WFD-C2-311) a new section of text is proposed to be added to the draft Plan which is set out in section xx of this report in response to the SRA. An amended text to policy ECON 21 is set out hereunder as follows:

ECON 21 Tourism

We will cooperate with various stakeholders and tourism agencies to build on the strengths of the Waterford City as the regional capital, Dungarvan as a Key Town and County Waterford in their promotion as a tourism destination of choice. To this end, we will facilitate and encourage:

- Sustainable tourism 'products' and activities/ attractors in appropriate locations which are based on and reflect the city and county's distinctive history, natural and/ or cultural heritage, agri-food, marine and horticultural sector, and outdoor pursuits and recreation; and,
- Ancillary tourism services and accommodation which will assist in providing a range of accommodation options across Waterford, in terms of type/ experience, choice, location and quality.

OPR Recommendation No. 9: Joint retail strategy

Having regard to the provisions of the Section 28 Ministerial Guidelines for Planning Authorities Retail Planning (2012), and in particular paragraph 3.5 'Joint or Multi-Authority Retail Strategies', and the Southern Regional Assembly 'Regional Spatial Economic Strategy', 2040, Waterford MASP Policy Objective 19 (a), the planning authority is required to review the W City Retail 08 of the retail policies under section 3.6.9 of the draft Plan to include additional policy objectives in the draft Plan to address deliverable timelines and mechanisms, including co-ordination with Kilkenny County Council, and to ensure that the Joint or Multi-Authority Retail Strategy for the Waterford Metropolitan Area will be undertaken with adjoining relevant authorities.

CE Response and Recommendation

The content of recommendation 9 is noted and changes required to the draft Plan are set out hereunder.

W City Retail 08 Joint Retail Strategy

Within one year of adoption of the Waterford City and County Development Plan we will prepare ~~carry out~~ a Joint Retail Strategy for the Waterford Metropolitan Area ~~Strategic Plan (MASP) area~~ in conjunction with Kilkenny County Council/~~adjoining relevant local authorities~~ and the Southern Regional Assembly, in accordance with the Retail Guidelines (2012) and Waterford MASP policy Objective 19, and we will vary the Development Plan as necessary following completion of the Joint Retail Strategy.

OPR Observation No. 5: Retail

Having regard to the need to prioritise retail provision within the town core and to adopt a sequential approach to development as set out in the Retail Planning Guidelines 2012, the planning authority is requested to:

- (i) strengthen the policy in respect to comparison floor space. Table 4.1 to be revised to clearly set out the limitations on comparison floor space in those settlements below tier 1; and
- (ii) identify core retail areas in accordance in Waterford city, Dungarvan and Tramore.

CE Response and Recommendation

The content of the submission is noted and it is considered appropriate that changes are made to Table 4.1, policy objective Retail 02 and the core shopping area mapping in the draft Plan and Appendix 4 Retail Strategy. It should be highlighted that the core shopping areas for Waterford City and Dungarvan are identified in figures 3.4 and 4.2 respectively in the draft Plan. The Core shopping area for Tramore is described heretofore as lying along the Main Street/Strand Street axis. This area is now proposed to be identified by way of a new map as set out hereunder.

Table 4.1 Appropriate Level of Retail Development			
Tier	Settlement Class & Type	Settlement	Appropriate Level of Retail Development
1	Regional City	<u>Waterford City Centre</u>	Major retail destination within the Region, offering a wide variety of convenience and comparison goods along with an extensive offer of retail, financial and business, leisure services including arts and cultural facilities. Provides a range independent and specialist shops.
2 Level 1	<u>Sub Regional</u> 2Key Town	<u>Dungarvan Town Centre/Ballinroad Clonmel Environs/ City Neighbourhoods</u>	Key shopping destination offering a variety of convenience and comparison goods, along with a range of retail and leisure services and some financial and business services
2 Level 2	<u>Sub Regional</u> <u>District/Suburban Centres</u>	<u>Tramore Town Centre, Ardkeen/ Farronshoneen, Waterford Shopping Ctr Lisduggan, Tramore Road/ Inner Relief Road, Ferrybank Centre</u>	Key shopping destination offering a variety of convenience and comparison goods, along with a range of retail and leisure services and some financial and business services
3 (A)(B)	Urban Towns (>1500 Pop) Large	Tramore Dunmore East Lismore Portlaoise	Local shopping destination serving the surrounding hinterland with a limited offer of convenience and comparison goods, and retail and leisure services.
4 (A& B)	Rural Towns (<1500 Pop) Large	Ardmore Cappoquin	

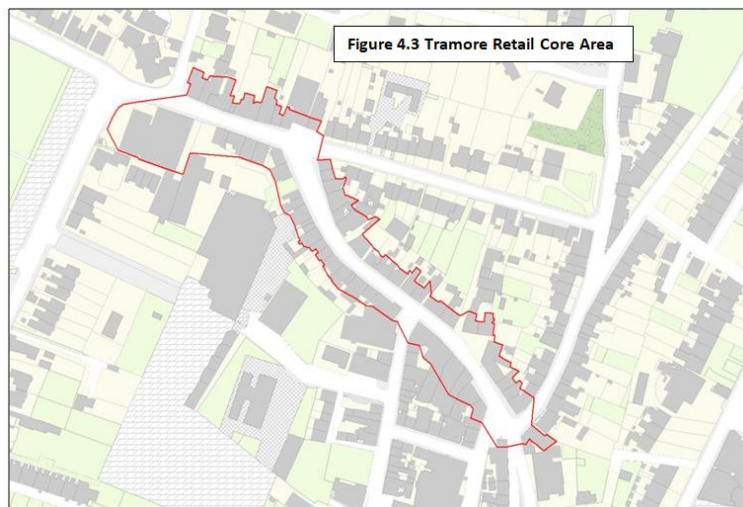
		Gaeltacht na nDéise inc Sean Phobal Kilmacthomas Passage East/ Crooke Stradbally Tallow	
4C	Rural Villages (<400 Pop)	Various	Limited retail offer generally comprising a local convenience store, public house, fuel filling station and post office.
5	Rural Nodes	Various	

Retail 02 Retail Hierarchy and Urban Centres

To promote retail provision in the following location:

- Dungarvan and Tramore Town Centres,
- Urban Towns,
- Rural Settlements; and,
- Rural Nodes

The type of retail development should be of an adequate level, type, size, scale and the nature of the floorspace proposed should be appropriate to that centre having regard to the retail hierarchy, the appropriate level of development at each tier of the settlement hierarchy (as set out in Table 4.2) and in the context of the guidance set out in the Retail Planning Guidelines (2012) or any update thereof. Due regard should also be had to the policies, action and vision and the assessment criteria for future retail development as set out in Chapters 7 and 8 respectively of the Retail Strategy (Appendix 4 of the Development Plan).



OPR Recommendation No. 10: Sustainable transport

In order to ensure the effective planning, implementation and monitoring of the development plan requirements under section 10(2)(n) of the Planning and Development Act 2000 (as amended), the planning authority is required, in consultation with the NTA (and TII and DTTaS), as appropriate, to include:

- (i) appropriate existing baseline figures for modal share. It is recommended that this could best be provided at individual settlement level for all settlement Classes 1 – 4A (inclusive) identified in the Core Strategy (with the exception of Clonmel Environs);
- (ii) realistic targets for modal change against the baseline figures provided under (i), above, to form a basis for an effective monitoring regime for the implementation of the planning authority’s sustainable transport strategy and its climate change strategy; and
- (iii) commitment to prepare a Local Transport Plan for Dungarvan within 1 year of the adoption of the draft Plan.

CE Response and Recommendation

The content of the submission is noted. Some of the baseline information requested is included in the draft Plan however this can be realigned with recommendation 10 along with realistic targets for sustainable transport modes over the lifetime of the Plan. It should be noted that amendments to transport policies to support the timely delivery of Local Transport Plans has been detailed in response to WFD-C2-355. It is recommended that the changes set out hereunder be provided for by way of an amendment to the draft Plan.

5.4 Achieving Modal Change

The Council will support and encourage sustainable and compact forms of development, which, if realised will facilitate a more balanced pattern of movement across the city and county and result in a modal shift to more sustainable modes of transport and a low carbon transport system.

The term mode share is a way to describe the proportion of people who travel by the various available modes i.e. forms of transport. Travel demand is derived from the need for people to access employment, schools, goods and services, as well as social and leisure trips. How this demand is met and the choice of travel mode is a function of the availability and quality of both the transport infrastructure (by all modes) and the service provision.

Information derived from POWSCAR data (provided by the NTA via Modal Share database) can be used to assess the existing baseline for both the Development Plan and in future Local Area Plan assessments. POWSCAR data provides the mode share for all settlements (including at small area level) for all modes of transport.

It is important to identify current mode share in order to plan for the future. Table 5.0 sets out how we as a County travel to work and school and compares that to the State and Southern Region's average.

The data identifies that we as a County have a high dependency on the private car as a mode of choice across all of our settlements. The Council is committed to working with key stakeholders such as the NTA, TII, Rural Link and local communities in providing a real alternative to the private car. For the majority of internal trips within a given settlement and for inter settlement trips within the County the Council will support and enhance the choice for walking, cycling and public transport through the implementation of objectives and key infrastructural requirements, that give priority to these sustainable mode, which are set out in WMATS, LTPs, County Transport Plan and ABTAs.

The Council hopes that the above interventions will allow the population of Waterford City and County to choice to walk, cycle and use public transport more frequently in their commutes to school and/or work, or to shop and socialise. Therefore the Council is committed to increase cycling mode to 10%²⁴ in line with The National Cycle Policy Framework and to increase public transport share to 20%.

Modal Share	Green Modes	Public Transport	Private Modes
	2016	2016	2016
State	16.6	12.9	62.4
Southern Region	13.5	7.8	70.0
Waterford City	20.9	4.5	67.0
Waterford County	14.6	6.4	70.5
Waterford MASP	18.4	4.6	69.5
Dungarvan	22.2	1.5	69.1
Tramore	16.1	4.9	73.3

Dunmore East	7.4	10.7	74.4
Portlaoigh	19.2	12.6	62.8
Lismore	28.3	1.2	61

Waterford City and County Council in conjunction with the NTA have performed analysis on mode share data for large urban settlements within the County as identified through the NTA’s Methodology for Analysis of Modal share in Settlements. The study outlined how mode share data which is linked to trip length distribution data for individual settlements can be used to inform the development of mode share potential and ambitions at settlement level for travel to work trips. Table 5.0 sets out the mode share potential for urban settlements within the County if everyone in that settlement was to choose an appropriate mode for the length of each trip taken. Table 5.1 sets out the Councils realistic growth ambition for each mode in each settlement up to 2028.

Trip Length Distribution

There is a general association between trip length and mode choice as there are distances which the average person may be willing to walk or cycle to access goods, services or employment, and there are distances at which these modes are less attractive options than alternative modes. Short distance trips by public transport may be unattractive compared to alternative modes as the wait time could be a significant proportion of overall journey time. In terms of distance, trips generally break down into: ‘ Short – generally serviceable by walking or cycling ’ Medium – generally serviceable by cycling, public transport or car; and ‘ Long – generally serviceable by public transport or car. The generic relationship between trip length and mode is presented visually in the Figure below.

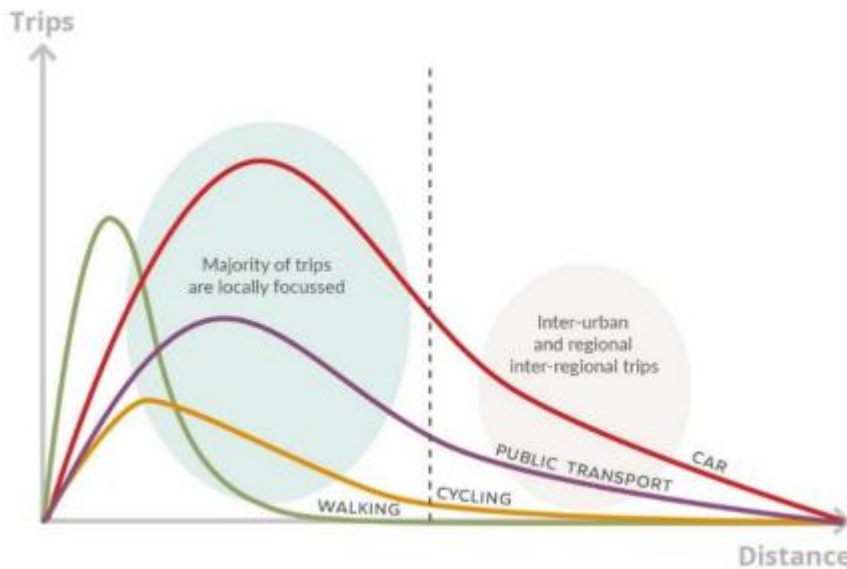


Figure: Relationship between trip length and mode (Source, NTA, 2021)

		CSO - Pop 2016 Data				CSO - Pop 2016 Data					POWSCAR - Dataset 2016				
						Mode Share					Trip Length Distribution				
						Current Modal Metric					Maximum Potential				
						Walk	Cycle	PT	Car	Other	Walk	Cycle	Cycle	Public Transport (PT)	PT & Car
Category	Settlement	Population	Employment	Pop/Emp Ratio	Walk	Cycle	PT	Car	Other	Emp 0-1.5km	Emp 1.5-3km	Emp 3-5km	Emp 5-10km	Emp 10+km	
C1-1	Waterford	53,653	23,904	0.44	13%	2%	3%	70%	13%	24%	28%	20%	11%	17%	
C2 - 5	Tramore	10235	1453	0.14	6%	1%	3%	78%	12%	18%	4%	2%	28%	47%	
C3 - 3	Dungarvan	9778	4240	0.43	15%	2%	1%	67%	14%	32%	17%	8%	5%	38%	
C4 - 4	Lismore	1581	453	0.29	11%	1%	1%	66%	22%	18%	11%	1%	8%	62%	
C4 - 5	Ballinroad	1266	37	0.03	1%	1%	1%	84%	13%	4%	7%	22%	17%	50%	
C4 - 5	Portlaoise	1999	209	0.10	5%	1%	1%	78%	15%	7%	1%	2%	13%	76%	
C4 - 5	Dunmore East	1749	198	0.11	6%	1%	2%	74%	17%	13%	3%	1%	6%	78%	

²(Source, NTA)

The Method

- Settlements were grouped according to size. There are four categories ranging from less than 5,000 to 20,000+.
- The second level of refinement was dividing the settlements according to their population to employment ratios. The reason this was applied was to reflect the varying levels of opportunity for work trips within the settlements. For example, where there is a very low employment base i.e. Tramore, the opportunity to walk or cycle to work is vastly reduced. In these settlements it would be expected that there would be a higher reliance on the private car, but similarly it may also indicate that there is an opportunity to provide inter-settlement public transport options. One way of increasing sustainable travel mode share is locating more employment in areas with a low employment base.
- Another layer of information was added which contains the trip length distribution for each settlement. This shows how many work trips are less than 1.5km, between 1.5 - 3km, 3 - 5km, 5 – 10k, and 10km +. Combined with the mode share data, this indicates the amount of trips currently made by each mode, while understanding the amount of trips which fall within each distance band. This can be used to show the opportunity or potential that may exist to increase the walking and cycling mode share. For example, where it is shown that there is a high percentage of trips made by car that are less than 1.5km, yet the walking mode share is low, this illustrates that there is the opportunity to convert these car trips to walking for example in Waterford City and Dungarvan. Where a significant portion are under 3km or 5km the opportunity to cycle is available.

Mode Share Ambitions

The data illustrates the opportunities that exist within each settlement in the County for use of active modes. The 'Potential' figures in Table 5.0 sets out the theoretical maximum potential for modal share in the large urban settlements in the County up to 2028 based in CSO 2016 figures. Table 5.1 provides what the Council considers to be a realistic growth ambition for each mode over the life of the Development Plan. These reduced figures give allowances for persons that cannot cycle, walk or access public transport due to a variety of reasons. It is considered that 80% achievement of the theoretical maximum potential that is set out in Table 5.0 is considered appropriate.

² In the analysis undertaken by the NTA as part of the 'NTA Mode Share Assumptions 2021' the Car was considered in all bands of the POWSCAR dataset. However in settlements where it is shown that there is a high percentage of trips made by car that are less than 1.5km, yet the walking mode share is low, this illustrates that there is the opportunity to convert these car trips to walking. Where a significant portion are under 3km or 5km the opportunity to cycle is available.

Table 5.1 Waterford Ambition Percentage Growth Per Mode for Active and Sustainable Transport to 2028 ³ Based on 80% Achievement of Potential						
Settlement	Walking		Cycle (1.5 – 5km)		Public Transport	
	WCCC Ambition	Relative % Growth from 2016 to 2028 Ambition	WCCC Ambition	Relative % Growth from 2016 to 2028 Ambition	WCCC Ambition	Relative % Growth from 2016 to 2028 Ambition
Waterford City	19%	47%	38%	1920%	9%	335%
Tramore	15%	146%	5%	535%	22%	712%
Dungarvan	25%	66%	20%	814%	4%	525%
Lismore	15%	34%	10%	948%	6%	1185%
Ballinroad	3%	159%	24%	1769%	13%	1588%
Portlaw	6%	16%	3%	435%	11%	718%
Dunmore East	11%	77%	2%	352%	4%	190%

The inclusion of mode share ambitions within the Development Plans illustrates a clear commitment by the Council to work towards achieving modal shift and promoting sustainable forms of transport. It must be noted that the NTA through the Active Travel grants, the development of Cycle Network Plans and the continuing programme of improvement in public transport for example through the Connecting Ireland programme, will work with the Council to assist with funding and delivering projects which will help to meet these objectives.

The Council in conjunction with the NTA is developing WMATS for Waterford City and will undertake Local Transport Plans for all the Local Area Plan locations which will provide a more granular level of how the above mode share ambitions will be achieved. During this process the above data may be amended due to more up to date data being available.

In order to achieve the ambitions in providing an alternative choice to the private car financial commitments from Government with regards to funding vital infrastructure/ public transport services are required. A behavioural change is also necessary from individuals with regards to how we decide what mode we choose to move in/ around and between our settlements.

To align this new section with the draft plan the following amendment is recommended to bullet point 4 in Tans 01 on page 112:

"Support the development of a low carbon transport system by continuing to promote modal shift (as per targets modal ambitions and potential as set out in Table 5.0 and Table 5.1) from private car use towards increased use of more sustainable forms of transport such as cycling, walking and public transport. "

OPR Observation No. 6: Climate action

In accordance with section 10(2)(n) of the Planning and Development Act 2000 (as amended), and having regard to and the importance attributed to climate action by Government policy, as evidenced by, inter alia, the recent Climate Action and Low Carbon Development Act 2021, the Climate Action Plan 2019 and the Development Plans, Guidelines for Planning Authorities, Consultation Draft (August 2021), the planning authority is requested to include an objective to consider a variation of the development plan within a reasonable period of time, or to include such other mechanism, as may be appropriate, to ensure that the development plan will be consistent with the local authority climate action plan, and the approach to climate action recommended in the forthcoming Development Plans Guidelines as adopted or any other relevant guidelines.

³ WCCC Ambition in Table 5.1 was calculated by multiplying POWSCAR Dataset 2016 in Table 5 by 0.8 which reflects the 80% achievement of the theoretical maximum potential. The relative % growth was calculated by dividing WCCC Ambition by CSO 2016 Mode Share Data in Table 5 - for the purpose of these calculations cycle (1.5 -3km and 3 – 5km were grouped together).

CE Response and Recommendation

The content of the submission is noted and amended text of policy objectives W City 20 and CA 01 is set out hereunder to reflect the details of the submission.

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 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.

CA 01

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. We will vary the Development Plan as necessary following the review/replacement of the strategy.

OPR Recommendation No. 11: Renewable energy and climate change mitigation

In accordance with the provisions of Section 28(1C) of the Planning and Development Act 2000 (as amended), and having regard to the government's commitment in the Climate Action Plan to achieve 70% of electricity from renewable sources by 2030 (adding 12GW of renewable energy capacity nationally), National Policy Objective 55 which promotes renewable energy use and generation to meet national targets, and section 28 guidelines Wind Energy Development Guidelines (2006) and the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change (2017), the planning authority is required to:

- (i) indicate how the development plan will contribute to meeting national renewable energy targets, including specific targets in megawatts for wind energy potential in the county. In the absence of any nationally or regionally determined targets for County Waterford specifically, you are advised to demonstrate appropriate metrics in this regard, which could include Waterford's share of estimates of additional national renewable electricity target as defined by the % of national land area represented by the county, linked back to the cumulative renewable energy production potential of the areas designated for renewables development;
- (ii) provide a policy framework that is consistent with relevant section 28 Guidelines to support the delivery of part (a) above including clear policy objectives and wind capacity and sensitivity mapping. Having regard to the requirements of section 9(4) of the Planning and Development Act 2000 (as amended), the Planning Authority is required to coordinate the objectives for wind energy development in the development plan, with those of the neighbouring counties, to ensure a coordinated Wind Energy Strategy across the region; and
- (iii) review Appendix 8 Landscape and Seascape Character Assessment, Appendix 12 Waterford Regional Airport & Business Park Masterplan in respect to wind farm development proposals and development management section 5.24 and objective DM30 in light of part (i) and (ii) above.

CE Response and Recommendation.

The content of the submission is noted. The changes required to give effect to the recommendation are set out hereunder.

- i. A brief narrative and new renewable energy targets are now identified for inclusion in Section 6.6 the draft Plan.
- ii. Appropriate changes have been made to Appendix 7 and 8 along with Section 5.24 and DM 30 of the draft Plan to give effect to the content of the submission.

The following text to be included by way of amendment to the draft Plan after paragraph 2 in Section 6.6 of the draft Plan:

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 energy⁴ to be developed locally to ensure we play our part in delivering on national renewable energy and carbon emission reduction targets as per the Climate Action Plan 2019 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).

Source	Operational (MW)	Permitted (MW)	Target 2030 (MW)	Note
On shore	62.87	107.87	142.72	
Off shore	0	0	126.35	Note 1
Solar	0	220.7	345.70	
Other, including auto production solar PV, CHP and hydro	4.683	0	76.40	
Total	67.553	328.57	691.18	

Note 1: 2030 Off shore wind energy renewable energy target is based on an attributal population percentage for Waterford against the national 5000 MW 2030 Target for Off shore wind energy

Amendments to policy objective UTL 13 Renewable Energy referring to the renewable energy targets in Table 6.2 are proposed by way of an additional bullet point as follows:

- Supporting the delivery of renewable energy to achieve the targets identified in Table 6.2 of the Development Plan;
- Facilitating and encouraging, where appropriate, proposals for renewable energy generation, transmission and distribution and ancillary support infrastructure facilities 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;
- Promote and encourage the use of renewable energy, including micro-generation/ auto-producers among business, agriculture, education, health and other sectors;

Amendments to Appendix 2 of the Renewable Energy Strategy as set out in Appendix 7 of the Development Plan is proposed as follows:

Appendix 2

The Wind Energy Policy of the Waterford County Development Plan 2011-2017 in place at time of making the Renewable Energy Strategy categorised Waterford County into four areas of suitability for wind farm development:

- Strategic Areas,
- Preferred Areas,

⁴ Based on our proportion of National population as per Census 2016.

- Areas Open to Consideration,
- No Go Areas.

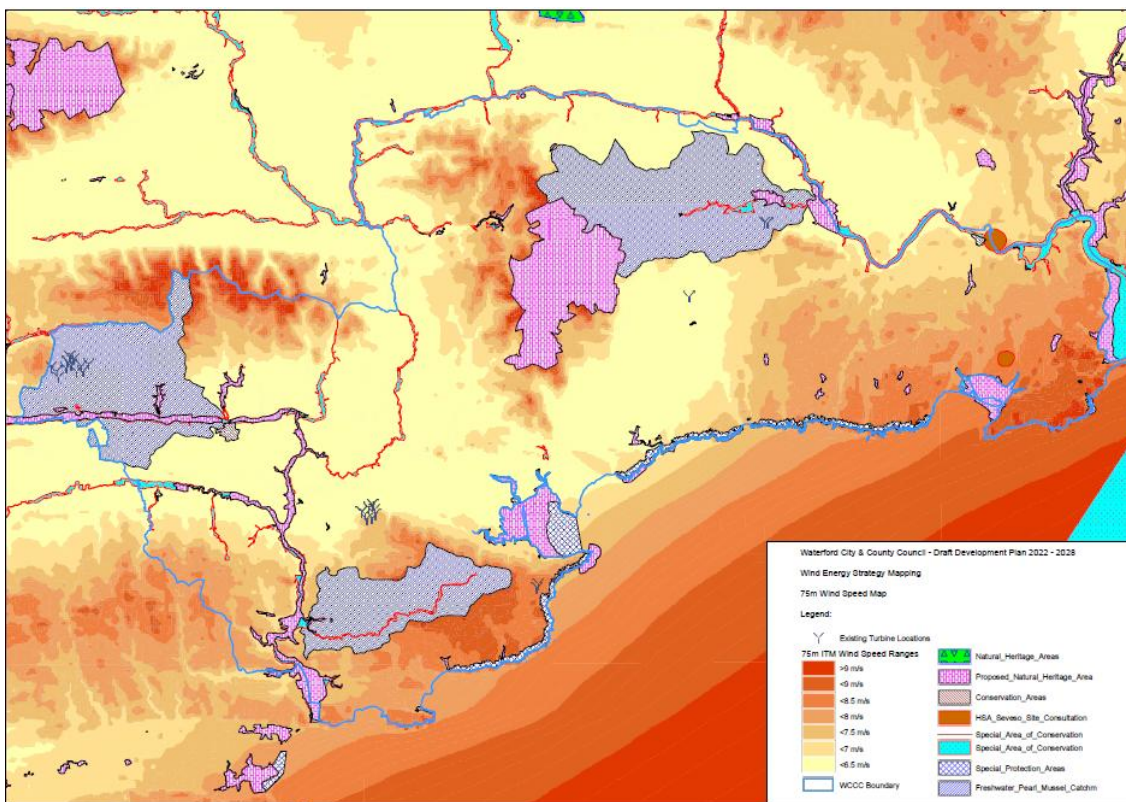
In preparing the new City and County Development Plan 2022 – 2028 these areas have been amended into three classifications as follows and as identified on the revised wind energy designations map:

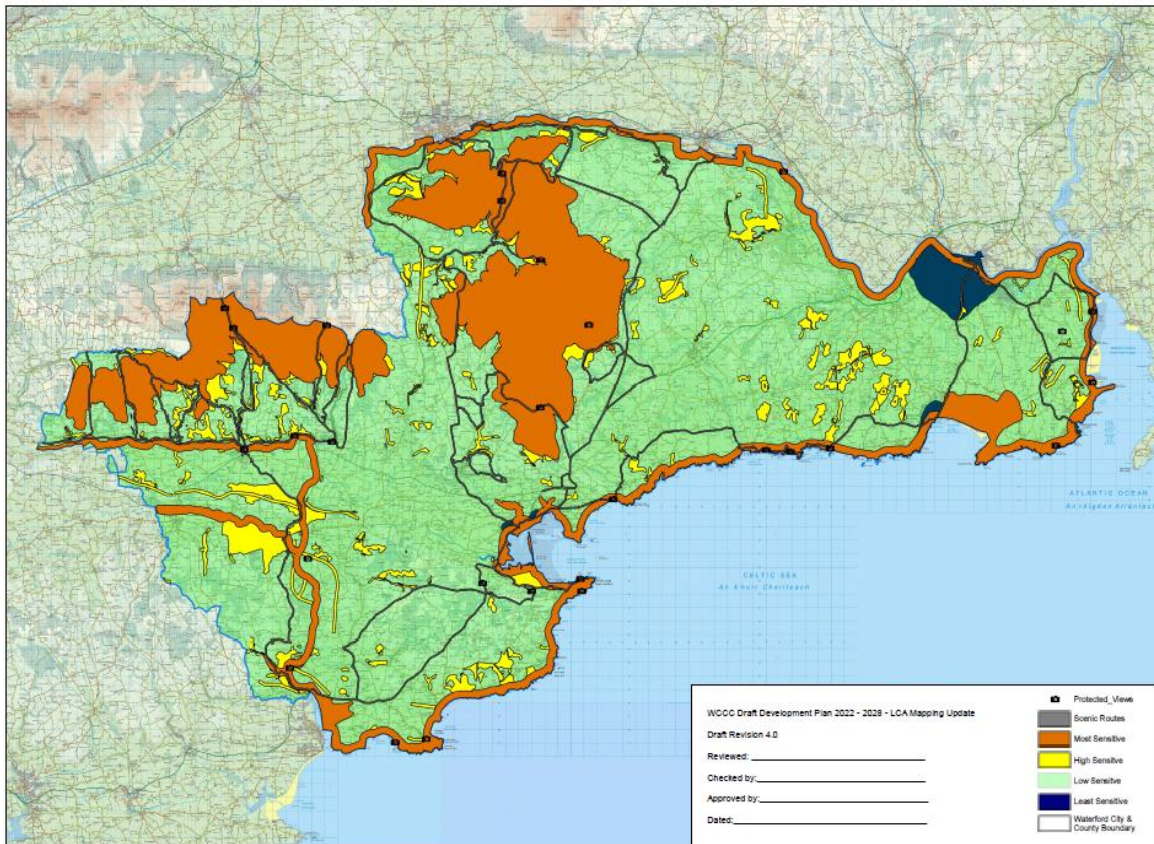
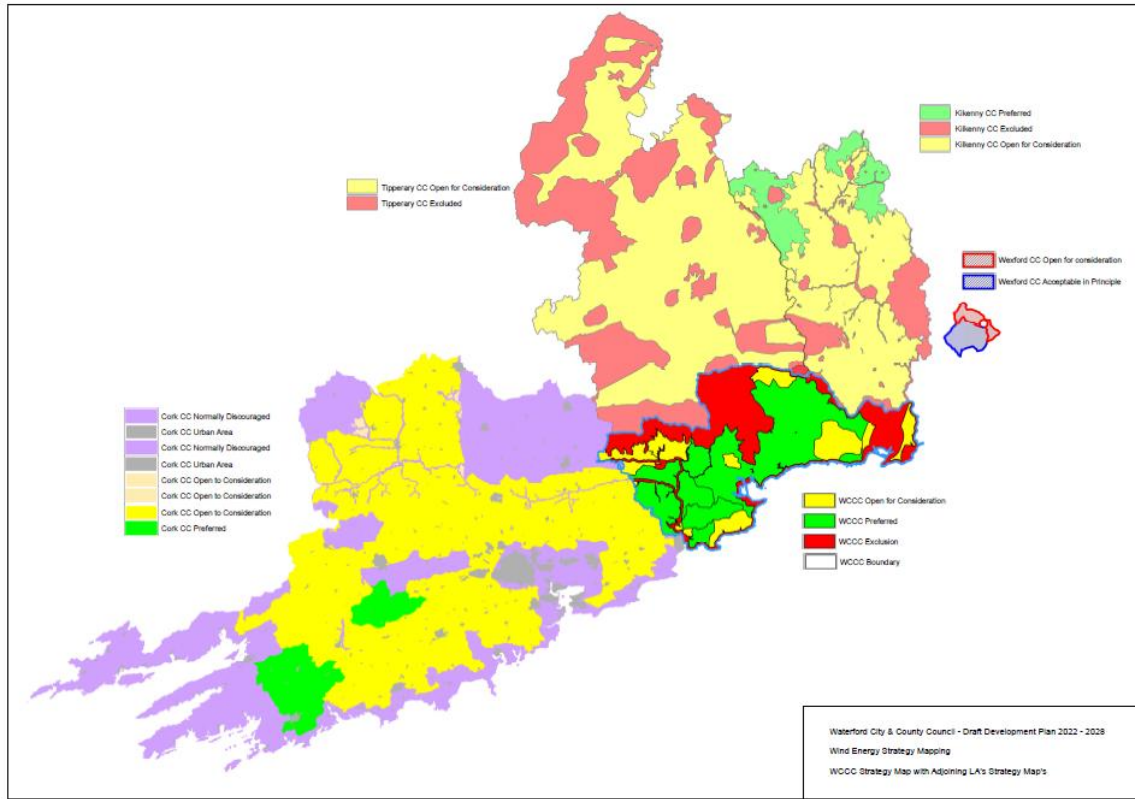
- Preferred Areas,
- Areas Open to Consideration,
- No Go Areas.

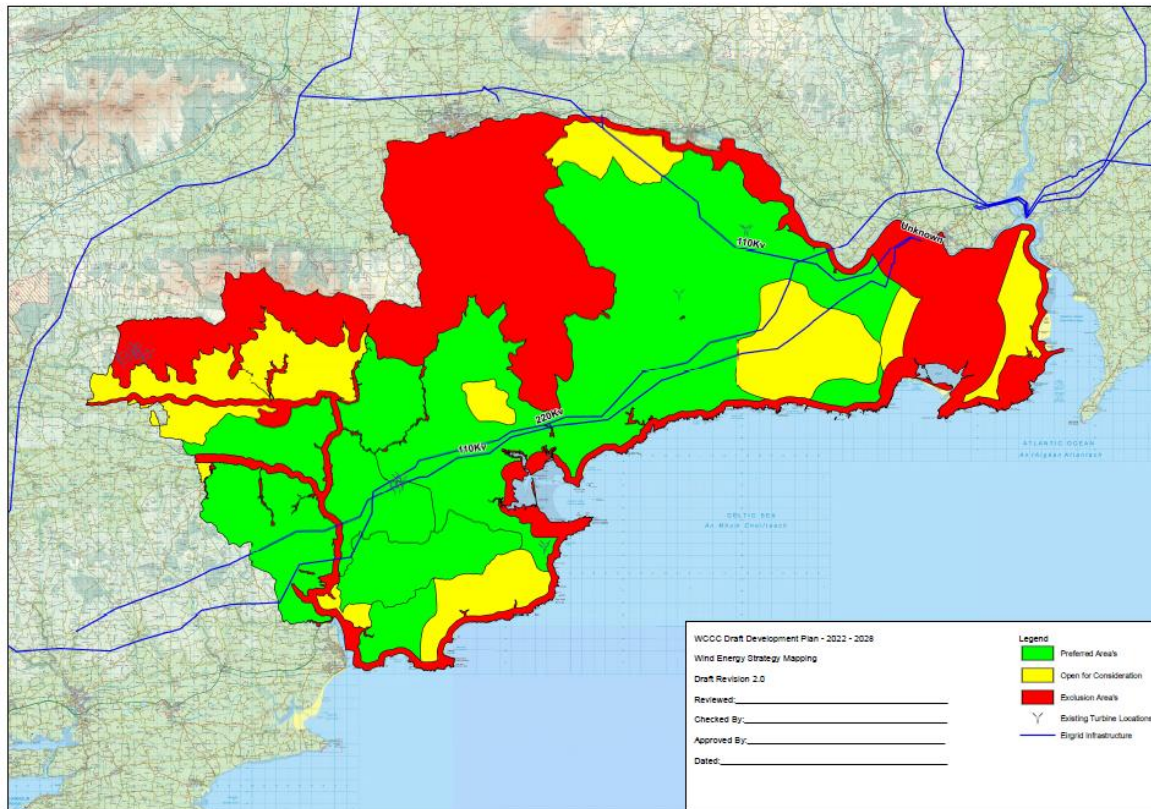
These areas have been identified by way of overlaying the following series of maps and data:

- The Landscape and Seascape Character Assessment (Appendix 8 of the Development Plan);
- Natura 2000 network;
- Urbanised areas;
- Waterford Regional Airport Masterplan (Appendix 12 of the Development Plan);
- Wind energy mapping of adjacent local authorities;
- Major road infrastructure; and,
- Transmission grid.

Maps representing these data sets including an amended LCA map are presented below along with the proposed wind energy map.







~~These classifications have now been superseded by the new Landscape and Seascape Character Assessment which is set out in Appendix 8 of the Waterford City and County Draft Development Plan 2022 – 2028 and the relevant policy objectives of Chapter 6 & 10 of the draft Development Plan.~~

Amendments to Section 5.24 Volume 2 of the draft Plan are recommended as follows:

~~The Council will support renewable energy developments in line with policy objective UTL 13 of the Development. In general, the impacts of wind and solar energy developments will vary depending on the location of the individual site, together with the number of turbines, layout, size, design and colour. All applications for wind farm and wind energy developments should be compatible with the 2006 Wind Energy Development Guidelines issued by the DoEHLG (or any updated revision of same), the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change (2017), and the Waterford Renewable Energy Strategy (Appendix 7 of the Development Plan and in particular the wind energy designation map (Appendix 2)) and the renewable energy targets set out in Table 6.2 of the Development Plan, while regard should also be had to the Waterford Landscape and Seascape Character Assessment (Appendix 8 of the Development Plan).~~

The title for section 5.25 to be amended as follows:

5.25 Micro Renewables/ Auto-producers

NOTE: In preparing the wind energy map it was found that the draft LCA sensitivity map contained deficiencies and discrepancies which required further review and amendment to generate a more user friendly map. This has resulted in amended and refined boundaries between different sensitivity areas and an increase in land area classified as low sensitivity i.e. 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 has been 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 have been corrected.

OPR Recommendation No. 12: Flood risk management

Having regard to the detailed requirements of The Planning System and Flood Risk Management, Guidelines for Planning Authorities (DECLG and DECHLG, 2009), section 28 guidelines the planning authority is required to:

- (i) review undeveloped land identified for development purposes in fully or partially located in Flood Zone A and B for which a Justification Test has not been carried out in Dungarvan, Dunmore East, Gaeltacht Na nDéise, Portlaw, Tramore, Kilbarry and Ballybeg (Waterford City and Suburbs). For land that is deemed to be of moderate or high flood risk and is sequentially preferable and could contribute to compact growth and higher density development, it will be necessary to undertake a Justification Test within the context of the SFRA;
- (ii) amend the objectives in Volume 4 (Book of Maps) of the draft Plan to ensure that all the settlements listed in the SFRA in Section 7.2.8, where a fluvial and/or tidal risk has been identified, have an objective to preserve the flood plain free from development; and
- (iii) include a development objective requiring 40m buffer between the river and development in Clonmel Environs as per Section 7.2.1 of the SFRA.

The Office of Public Works should be consulted in relation to the matters raised in this recommendation.

CE Response and Recommendation

The content of the recommendation is noted and relevant changes have been provided for by way of the following:

- i. A review of the SFRA has been carried out and justification tests have been applied to all relevant lands.
- ii. The draft Plan has included in policy objectives UTL 11 and FM 02 robust statements which seek to retain the natural functions of floodplains and keep them free from development. It is considered that these, in addition to the amended SFRA will address the issues raised in the submission.
- iii. The development objective to maintain the 40m buffer to the River Suir within the Clonmel Environs area is provided for.

The Strategic Flood Risk Assessment has been reassessed having regard to the content of the OPR submission and that of the OPW (WFD-C2-213). The revised and updated SFRA (Appendix 13 of the draft Plan) is attached to this report. It is recommended that the following specific development objective be included by way of amendment to Appendix 2 of the draft plan:

[Clonmel Environs: Maintain a 40 m buffer to the River Suir free from new development in the interest of retaining the natural function of the floodplain and protecting new development from flooding.](#)

OPR Recommendation No. 13: Public rights of way.

Having regard to the requirements of Section 10(2)(o) of the Planning and Development Act 2000 (as amended), the planning authority is required to include written policy together with maps identifying public rights of way.

CE Response and Recommendation

The content of the recommendation is noted. It is recommended that the text of section 10.4 of the draft Plan be amended as set out hereunder, that amendments be made to the text of policy objective BGI 10 to protect public rights of way (also set out hereunder) and that Table 10.0 be removed from Volume 1 and placed in Appendix 11. The recommended amendment to text in Section 10.4 of the draft plan reads:

10.4 Walking Trails and Public Rights of Way

The Planning and Development Acts 2000 (as amended) requires a County Development Plan to preserve public rights of way, which give access to seashore, mountain, lakeshore, riverbank or other place of natural beauty or recreational utility. Waterford has a county wide network of walking trails allowing access to a great range of scenic landscapes. These are set out in Appendix 11. The majority of the routes identified are subject to agreements with landowners which facilitate permissive access. The Council recognises the importance of maintaining established rights of way and supports initiatives for establishing new walking routes and enhanced accessibility. A full review of public rights of way will be carried out during the life of the Development Plan.

Amended text to policy objective BGI 10 to read as follows:

BGI 10 Trail Development and Public Rights of Way

We will protect public rights of way which give access to seashore, mountain, lakeshore and riverbank or other place of natural beauty or recreational utility. We will work in collaboration with state bodies, development agencies, landowners and local communities to support the maintenance and promotion of existing trails and outdoor recreational amenities. We will examine the sustainable environmental and economic development potential of additional trails and outdoor recreational amenities and associated infrastructure whilst ensuring adherence to best practise principles in relation to upland path repair and management. Derived proposals will ensure no adverse impacts on ecological integrity including the Natura 2000 Network.

OPR Observation No. 7: Environmental reporting

The planning authority is advised that in order to give full meaning to the strategic environmental assessment process as set out in the directive, it should ensure that as/when material amendments stage arise, the environmental reporting is iterative and transparent with the decision-making process at that stage.

CE Response and Recommendation

The contents of the observation are noted and the ongoing process of preparing the Development Plan will be fully informed by the SEA process to ensure that the policy objectives and content of the Plan is full alignment with environmental reporting obligations.

OPR Observation No. 8: Implementation and monitoring

Having regard to the commitment of the planning authority to securing and monitoring the implementation of the strategies, policies and objectives of the draft Plan, the Office would advise the planning authority to consider how Appendix ‘Implementation and Monitoring’ could be amended to ensure that any monitoring is strategic in nature and consistent with Part 10 of the Development Plans, Guidelines for Planning Authorities, Consultation Draft (August 2021).

CE Response and Recommendation

The comments of the OPR are noted. Monitoring of plan implementation is critical to the success of the development plan function. As such the methodology for monitoring must be structured and measurable without recourse to significant resources and data which may not be readily available. It is recommended that a new summary table be included by way of an amendment in Appendix 17 which reflects the format and requirements of Part 10: Plan Implementation Monitoring and Reporting of the Draft Development Plan Guidelines for Planning Authorities 2021 and the Planning and Development Act 2000, as amended. The table identifies 24 measurable elements of the Plan and specifies where these are to be monitored on an annual basis or every two years.

Indicator	
Residential (Annual Monitoring)	
<u>1</u>	<u>New home completions (including through refurbishment/conversions)</u>

<u>2</u>	<u>New home completions per NPO 3</u>
<u>3</u>	<u>Planning permissions granted for residential development with:</u> I. <u>A breakdown of 1, 2 ,3 and 4+ units permitted and</u> II. <u>A breakdown per Tier 1 and Tier 2 lands</u>
<u>4</u>	<u>Breakdown by relevant rural area type of rural housing:</u> I. <u>Planning Applications lodged</u> II. <u>Breakdown in decisions</u> III. <u>New home completions</u>
Commercial (Annual Monitoring)	
<u>5</u>	<u>Developed and occupied commercial floorspace</u>
<u>6</u>	<u>Planning permissions for business/employment uses (m2 of development) for:</u> I. <u>Office</u> II. <u>Industrial</u> III. <u>Retail</u> IV. <u>Warehousing/Logistics</u>
Settlement Consolidation Sites (Annual Monitoring)	
<u>7</u>	<u>Specific reporting on the progression of the Settlement Consolidation Sites identified in the development plan. This shall include information on enabling infrastructural services delivery, planning permissions granted, housing constructed, funding applications made, project timelines, Vacant Site Levy commentary, etc</u>
Policy Objectives (Two Year Monitoring)	
<u>8</u>	<u>Strategic Environmental Assessment</u>
<u>9</u>	<u>Local Area Planning (inc Local Transport and Surface Water Management planning) (CS 08)</u>
<u>10</u>	<u>Rural Strategy (CS 15)</u>
<u>11</u>	<u>Joint Retail Strategy (W City Retail 08)</u>
<u>12</u>	<u>Wide Open Space and Recreation Strategy (Waterford City) (W City 19 & ECON 17)</u>
<u>13</u>	<u>South Quays Design Framework (W City 29)</u>
<u>14</u>	<u>Regeneration and Active Land Management (ECON 6 & 7)</u>
<u>15</u>	<u>Flagship Tourism Projects (ECON 22)</u>
<u>16</u>	<u>Renewable Energy (UTL 13)</u>
<u>17</u>	<u>Modal Shift Ambitions (Trans 01)</u>
<u>18</u>	<u>PLUTS (Trans 05)</u>
<u>19</u>	<u>Countywide Transport Strategy (Trans 06)</u>
<u>20</u>	<u>Public Rights of Way (BGI 10)</u>
<u>21</u>	<u>Wetland and biodiversity mapping and assessment (BD 13)</u>
<u>22</u>	<u>Tree Audit and augmentation (BD 25 & 26)</u>
<u>23</u>	<u>County Blue Green Infrastructure Strategy (BGI 03)</u>
<u>24</u>	<u>Heritage Plan Review</u>
<u>25</u>	<u>Demesnes Architectural Conservation Areas (BH 18)</u>
<u>26</u>	<u>Thatch Survey Review (BH 24)</u>
<u>27</u>	<u>City Walls Interpretation Strategy (AH 05)</u>

OPR Observation No.9: Standardised zoning objectives

Having regard to the recently published Development Plans, Guidelines for Planning Authorities, Consultation Draft (August 2021), the planning authority is advised to review the zoning objectives in the draft Plan to adopt the standardised zoning objectives in Appendix B of the Guidelines. This will assist in providing a consistent approach to zoning nationally and aid the understanding of zoning objectives by the public and the development sector alike.

CE Response and Recommendation

The content of the Development Plans, Guidelines for Planning Authorities, Consultation Draft (August 2021) and that of the submission are noted. The first table below sets out the correlation between the general zoning types (GZT) of the draft Plan with those of the Guidelines and are for illustrative purposes

only. It is recommended that the draft Plan be amended by the inclusion of the Table 10 & 11 below in place of the existing Tables 10 and 11 of Volume 2 of the draft Plan.

Draft Development Plan				Draft Dev. Plan Guidelines		
USE	ZONING	OLD CODE	OBJECTIVE	Zoning	New Code	OBJECTIVE
Residential	New Residential Medium Density (Tier 1 and 2)	R1.3	To provide for new residential areas and their amenities	New Residential	R1	Provide for new residential development in tandem with the provision of the necessary social and physical infrastructure
	New Residential Low Density	R1.4	To provide for new low density residential development	New Residential	R1	Provide for new residential development in tandem with the provision of the necessary social and physical infrastructure
	Existing Residential	R2.6	To protect, provide and improve residential areas and their amenities	Residential	RS	Provide for residential development and protect and improve residential amenity
	Residential: Strategic Reserve	R4.6	To provide for the long term strategic expansion of residential development	Residential: Strategic Reserve	SRR	To provide for the long term strategic expansion of residential development
Urban/ Town	City/ Town Centre	M2	To protect, provide for and improve City/Town Centre amenity, viability and vitality.	Town Core	TC	Provide for the development and enhancement of town core uses including retail, residential, commercial, civic and other uses
	General Business	M5	To provide for and improve General Business uses; this includes suburban district retail and local neighbourhood centres.	General Business	GB	To provide for and improve General Business uses; this includes suburban district retail and local neighbourhood centres.
	Opportunity	M1	To promote the development of mixed use, regeneration and new undeveloped lands.	Regeneration	RE	Provide for enterprise and/ or residential led regeneration
Community Services and Infrastructure	Community/ Social	S5	To provide, protect and improve community facilities.	Community Infrastructure	CI	Provide for and protect civic, educational, religious, community, health care and social infrastructure
	Open Space/ Amenity	G5	To preserve and provide for recreational uses, open space and	Open Space and Recreation	OS	Preserve and provide for open space and recreational amenities
	Airport	N1.3	To provide for Airport related activities including passenger terminal buildings and services , airside retail, hotel, airport infrastructure, hangerage, storage, maintenance and ancillary facilities, park and ride , transport depot, training facilities	Transport and Utilities infrastructure	TU	Provide for transport and utilities infrastructure
	Seaport/Harbour	N1.4	To provide for harbour related uses and promote the economic and recreational use of the area.	Transport and Utilities infrastructure	TU	Provide for transport and utilities infrastructure
	Utilities	N6	To provide for public utilities, public infrastructure and services.	Transport and Utilities infrastructure	TU	Provide for transport and utilities infrastructure
Rural	Green Belt and Conservation	G3	To provide for a green belt area as a clear physical demarcation to the adjoining urban area, to provide for the development of agriculture and to protect and improve rural amenity and to restrict residential development	High Amenity	HA	Protect and enhance high amenity areas
				Rural Village	RV	Protect and promote the character of the Rural Village and promote a vibrant community appropriate to available physical and community infrastructure
Employment	General Industry (heavy)	C2.2	To provide for general industry, these activities would not be compatible with residential amenity. Light industry activities area also permitted under this land use zoning.	Special Industry	SI	Provide for specialized industrial development
	Light Industry, Enterprise & Employment	C2.1	To provide for a mix of light industry business and technology uses.	Light Industry/ High Technology/ Manufacturing Campus Development	CD	Provide for light industry, general enterprise, business development, office, research and development and high technology/ high technology manufacturing type employment in a high quality built and landscaped environment
	Tourism	C5	To provide for tourist uses.	Tourism	TM	To provide for tourist uses.
White lands	White lands	O1		White lands	O1	

Table 10: Land Use Zoning Objectives

Land Use	Code	Zoning Objective
Existing Residential	RS	Provide for residential development and protect and improve residential amenity.
New Residential	R1	Provide for new residential development in tandem with the provision of the necessary social and physical infrastructure
Residential: Strategic Reserve	SRR	To provide for the long term strategic expansion of residential development.
Town Core	TC	Provide for the development and enhancement of town core uses including retail, residential, commercial, civic and other uses.
General Business	GB	To provide for and improve General Business uses; this includes suburban district retail and local neighbourhood centres.
Regeneration	RE	Provide for enterprise and/ or residential led regeneration.
Special Industry	SI	Provide for specialised industrial development.
Light Industry/ High Technology/ Manufacturing Campus Development	CD	Provide for light industry, general enterprise, business development, office, research and development and high technology/ high technology manufacturing type employment in a high quality built and landscaped environment.
Tourism	TM	To provide for tourist uses.
Community Infrastructure	CI	Provide for and protect civic, educational, religious, community, health care and social infrastructure.
Open Space and Recreation	OS	Preserve and provide for open space and recreational amenities.
Transport and Utilities infrastructure	TU	Provide for transport and utilities infrastructure
High Amenity	HA	Protect and promote the character of the Rural Village and promote a vibrant community appropriate to available physical and community infrastructure.
Rural Village	RV	Protect and promote the character of the Rural Village and promote a vibrant community appropriate to available physical and community infrastructure.
White lands	O1	

Uses not covered in the Land Use Matrix may be permitted subject to compliance with the written provisions of the Development Plan.

Table 11: Zoning Matrix

Use Type	RS	R1	SRR	TC	GB	RE	SI	CD	TM	CI	OS	TU	HA	RV
Advertising Structure	X	X	X	O	I	O	I	I	O	O	X	I	X	I
Agricultural	X	X	O	X	X	X	X	X	X	X	X	X	I	O
Agricultural Machinery Outlet	X	X	X	O	O	X	O	O	X	X	X	X	X	I
Allotments	O	O	O	O	O	O	O	O	O	O	I	X	I	I
Amusement	X	X	X	O	X	X	X	X	I	X	X	X	X	O
Bed & Breakfast/ Guesthouse	I	I	X	I	I	O	X	X	I	O	X	X	O	I
Betting Office	X	X	X	I	I	O	X	X	X	X	X	X	X	I
Boarding Kennels	X	X	X	O	O	X	X	O	X	X	X	X	O	O
Bus / Transport Depot	X	X	X	X	X	X	I	I	X	X	X	X	O	O
Café/ Tea Shop	O	O	X	I	I	I	O	O	I	O	O	O	O	I
Caravan Parks/ Camping	X	X	X	X	X	X	X	X	I	X	X	X	O	I
Cemetery/ Burial Grounds	X	X	X	X	X	X	X	X	X	I	O	X	X	I
Childcare Facility/ Crèche	O	O	O	I	I	I	O	I	O	I	X	X	X	I
Civic Amenity/ recycling centre (Excluding Bottle/ Bring Banks)	X	X	X	X	O	X	I	I	X	X	X	X	X	O
Commercial Car Park	X	X	X	I	I	O	O	O	O	O	X	I	X	O
Community Facility	O	O	O	I	I	I	O	O	O	I	O	O	O	I
Conference Centre	X	X	X	I	I	I	X	O	O	X	X	O	X	I
Cultural/ Heritage	X	X	X	I	I	I	X	O	O	O	O	X	O	I
Dwelling / Principal Private Residence	I	I	O	I	I	I	X	X	X	X	O	X	O	I
Education	O	O	O	I	I	I	X	O	O	I	O	X	O	I
Enterprise Centre/ Units	X	X	X	I	I	I	O	I	O	O	X	O	X	I
Funeral Home/ Crematorium	X	X	X	O	O	O	O	O	X	X	X	X	X	O
Garden Centre	X	X	X	O	I	O	X	O	X	X	O	X	O	O
Golf Course	X	X	X	X	X	X	X	X	O	X	O	X	O	O
Health Centre/ Clinic	O	O	X	I	I	I	X	O	X	I	X	X	X	I
Home-based economic activity	I	I	O	I	I	I	X	X	O	X	X	X	O	I
Hospital	X	X	X	O	O	O	X	O	X	O	X	X	X	I
Hostel	X	X	X	I	I	O	X	X	O	O	X	X	X	I
Hotel/ Tourist Accommodation	O	O	X	I	I	I	X	O	I	O	X	O	X	I
Incinerator	X	X	X	X	X	X	O	X	X	X	X	X	X	X
Industry – General/ Heavy	X	X	X	X	X	X	I	X	X	X	X	X	X	O
Industry – Light	X	X	X	O	O	O	I	I	X	X	X	X	X	I
Kiosks	X	X	X	I	I	O	O	O	O	O	O	O	O	I
Leisure complex	X	X	X	O	O	O	X	O	O	O	O	X	X	I
Motor Sales	X	X	X	O	O	O	O	I	X	X	X	X	X	I
Motor-Repair Garage	X	X	X	O	O	X	O	I	X	X	X	X	X	I
Night Uses (Nightclub, Pubs, Fast Food Takeaways)	X	X	X	I	O	O	X	O	O	X	X	X	X	I
Nursing Home/ Assisted Living	O	O	O	I	O	O	X	X	X	O	X	X	X	I
Office	X	X	X	I	I	I	I	I	X	X	X	O	X	I
Off-License	X	X	X	I	O	O	X	X	X	X	X	X	X	I
Open Space (Amenity)	I	I	I	I	I	I	I	I	I	I	I	I	I	I
Park & Ride Facility (incl. car parking)	X	O	O	O	O	X	X	O	X	X	O	O	O	I
Park/ Playground	I	I	I	I	O	O	X	O	I	I	I	X	O	I
Petrol Station (incl. convenience shop)	X	X	X	I	I	O	O	O	X	X	X	O	X	I
Place of Worship	O	O	X	O	O	O	X	O	X	O	X	X	X	I
Playing Fields/ Sports Club	O	O	O	O	O	O	X	O	O	O	O	X	O	I
Public House	X	X	X	I	I	I	X	O	O	X	X	X	X	I
Renewable Energy	I	I	I	O	I	O	I	I	I	I	I	I	I	I
Residential Scheme	I	I	X ⁵	I	O	I	X	X	X	O	X	X	X	I
Restaurant	O	O	X	I	I	I	X	O	O	X	X	X	X	I
Retail Comparison Goods	X	X	X	I	O	O	X	X	X	X	X	X	X	I
Retail Convenience (corner/ neighbourhood shop)	O	O	X	I	I	O	O	O	O	X	X	X	X	I
Retail Food (Supermarket)	X	X	X	I	I	I	X	X	X	X	X	X	X	I

⁵ In the interest of delivering Housing for All and other programs seeking to provide affordable housing, the development of affordable housing by an Approved Housing Body or the Housing Authority on lands zoned for Strategic Residential Reserve (SRR) may be considered acceptable subject to compliance with the policy objectives and development management standards of the Development Plan.

Retail Warehousing	X	X	X	O	O	O	X	X	X	X	X	X	X	O
Science & Technology Based Industry	X	X	X	O	O	O	I	I	X	O	X	O	X	I
Scrap Yard / Waste Management	X	X	X	X	X	X	I	O	X	X	X	X	X	O
Showrooms	X	X	X	O	I	O	O	I	X	X	X	X	X	I
Storage Depot/ Warehouse	X	X	X	O	O	X	O	O	X	X	X	X	X	I
Student Accommodation	I	I	X	I	O	I	X	X	X	O	X	X	X	I
Traveller Accommodation	I	I	X	I	O	I	X	X	X	O	X	X	X	I
Utility	O	O	O	O	O	O	O	O	O	O	O	O	O	I
Veterinary Surgery	O	O	X	I	I	I	X	O	X	X	X	X	O	I
Warehousing / logistics	X	X	X	X	O	X	O	O	X	X	X	X	X	
Wholesale Cash and Carry	X	X	X	X	O	X	X	O	X	X	X	X	X	

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

Southern Regional Assembly Submission (WFD-C2-311)

This section of the Chief Executive (CE) Report considers the individual issues raised in the submission made by the Southern Regional Assembly. A total of 23 observations were raised in the submission and the respective response and recommendation of the CE to each is given hereunder. Some of the observations raised are similar to those raised by Office of the Planning Regulator (Submission ref. no, WFD-C2-363) and where this occurs the response and recommendation of the CE has been provided to the OPR submission.

Observation 1

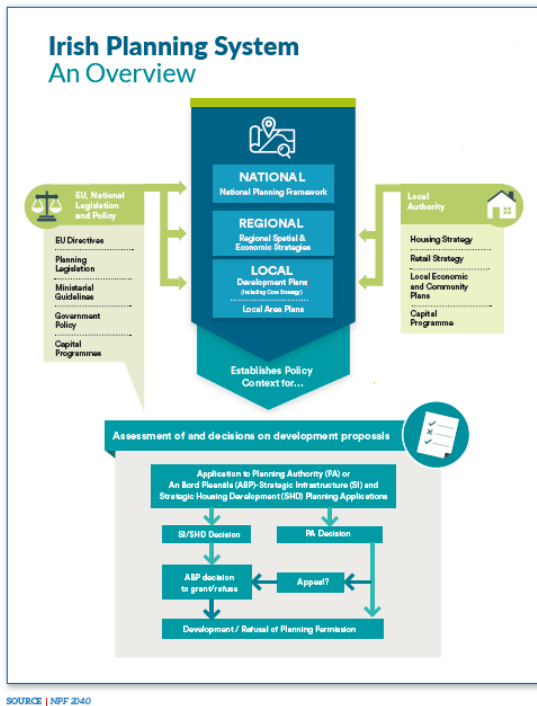
It is considered that additional content to show the interrelationship between the NPF, the RSES and Development Plans could strengthen the introductory section of the Draft Plan. This could include graphic and text along the following lines:

The National Planning Framework sets the high-level framework for shaping future growth of a projected extra one million people living in Ireland by the year 2040. It plans a new strategy to manage growth with a roughly 50:50 distribution of growth between the Eastern and Midlands Region, and the Southern and Northern and Western regions, with 75% of growth to be outside of Dublin and its suburbs. It targets significant growth of over 50% to our regional cities allied to a major policy emphasis on renewing and developing existing settlements allied to strengthened and more environmentally focused planning at the local level.

CE Response & Recommendation

The comments of the SRA are noted and the following amendments (text and image) are proposed to be included in section 1.3 Policy context of the draft Plan:

The National Planning Framework sets the high-level framework for shaping future growth of a projected extra one million people living in Ireland by the year 2040. It plans a new strategy to manage growth with a roughly 50:50 distribution of growth between the Eastern and Midlands Region, and the Southern and Northern and Western regions, with 75% of growth to be outside of Dublin and its suburbs. It targets significant growth of over 50% to our regional cities allied to a major policy emphasis on renewing and developing existing settlements allied to strengthened and more environmentally focused planning at the local level.



Observation 2

It is considered that the MASP Strategic Goals should be amended at Point 4 so as to include the objective for Metropolitan Scale Regional Amenities and a focus on Waterford Harbour.

CE Response & Recommendation

The comments of the SRA are noted and the following amendments are proposed to point 4 Section 1.3.2 of the draft Plan:

A high-quality environment and quality of life, as demonstrated through the Healthy City, a transition to a zero-carbon future and enhanced environmental quality incorporating blue/green infrastructure, a metropolitan area that is creative in terms of its culture, arts and heritage and which fosters an enhanced tourist experience and Metropolitan Scale Regional Amenities with a focus on Waterford Harbour;

Observation 3

The Vision and 8 strategy points with icons in chapter 1 together with the Core Strategy Principles and Strategic Aims in Chapter 2 provide a strong basis for the overall policy framework of the Draft Plan. All of these elements are related, and it is considered that the Draft Plan could be strengthened by showing – in table (indicative example shown), diagrammatic form or otherwise – how these key strategic elements are linked and relate to each other.

CE Response & Recommendation

The comments of the SRA are noted and the following amendments are proposed by the addition of a new info graphic set out hereunder as Figure 1.1 of the draft Plan.

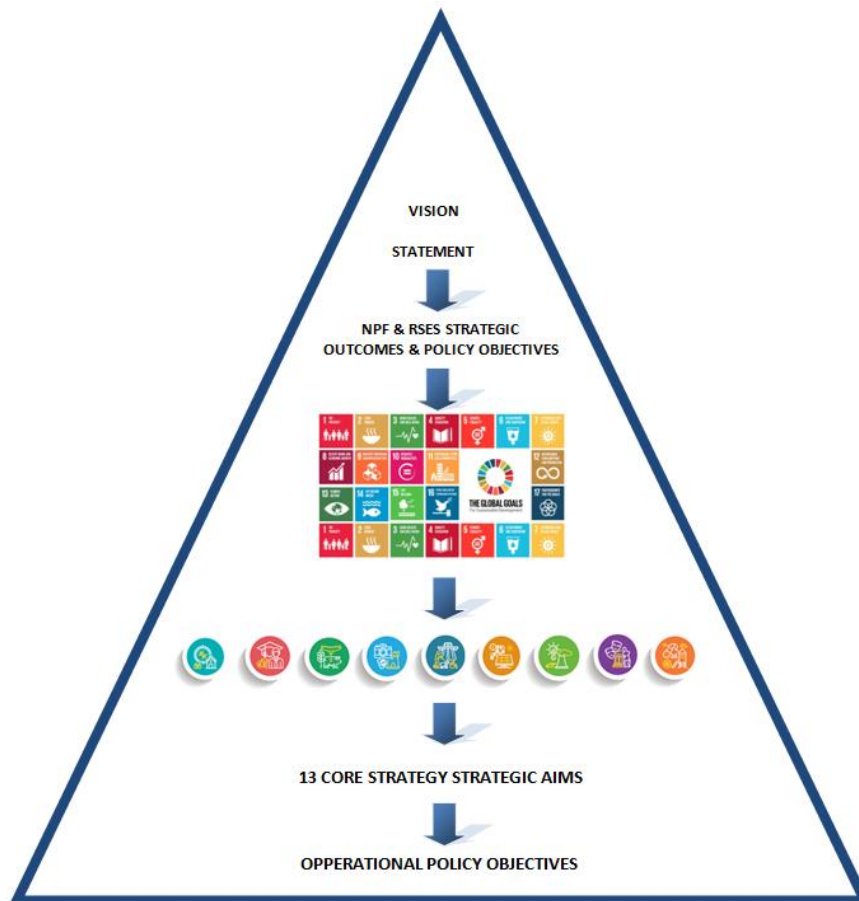


Figure 1.1

The text of the Vision Statement in Section 1.1 is to be amended 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 an excellent place to live, visit and do business.

Observation 4

It is recommended that Section 2.2 of the Draft Plan be strengthened to set out the role which Waterford can play in developing collaboration between the Cities and Metropolitan Areas in the Region areas to realise combined strengths and potential as a viable alternative to Dublin.

CE Response & Recommendation

The comments of the SRA are noted and the following amendments are proposed to the text of section 2.2 of the draft Plan:

While the SRSES identifies the importance of collaboration between Metropolitan Areas (RPO 6) and their combined potential as a viable alternative to Dublin, of building critical mass in the three cities of Waterford, Limerick and Cork in order to deliver sustainable employment and population growth and thereby enhance the function of the cities as engines for broader economic growth across the region, the SRSES also sets out a settlement typology, considering the role and function of all settlements, settlement networks and rural areas.

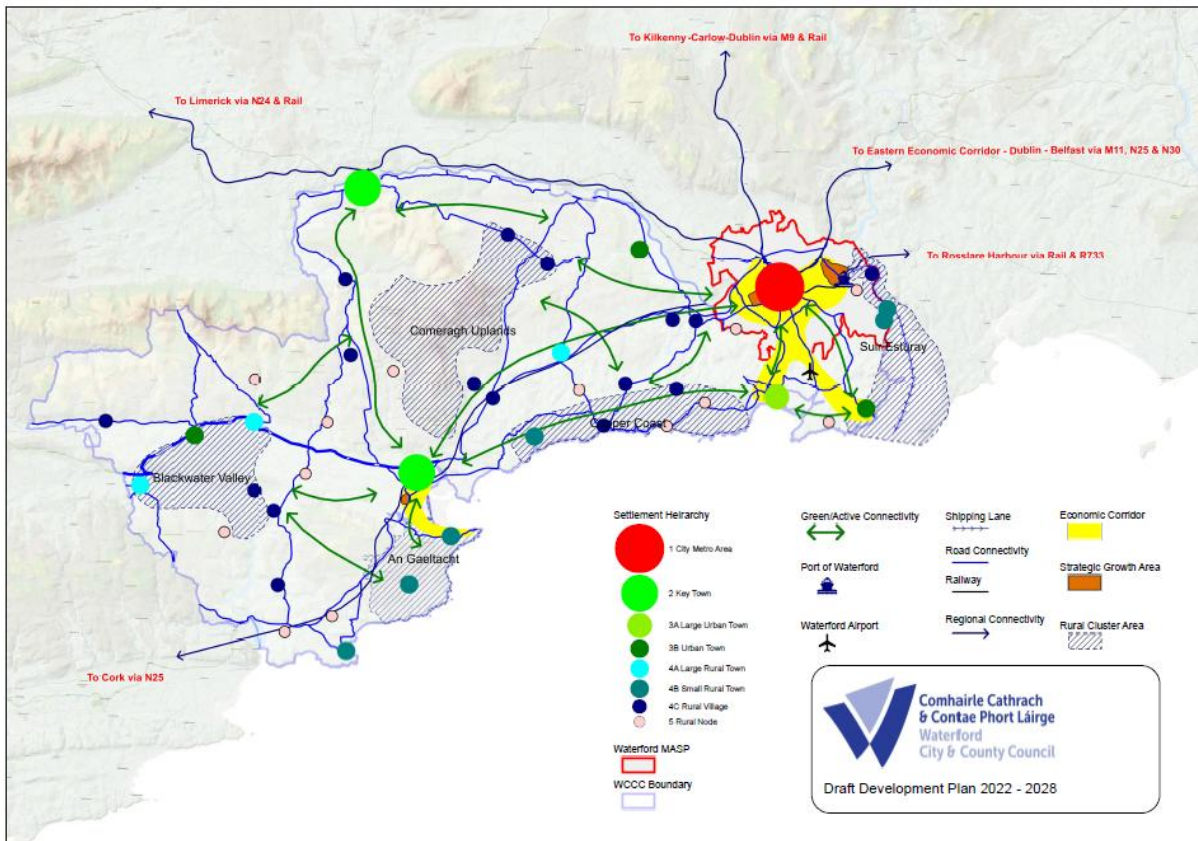
Observation 5

The Planning Authority is requested to review the Waterford Spatial Strategy Map and to include the intra-regional linkages and networks identified in the RSES Strategy Map linking Waterford to the other cities and Metropolitan Areas and to Rosslare Europort and to provide an expression of the relationship of Waterford to the wider Region and beyond the county boundary.

Table 2.1: Settlement Hierarchy & Typology			
Class	Category	Place	Attributes
1	City-Metropolitan Area	Waterford City	Metropolitan areas accessible with national and international connectivity, strong business core, innovation, education, retail, health and cultural role.
2	Key Town	Dungarvan, including Ballinroad Clonmel Environs	Strategically located urban centre with accessibility and significant influence in a sub regional context.
3A	Large Urban Town	Tramore.	Towns and villages of above 1,500 pop, which provide a housing employment and or service function. The category is broad and ranges from large commuter towns to more remote towns and villages.
3B	Urban Town	Dunmore East, Portlaw and Lismore.	
4A	Large-Rural Towns	Cappoquin, Kilmacthomas, Tallow, Ardmore, Gaeltacht na nDéise (inc Sean Phobal), Passage East/Crooke, Stradbally,	Rural towns and villages less than 1,500 pop and the wider rural region. <u>While rural in scale these towns provide a range of employment along with commercial, cultural and community services.</u>
4B	Rural Villages	Aglish, Ballyduff Upper, Ballymacarbry, Bonmahon/Knockmahon, Cheekpoint, Clashmore, Clonea Power, Dunhill, Kill, Kilmeaden/Ballyduff, Lemybrien/Kilrossanty, Rathgormuck, Touraneena, Villierstown.	Rural towns and villages less than 500 pop and their immediate rural areas. <u>These have a primary residential function and generally have more limited employment availability and services than those evident in Class 4A.</u>
5	Rural Nodes	Annestown, Ballylaneen, Ballymacaw, Butlerstown, Faithlegg, Fenor, Grange, Kilbrien, Knockanore, Mellary, Modeligo, Piltown, Whitechurch.	Small clusters of development usually focussed around a community or commercial use and which have potential to function as a centre for a small number of additional housing units.

CE Response & Recommendation

The comments of the SRA are noted and it is recommended that Figure 2.1 Waterford Spatial Strategy set out below is to be inserted as an amendment to the draft Plan having regard to the comments of the SRA.



Observation 6

(a) RSES RPO 3 - Local Authority Core Strategies states that ‘In preparing Core Strategies, local authorities shall determine a hierarchy of settlement and appropriate growth rates in accordance with the guiding principles (including environmental protection) and typology of settlement in the RSES. The Settlement Strategy at Section 2.7 includes four different categories of rural settlement from 4A (Large Rural Towns) to 5 Rural Nodes with what seems like narrow degrees of differentiation between different categories. The Planning Authority is requested to review these settlements having regard to their attributes and the guidance on settlement typology set out in the RSES and amend the settlement categories as appropriate.

(b) The planning authority is requested to review the divergence in settlement categories between Table 2.1 in the Draft Plan and the summary of settlement categories at section 4.7.1 in the SEA and address any implications arising.

CE Response & Recommendation

The comments of the SRA are noted and the amended table 2.1 is set out below while the SEA has been duly amended to reflect the contents of Table 2.1. and associated narrative text as set out below.

During the lifetime of the Development Plan we will monitor the level of development across these rural settlements and where development is not forthcoming in any particular settlement for whatever reason we may facilitate additional development in neighbouring settlements. In addition, settlements with service/infrastructure capacity and those within and adjacent to the Waterford City MASP area may facilitate additional growth to a scale consistent with the proper planning and sustainable development of the area. In all cases the developer will be required to demonstrate that the proposal is in compliance with the principles of proper planning and sustainable development and the policy objectives and development management standards of the Development Plan.

Observation 7

In relation to the development of significant additional residential development in Rural Towns (Category 4A and Category 4B) the Planning Authority should ensure that settlements have the assimilative capacity for such developments and that this is reflected in population allocations and would satisfy the requirements of the RSES in RPO3 – Local Authority Core Strategies, RPO5 – Population Growth and Environmental Criteria as well as providing the necessary holistic infrastructure and services to support additional residential development in accordance with the requirements of RPO 26 – Towns and villages.

CE Response & Recommendation

The comments of the SRA are noted. In reconfiguring the settlement hierarchy and Table 2.1, the content of SRSES policy objectives RPO3 – Local Authority Core Strategies & RPO5 - Population Growth and Environmental Criteria have been considered in terms of the typology for settlements set out in the SRSES, the infrastructural capacity, assimilative capacity of the receiving environment and flood risk (this latter point has also been comprehensively dealt with through the amended SFRA). Having regard to the totality of these issues it is considered that the amended settlement hierarchy, along with the amended narrative for each settlement class in Section 2.9 of the draft Plan will ensure the sustainable development of Waterford's settlements. The proposed amendments to the text in Section 2.9 reads:

4A Large-Rural Towns (1000 500 -1500 Pop): These settlements which have developed historically as strong rural market towns servicing their immediate rural hinterlands can support a maximum of c. 50 20 houses during the life of the Development Plan subject to compliance with the policies and standards of the Development Plan.

4B Small Rural Towns (750 1000 Pop): ~~These settlements can support a maximum of c. 40 houses during the life of the Development Plan subject to compliance with the policies and standards of the Development Plan.~~

4C B Rural Villages (<400 Pop): Small cluster housing of 5-10 houses will be supported in principle, subject to compliance with the policies and standards of the Development Plan. This is subject to a total of c. 15 houses being permitted during the life of the Development Plan. Larger clusters may be achievable where services can support such a proposal. Settlements located close to or within the Waterford MASP may facilitate additional numbers of houses where services support the proposal.

5 Rural Nodes: Small cluster housing of 5-10 houses will be supported in principle subject to compliance with the policies and standards of the Development Plan. Development of up to 10 houses may be appropriate over the lifetime of the Development Plan.

Observation 8

In order to comply with RSES RPO3, Local Authority Core Strategies, RPO 5 Population Growth and Environmental Criteria, RPO 10 Compact growth in Metropolitan Areas, RPO 31 Sustainable Place Framework and RPO 35 Support for Compact growth, the planning authority is requested to review and amend the Core Strategy including Core Strategy Tables 2.2 and 2.3 and provide the following additional data:-

- a) address population allocations to all settlements and settlement categories
- b) indicative residential densities for all settlement categories
- c) information on the prioritisation of zoned land to be services for development and
- d) projected housing unit numbers required for all settlement levels and housing in the open countryside

This information is required to ensure implementation of national and regional policy for compact growth, sustainable growth of towns and villages and suitable densities for all urban settings. Additionally,

this will assist in ensuring the phased delivery of services including water, wastewater and transport' and meeting the requirements of RPO 33 - Housing Need Demand Assessment (HNDA).

CE Response & Recommendation

The comments of the SRA are noted and accepted. An amended Core Strategy table has been prepared in response to submission ref. no. WFD-C2-363 and can be found in section xx of this report. This amended table will replace tables 2.2. and 2.3 and is consistent with the typology of Appendix A of the Development Plans: Guidelines for Planning Authorities consultation draft (Aug 2021). Respective changes will also be reflected in the SEA Environmental Report while associated changes to table references and content will be applied having regard to the new table.

Observation 9

(a) The planning authority is requested to provide clarity in the Core Strategy policy for sustainable rural housing including addressing the apparent divergence between the policy content and SEA evaluation. This is linked directly to the need for a robust evidence base in the Core Strategy that includes population allocations to all settlements and settlement categories and projections for housing unit numbers, previously addressed in the point above.

(b) The planning authority is requested to clarify the differing information on household size and indicate in precise terms how household size has been applied in the Core Strategy in conjunction with the request above to provide for residential densities for all settlement categories.

CE Response & Recommendation

The comments of the SRA are noted and accepted. An amended Core Strategy table has been prepared and can be found in section xx of this report in response to submission ref. no. WFD-C2-363 and applies the NPF household size of 2.5 while relevant residential densities are identified for the relevant classes of settlements. This amended table will replace tables 2.2. and 2.3 and is consistent with the typology of Appendix A of the Development Plans: Guidelines for Planning Authorities consultation draft (Aug 2021). Respective changes will also be reflected in the SEA Environmental Report while associated changes to table references and content will be applied having regard to the new table.

Observation 10

Having regard to SEA Evaluation of the Core Strategy and its reference to the Core Strategy Strategic Aims 3 & 8 which 'promote a climate resilient pattern of development and land uses' and Policy CS05 Housing Strategy, which states 'We will.... ensure effective delivery of housing and mitigate current residential leakage and unsustainable travel patterns', it is considered that policy HS05 could be strengthened by additional policy measures to give effect to this policy and specify what measures will provide for alternative sustainable housing options (including serviced sites, etc,..) that will mitigate current residential leakage and unsustainable travel patterns'. It is unclear if it the intention of the planning authority to also apply criteria for reduction of CO2 to development in rural areas in the same way as for urban areas as stated on page 30.

CE Response & Recommendation

The comments of the SRA are noted and accepted. It should be stated however that the settlement typology and the identification of settlement boundaries and development envelopes within which development is promoted is considered to be a significant move towards facilitating a choice in the housing market across all our rural towns and villages i.e. Classes 4A, 4B and 5. With the exception of brownfield sites, it is considered less beneficial to identify sites which would be preferential for development in the interest of facilitating flexibility, affordability and choice in the housing market. That being said additional brownfield sites have been identified across all settlement classes in addition to those in Table 3.1 for Waterford City and these are proposed to be included as a new Appendix 21 in the draft Plan which is attached to this report.

The move towards active land management will be an operational issue for WCCC to consider during the lifetime of the development plan and the continued use of statutory powers under the Derelict Sites Act 1990 and the Urban Regeneration and Housing Act 2015, as amended, will be utilised to bring redundant lands back to use in line with policy objective H 06. In this regard the monitoring of plan implementation will include a baseline and targets relating to infill brownfield sites along with the vacant and derelict sites registers.

It is recommended that amended text in section 7.1 of the draft Plan and policy objective H0 5 read as follows:

7.1 Regeneration and Active Land Management

The National Planning Framework and the Southern Regional Spatial and Economic Strategy identify 'Compact Growth' as the means to deliver sustainable growth in our urban settlements. The Council ~~will~~ is committed to consolidation, redevelopment and regeneration of infill, brownfield, underused, vacant and/or derelict sites within the existing urban footprints, rather than the continued sprawl of urban development into the open countryside. Appendix 21 of the draft plan identifies a range of brownfield sites across all settlement classes which could be developed during the lifetime of the draft Plan and beyond through active land management or other means. ~~This will be delivered through active land management together with the positive regeneration of urban areas and settlements.~~

Regeneration Policy Objectives	
H 05	To maximise the efficient use of existing infrastructure and services and promote a positive modal shift towards sustainable transport use, we will facilitate the sustainable, compact, sequential regeneration and redevelopment of urban areas through the appropriate development of identified key infill and brownfield sites as per Table 3.1 and <u>Appendix 21</u> for a mix of uses appropriate to the location.

An amended table 3.1 is also proposed as an amendment to the draft plan which can be found in response to WFD-C2-363.

Observation 11

RPO 11 – Key Towns and RPO24 – Dungarvan provide a significant policy platform for the role and future development of Dungarvan as a Key Town. The planning authority is requested to review the content on Dungarvan having regard to its designation as a Key Town and a Gaeltacht Service Town with a significant sub-regional role with a view to the inclusion of a separate and distinct section in the Plan to set out Dungarvan's role as Key Town in more detail.

CE Response & Recommendation

The comments of the SRA are noted and it is recommended that the text of section 1.3.3 of the draft plan be amended as detailed below setting out in greater detail the role of Dungarvan as a Key Town.

1.3.3 Dungarvan Key Town

The SRSES notes that Dungarvan (including Abbeyside and Ballinroad), is a former county town and an important economic driver for West Waterford. As such Dungarvan is designated as one of 14 Key Towns in the SRSES and it plays a critical role in underpinning the RSES and ensuring a consolidated spread of growth beyond the cities to the sub-regional level. The town will be the focus for significant growth (more than 30%) during the period to 2040. ~~The town is resilient in terms of indigenous industry, FDI, retail,~~

tourism, services and community facilities/ amenities. The SRSES notes in particular Dungarvan's designation as a Gaeltacht Service Town, and its tourist function on the Waterford Greenway.

Dungarvan is recognised for its strategic location on the Waterford-Cork N25 transport corridor, as an attractive coastal and harbour town which functions as a tourist centre for the Waterford Greenway and the Gold Coast and as a significant food hub focussing on high quality local produce. The town is a significant location for indigenous industry and Foreign Direct Investment (FDI), with educational and health/community facilities and a vibrant retail and services sector serving the local community and an expanding tourism sector. The town is the Gaeltacht Service Town for the nearby Gaeltacht na nDéise located around An Rinn and An Sean Phobal.

The SRSES highlights a number of key attributes in relation to Dungarvan which include its strategic location on the Waterford – Cork N25 transport corridor and access to ports/airports in Waterford and Cork and Belview Port, Smarter Travel legacy, extensive and diverse employment base, role as a Gaeltacht Service Town servicing Gaeltacht na nDéise, a renewable energy hub, tourist centre for Ireland's Ancient East & Waterford Greenway with close proximity to the UNESCO Geocoast and other natural and recreational assets and its role in servicing the healthcare needs of West Waterford with St Joseph's Hospital & Dungarvan District Hospital.

In terms of progressing the future sustainable development of Dungarvan as a Key Town, the SRSES contains a specific Regional Policy Objective (RPO 24) in relation to Dungarvan which support the strategic goals identified for the town in the Dungarvan Town Development Plan 2012 – 2018. These can be summarised as follows:

- i. To strengthen the role of Dungarvan as a strategically located urban centre of significant influence in a sub-regional context and in its sub-regional role as a Gaeltacht Service Town, leveraging its strategic location along the Waterford Cork N25 route and to build upon its inherent strengths including historical, cultural and architectural heritage, digital connectivity, skills, innovation and enterprise, tourism (in particular the Waterford Greenway and its potential sustainable expansion), culture and retail services. In respect of its importance to the environment, to tourism, to fishing, and to aquaculture (niche industries supporting rural employment), the RSES supports the environmentally sustainable development and treatment of Dungarvan Harbour and coastline;
- ii. To seek improvements and upgrading of the N25 Waterford to Cork route, the N72 Dungarvan to Mallow and the R672 linking the Key Towns of Clonmel and Dungarvan;
- iii. To support the development of Dungarvan as the Gaeltacht Service Town for Gaeltacht na nDéise;
- iv. To support for enhanced provision of bus services to enable improved intra-regional and inter-regional connectivity to attract more passengers to public transport and away from use of private motor cars;
- v. To support the continued development of cycling and walking infrastructure as part of Go Dungarvan Smarter Travel Programme and to support the accessibility of the public realm for vulnerable road/ footpath users and persons with disabilities;
- vi. To support the delivery of the infrastructural requirements identified for Dungarvan (including amenities and facilities for the community and voluntary sector) subject to the outcome of the planning process and environmental assessments;
- vii. Support the development of Dungarvan as a subregional centre for education and training, including lifelong learning, by building on existing links with international third-level education providers and WIT; and
- viii. Support investment in flood defence measures.

Through the implementation of Regional Policy Objective 24, the SRSES seeks to strengthen this function in terms of growing economic activity and population, and providing infrastructure to support this growth;

in particular, enhanced placemaking and regeneration of the town centre, improvements to the N25 and N72, upgrades to water and waste water services, and improvements to sustainable transport modes through provision of a Local Transport Plan for the town. The draft Development Plan supports these policy objectives which will promote and facilitate the sustainable development of our Key Town.

Observation 12

Having regard to the potential for collaboration and sub-regional growth opportunities through the development of the networks identified at Section 3.8 and RPO 30, the planning authority is requested to include additional content or policy references to reflect their potential. The RSES also supports the development of Rural Settlement Networks and other cross-boundary collaborations, and the planning authority may wish to consider other options for smaller scale networks of collaboration and partnership.

CE Response and Recommendation

The comments of the SRA are noted regarding the addition of a narrative and an associated policy objective to support the strengthening of existing and development of new sub-regional and local economic clusters. Taking due cognisance of the content of Section 3.8 of the SRSES and associated policy objectives it is recommended that the following text be introduced as a new text in section 4.4 of the draft Plan along with an associated new policy objective (additional editing to policy and section numbering will be required in Chapter 4 to as a result of the recommended change as set out hereunder). The recommended amended text reads as follows:

4.4 Networks, Clustering, Innovation/ and Enterprise Hubs and Social Enterprise.

In addition to the active land management of economic sectors, the council aims to support and facilitate clustering/ innovation hub initiatives within and across sectors. Strengthening and developing clustering or innovation hub potentials (e.g. engineering, food, circular economy, creative industries, ecommerce, crafts, and tourism) will further attract and embed foreign owned companies, and stimulate the growth and start-up of more innovative Irish owned enterprises.

Within the urban context, Waterford has existing clusters/ innovation hubs, including life sciences, communications technology, and manufacturing, centred around and supported by a number of high quality research centres. These include TQS in Lismore, the Telecommunications, Software and Systems Group (TSSG), the Pharmaceutical and Molecular Biotechnology Research Centre (PMBRC), Crystal Valley Tech and the South Eastern Applied Materials Research Centre (SEAM), as well as the ArcLab Research and Innovation Centre which is a focus for tech start-ups, and RIKON, a centre of Innovation in Business Technology Management, all with links to WIT. A number of these also support the wider city region.

In addition to the above, clustering initiatives in the rural context, with communities working together, have resulted in the identification of a number of distinctive strategic areas within geographic clusters forming rural economic development zones⁶ within their respective areas as per Table 4.0 above.

Such initiatives assist in providing a network and connected nodes of support for start-up business, learning, and co-operative initiatives throughout the city and county, and the Council will continue to assist in facilitating and supporting the provision of facilities which will support and strengthening these.

It is recognised that important symbiotic relationships exist between settlements/areas which advance enterprise and innovation at both a sub-regional and local level. Settlements and areas can share similar economic strengths and specialism's, which combined, provide strategic opportunities to drive the regional economy, contributing to and interacting with the larger centres of growth such as key towns and metropolitan areas. These networks present opportunities for collaborative projects and shared

⁶ Functional economic areas where the 'boundaries' reflect patterns of economic activity (e.g. Travel-to-work) rather than administrative areas

benefits from strategic infrastructure investments, particularly from improved inter-regional connectivity (transport networks and digital communications) perspective.

Regional Policy Objectives RPO 28 – Collaboration/partnership, RPO 29 – Rural Settlement networks and RPO 30 – Inter-Urban Networks as Regional Drivers of Collaboration and Growth recognise the important role of the development plan in fostering and supporting collaborative partnerships. The SRSES also identifies the following potential networks which are supported through the policy objectives of the Development Plan:

- Limerick – Waterford Transport and Economic Network: This potential network along a strategic east-west axis across the region links the cities and MASP areas of Limerick and Waterford and the Atlantic Economic Corridor and Eastern Corridor along with the Key Town of Clonmel and the towns of Carrick-on-Suir, Cahir and Tipperary. Early initiatives along this axis include the River Suir Blueway.
- Waterford-Kilkenny-Carlow-Dublin M9/Rail Network: A potential inter-regional network and opportunity for economic collaboration connecting the Waterford Metropolitan Area and Key Towns of Carlow and Kilkenny City on a strategic road and rail corridor linking the region to the Dublin Metropolitan Area and Eastern and Midland Region.
- Cork, Limerick-Shannon and Waterford Metropolitan Area Network.
- Cork to Waterford Transport and Economic Network including the River Blackwater Blueway and inter-county Greenway network.
- Eastern Corridor (Dublin Belfast Economic Corridor extending to Rosslare Europort including Gorey-Enniscorthy- Wexford & strong connectivity to New Ross, Waterford/Belview Port)).

Waterford City and County Council supports partnership and collaboration and the delivery of sub – regional, inter-urban and local networks which enhance the sustainability and resilience of communities in Waterford and across the broader region, while also supporting improved intra-regional connectivity between networked settlements by means of public transport, rail, inter-urban walking and cycling routes, greenways and e-mobility initiatives. Opportunities for networks and clusters are identified in Table 4.0 while transport connectivity is considered further in Chapter 5.

Social Enterprise is considered to be critical to the continuing improvement in welfare and living standards of people living in rural and urban communities in Waterford and will continue to be supported by the Council. It acts on enterprise, employment, second chance education, climate action, security, mental and physical health, transport, childcare and elderly care, performing arts, sport and recreation, social and economic inclusion, community services, infrastructure, facilities and all types of people and infrastructural programs.

It is recommended that the following changes be made to table 4.0 as an amendment to the draft Plan:

Table 4.0 Strategic Employment Locations	
Employment Opportunities	Strategic Development Areas
Increased densities and brownfield regeneration in existing built-up areas	<ul style="list-style-type: none"> • City Centre (including Viking Triangle) • Waterford Cultural Quarter centred on O'Connell Street • Former Waterford Crystal Site, Cork Road • 'Gas Works' site (Johnstown Industrial Estate) • Millers Marsh • Bolton Street Car Park • Brooks Site • Waterford City East/Dunmore Road
Employment and retail hubs in accessible locations to complement city/ town centre	<ul style="list-style-type: none"> • North Quays SDZ • City Centre – Michael Street • Bilberry – former Waterford Stanley Site • Dungarvan (former Glanbia site) • Tramore –Riverstown and Pickardstown
Commercial and research synergies in proximity to hubs such as a University/ Hospital/ Airport/ Port	<ul style="list-style-type: none"> • TUSE/ Research & Innovation Centre • Knowledge Campus • University Hospital, Waterford • Waterford Airport • Port of Waterford
Strategic regional and rural enterprise sites for campus-style/ space intensive uses to strengthen local employment base	<ul style="list-style-type: none"> • IDA Business and Technology Park, Butlerstown • Existing Enterprise Centres: Dungarvan, Tallow, Lismore Cappoquin; Dunmore East, Kilmacthomas, Dunhill • Additional/ New Enterprise Centres/ Co-working hubs: Dungarvan, Tallow, Lismore, Cappoquin, An Rinn (Gaeltacht na nDéise), Villierstown and Portlaw.
<u>Sub-Regional, Inter-Urban, Urban and Rural Networks and clustering synergies to leverage 'connectedness' and collective and collaborative efforts</u>	<ul style="list-style-type: none"> • Limerick – Waterford Transport and Economic Network • Waterford-Kilkenny-Carlow-Dublin M9/Rail Network • Cork, Limerick-Shannon and Waterford Metropolitan Area Network • Cork to Waterford Transport and Economic Network. • Eastern Corridor (Dublin Belfast Economic Corridor extending to Rosslare Europort, New Ross and Waterford/Belview Port)). • WIT Carriganore Campus/ TUSE Research and Innovation Centre; IDA Business & Technology Park • Blackwater Valley and Blueway • Copper Coast • Comeragh Uplands • Waterford Estuary • Waterford Greenway • Gaeltacht na nDéise Waterford Gaeltacht

The inclusion of an addition policy is recommended to support the achievement of RPO 28, 29 & 30. The proposed policy will be included as policy ECON 09 (associated editing of draft policy numbering will be required to the final Plan) and reads:

ECON 09: Fostering and Supporting Economic Collaborative Partnerships

We recognise and support collaborative economic partnerships at a local, sub – regional and inter – urban scale and recognise its capacity to act as a multiplier delivering growth of scale. We will work with project proponents, neighbouring local authorities, state agencies and statutory providers to build and enhance our networks, our shared assets and specialism and identify and support strategic opportunities particularly through the provision of sustainable and shared infrastructure.

Observation 13

In relation to Table 3.0, the planning authority is requested to provide additional data on:

- a) Indicative residential densities across the city/neighbourhoods;
- b) Information on the prioritisation of zoned land to be serviced for development; and,
- c) Projected housing unit numbers required across the city/neighbourhoods.

Please also refer to Observation/Recommendation 8.0 above in addressing these issues.

CE Response and Recommendation

The comments of the submission are noted with regard to the city neighbourhoods. It should be noted that an amended core strategy table has been provided in response to both observation 8 above and the submission made by the OPR (WFD-C2-363). To address the specific issues raised the following is proposed:

- a) The indicative density for each class of settlement is set out in the amended core strategy table set out in response to WFD-C2-363;
- b) The prioritisation and phasing of zoned land has been amended to comply with both the SRA and OPR submissions and Appendix A of the NPF. This is set out in an amended Appendix 17 Tiered Approach to Zoning as attached to this report and the land use zoning maps; and,
- c) A new table will be inserted in section 3.3 of the draft Plan which will replace the neighbourhoods as currently listed by bullet points on page 52 of the draft Plan. The new table will provide housing unit numbers accordingly. The proposed new table is set out in response to submission WFD-C2-363.

Observation 14

It is recommended that Objective W City 19 - Citywide Amenity/ Recreation and Blue Green Infrastructure Strategy Policy Objective be amended to include a specific objective for the ‘identification of a location for Regional Scale Park within the Waterford Metropolitan Area as well as the development of neighbourhood parks and open spaces’ set out at Waterford MASP Policy Objective (PO) 21 (c).

CE Response and Recommendation

The comments of the SRA are noted and the recommended amended text for PO W City 19 is set out hereunder.

Citywide Amenity/ Recreation and Blue Green Infrastructure Strategy Policy Objective	
W City 19	In support of MASP Policy Objective 21 and delivery a more climate resilient and sustainable city and metropolitan area for the county and region, we will prepare a Metropolitan Wide-Open Space and Greenbelt Strategy during the initial lifetime of the Development Plan in collaboration with key stakeholders such as Irish Water, NPWS, OPW, SRA, WIT, Wexford Co. Co. and Kilkenny Co. Co. This will include a Blue Green Infrastructure Strategy for the city. <u>This will also identify a location for a Regional Scale Park within the Waterford Metropolitan Area as well as the development of neighbourhood parks and open spaces’ in a manner consistent with Waterford MASP Policy Objective (PO) 21 (c) as identified in the SRSES.</u>

Observation 15

Chapter 4 should be strengthened to include policies and objectives that support ‘capacity building’ to build economic resilience and funding resources, including international good practice, bidding capacity and the use of /development of a shared evidence base.

CE Response and Recommendation

The comments of the SRA are noted and the following amendments are recommended to policy ECON 01:

Enabling Growth and Development

We will support and facilitate regeneration, consolidation and growth at strategic employment and nodal locations along strategic public transport corridors, and maximise commercial and employment development opportunities so as to foster more sustainable economic growth, diversity and resilience in accordance with the Core and Settlement Strategies by:

- Providing appropriate and adaptable zoning and use provisions throughout the city and county;

- Maximising the efficiency of zoned lands by advocating for and facilitating the provision, upgrade or refurbishment of necessary and timely supporting infrastructure, sustainable transport opportunities, and utilities;
- Work closely with the Southern Regional Assembly, neighbouring Local Authorities, WIT, the Chamber’s 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.
- Collaborating with government departments and agencies to build our shared bidding expertise and capacity so as to identify infrastructure deficits and opportunities, prepare strong business cases and identify funding sources, to bid, and successfully attract competitive funding which secure funding through the NDP, URDF, RRDF and other funding streams for projects that will deliver on the goals of the NPF and SRSES and other national strategies that support regional and local authority statutory plans, associated strategies and local economic and community plans;
- Supporting the development of small-scale ancillary services in large industrial and business parks where they do not detract from the vitality and viability of the city or town centres in the subject settlement;
- Favourably considering the redevelopment of brownfield sites and disused agricultural or commercial buildings in urban and rural areas for industrial, enterprise or cultural developments, subject to normal planning considerations;
- Ensuring that significant employment development is located at strategic locations as identified in Waterford MASP, in Table 4.0 and that other new employment generating enterprises base themselves in the city or existing towns, villages and settlement nodes, in proximity to existing infrastructure, services and concentrations of employment.
- Supporting and facilitating a business environment that is attractive, accessible and healthy, and places Waterford City at the forefront of destinations for inward investment in the state and supports its role in the city region as the regional driver of growth.

Observation 16

It is considered that the section on Climate Action & Jobs should be strengthened by reference to the RSES content on the Low Carbon Economy, which seeks to develop sustainable economic pathways and would complement existing policy objectives relating to achieving a Just Transition.

CE Response and Recommendation

The comments of the submission are noted and the following additional narrative text is recommended to be inserted as the first paragraph in Section 4.8 of the draft Plan by way of amendment:

The challenges to our society, biodiversity and economy resulting from climate change are significant and will require investment in innovative solutions to be developed and employed in order to decouple continued growth needed to deliver NPF and RSES targets from carbon emissions and build resilience across our communities and economic sectors. The SRSES sets out a number of key policy objectives to develop sustainable economic pathways to achieve a reduction in our CO2 emissions with particular reference to electricity generation, the built environment, agriculture/forestry, transport and the circular bio-economy. The Development Plan supports these policy objectives.

The following amendments are recommended to reflect the content of the submission in policy objective ECON 19:

Climate Action Policy Objectives	
ECON 19	<p><u>Green Technology & the Just Transition to a Low Carbon Economy</u> We will support the development of sustainable economic pathways to achieve a <u>reduction in our CO2 emissions across all sectors and the development of low carbon and green tech businesses and industries throughout Waterford City and County.</u></p>

Observation 17

The Council is requested to review Policy Objective UTL 09 to include reference to the application of Nature Based Solutions

CE Response and Recommendation

The comments of the SRA are noted. It is recommended that the following amendment be made to policy objective UTL 09:

UTL 09 Storm and Surface Water Management

To require the use of Nature Based Solutions and Sustainable Drainage Systems to minimise and limit the extent of hard surfacing and paving, and require the use of SuDS measures to be incorporated in all new development (including extensions to existing developments).

Surface water drainage must be dealt with in a sustainable manner, in ways that promote its biodiversity value, and in ways that avoid pollution and flooding, through the use of an integrated SuDS (including integrated constructed wetlands), where appropriate. This includes runoff from major construction sites.

Development proposals shall be accompanied by a SuDS assessment, which includes details of run-off quantity and quality and impacts on habitat and water quality, and shall demonstrate how runoff is captured as close to source as possible with subsequent slow release to the drainage system and watercourse, as well as the incorporation of appropriate measures to protect existing water bodies and remove pollutant materials. The detail of the assessment should be commensurate with the scale of the development proposed.

Storm/ surface water management and run-off design should be carried out in accordance with Sustainable Urban Drainage Systems (SuDS) standards such as:

- 'The SuDS Manual "(CIRIA, 2015), "Sustainable Drainage: Design and Evaluation Guide" (McCloy Consulting & Robert Bray Associates);
- "Dublin Corporation Storm water Management Policy Technical Guidelines"; and
- "Greater Dublin Regional Code of Practice for Drainage Works" incorporating "Greater Dublin Strategic Drainage Study, Volume 2, New Development" or any future updates.

In all instances the use of Nature Based Solutions is preferred to engineered solutions.

Observation 18

Having regard to the stated need at section 6.4 of the Draft Plan & RSES RPO 222 for electrical infrastructure such as upgrades to transmission and distribution networks and increased electrical capacity to meet increased electrical demand for the continued growth and development of Waterford and the requirement under the Planning and Development Act at Section 10 (2) (b) to include objectives for the provision of energy infrastructure.

CE Response and Recommendation

The comments of the SRA are noted and the new utility policy below is recommended for inclusion as an amendment in the draft plan to reflect RPO 222.

UTL 24 Electricity Infrastructure

Subject to appropriate environmental assessment and compliance with the policy objectives and development management standards of the development plan, we will support and facilitate the

development of a safe, secure and reliable supply of electricity, associated electricity networks and transmission infrastructure to serve existing and future demand.

Observation 19

The Council is requested to review Section 6.6 on Renewable Energy and related Policy Objectives with a view to the inclusion of additional policy content to reflect the potential of renewable energy opportunities for Waterford. The use of specific time bound targets in policy objectives would also serve to strengthen the policies for renewable energy in the plan.

CE Response and Recommendation

The comments of the submission are noted. Changes proposed to the draft Plan are set out in detail in response to the submission by the Office of the Planning Regulator WFD-C2-363.

Observation 20

Having regard to the Utility, Energy & Communication Policy Objectives at Section 6.9 and RSES RPO 112 – Water Quality, the planning authority is requested to review and strengthen the policies for control of the use of septic tanks, including cumulative effects, to safeguard water quality and to reflect the SEA Strategic Environmental Objectives (SEO) for Sustainable and efficient use of natural resources.

CE Response and Recommendation

The comments of the submission are noted. The draft Plan has included policy objectives WQ 1 – WQ5 to protect water quality and Blue Dot Catchments. It should also be noted that changes to the policy objectives and development management standards of the draft Plan are proposed in response to the submission made by Irish Water WFD-C2-329. Notwithstanding, the following amendment is recommended to policy objective UTL 08.

UTL 08: Protection of Water Resources

To work together with Irish Water towards a common goal of protecting our drinking water sources. This will be achieved by:

- Supporting the preparation of Drinking Water Protection Plans and Source Protection Plans by Irish Water, to protect sources of public water supply, in accordance with the requirements of the Water Framework Directive;
- Having regard to the EPA 2019 publication 'Drinking Water Report for Public Water Supplies 2018' (and any subsequent update) in the establishment and maintenance of water sources in the County in conjunction with Irish Water;
- Protecting both ground and surface water resources including taking account of the impacts of climate change, the cumulative impacts of septic tanks and waste water treatment systems, and to work with and support Irish Water to develop and implement Water Safety Plans to protect sources of public water supply and their contributing catchment.

Observation 21

It is considered that Objective ECON 06 in chapter 5 and H05 in chapter 7 could be strengthened by the identification of Brownfield sites and locations for rejuvenation across the county.

CE Response and Recommendation

The comments of the submission are noted. A review has been carried out of the regeneration potential across all settlements having regard in particular to the proximity of sites to settlement centres and the potential for sustainable reuse of the lands. It is recommended that a new appendix (Appendix 21) be included in the draft Plan as attached to this report.

Observation 22

It is recommended that Chapter 9 be strengthened by the inclusion of policy objectives to address the All-Ireland Pollinator Plan and in support of RPO 128 All-Ireland Pollinator Plan.

CE Response and Recommendation

The comments of the submission are noted. Chapter 9 of the draft Plan has identified our commitment to continue to play our part in terms of enhancing biodiversity as a partner in the implementation of the All-Ireland Pollinator Plan. It is recommended that the text in policy objective BD 02 be amended to support the pollinator plan specifically. The recommended amendment to the policy objective of the draft Plan is set out hereunder.

BD 02

In support of the All-Ireland Pollinator Plan we will seek to maintain and enhance Waterford's biodiversity in favourable conservation condition so that environmental resilience and net gain in biodiversity enhancement and creation are achieved during implementation of this plan.

Observation 23

In relation to the list of protected views/ scenic routes, it is recommended that a map to locate all the listed protected views/ scenic routes should be included.

CE Response and Recommendation

The comments of the submission are noted. The schedule of protected views and scenic routes as set out in Appendix 8 of the draft Plan did not correlate to the associated map. This error has now been corrected and the relevant schedule remains unchanged.

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	Submission Summary	Chief Executive Response & Recommendation
WFD-C2-143	<p>The submission requests that the vision for Waterford be developed to include the following:</p> <ul style="list-style-type: none"> • Healthy, accessible, affordable, inclusive and diverse place to live • Walking- and cycling-friendly routes across the county. • People will have options about how they move in and around the county for work, education, shopping and leisure. • Waterford will be an open, clean City and County that embraces its surroundings through inviting open parks and public spaces, swimming places, transport routes that are walking & wheeling- (non-motorised vehicles¹) friendly; where sustainable, people centred facilities allow residents and visitors alike to enjoy informal or formal sport, music, theatre and culture in villages and urban public open spaces. <p>The submission also offers a number of suggestions with regards to how the draft development plan can be funded - these include: Motor taxation revenue 2000 – 2028.</p>	<p>The CE notes the issues raised.</p> <p>It is considered that the issues outlined in the submission are important to the overall vision and strategy but are already reflected in the policy objectives of the draft Plan. Furthermore, the strategic outcomes set out in Section 1.6 of the draft Plan as based on the UN Agenda 2030 have fully considered the issues raised in the submission.</p> <p>Recommendation No change to Draft Plan.</p>
WFD-C2-201	<p>An tÚdarás agrees and supports the specific goals (8 in total) which are outlined in this chapter, but we recommend that 'the New Strategy of an tÚdarás 2021-2025' is taken on board as one of the reference documents and to include it on the national document list.</p>	<p>The CE notes the issues raised.</p> <p>Recommendation It is recommended that Section 1.7.4 be amended to include the following bullet point reference: New Strategy of an tÚdarás 2021-2025.</p>
WFD-C2-242	<p>The submission supports the Vision underpinning the development plan in the areas of inclusion and integration.</p>	<p>The CE notes the issues raised.</p> <p>Recommendation No change to Draft Plan.</p>

URN	Submission Summary	Chief Executive Response & Recommendation
WFD-C2-252	<p>It is welcomed that the role of the Circular Economy is acknowledged in Chapter 6 'Utilities, Infrastructure, Energy and Communication', in particular in relation to Section 6.8 Waste Services/ Infrastructure. However, it is considered that there is potential to include direct reference to the Circular Economy in certain other sections as follows:</p> <p>Part 1: Vision and Strategy Chapter 1: Waterford and the Development Plan Within 1.1 Our Vision, where a number of aims are listed, an extra aim could be included here could be to follow Circular Economy principles. The Circular Economy could also be incorporated within the activities listed to support the aims outlined.</p> <p>The Circular Economy can also contribute towards achieving the objectives of the Sustainable Development Goals, actions for which are outlined in Section 1.6 of the Draft Development Plan, especially of relevance in relation to points b), c), e) and f).</p> <p>An example of suitable wording could be as follows: Waterford City and County Council plays a fundamental role in the transition from a linear to a circular economy through key policies in public services that affect citizens' wellbeing, economic growth and environmental quality. This plan will foster the linkages to transition from a linear model to a circular model which keeps resources in use for as long as possible.</p> <p>Section 1.7.1 International Policy and Directives Suggested inclusion of the following: Waste Framework Directive European Circular Economy Action Plan 2020 – For a cleaner</p>	<p>The CE notes the issues raised.</p> <p>It is considered that the proposed text would be more appropriately located in Section 6.8 of the draft Plan.</p> <p>Recommendation As such the following amendment is proposed to be included as paragraph 2 of Section 6.8 of the draft Plan: <u>Waterford City and County Council plays a fundamental role in the transition from a linear to a circular economy through key policies in public services that affect citizens' wellbeing, economic growth and environmental quality. This plan will foster the linkages to transition from a linear model to a circular model which keeps resources in use for as long as possible.</u> In addition the following text is to be added to Section 1.7.1 International Policy and Directives <u>Waste Framework Directive</u> <u>European Circular Economy Action Plan 2020 – For a cleaner and more competitive Europe – part of the European Green Deal</u> The following text is to be added to Section 1.7.2 National Legislation <u>Waste Management Act 1996</u> <u>Climate Action and Low Carbon Development Acts 2015 to 2021</u> The following text to be included in Section 1.7.3 National Policy <u>Waste Action Plan for a Circular Economy 2020 – Ireland's National Waste Policy 2020-2025</u> <u>(Department of Environment, Climate Action and Communications (DECC))</u> The following text to be included in Section 1.7.5 Regional Plans and Policy <u>Southern Region Waste Management Plan 2015-2021 and its successor.</u></p>

URN	Submission Summary	Chief Executive Response & Recommendation
	<p>and more competitive Europe – part of the European Green Deal</p> <p>Section 1.7.2 National Legislation Suggested inclusion of Waste Management Act 1996 Climate Action and Low Carbon Development Acts 2015 to 2021</p> <p>Section 1.7.3 National Policy Suggested inclusion of Waste Action Plan for a Circular Economy 2020 – Ireland's National Waste Policy 2020-2025 (Department of Environment, Climate Action and Communications (DECC))</p> <p>Section 1.7.5 Regional Plans and Policy Suggested inclusion of Southern Region Waste Management Plan 2015-2021 and its successor.</p>	
WFD-C2-332	<p>This submission calls for health and well being to be given greater emphasis in the draft development plans vision, context and policy section.</p>	<p>The CE notes the issues raised.</p> <p>It is considered that the issues of health and wellbeing are important and as such have already been reflected in the policy objectives of the draft Plan.</p> <p>Recommendation That being said the following text changes are proposed to the third bullet point of the Vision statement in Section 1.1 of the draft Plan:</p> <ul style="list-style-type: none"> • Our unique built, historic, cultural and natural environment, which will be protected and, where appropriate, enhanced as a key asset in underpinning a high quality of <u>health/well being</u>, life and place.
WFD-C2-339	<p>The submission requests that the vision be updated to state the quantitative measures of success, or "how we, as the Waterford Community, measure such vision being put into</p>	<p>The CE notes the issues raised.</p> <p>Appendix 16 sets out a methodology as to how it is intended to monitor</p>

URN	Submission Summary	Chief Executive Response & Recommendation
	<p>action". It suggests that phrases such as "best county to live, work & play" also be added to the vision.</p>	<p>implementation of the Development Plan at a strategic level. In this regard the content of this report relating to submission ref. no. WFD-C2-363 should be noted.</p> <p>Recommendation It is considered that the following amendment to the draft Plan vision statement is appropriate:</p> <p>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 as the Regional Capital, a University and Learning City, and an economic driver for the region. <u>It will be the best city and county in which an excellent place to live, visit and do business.</u></p>
<p>WFD-C2-354</p>	<p>Submission by DP Energy joint venture company involved in the development of three offshore wind projects totalling 3GW in Ireland on the east, south and west coasts. These projects include Inis Ealga Marine Energy Park off the Cork and Waterford coasts.</p> <p>The submission comments on a number of sections of the draft plan: Section 1.1 Our Vision - one of the aims of the Development Plan should be to "Recognise and support the development of renewable energy solutions and projects, including offshore wind farm developments".</p>	<p>The CE notes the issues raised.</p> <p>The vision statement makes reference to the sustainable use of natural resources and living within our environmental capacity while Section 1.6 has identified a strategic aim or outcome of the draft plan as being to promote development that supports our resilience to climate change. It is considered that these provide appropriate reference to renewable energy in terms of an overall high level vision and strategy. It should be noted also that amendments are proposed relating to renewable energy in response to WFD-C2-363.</p> <p>Recommendation No change to Draft Plan.</p>
<p>WFD-C2-372</p>	<p>The submission seeks the following additional bullet point under 'We will be recognised as the Regional Capital and for: > The value we place on the health, well being and quality of life of people in our communities through support for placemaking, community and sporting infrastructure and</p>	<p>The CE notes the issues raised.</p> <p>The vision statement makes reference to the sustainable use of natural resources and living within our environmental capacity while Section 1.6 has identified a strategic aim or outcome of the draft plan as being to promote</p>

URN	Submission Summary	Chief Executive Response & Recommendation
	<p>active and healthy lifestyles. Please also edit the final bullet point as follows: > Creates more open, diverse, healthy, active and inclusive society.</p> <p>Under Section 1.3.2 Waterford City - Please also edit the final bullet point as follows: > Creates more open, diverse, healthy, active and inclusive society.</p> <p>Section 1.6 UN Agenda 2030: The Development Plan and its Outcomes (pgs 9-12) The eight points set out to incorporate the objectives of the 17 UN Sustainable Development Goals do not currently reference sport, physical activity, active lifestyles, health and well being in line with Sustainable Development Goal 3. Such references might be best placed under g) and/or h).</p>	<p>development that supports our resilience to climate change. It is considered that these provide appropriate reference to renewable energy in terms of an overall high level vision and strategy. It should be noted also that amendments are proposed relating to renewable energy in response to WFD-C2-363.</p> <p>Recommendation No change to Draft Plan.</p>

3.2.2 Chapter 2 – Spatial Vision and Core Strategy & Chapter 3 – Waterford City and MASP

URN	Submission Summary	Chief Executive Response & Recommendation
WFD-C2-3	The submission call for the Council to capitalise on Waterford's potential.	The content of the submission is noted which relates to the operational inertia associated with significant development and redevelopment projects. No amendment recommended to the draft plan on foot of the submission.
WFD-C2-5	The submission calls for a new bridge/ river crossing at the Tower Hotel to take pressure off the quays.	The content of the submission is noted. Policy objective W City 26 identifies a number of possible transformative transport objectives for Waterford City including additional river crossings in the city centre and down-stream. The timeframe for delivery and the range of such strategic pieces of infrastructure will be determined by WMATS and funding streams. No amendment proposed to the draft on foot of this submission.
WFD-C2-6	The submission calls for the site which is locally known locally as "the forge" on the Main Street in Kilmeaden to be rezoned from residential to commercial. The submission highlights that the site could accommodate 3-4 terrace style houses.	The content of the submission is noted. Kilmeaden is identified as Class 4 B rural settlement. The draft Plan defines a settlement boundary and new general zoning types proposed by the OPR (submission ref. no. WFD-C2-363) will assign a rural village zoning (RV) to these settlements which will support the objective of the submission. No amendment proposed to the draft on foot of this submission.
WFD-C2-9	Antisocial behaviour needs to be managed by way of enhanced CCTV across Waterford City centre particularly in areas where night time uses are taking place.	The content of the submission is noted. The provision of CCTV and management of night time activity across public areas in the city is an operational matter for a number of agencies. The layout and configuration of public streets and spaces and the nature and spatial extent of land uses is a function of the development plan and it is considered that policy objectives i.e. W City 10, seek to avoid overconcentration of particular night time uses in any one location which may give rise to anti social behaviour and disturbance to residential amenity. No amendment proposed to the draft on foot of this submission.
WFD-C2-10	Rezoning of land for residential development which is owned by Tramore Racecourse will restrict the capacity of the racecourse to operate events as the lands are used for temporary car parking.	The content of the submission is noted. It is recommended that the land use zoning of the draft Plan relating to the said lands be aligned to the zoning associated with the Racecourse i.e. Lands be rezoned to RE regeneration.

URN	Submission Summary	Chief Executive Response & Recommendation
WFD-C2-16	The submission seeks the rezoning of land for tourism development.	The content of the submission is noted. The lands in question are located at Helvick Head on lands currently zoned green belt and which lie within the Helvick Head to Ballyquin SPA. The area is un-serviced and the rezoning of the land for tourism development is considered inappropriate. No amendment proposed to the draft on foot of this submission.
WFD-C2-18	The submission principally focuses on the proposed provisions of the Draft Development Plan in the context of national and regional planning policy and the role of both the LDA and Waterford City and County Council in making the most effective use of State lands where appropriate and supporting the achievement of a stable, sustainable supply of land for housing into the future.	The content of the submission is noted in terms of delivering compact growth with potential for higher density, particularly on publically owned lands suitable for regeneration (St. Otteran's, the City Centre, North Quays identified), through a flexible approach to development management standards and by engaging Active Land Management as a process to deliver regeneration potential. The submission particularly supports policy objectives H 01, H 04, H 05, SC 40 – 42. Note should also be had of submission WFD-C2-363 and 311 in terms of delivering the higher level goals of the NPF and RSES. No amendment to the draft Plan is recommended on foot of the submission.
WFD-C2-25	The submission seeks the rezoning of land at the Glen, Waterford City.	The content of the submission is noted. The lands in question are located within a block which is predominantly residential in character and it is considered that residential land use zoning proposed in the draft plan is appropriate. No amendment proposed to the draft Plan on foot of this submission.
WFD-C2-28	Rezoning of land at Faithlegg, Co. Waterford.	The content of the submission is noted. The lands in question are located in a rural area at Faithlegg adjacent to Faithlegg House Hotel. The area is un-serviced and is excessively developed given its rural context. It is considered that the proposed rezoning would be inappropriate. No amendment proposed to the draft Plan on foot of this submission.
WFD-C2-29	Rezoning of land at Ballycashin, Waterford City.	The content of the submission is noted. The lands in question are located within built area of Waterford City and consist of a small area of land at the end of an existing cul de sac road. The additional lands will facilitate the development of a small number of residential dwellings to finish out this residential area. In principle the proposal is acceptable and it is recommended that the lands be zoned for new residential (R1) by way of an amendment to the draft Plan.

URN	Submission Summary	Chief Executive Response & Recommendation
WFD-C2-30	Support for amenity and greenbelt land use zoning provisions of the Draft Development Plan adjacent to Laoi na Mara, Dunmore East.	The content of the submission is noted. No amendment recommendation to the draft Plan on foot of the submission.
WFD-C2-31	This submission calls for the rezoning of land in Baile na nGall, An Rinn.	The content of the submission is noted. The lands in question are located on lands zoned for green belt in close proximity but removed from the zoned area of Baile na nGall. There are a significant number of single one off houses in the vicinity and the proposal to rezone lands as per the submission would further extend this pattern of growth which would be considered inappropriate. No amendment recommendation to the draft Plan on foot of the submission.
WFD-C2-32	The submission calls for the redevelopment of Steinberg Fireplaces for residential use. The site is located halfway between Waterford City and Tramore.	The content of the submission is noted. The lands in question are located on lands zoned for green belt between Waterford City and Tramore. The proposal seeks to facilitate a significant residential type of development (two blocks of four floors each) in this un-serviced rural location. It is considered that this pattern of development would be contrary to the objectives of the draft and as such would be considered inappropriate. No amendment recommendation to the draft Plan on foot of the submission.
WFD-C2-37	The submission seeks the rezoning of land in Fenor.	The content of the submission is noted. Fenor is identified as Class 4 rural node. The draft Plan defines a settlement boundary and new general zoning types proposed by the OPR (submission ref. no. WFD-C2-363) will assign a rural village zoning to these settlements. A portion of the lands identified in the submission lie within the development boundary of Fenor. No amendment recommendation to the draft Plan on foot of the submission.
WFD-C2-40	Submission requests the rezoning of lands at Páirc na gCapall (Kilrush Park, Geal gCua Estate, The Paddocks, Dungarvan AFC and Westgate Business Park) from 'R4.6 Strategic Residential Reserve and 'C2.1 Industrial, Enterprise and Employment' for residential development purposes. A number of drone, aerial and ground level photographs as well as a Land	The content of the submission is noted. The lands in question are located in an area of Dungarvan where the long term objective is to develop significant residential and supporting amenity, community and social uses. Having regard to the quantum of land required for the purposes of the core strategy and the servicing requirements of the lands it is considered that zoning the lands for residential development (R1) at this time would be appropriate. The content of submission WFD-C2-363 and WFD-C2-362 should also be noted and considered in tandem with this response and recommendation. The proposal includes the rezoning of c. 4.6ha of land from industry, enterprise and employment to residential use also. The rezoning of the lands as set out in the submission is recommended (R1) by way of amendment to the draft Plan along with the following specific objective to be included in Appendix 2 of the draft Plan: <u>Dungarvan: The development of the lands at Páirc na gCapall will be informed by a master plan for the entire landholding to be agreed in writing with the planning authority, providing for appropriate phasing of housing, housing mix and layout, an infrastructure and service delivery plan, enhanced access to Dungarvan town centre, augmentation of</u>

URN	Submission Summary	Chief Executive Response & Recommendation
	Use/Vegetation analysis were submitted in conjunction with the submission	<u>biodiversity value across the lands and incorporation of the former line of the railway and its masonry bridge for active transport modes across the site as part of broader amenity strategy and provision of lands for a future school campus.</u>
WFD-C2-42	The submission call for the rezoning of lands at Park Avenue and Park Land in Maypark, Waterford City from Open space to Residential. The submission sets out a number of points supporting the rezoning and refers to national policy and guidelines.	The content of the submission is noted. The lands in question are located just c. 40m from the southern bank of the River Suir and adjacent to a substantial waste water pumping station serving the public sewer for this area of Waterford City and linking to the city WWTP north of the Suir. Service networks associated with the pumping station traverse the site. The lands have been zoned for amenity purposes historically. Notwithstanding the details of the submission it is considered inappropriate to facilitate additional residential development on this isolated site having regard to the proximity to significant public services and the Suir. No amendment recommendation to the draft Plan on foot of the submission.
WFD-C2-43	The submission call for the zoning for lands located at Duffcarrick, Ardmore, Co. Waterford which are located along the seafront to be zoned for Tourism purposes.	The content of the submission is noted. The lands in question (4.9 ha) are located adjacent to the settlement boundary of Ardmore and adjacent to the beach. It is unclear as to whether independent access is available to link the land to the public road. The village of Ardmore is identified as Class 4A rural town. The draft Plan defines a settlement boundary for these towns and new general zoning types proposed by the OPR (submission ref. no. WFD-C2-363) will assign a rural village zoning to these settlements. In principle, the text of policy objective ECON 22 of the draft development would support proposals for tourism accommodation on the lands in question. No amendment recommendation to the draft Plan on foot of the submission.
WFD-C2-44	The submission call for the re-zoning the lands west of Ballycashin roundabout from GS (Mixed/General/'Green' /Recreation/Conservation) Residential as it is not in keeping with other sections of the Outer Ring Road which have seen considerable residential land-banks developed.	The content of the submission is noted. The lands in question are located adjacent to the outer ring road and have been identified as a significant green buffer to accommodate possible future sustainable transport and amenity infrastructure, segregated from the main public road and linking Waterford Nature Park to Waterford Greenway at Carriganore. The response to submission WFD-C2-29 should also be noted in terms of additional lands for residential use at this location. No amendment recommendation to the draft Plan on foot of the submission.
WFD-C2-45	Submission relates to a specific development proposal in Tramore.	Submission relates to a specific development proposal in Tramore and does not relate specifically to the development plan proposals for the area. No amendment recommendation to the draft Plan on foot of the submission.

URN	Submission Summary	Chief Executive Response & Recommendation
WFD-C2-49	The submission calls for the rezoning of lands at Passage Cross and Blenheim Heights, Waterford City from Strategic Reserve to New Residential.	The content of the submission is noted. The lands in question are located on the periphery of Waterford City south of Kings Channel. In terms of compliance with the population targets as set out in the NPF, RSES and the associated housing unit targets/core strategy table set out in response to WFD-C2-363, it is considered that the zoning of the land for residential development at this time would be inconsistent with the core strategy, national and regional policy and relevant S28 Ministerial Guidelines. No amendment recommendation to the draft Plan on foot of the submission.
WFD-C2-50	The submission calls for the rezoning of lands at Passage Cross and Blenheim Heights, Waterford City from Strategic Reserve to New Residential.	The content of the submission is noted which is similar to WFD-C2-49 above. The lands in question are located on the periphery of Waterford City at Passage Cross/Blenheim. In terms of compliance with the population targets as set out in the NPF, RSES and the associated housing unit targets/core strategy table set out in response to WFD-C2-363, it is considered that the zoning of the land for residential development at this time would be inconsistent with the core strategy, national and regional policy and relevant S28 Ministerial Guidelines. No amendment recommendation to the draft Plan on foot of the submission.
WFD-C2-51	The submission calls for the rezoning of lands at Passage Cross and Blenheim Heights, Waterford City from Strategic Reserve to New Residential.	The content of the submission is noted and appears similar to WFD-C2-49 and 50 above. The lands in question are located on the periphery of Waterford City at Passage Cross/Blenheim. In terms of compliance with the population targets as set out in the NPF, RSES and the associated housing unit targets/core strategy table set out in response to WFD-C2-363, it is considered that the zoning of the land for residential development at this time would be inconsistent with the core strategy, national and regional policy and relevant S28 Ministerial Guidelines. No amendment is recommended to the draft Plan on foot of this submission.
WFD-C2-53	The submission calls for the rezoning of lands at Townspark West, Tallow, Co. Waterford.	The content of the submission is noted. The lands in question are located 200m outside the defined settlement boundary of Tallow. Including the lands within the settlement boundary for the purposes of a dwelling house would be inappropriate and would give rise to further similar type development on un-serviced lands. No amendment is recommended to the draft Plan on foot of this submission.
WFD-C2-57	The submission requests the following rezoning of lands at Blenheim, Waterford City: 1. Rezoning of Residential Phase 3 and Open Space to Residential Phase 1 lands 2. Rezoning of Open Space and Agriculture to Residential Phase 2 lands	The content of the submission is noted and appears similar to WFD-C2-49, 50 & 51 above. The lands in question are located on the periphery of Waterford City at Passage Cross/Blenheim. In terms of compliance with the population targets as set out in the NPF, RSES and the associated housing unit targets/core strategy table set out in response to WFD-C2-363, it is considered that the zoning of the land for residential development at this time would be inconsistent with the core strategy, national and regional policy and relevant S28 Ministerial Guidelines. No amendment is recommended to the draft Plan on foot of this submission.

URN	Submission Summary	Chief Executive Response & Recommendation
WFD-C2-60	The submission is made on behalf of SE Construction (Kent) Ltd. It seeks to have additional land zoned for residential purposes included within the 'development boundary' of Kilmeaden. The submission outlines that the lands in question have recently been granted planning permission under planning Reg. Ref. 21/214.	The content of the submission is noted which requests that c.1.7ha of land be zoned for residential development at Adamstown, Kilmeaden. The lands are close to the village centre but lie outside the settlement boundary of the village. It is considered that the proposed inclusion of the lands within the boundary would be appropriate. It is recommended that the boundary of the village be amended to have regard to the lands defined in the submission. The lands would therefore be zoned for rural village (RV) development.
WFD-C2-61	The submission calls for the rezoning of lands for New Residential purposes at Blenheim Heights, Waterford City.	The content of the submission is noted and appears similar to WFD-C2-49, 50, 51 & 57 above. The lands in question are located on the periphery of Waterford City at Passage Cross/Blenheim. In terms of compliance with the population targets as set out in the NPF, RSES and the associated housing unit targets/core strategy table set out in response to WFD-C2-363, it is considered that the zoning of the land for residential development at this time would be inconsistent with the core strategy, national and regional policy and relevant S28 Ministerial Guidelines. No amendment is recommended to the draft Plan on foot of this submission.
WFD-C2-62	The submission requests the rezoning of lands at Baile na nGall Beag, An Rinn from greenbelt to residential zoning.	The content of the submission is noted. The lands in question (c .25ha) are located at Baile na nGall Beag adjacent to the local primary road. The lands are zoned as green belt and there are 11 no. individual dwelling houses in this area immediately adjoin the proposed lands. The area lies just north of lands zoned existing residential while the village centre is also in close proximity. The public sewer services existing development in this area. Given the location and proximity of the lands to the village core, the small size of the land parcel, the access for the local primary road, the infill nature of the development and the general pattern of development in the area it is considered that the proposal to zone the land as suitable for development is acceptable. It is recommended that the lands and those adjacent on which dwelling houses exist be zoned for existing residential development (RS).
WFD-C2-66	The submission requests the rezoning of lands at Spa Road, Clonmel, from strategic reserve to residential zoning.	The content of the submission is noted. The lands in question (c 1.6ha) are located south of the Spa Road on lands zoned for residential strategic reserve. Lands to the north on the opposite side of the Spa Road are zoned for new residential development. The submission seeks to have the lands rezoned for a low density type of development. The core strategy requires a total of 1 hectare of lands are required to facilitate residential development during the lifetime of the Development Plan. It is considered that the additional

URN	Submission Summary	Chief Executive Response & Recommendation
		<p>quantum of land sought to be zoned in the submission would be inappropriate. No amendment is recommended to the draft Plan on foot of this submission.</p>
<p>WFD-C2-69</p>	<p>The submission requests the rephrasing of Policy Objective W City 26 to align with the North West Area Action Plan.</p> <p>The submission seeks an objective of included in the amended draft plan for a review and assessment of the NWAAP objective for the creation of the District Centre on the Carrickphierish Road and its implementation with full public consultation prior to the preparation of the LAP for Neighbourhood Two.</p> <p>The submission also requests that Section 8.4 of the Current Plan be retained in full (amended for current guidelines) until such time as the DRAFT HNDA has passed all stages of the consultation process.</p>	<p>The content of the submission is noted. The following response and recommendation refers:</p> <p>The details relating to amendments in transport policy objectives for the area have been considered in the amendments set out in relation to submission on Chapter 5.</p> <p>It should be noted that the density figures set out in the draft Plan are consistent with the approach provided for in national guidelines which seek to provide a flexible approach to considering development proposals, facilitating higher densities commensurate with access to public transport services. The new general zoning types (GZT) on which the draft Plan is based are consistent with the draft Development Plans: Guidelines for Planning Authorities 2021 which do not differentiate between densities.</p> <p>In terms of the preparation of a LAP to provide for the future sustainable growth of the Gracedieu area, it should be understood that this will have its own statutory consultation process which will ensure full engagement with the local community. This will assess both neighbourhoods 1 & 2.</p> <p>With regard to the HNDA/HST, this strategy has undergone further review so as to fully inform the material amendments stage of the development plan making process so as to replace Section 8.4 of the current city development plan as referred to also in the submission. The final Housing Strategy and Housing Need and Demand Assessment (also considered further in WFD-C2-363) has been included as appendix xx of this report. In this regard it should be noted that a number of strategies have been prepared to inform the development plan, which in their own right do not have statutory preparation processes.</p> <p>In terms of WMATS, this is being prepared by the NTA with WCCC as a stakeholder. The process will have its own public consultation period which is understood to be a period during Q1 of 2022.</p> <p>Finally in terms of extending the timeframe for preparing the final development plan in order to facilitate further consultation, it is considered that the public consultation process had delivered a significant amount of engagement with the general public as is evidenced in the number of submissions received to date at both pre draft and draft plan stage which far outnumber the experience when preparing the current development plan. More detailed local area planning will be informed by further consultation which can focus on issues relevant to local community interest.</p> <p>It is recommended that the following amendment text to Section 3.3.1 be made: Given the passage of time since the Action Area Plan was first made, the extent of <u>remaining</u> undeveloped lands in Neighbourhood One, the infrastructure required and the broad transport and infrastructure strategies to be prepared following the making of the Development Plan, it is proposed to carry out a detailed strategic assessment of the opportunities and constraints to <u>completing Neighbourhood One and developing out Neighbourhood</u></p>

URN	Submission Summary	Chief Executive Response & Recommendation
		Two, and prepare a Local Area Plan to facilitate a statutory approach to the detailed planning requirements for the area.
WFD-C2-73	The submission requests that lands at between existing housing at Carn Glas Heights and Carrig Heights to the north and east, Carrig Heights and property belonging to Respond (housing association) off Dominick Place to the east and south-east and various public utilities to the south and west be amended from N6 - Other networks and basic infrastructures/ utilities to R 1.3 - New Residential. The submission also suggests that the existing house to the northeast of the landholding would be more appropriately zoned R2.4 - Existing Residential.	The content of the submission is noted which seeks to rezone the land from infrastructure to residential. The lands are zoned for a mix of community services and amenity in the current city development plan. Taking cognisance of the current land use zoning and the nature of development on the site is recommended that the land use zoning be amended to provide for existing residential zoning (RS) on the existing dwelling house and mixed/general community services/facilities (C1) on the remainder of the lands.
WFD-C2-74	The submission requests that land at Newtown, Tramore be re-zoned from R2.4-Strategic Residential Reserve to R1.4 Low-Density Residential.	The content of the submission is noted which seeks to rezone lands at Newtown Tramore from strategic reserve to low density residential. These lands and those immediately adjacent and under the control of the landowner have also been the subject of review under submission ref. no. WFD-C2-363 made by the Office of the Planning Regulator. In particular recommendation 4 of WFD-C2-363 requests the removal of residential zoning in this location. No amendment is recommended to the draft Plan on foot of this submission.
WFD-C2-75	The submission requests that lands at Monvoy, Tramore (12.78Ha) be re-zoned from R4.6 -Strategic Residential Reserve to R 1.3 -New Residential -Medium Density.	The content of the submission is noted which seeks to rezone 12 ha of residential strategic reserve land to new residential lands at Monvoy, Tramore. The lands lie immediately to the north of the Garraun stream and a housing development recently completed by the developer in question. There is limited scope to facilitate additional residential development within Tramore subject to the core strategy and the housing targets as defined under S 28 Guidelines. To this end it is recommended that 1.5 hectares of land be rezoned to facilitate residential development on the lands during the lifetime of the development plan.

URN	Submission Summary	Chief Executive Response & Recommendation
WFD-C2-76	<p>This submission seeks amendments to the proposed Draft Plan as follows:</p> <ol style="list-style-type: none"> 1. A change in the zoning of the parcel of land to the west of the N25 road line at Killotteran to either O 1 - White Lands (agriculture) or G3 - Conservation, amenity or buffer space (greenbelt) to reflect the current use of the land. 2. A change in the zoning for Killotteran House, its attendant grounds and the agricultural lands in family ownership to the north as far the N25, from C2.1 Industrial, Enterprise, Employment to either O1 - White Lands (Agriculture) or G3- Conservation, amenity or buffer space (greenbelt). <p>The submission requests that both these zonings reflect the current and proposed continued use of the land and property.</p>	<p>The content of the submission is noted which seeks to rezone lands at Killotteran from enterprise and employment uses to agri/greenbelt use to reflect the existing use of the lands. While the content of the submission is noted it is considered that the lands are strategically located to facilitate enterprise or employment uses and as such the land use zoning proposed in the draft Plan should remain unchanged. This would not interfere with the use of the lands for their existing residential and agricultural activities. No amendment is recommended to the draft Plan on foot of this submission.</p>
WFD-C2-77	<p>The submission requests that the lands that form the northern part of the former Waterford Crystal opportunity site zoning be</p>	<p>The content of the submission is noted which seeks to rezone 08 ha of land on Ashe Road immediately to the south of Roanmore Crescent from M1 to M5 and removal of the lands from the opportunity site designation for the former Waterford Crystal site as the lands are in separate ownership. Given the proximity of the lands to the existing housing it is considered that the lands would be best suited as an infill</p>

URN	Submission Summary	Chief Executive Response & Recommendation
	rezoned from M 1- Opportunity Site -Mixed Use zoning to MS- Mixed Use general business zoning.	residential development site. It is recommended that the lands be zoned for new residential development (R1) and the lands be removed from opportunity site no. 19.
WFD-C2-78	The submission requests that part of Rothwell's land holding at Blenheim be rezoned from G3 Conservation/ amenity or buffer space (Greenbelt) to R1 .4 -New Low Density Residential.	The content of the submission is noted. The lands in question are located on the periphery of Waterford City between Blenheim and the Suir. In terms of compliance with the population targets as set out in the NPF, RSES and the associated housing unit targets/core strategy table set out in response to WFD-C2-363, it is considered that the zoning of the land for residential development at this time would be inconsistent with the core strategy, national and regional policy and relevant S28 Ministerial Guidelines. No amendment is recommended to the draft Plan on foot of this submission.
WFD-C2-79	The submission requests that the existing residential zoning on the lands at Bookie Woods, Upperbranch Road, Tramore, is retained.	The content of the submission is noted which seeks to rezone the entire area of the lands (2.1 ha) at Bookie Woods to facilitate residential use, a portion of which is identified for open space in the draft Plan. The proposed zoning in the draft Plan reflects the layout of development permitted under planning permission ref. no. 20/150 and it is considered that this proposed zoning provision is appropriate. A number of submissions have been received in support of the land use zoning provisions set out in the draft plan to date for these lands. No amendment is recommended to the draft Plan on foot of this submission.
WFD-C2-80	The submission requests that G5- Mixed/ General -green/ recreation/conservation (Open Space) lands at the former Ard Ri Hotel Waterford City be rezoned to M1 Mixed Use-General Development (opportunity site).	The content of the submission is noted which seeks to rezone lands to the north of Plunkett Station from amenity to mixed use and opportunity. The lands are elevated above the cliff and fall within the boundary of the former Ard Ri hotel. Lands immediately north are located in Kilkenny and are zoned for amenity use in the current Ferrybank Belview LAP. It is considered that the zoning provisions of the draft plan are appropriate to this location and therefore no change is recommended to the draft plan on foot of this submission.
WFD-C2-81	The submission requests that G5 -Mixed/ General - green/ recreation/ conservation (open space) at the former Athenaeum House Hotel be rezoned to R2.6- Existing Residential.	The content of the submission is noted which seeks to rezone 1-1 ha open space land to existing residential zoning, having regard to use of the historic use of the lands. The lands are adjoined to the north by lands within Kilkenny County which is zoned for existing residential development in the Farrybank Belview LAP. It is recommended that the central portion of the lands be rezoned for existing residential development (RS) and the remainder of the lands be retained for amenity use (HA).
WFD-C2-	This submission seeks the following:	The content of the submission is noted and the response and recommendation relating to key issues is as follows:

URN	Submission Summary	Chief Executive Response & Recommendation
82	<p>1. Land west of Killea Road The change in proposed zoning for that part of the landholding on the west side of Killea Road (3ha) from R1.3 New/ Proposed Residential Medium Density to R2.6 Existing Residential.</p> <p>2. Strategic Reserve Land east of Killea Road The change in proposed zoning for part of the landholding from Strategic Residential Reserve to R1.3 New/ Proposed Residential-Medium Density.</p> <p>3. Open Space/ Tourism The change in proposed zoning for part of the landholding from GS Mixed/ general green/recreation/conservation (open space) to CS Tourism and related.</p>	<p>1: The likely completion time for the housing development is considered acceptable and it is recommended that the lands be zoned for existing residential development (RS).</p> <p>2: In terms of compliance with the population targets as set out in the NPF, RSES and the associated housing unit targets/core strategy table set out in response to WFD-C2-363, it is considered that the zoning of additional land for residential development at this time would be inconsistent with the core strategy, national and regional policy and relevant S28 Ministerial Guidelines. No amendment recommended in this regard.</p> <p>3: The rezoning of 2.8 ha of open space and amenity land to tourism development will support the provision of tourism accommodation available in Dunmore East. The land in question lies adjacent to and north of the existing caravan park and section of woodland. It is recommended that the land be zoned for tourism development (TM)</p> <p>It is further recommended that the following specific development objective be included in Appendix 2 of the draft Plan for the lands: <u>Dunmore East: Development on these lands should protect the visual amenities of the area and enhance the access to the village for pedestrians through the neighbouring woodland. All vehicular access shall be via an improved roadway form the Killea Road at the Fairways.</u></p>
WFD-C2-83	<p>This submission seeks an extension of the R1.3 New Residential -Medium Density land eastwards into the S5 Mixed/ general community services/facilities land at Duckpool, Dungarvan.</p>	<p>The content of the submission is noted which seeks to rezone c. 1.5 ha of land zoned for mixed community use to new residential, forming an extension to lands proposed for residential use in the draft Plan and on which there is a live planning application for housing development 21/346. It is considered that the provision of the additional lands for residential use would be contrary to the core strategy of the Development Plan, particularly given the location of the lands which are removed from the centre of Dungarvan. The comments of the OPR in submission ref. no. WFD-C2-363 should be noted. No amendment recommended to the draft Plan on foot of this submission.</p>
WFD-C2-	<p>This submission seeks an amendment to the settlement</p>	<p>The content of the submission is noted which seeks to bring two parcels of land into the settlement boundary of the village. It is considered that the inclusion of c.1 ha of land would be appropriate and would</p>

URN	Submission Summary	Chief Executive Response & Recommendation
84	boundary for Crooke to be extended to incorporate a parcel of land to the north and east which currently fall outside the proposed settlement boundary within the settlement boundary.	support delivery of housing during the life of the Development Plan. It is recommended that the boundary of the village be extended to include c. 1 ha (lands will identified for rural village development or RV) and the following specific development objective be included in Appendix 2 of the draft Plan to ensure vehicular access to lands to the east is protected: <u>Crooke: the development of these lands shall be designed so as to facilitate future vehicular access to adjacent lands to the east.</u>
WFD-C2-85	The submission requests that lands located to the south of One The Waterfront, Gallwey's Hill, Tramore be rezoned from G5-Mixed/ General -green/ recreation/ conservation (open space) to C5-Tourism and Related Uses.	The content of the submission is noted which seeks to bring an area of cliff edge zoned as general amenity located in close proximity to Lady Slip into tourism/commercial use. The area in question is located directly to the rear of the beach. It is considered that the proposal would be inappropriate and would negatively impact on this area of public amenity and as such no amendment to the draft Plan is recommended on foot of this submission.
WFD-C2-88	The submission requests that the rear gardens of properties to the east of the Church Road, Tramore, which are currently zoned G5- Mixed/ General-green/ recreation/ conservation (open space) be re-zoned to R2.6 to reflect their existing use.	The content of the submission is noted which seeks to bring an area of private garden space located above the east facing cliff on the western end of Tramore beach, zoned as mixed general open space into a more appropriate existing residential land use zoning. The properties in question are c. 40 m in depth and constricted between the road and cliff. The proposal is acceptable in principle however the extension of the existing residential land use zoning (RS) to the cliff edge as requested would be inappropriate and an area of amenity buffer (HA) should be retained. The recommended amendment is set out on the land use map.
WFD-C2-90	The submission requests that the M1 zoning extends to the ownership/ river edge and that there is not an unzoned area left over within the landholding. The submission highlights that this is important to enable yacht berths/ marina activity on and adjacent to the site and it	The content of the submission is noted. The following response and recommendation should be noted. The zoning map reflects the extent of land lying outside the Lower River Suir SAC and it is recommended that the land use zoning remain unchanged from that set out in the draft plan. Meanwhile uses on lands have been accounted for in Volume 2, Section 11.4 of the draft plan. It is recommended that the boundary of the opportunity site be amended to include only the lands which were formally occupied by Waterford Stanley and exclude the adjacent boat yards.

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	identifies this as a minor technical adjustment and not a zoning change per se.	
WFD-C2-91	The submission requests additional housing on the adjacent strategic reserve lands.	The content of the submission is noted. The provision of housing on lands zoned as strategic reserve would be inappropriate and inconsistent with the provisions of the core strategy and the population/housing targets underpinning the draft Plan. No amendment is recommended to the draft Plan on foot of this submission.
WFD-C2-92	The submission refers to additional crossings of the River Suir, included as Critical Transport and Mobility Infrastructure included in Policy Objective W City 26. The submission acknowledges that the proposals are not national road schemes. However, it highlights the special requirements of the tolling scheme (N25 Waterford Bypass PPP Scheme). The submission requests that the proposed development objectives related to the access strategy to the N29 to support Belview Port development to ensure that objectives included in the Draft Plan support the Ferrybank - Belview Local Area Plan, 2017.	The content of the submission is noted in terms of possible future additional river crossings and the contractual agreement relating to the N25 Waterford Bypass PPP Scheme. It is recommended that the following additional bullet point be amendment to policy objective W City 26 on foot of the recommendations identified in the submission: <u>Facilitate and support the implementation of enhanced road access to Belview Port in collaboration with Kilkenny County Council in a manner consistent with the provisions of Section 5.2.2. of the Ferrybank Belview Local Area Plan 2017.</u>
WFD-C2-94	This submission seeks the rezoning of c.5 acres of land at Ballinroad from Strategic Reserve to Residential.	The content of the submission is noted. The rezoning of 2 ha of land from strategic reserve to new residential is counter to the core strategy of the draft Plan, particularly given the location of the lands in Ballinroad. No amendment is recommended to the draft Plan on foot of this submission.

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WFD-C2-95	The submission seeks the rezoning of land at Ballyduff West, Kilmeaden Co Waterford.	The content of the submission is noted. The rezoning of lands for residential use at this rural location c. 1km from Ballyduff village is considered inappropriate. No amendment is recommended to the draft Plan on foot of this submission.
WFD-C2-99	The submission seeks the rezoning of land at Coxtown, Dunmore East from Greenbelt to Residential.	The content of the submission is noted. The provision of residential zoning is sought to facilitate the completion of a housing scheme permitted under planning permission ref. no. 99/17 and for which infrastructure has been put in place. The proposal is acceptable in principle and it is recommended that 0.5 ha are zoned for new residential development (R1). In addition, it is recommended that the following specific development objective be included in Appendix 2 of the draft Plan: <u>Dunmore East: Residential development on these lands shall provide significant screen planting between housing area and the existing cliff walk between Dunmore East and Portally Cove prior to the occupation of any permitted development .</u>
WFD-C2-101	The submission seeks the rezoning of land along the Cliff Road and The Cove Road, Tramore from 'G5' to either 'R2.6' or 'R1.4'.	The content of the submission is noted. The provision of residential zoning is sought to facilitate the development of the former grounds associated with the neighbouring residence, Juverna. The submission seeks to facilitate new residential development on lands zoned for mixed general amenity. There is an existing unoccupied dwelling and other domestic gardens located on the northern portion of the lands with an area of mature tree cover to the south of the area. The mixed general amenity area dominates the entrance to The Pier along with other mature tree stands. Given the historic context of the site and the residential use thereon, it is considered that the rezoning of the northern portion of the lands (c.1 ha to include Area A, B and the portion of C to the west of the existing residence) for existing residential use (RS) would be appropriate. It is recommended that this partial change of zoning be included as an amendment to the draft Plan.
WFD-C2-103	The submission requests that the population growth target between 2016 and 2031 be raised to 500, that the housing provision target be raised to 120 and that the area of land zoned for housing be increased to 8 ha.	The content of the submission is noted. In terms of compliance with the population targets as set out in the NPF, RSES and the associated housing unit targets/core strategy table set out in response to WFD-C2-363, it is considered that the provision of such a quantum of population over the lifetime would be inconsistent with the core strategy, national and regional policy and relevant S28 Ministerial Guidelines. No amendment is recommended to the proposed draft Plan.
WFD-C2-106	The submission seeks the rezoning of land at Northern Industrial Estate/Hazelbourne.	The content of the submission is noted as is the historic new residential development zoning (R1) thereon. Given the contextual location of the site it is considered that retaining the existing land use on for the area would be appropriate. Development proposals will be required to be supported by a site specific flood risk assessment and a sequential approach to avoiding development in flood zone A & B. It is considered however that the rezoning of the open amenity lands which are being utilised by the community for new

URN	Submission Summary	Chief Executive Response & Recommendation
		residential development would be inappropriate. No change recommended to the draft Plan on foot of this submission.
WFD-C2-107	The submission seeks the rezoning of land at Killadangan, Dungarvan, Co. Waterford west of 'Radley Engineering' to 'C2.1'.	The content of the submission is noted and the proposed rezoning to facilitate continued operation of the employer at this location is hereby recommended as an alteration to the draft Plan.
WFD-C2-109	The submission requests the rezoning of lands at Carraigeigh House, Carraiganore, Waterford from Industrial to Residential purposes.	<p>The content of the submission is noted and the proposed rezoning would be considered inappropriate. The following amendment to section 11.3 of the draft Plan is proposed to facilitate sustainable development where such a situation may arise:</p> <p>Section 11.3: Uses in a zone that are not in conformance with the use zoning objectives, shall be regarded as nonconforming uses. The expansion of existing non-conforming uses will be permitted where such use is consistent with sustainability development principles and good planning practice. <u>New dwelling houses for landowners and immediate family members (owners of the lands prior to the Development Plan being made) may be facilitated where compliance can be demonstrated with relevant policy objectives of the Development Plan and the development would not prejudice the future development of the land for the purpose for which it is zoned.</u></p>
WFD-C2-111	The submission requests the rezoning of land at Mayfield, Portlawn.	The content of the submission is noted. The lands are proposed for industrial and enterprise use in the draft Plan. While the lands are within the village the quantum of residentially zoned land required for Portlawn over the lifetime of the plan has been set out in the amended core strategy table and land use zoning for residential use has been reconsidered in response to submission ref. no. WFD-C2-363 made by the Office of the Planning Regulator. It is considered that the land subject of this submission is surplus to the requirements of the plan. No amendment is therefore recommended to the draft Plan on foot of this submission.
WFD-C2-112	The submission seeks the rezoning of land at Killoteran, Waterford City from 'Educational' to 'Residential'.	The content of the submission is noted and the proposed rezoning would be considered inappropriate. The amendment proposed relating to WFD-C2-109 will address the issue raised. No amendment is recommended to the draft Plan on foot of this submission.
WFD-C2-115	The submission seeks the zoning of land at Leamybrien, Co. Waterford.	The content of the submission is noted. The lands lie immediately adjacent to the development boundary of the village and are traversed by a floodzone A. A portion of the lands may be developable outside the floodzone. The proposed extension of the development boundary is recommended and the lands will be included for rural village (RV) development.

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WFD-C2-117	The submission seeks the extension of the settlement boundary in Ardmore Village.	The content of the submission is noted. The lands traverse the development boundary of the village. The inclusion of part of the lands within the boundary may facilitate alternative development layout. The proposed extension of the development boundary is recommended and the lands will be included for rural village (RV) development.
WFD-C2-121	The submission seeks the re-zoning of land behind Wellington Terrace, Dunmore East, from 'Amenity' to 'Tourism'.	The content of the submission is noted. Taking cognisance of the location immediately to the rear of a terrace of existing dwelling houses, the elevated and sloping nature of the site and the constrained access, it is considered inappropriate to amend the zoning as requested in the submission. No amendment recommended to the draft Plan on foot of this submission.
WFD-C2-125	This submission supports that the Draft Plan is not prescriptive in relation to the exact use specified for particular areas i.e. Tallow. It also requests that the proposed residential use zoning description in un-zoned settlements would not preclude the possibility of provision of individual one-off serviced residential sites.	The content of the submission is noted. The development of serviced sites is not precluded on lands within the settlement boundaries of any rural settlement. No amendment recommended to the draft Plan on foot of this submission.
WFD-C2-126	The submission seeks the zoning of land at Leamybrien, Co. Waterford.	The content of the submission is noted. In terms of compliance with the population targets as set out in the NPF, RSES and the associated housing unit targets and the core strategy revised in response to WFD-C2-363, it is considered that the provision of additional lands within the settlement boundary would be inconsistent with the core strategy, national and regional policy and relevant S28 Ministerial Guidelines. No amendment recommended to the draft Plan on foot of this submission.
WFD-C2-127	The submission seeks the rezoning of land at Crystal Sport and Leisure Centre, Cork Road, Waterford from 'G5' to 'M1'.	The content of the submission is noted and it is recommended that the land use zoning of the draft plan be amended to facilitate regeneration uses (RE) on the lands.
WFD-C2-129	The submission requests that lands at The Estuary Road, Tramore are rezoned from Industrial, enterprise, employment to Residential. The	The content of the submission is noted. Taking cognisance of the location adjacent to the public waste water treatment plant, the predominant tourism and commercial/employment character of the area and its isolated position in terms of general built residential areas, it is considered that the proposed rezoning is inappropriate and as such no amendment is recommended to the draft Plan.

URN	Submission Summary	Chief Executive Response & Recommendation
	submission also request that changes to the wording in Section 2.14 Tramore be made.	
WFD-C2-132	The submission seeks revised or additional Development Plan objectives with regards to the former Gasworks site The revisions are sought in the context of National and Regional policy. It is submitted that there is a need for more proactive objectives and guidance to support and facilitate the implementation of strategic national and regional policy for compact growth in the city. Review details of Table 3.1 Volume 1 to apply correct site area to Gasworks site and apply appropriate residential potential estimate. A description of the assumptions applied in Table 3.1 to the potential yield calculation should be set out.	<p>The content of the submission is noted. It is considered that the tiering/phasing of regeneration sites should also be identified in the draft plan and the sites are duly identified in the amended Table 3. (An amended table is set out in response to submission WFD-C2-363 by the OPR which included amendments to the Gasworks site as per this submission). Amendments proposed relating to development management standards are similarly addressed in response to the OPR submission however it is recommended also that additional text be added to DM 05 as set out below to facilitate a qualitative assessment of development proposals on regeneration sites where higher densities and taller buildings may be appropriate.</p> <p><u>DM05: Where the opportunity exists to increase density and building heights in pursuit of compact, regeneration, sequential and transit oriented development, and where it can be demonstrated that the development management standards set out in the Development Plan may in certain cirmstances be counter to achieving these principles of sustainable urban development, we will consider such proposals on their own merits having regard to the relevant S28 Guidelines in place at the time.</u></p>
WFD-C2-134	The submission calls for adequate land to be zoned to meet Dungarvan's population target. It submits that adequate social infrastructure should be developed alongside housing.	The content of the submission is noted and the land use provisions of the draft Plan have been amended in response to the submissions made by the Office of the Planning Regulator WFD-C2-363 and the Southern Regional Assembly WFD-C2-311. No amendment to the draft plan is recommended on foot of this submission.

URN	Submission Summary	Chief Executive Response & Recommendation
WFD-C2-139	<p>The submission refers to Section 3.3.1 of the draft plan and requests that it be 'totally rewritten'. The submission makes reference to the 1999 local action plan for the city north west suburbs and subsequent variations. It submits that objectives included in previous plans have been totally ignored. The submission states that before preparing an LAP for Neighbourhood Two - Gracedieu there should be a complete and comprehensive review of the current state of development in Neighbourhood One and particular the aims and objectives Variation No.5 of May 2005 as they relate to the Neighbourhood Centre. It highlights that a new review would allow all the residents of the area, new and old, a chance to decide what type of neighbourhood they would like to live in and how it might be achieved together with the Council and developers inputs.</p>	<p>The content of the submission is noted along with that of WFD-C2-69. The preparation of the LAP for Neighbourhood 2 Gracedieu as set out in the draft Plan will consider the completion of Neighbourhood 1 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. No amendment to the draft plan is recommended on foot of this submission..</p>
WFD-C2-140	<p>The submission submits that that to allow development in Whiting Bay would lead to unsustainable travel patterns and damage a</p>	<p>The content of the submission is noted. The area of Whiting Bay is identified as visually sensitive and vulnerable. No amendment to the draft plan is recommended on foot of this submission.</p>

URN	Submission Summary	Chief Executive Response & Recommendation
	biodiversity area.	
WFD-C2-142	The submission calls for the rezoning of land at Kilotteran, Waterford City from proposed industrial to residential.	The content of the submission is noted. No amendment to the draft plan is recommended on foot of this submission.
WFD-C2-143	The submission sets out 58 specific bullet points relating to broad topics, the provision of open spaces, transport and mobility and placemaking. a number of these issues are considered here while other are dealt with under Ch 5 & 8 of this report.	<p>The content of the submission is noted and responses to the various points raised are dealt with across this report, particularly in relation to Ch 5 & 8. In response to some of the issues raised it must be remembered that role and function of the Plan is set out in sections 1.1 and 1.2 and some of the issues raised relate to operational matters which are not within the remit of the Plan per se.</p> <p>In terms of monitoring the implementation of the plan, relevant amendments have been set out in response to WFD-C2-363 (amended Appendix 16 of the Plan), based on the recent Section 28 Ministerial Guidance. It is vital to ensure that such monitoring can be undertaken in a manner which is consistent to some degree with other local authorities and subject to available resources.</p> <p>Comments with regard to Agenda 2030 are noted and the draft Plan has assigned these to strategic outcomes at a high level in a manner which has been considered appropriate. Assigning these at a granular project level falls outside the remit of the draft Plan.</p> <p>With regard to the population targets underpinning the draft plan, these have been amended and are consistent with the targets and policy objectives of the NPF, RSES and relevant Ministerial Guidance. Reference should again be made here to the response and recommendation relating to WFD-C2-363.</p> <p>The draft Plan has made significant steps towards protecting our build heritage through the policy objectives in Ch 11 and the designation of new ACAs and a strategic review of the RPS. In addition WCCC is engaging in projects funded through the URDF/RRDF, Historic Structures Fund and other funding streams to bring life back into redundant and underutilised buildings.</p> <p>In terms of naming public buildings, places and erecting of statues, street and other art instillations, the Plan deals with such issues as part of a development application process to inform the naming of residential streets and housing schemes. The process of naming and identifying public art instillations falls outside the role of the Plan. The Plan would support the development of these elements where they improve the public realm and where such proposals respect their setting as set out in policy objectives BH 29 and 30.</p> <p>Additional initiatives such as the development of a maritime museum could be considered further as part of</p>

URN	Submission Summary	Chief Executive Response & Recommendation
		<p>tourism and cultural strategy planning and the Plan would duly support these when prepared.</p> <p>In terms of providing additional amenity spaces and the repurposing our city car parks for amenity space, such proposals will be considered through the implementation of policy objective W City 19 and will be informed also through future demand management measures and actions identified to implement WMATS over the lifetime of the Plan and beyond while also implementing the 10 minute neighbourhood concept.</p> <p>It is recommended that the bullet points relating to the urban design framework for the South Quays be amended as follows: River leisure uses which promote and support diverse uses along the riverside and within the river, including public baths and a maritime museum where feasible.</p>
WFD-C2-144	This submission seeks the rezoning of Land at Baile na Gall, An Rinn.	The content of the submission is noted. An amendment to the draft plan is recommended under WFD-C2-62 which takes into consideration the details of this submission also.
WFD-C2-157	The submission questions the need to rezone a strip of land to open space/amenity at Gracedieu/ Bilberry. It raises concern that this might cause antisocial behaviour and encourage the movement of the goats into the area.	The content of the submission is noted and the land use provisions of the draft Plan have been amended in response to the submissions made by the Office of the Planning Regulator WFD-C2-363 which has amended the land use zoning in this area in the interest of general amenity. No amendment to the draft plan is recommended on foot of this submission.
WFD-C2-160	<p>This submission relates to .the future development of the Gracedieu area</p> <p>Request 1: Right-of-way and access to our barns and field to be protected</p> <p>Request 2: Risk of flooding resulting from new development to be avoided.</p>	The content of the submission is noted. The issues raised with regard to ensuring continued access as part of the future development and surface water runoff from future development are issues which are better considered in detail at time of determining any future planning application or similar consent stage. The text of W City 26 has been amended to ensure the optimal access arrangement to service development in Neighbourhood 2 is prepared as part of a statutory LAP process, duly informed by public consultation with all communities. No amendment to the draft plan is recommended on foot of this submission.
WFD-	The submission requests that	The content of the submission is noted. The response to WFD-C2-69 has referred to issues raised in this

URN	Submission Summary	Chief Executive Response & Recommendation
C2-163	density levels set out in Section 5 of the Action Plan be retained.	submission.
WFD-C2-166	This submission raises concerns with the proposed zoning on Kennel Lane, Faithlegg as indicated in submission WFD-C2-28.	Details of the submission are noted. The response and recommendation of this report to WFD-C2-28 should be noted.
WFD-C2-167	The submission raises an objection to a proposal to rezone lands at Faithlegg as set out in submission ref. no. WFD C2 28.	Details of the submission are noted. The response and recommendation of this report to WFD-C2-28 should be noted.
WFD-C2-168	The submission is written in opposition to the zoning of lands at Kennel Lane, Faithlegg for residential use.	Details of the submission are noted. The response and recommendation of this report to WFD-C2-28 should be noted.
WFD-C2-169	The submission covers a wide range of topics from economic and social audits, decent work initiatives, a work forum, enterprise audits, a pilot project for a Jobs Guarantee, employee-driven innovation, trial an affordable childcare project, trialling a 4-day working week, Integrate affordable and social housing into all developments, Expedite the developments of the North Quays and Michael Street, utilising Plunkett Station as a freight distribution centre and Link the Waterford Greenways.	The content of the submissions is noted. It is considered that the vision and associated goals/outcomes of the draft Plan seek to ensure an appropriate living standard, quality of life and provision of services for citizens across Waterford. No amendment to the draft plan is recommended on foot of this submission.

URN	Submission Summary	Chief Executive Response & Recommendation
WFD-C2-175	This submission raises concerns with the proposed zoning on Kennel Lane, Faithlegg as indicated in submission WFD-C2-28.	Details of the submission are noted. The response and recommendation of this report to WFD-C2-28 should be noted.
WFD-C2-179	The submission states that the Clashmore/Kinsalebeg area is already under pressure due to the lack of rental housing and properties for sale and we feel that limiting development to 5/10 houses could have a serious impact on the development and future viability of the area. The submission asks that Clashmore/Kinsalebeg should not be treated as a small rural village but be recognised as an area where additional mixed development could take place.	The content of the submission is noted. In terms of compliance with the population targets as set out in the NPF, RSES and the associated housing unit targets and the core strategy revised in response to WFD-C2-363, it is considered that the provision of additional housing would be inappropriate within the settlement. The text of the final paragraph of section 2.9 of the draft Plan should be noted however which commits to monitoring of housing delivery over the lifetime of the plan and which may facilitate additional housing in certain circumstances in certain settlements. No amendment to the draft plan is recommended on foot of this submission.
WFD-C2-182	The submission raises an objection to a proposal to rezone lands at Faithlegg as set out in submission ref. no. WFD C2 28 by residents of The Kennel Lane, Faithlegg.	Details of the submission are noted. The response and recommendation of this report to WFD-C2-28 should be noted.
WFD-C2-183	This submission seeks to have lands zoned for residential use in Tallow.	The content of the submission is noted. The lands (c. 5 ha) in question are located outside the settlement boundary of Tallow at Townparks West. The development area of Tallow is defined by a settlement boundary within which adequate is available to deliver the housing required over the lifetime of the Development Plan. No amendment to the draft plan is recommended on foot of this submission.
WFD-C2-	This submission raises concerns with the proposed zoning on	Details of the submission are noted. The response and recommendation of this report to WFD-C2-28 should be noted.

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187	Kennel Lane, Faithlegg as indicated in submission WFD-C2-28.	
WFD-C2-191	This submission provides the context of the current Rail Transport provision within the wider Waterford area and MASP.	<p>The content of the submission is noted as it relates to chapter 1-3 of the draft Plan. It is noted that rail links are shown to all major centres with existing rail connections i.e. Limerick/Cork, Dublin and Rosslare in Figure 3.2 while figure 2.1 is also being amended on foot of WFD-C2-311. It is recommended that the following bullet point be added to W City 26:</p> <p><u>Development of an integrated bus/rail transport hub on the North Quays.</u></p> <p>No further amendment recommended to Chapter 1 – 3 of the draft Plan on foot of this submission.</p>
WFD-C2-195	The submission seeks the rezoning of land in Tramore.	The content of the submission is noted. The lands (0.8ha) consist of two areas of land at Summerville. It is considered that the inclusion of the lands for residential development is appropriate given their location and availability of services. An amendment is recommended to the draft Plan accordingly to zone the lands for new residential development (R1).
WFD-C2-202	This submission raises concerns with the proposed zoning on Kennel Lane, Faithlegg as indicated in submission.	Details of the submission are noted. The response and recommendation of this report to WFD-C2-28 should be noted.
WFD-C2-203	The submission seeks the rezoning of lands at Blenheim.	The content of the submission is noted. The issue of zoning of additional lands at Blenheim for residential development has been considered under WFD-C2-49 among others. No amendment to the draft plan is recommended on foot of this submission.
WFD-C2-204	The submission seeks the rezoning of lands at Dungarvan/Clonea.	The content of the submission is noted along with that of WFD-C2-370. It is recommended that the zoning for tourism related land use (TM) be included as an amendment to the draft Plan.
WFD-C2-205	The submission seeks the use of land for a supermarket in Cappoquin.	The content of the submission is noted. The lands are located within the development boundary of Cappoquin and could be developed for a number of uses compatible with the location (RV Rural Village). It would be inappropriate to specify a particular commercial land use for any location. No amendment to the draft plan is recommended on foot of this submission.
WFD-C2-206	The submission seeks to rezone lands in Dungarvan/Gold Coast and reconsideration of the land use zoning matrix.	The content of the submission is noted. It is considered that the land use zoning identified in the draft Plan is appropriate having regard to the extent of residential development in this area and poor access to Dungarvan. No amendment to the draft plan is recommended on foot of this submission.

URN	Submission Summary	Chief Executive Response & Recommendation
WFD-C2-210	The submission seeks the rezoning of land at Stradbally.	The submission seeks to zone 7.9ha of land outside the settlement boundary of Stradbally for new residential development. It is considered that the lands are located remote from the village centre and there are sufficient lands located within the settlement boundary to cater for future housing demand during the lifetime of the Development Plan. No amendment to the draft plan is recommended on foot of this submission.
WFD-C2-213	The submission welcomes the details relating to flood zones in the draft plan and suggests a number of changes in terms of the SFRA and associated policy objectives of the draft Plan. These details can be reviewed via the submission on the consult.waterfordcouncil portal.	<p>Then content of the submission is noted. Having regard to the issues identified and changes proposed by way of this report, a revised Strategic Flood Risk Assessment (SFRA) has been prepared which is provided as appendix xx to this CE Report. The following additional policies are recommended for inclusion in the draft Plan:</p> <p><u>1: Additional bullet point to policy UTL 10 to read as follows: To support the making of Local Area Plan for larger urban centres we will prepare surface water management plans where adequate data exists to support their preparation. Where data is lacking we will carry out a data review gap analysis and prepare conceptual surface water management plans as an initial step.</u></p> <p><u>2: An additional bullet point to policy CS 16 to read as follows: Site selection should be informed by a sequential approach to development and the avoidance of development within flood zones. Development within floodzones should be for water compatible uses only.</u></p>
WFD-C2-214	The submission is written in opposition to a submission for the zoning of lands at Faithlegg for residential use, reference number WFD-C2-28.	Details of the submission are noted. The response and recommendation of this report to WFD-C2-28 should be noted.
WFD-C2-220	The submission seeks the rezoning of land at Lislyn within the Clonmel Environs.	The content of the submission is noted as is the content of WFD-C2-66 above. No amendment to the draft plan is recommended on foot of this submission.
WFD-C2-222	The submission seeks the rezoning of lands in Tramore and identification of a specific development objective.	The submission seeks to rezoned 8.4 ha of the golf club from amenity to new residential use to facilitate a retirement village. The lands are located on the periphery of the golf club, remote from the town and services. It is considered that the proposal would be inappropriate in terms of its location and no amendment is recommended to the draft Plan on foot of this submission.
WFD-C2-	The submission seeks the rezoning of land in Tramore.	The content of the submission is noted which seeks to rezone 7.3 ha land at Knockenduff from strategic reserve to residential use over two phases. The lands lie adjacent to Tramore Golf Club and front onto the

URN	Submission Summary	Chief Executive Response & Recommendation
223		Knockenduff road. The quantum of residentially zoned land required for Tramore over the lifetime of the plan has been set out in the amended core strategy table and land use zoning for residential use has been reconsidered in response to submission ref. no. WFD-C2-363 made by the Office of the Planning Regulator. It is considered that the land subject of this submission is surplus to the requirements of the plan and no amendment is therefore recommended to the draft Plan on foot of this submission.
WFD-C2-226	This submission seeks the rezoning of lands in Dunmore East.	The content of the submission is noted which seeks to rezone 7.6 ha land at Dunmore East Golf Club to tourism development. This is requested to facilitate the continued viability of tourism facilities in the area. In addition it is requested that an objective be included as an amendment to ensure the visual amenity of the area is retained. It is recommended that an amendment be made to the draft plan to facilitate the change in land use zoning to tourism development (TM) while the following specific development objective be included in Appendix 2 for the relevant area of the golf club: <u>Dunmore East: Future development in the vicinity of the golf club will need to protect and enhance the visual, natural and other amenities of the area.</u>
WFD-C2-231	The submission seeks the rezoning of land in Tramore.	The submission seeks to rezone land zoned for new residential development at Gallwey's Hill Tramore to mixed general amenity. The submission refers to significant opposition to a recent planning application on these lands for residential development. Note is also made of submission WFD-C2-85 seeking the rezoning of mixed general amenity lands to tourism and related uses on lands neighbouring this submission. Having regard to these matters it is considered that the rezoning of the lands as per the submission would be appropriate and it is recommended that the draft Plan be amended to rezone the lands to high amenity (HA).
WFD-C2-233	The submission welcomes and broadly supports the provisions of the draft development plan. The submission highlights 4 critical areas of interest: The importance of Urban Design Framework Plan for the South Quays. The POW as a landowner on the South Quays welcomes the proposed land use zoning provisions of the draft	The content of the submission is noted and the support given for the policy objectives of the draft Plan. It is considered that any new parking strategy for the city and city centre will consider the spatial expression of revised car parking facilities in terms of balancing the need to service the city centre with both public transport/sustainable modes and appropriate car parking facilities. The making of the design framework for the South Quays will be informed through engagement with primary stakeholders which would include landowners, business groups and residents. It is recommended that the following bullet point be included as an amendment in section 3.3.9 of the draft Plan in reference to the design framework for the South Quays: <u>A review of traffic management along the R680.</u>

URN	Submission Summary	Chief Executive Response & Recommendation
	<p>development plan and the policy objective to develop a design framework to structure future development in this city centre area. In addition to issues identified for consideration in the design framework, further consideration must also be given to congestion on the R680 (Strategic Regional Route) which impedes traffic movement on the south quays. The POW looks forward to full engagement with WCCC in the preparation of any design framework.</p>	
<p>WFD-C2-237</p>	<p>The submission calls for the extension of the settlement boundary at Villerstown, Co. Waterford.</p>	<p>The submission seeks to rezone 1.5 ha. of land outside the settlement of Villierstown for residential development. The lands consist of a long linear portion of agricultural land along the Quay Road. The development would result in another linear section of housing similar to that on the Ballingowan Road. There is a significant quantum of land available for village development within the defined village boundary. No amendment to the draft plan is recommended on foot of this submission.</p>
<p>WFD-C2-243</p>	<p>The submission seeks the rezoning of lands adjacent to Garranbane N.S. for community and amenity purposes uses.</p>	<p>The content of the submission is noted and it is recommended that the land adjacent to the school be rezoned for community infrastructure (CI) to facilitate the continued operation of the school during the lifetime of the Development Plan. In addition, the lands on which the school is located should be duly zoned (CI) to accommodate the school use. Finally, the zoning of mixed general community services (community infrastructure) on lands to the north east of St. Lawrence's Church should be removed and the lands be zoned for conservation amenity buffer/greenbelt.</p>
<p>WFD-C2-246</p>	<p>Support for existing submission ref no. WFD-C2-6 regarding land use zoning.</p>	<p>The content of the submission is noted and reference is duly made to the recommendation to WFD-C2-6 above.</p>
<p>WFD-C2-250</p>	<p>The submission raises concerns around the overdevelopment of settlements, particularly rural</p>	<p>The content of the submission is noted. Chapter 8 Placemaking (policy objective PLACE 09) and Section 3.1 Volume 2 of the draft Plan refer to the need for new developments to be fully cognisant of the context of any proposal, ensuring that development proposals are informed by design statements, the detail of which</p>

URN	Submission Summary	Chief Executive Response & Recommendation
	settlements where the pace of residential development may be greater than that of service provision. There needs to be a balance to the delivery of housing and community/general services. Particular mention is made of recent planning history in Kilmeaden.	should be commensurate with the size/scale of the proposal. It is considered that this is best practice and will avoid the type of development referred to in the submission. No amendment to the draft plan is recommended on foot of this submission.
WFD-C2-260	The submission queries the flood zone extent in the draft plan and seeks to have land rezoned to facilitate development.	The content of the submission is noted. Due regard should be given also to the response and recommendation to WFD-C2-313 and 363 with regard to identification of floodzones and plan making justification tests. The SFRA (Appendix 13 of the draft Plan) has been amended on foot of the above submissions and is attached to this report.
WFD-C2-263	The submission seeks the rezoning of land in Portlaw.	The content of the submission is noted along with the planning history as stated. It is noted that the site lies partially within floodzone A and entirely within the River Suir SAC. Notwithstanding the planning history, the rezoning of land within the SAC would not be supported by the Strategic Environmental Assessment and Appropriate Assessment accompanying the draft Plan as the development would result in the loss of the ecological area and as such would have significant adverse impacts on the SAC. No amendment recommended to the draft plan on foot of the submission.
WFD-C2-264	The submission seeks the rezoning of lands in Dungarvan. The submission suggests that land use zoning decisions would be more appropriately taken as part of any Local Area Plan prepared for the town. during the life of the development plan.	The content of the submission is noted which seeks to rezone 3.9 ha land adjacent to the GAA grounds for new residential development. The quantum of residentially zoned land required for Dungarvan over the lifetime of the plan has been set out in the amended core strategy table and land use zoning for residential use has been reconsidered in response to submission ref. no. WFD-C2-363 made by the Office of the Planning Regulator. It is considered that the land subject of this submission is surplus to the requirements of the plan. No amendment to the draft plan is recommended on foot of this submission.
WFD-C2-267	The submission seeks the rezoning of lands in Annestown.	The content of the submission is noted. It is considered that the tourism policy objectives relating to the provision of tourism attractors and accommodation provide a robust basis on which planning applications for tourism related development can be assessed. No amendment to the draft plan is recommended on foot of this submission.

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WFD-C2-271	This submission seeks the rezoning of land in Dungarvan.	The content of the submission is noted which requests that the western portion of the lands adjoining An Cromptán (c. 2.3 hectares) be retained for residential use and the eastern portion of the lands (c. 4.3 hectares) to be zoned residential reserve. The quantum of residentially zoned land required for Dungarvan over the lifetime of the plan has been set out in the amended core strategy table and land use zoning for residential use has been reconsidered in response to submission ref. no. WFD-C2-363 made by the Office of the Planning Regulator. It is considered that the land subject of this submission is surplus to the requirements of the plan. No amendment to the draft plan is recommended on foot of this submission.
WFD-C2-275	The submission raises an objection to a proposal to rezone lands at Faithlegg as set out in submission ref. no. WFD C2 28.	The content of the submission is noted. The lands in question are located in a rural area at Faithlegg adjacent to Faithlegg House Hotel. The area is un-serviced and is excessively developed given its rural context. It is considered that the proposed rezoning would be inappropriate. No amendment to the draft plan is recommended on foot of this submission.
WFD-C2-277	The submission raises an objection to the rezoning of land at Faithlegg as proposed under submission ref. no. WFD C2 28.	Details of the submission are noted. The response and recommendation of this report to WFD-C2-28, among others, should be noted.
WFD-C2-280	The submission requests that the Council consider if sufficient land has been zoned in the draft plan for residential purposes to meet the ongoing needs for housing of the local population in Ballinroad during the lifetime of the plan.	The content of the submission is noted. The quantum of residentially zoned land required for Dungarvan and Ballinroad over the lifetime of the plan has been set out in the amended core strategy table and land use zoning for residential use has been reconsidered in response to submission ref. no. WFD-C2-363 made by the Office of the Planning Regulator. No amendment is therefore recommended to the draft Plan on foot of this submission.
WFD-C2-281	This submission seeks the rezoning of land in and around the Industrial park in Dungarvan.	The content of the submission is noted. It is considered that the rezoning of the industrial employment and enterprise land identified in the draft Plan to existing residential use at this location would be counter to ensuring adequate space is provided for industrial manufacturing and other associated uses to take place. Furthermore it is important that the draft Plan identifies additional lands for tourism development to the west of Dungarvan and as such it is recommended that no amendments are made to the draft plan on foot of the submission. Note is made of Volume 2, Section 11.3 of the draft plan in terms of non-conforming land uses.
WFD-C2-282	Submission requests the rezoning of land at Dunhill.	The content of the submission is noted which seeks to zone 1.36 ha of land for new residential development in Dunhill. The lands lie immediately outside the development boundary of the village. There is adequate land identified within the village to offer choice in terms of the location of new residential development

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		during the life of the Plan. No amendment recommended to the draft Plan on foot of this submission.
WFD-C2-285	The submission welcomes the provision of specific policies W City 08 and W City 19 relating to the preparation of a joint retail strategy and amenity, recreation and blue green infrastructure strategy for the MASP and looks forward to engaging with WCCC to deliver these policies and the MASP.	The content of the submission is noted as is the response and recommendation to WFD-C2-363. No further amendment recommended to the draft plan on foot of this submission.
WFD-C2-287	The submission seeks the rezoning of land at Newtown Tramore.	The content of the submission is noted which seeks to rezone 1.2hs of land from general amenity buffer to new residential at Newtown Glen. The land lies to the rear of two existing dwellings, is bounded by a caravan park to the north and is un-serviced by public sewer. The quantum of residentially zoned land required for Tramore over the lifetime of the plan has been set out in the amended core strategy table and land use zoning for residential use has been reconsidered in response to submission ref. no. WFD-C2-363 made by the Office of the Planning Regulator. No amendment is therefore recommended to the draft Plan on foot of this submission.
WFD-C2-301	The submission raises concern with Policy Objectives, W City 26 and Trans 50 with regards to Road Proposal/ Improvement Schemes: Knockhouse Road (L5507) Proposal/ Improvement from Cumann Na mBan Ring at WIT Arena to Carrickpherish Road Junction.	The content of the submission is noted. The response to WFD-C2-69 has referred to issues raised in this submission. No further amendment proposed to the draft Plan on foot of this submission.
WFD-C2-302	The present zoning seems excessive for Tramore. Better clarification and reassurance should be given as to when (if ever) this zoned land north of	The content of the submission is noted in terms of the quantum of strategic reserve land identified in Tramore. The extent of strategic reserve lands has been reconsidered on foot of submission WFD-C2-363 made by the Office of The Planning Regulator and the need to provide for the future development of settlements over the next 2 - development plan cycles to 2040. Policy objective H 18 refers to the requirement to ensure housing is climate resilient. Having regard to the content of the submission it is

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	<p>R675 will be approved for development. What improvements in infrastructure (e.g. to the capacity of the towns' sewage system) would be needed to permit such development?</p> <p>The submission highlights that new build dwellings are excessively large for the number of residents that occupy the dwellings. Large obtrusive houses should be discouraged.</p>	<p>recommended that the following text be included as an additional bullet point in H 18: <u>Housing units by way of their internal floor area and volume should seek to minimise the need for unnecessary use of building materials, the associated generation of waste, and the need for space heating and cooling. House sizes should be within a margin of 25% the national average house unit size.</u></p> <p>No further amendment to the draft Plan is recommended on foot of this submission.</p>
WFD-C2-304	<p>The submission requests that the Bunmahon-Tankardstown 19th C mine heritage complex be designated as a "Local Area Plan" (LAP) as it would align with several objectives made in the draft Development Plan and provide an integrated framework for conservation, protection and promotion of that heritage for the benefit of local and district communities.</p>	<p>The content of the submission is noted. The importance of Bonmahon/ Tankardstown is recognised by its designation as an Architectural Conservation Area and further consideration could be given in due course to preparing a village design statement or similar non-statutory plan for the area. No amendment recommended to the draft Plan on foot of this submission.</p>
WFD-C2-306	<p>The submission raises an objection to a proposal to rezone lands at Faithlegg as set out in submission ref. no. WFD C2 28.</p>	<p>Details of the submission are noted. The response and recommendation of this report to WFD-C2-28 should be noted.</p>
WFD-C2-309	<p>The submission requests the rezoning of land at Knockboy, Waterford City from G5</p>	<p>The content of the submission is noted which relate to a 0.4ha area of amenity space to the south of the Knockboy Road. There is a more substantial portion of land zoned for mixed general amenity (os)(c. 2.7 ha) to the north of the Knockboy Road which has potential to link existing and future housing areas while</p>

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	Mixed/general 'green'/recreation/conservation to low density residential.	providing for biodiversity links in the area. This will be further considered in the forthcoming Wide Open Space and BGI Strategy for Waterford City. The rezoning of the lands in question is however considered acceptable and it is recommended that the draft Plan be amended accordingly.
WFD-C2-314	The submission seeks an extension of the settlement boundary of Kilmacthomas to the south west of the village to provide for large detached executive housing units, providing reasonably sized housing on large sites.	The content of the submission is noted which seeks to rezone 6.4 ha of land from an employment use in the current county development plan to a low density residential type land use. The lands are located within the settlement boundary of Kilmacthomas in the draft Plan but are located remote from the village core and have been included solely for reasons of their employment land use zoning which is considered appropriate. There is a significant quantum of land available within the settlement for new residential development as quantified in the core strategy and settlement strategy in Chapter 2 of the draft Plan. No amendment is therefore recommended to the draft Plan on foot of this submission.
WFD-C2-316	The submission seeks that lands at Williamstown, Waterford City should be included within the Neighbourhood of Ballytruckle/Kilcohan as either a significant residential development areas or mentioned within the well established neighbourhoods section.	<p>The content of the submission is noted. In response the following is relevant:</p> <ol style="list-style-type: none"> 1. It is considered that the inclusion of Williamstown into the Sacred Heart Neighbourhood is appropriate as set out in section 2.8 as reference has been made to this relationship in section 3.3 of the draft Plan. 2. Amendments to the text of section 3.3 can be facilitated. 3. Table 3.2 can be amended to have regard to the comments raised while an additional neighbourhood centre should be identified and land zoned for same along the Williamstown road to facilitate more walkable and accessible neighbourhoods. 4. The reference to section 4.13.6 should have read 4.12.6 and this can be amended. <p>The following amendments are therefore recommended:</p> <ol style="list-style-type: none"> 1. The text changes to section 2.8 of the draft plan as follows: Sacred Heart Neighbourhood comprising Ballytruckle, Kilcohan and <u>Williamstown</u>. 2. Title of section 3.3.3 to read: 3.3.3 The Sacred Heart/ Ballytruckle/ Kilcohan/ <u>Williamstown</u>. 3. The word "small" removed for the narrative in section 3.3.3 as follows: Therefore, lands zoned for opportunity on the Airport Road are identified to facilitate the development of a small neighbourhood centre. 4. Table 3.2 to be amended as follows: Tier 4 Local shopping to include locations at <u>The Outer Ring Road Williamstown, Ballygunner Road (opposite Meadowlands), Proposed Neighbourhood Centre Knockboy.</u> 5. Land use zoning to accommodate new neighbourhood scale services at junction of Williamstown Road and Ballygunner Road.
WFD-C2-	The submission requests the rezoning of land at Knockhouse	The content of the submission is noted which seeks to rezone 114 ha of land from a mix of general amenity buffer and industry/enterprise to new residential use for the provision of low density housing. The quantum

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317	Upper, Gracedieu, Waterford from Agricultural to Low Density Residential (Executive housing).	of residentially zoned land required for Waterford City over the lifetime of the plan has been set out in the amended core strategy table and land use zoning for residential use has been reconsidered in response to submission ref. no. WFD-C2-363 made by the Office of the Planning Regulator. No further amendment is recommended to the draft Plan on foot of this submission.
WFD-C2-320	The submission relates to lands at The Paddocks, Williamstown Road, Waterford City. The main points of this submission are summarised as follows: Our client seeks to retain the existing residential zone on all undeveloped lands in keeping with the vision for 'The Paddocks' Residential Estate which will provide ongoing residential development currently taking place (including a proposed residential development which will be lodged imminently to the Planning Authority). Retaining residentially zoned lands within the forthcoming development plan that are deliverable, accessible and consolidate existing and approved development.	The content of the submission is noted. A portion of the lands (c. 0.12ha) which is zoned for new residential use in the current city development plan has been identified in error as amenity/ conservation in the draft Plan. It is recommended that an amendment be made to the draft plan to retain the residential use (R1) on the lands in question.
WFD-C2-321	This submission relates to 5.25 ha of Kingscroft Developments Ltd. lands at Carrickpherish Road, Waterford.	The content of the submission is noted. The lands are zoned for mixed use general development in the draft Plan. The submission seeks to rezone specific portions of the lands for a mix of commercial, amenity and low density residential development. The proposal is considered inappropriate in terms of delivering the general zoning types applied across the plan area, in particular low density residential. The lands are located on the main Carrickpherish Road which will likely be serviced by high capacity public transport in time as it lies at

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	Rather than the draft proposal to zone the entirety of the 5.25 ha lands for the purposes of Opportunity M1 it is submitted that the lands be zoned for the variety of purposes facilitating a mix of 'Opportunity M1', 'Residential Low Density R1.4' and 'Open Space / Amenity G5', which is more appropriate at this location responding to its receiving environment, while retaining substantive economic benefits and redevelopment/regeneration potential to the area.	the centre of Neighbourhood 1 Carrickphierish. No amendment to the draft plan is recommended on foot of this submission.
WFD-C2-324	The submission requests the rezoning of land at Williamstown, The Ring Road, Waterford City from agricultural zoning to a new tourism category to facilitate integrated tourism recreation, leisure resort, tourist accommodation, and low density residential.	The content of the submission is noted. It is considered that the concept behind the proposal will support the broader tourism services available within Waterford, subject to the preparation of a more detailed masterplan for the landholding prior to any development progressing. Any proposal should also consider how the development will integrate into the wider open space and recreation strategy for the city and how it will assist in achieving the citywide Decarbonising Zone. It is recommended that the land use zoning for the lands be amended to tourism related uses (TM) in the draft Plan and the following specific development objective be included in Appendix 2 for the lands: <u>Williamstown: The development of these lands will be subject to the preparation of a more detailed integrated masterplan for the landholding and the adjacent golf club in consultation with the Planning Authority 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 and support the Waterford Decarbonising Zone in policy objective W City 20.</u>
WFD-C2-325	The primary objective of this submission is to seek a designation of all of the subject lands at Coleville Road, Clonmel	The content of the submission is noted which requests that c. 10 ha of land zoned for general amenity/conservation buffer be rezoned to strategic residential reserve. In addition it is requested that provision be made to protect the line of a new river crossing south of Mongarriff roundabout to lands at Kilgainy Lower. The content of submission WFD-C2-341 is also be noted in considering this submission. The

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	Environs that fall outside the designated Flood Zone A boundary to be zoned, Zoning Objective R4.6 (Strategic Residential Reserve) as opposed to the proposed Zoning Objective G3 (Conservation, amenity or buffer space)	draft Plan has identified c. 13ha of strategic residential reserve lands which is considered adequate to cater for the housing targets set out in the NPF to 2040. It is considered therefore that the provision of additional land for this purpose is unnecessary and no amendment to the draft plan is recommended on foot of this submission. In terms of retaining land free from development along the line of a possible future river crossing it is recommended that the following specific development objective be included in Appendix 2 of the draft Plan: Clonmel Environs: To protect the line of a future river crossing linking Mongarriff roundabout to lands at Kilgaisy Lower.
WFD-C2-326	The submission requests the rezoning of land at Gracedieu, Waterford City from open space and community facilities to mixed/general community services/facilities.	The content of the submission is noted which seeks to rezone 6.5 ha of land at Roanmore GAA club from white lands to mixed use/general community services to facilitate possible development of a nursing home/assisted living/crèche. The lands are accessed via the Knockhouse Road which is un-serviced by public foul sewer, public lighting and footpaths. Relevant policies relating to the locating and servicing of nursing homes and similar facilities are set out in policy objectives H 12 & 13. It is considered that the location of the GAA lands would not be appropriate at present in the absence of public services and the proposed zoning would be premature the preparation of a masterplan and LAP for Neighbourhood 2 Gracedieu. No amendment is therefore recommended to the draft Plan on foot of this submission.
WFD-C2-328	The submission is written in opposition to a submission to rezone lands at/near Ceann a Bhathla, Heilbhc, An Rinn from agricultural use to tourist purposes (wfd-c2-16).	The content of the submission is noted as they relate to submission ref. no. WFD-C2-16. The lands in question are located at Helvick Head on lands currently zoned green belt and which lie within the Helvick Head to Ballyquin SPA. The area is un-serviced and the rezoning of the land for tourism development is considered inappropriate. No amendment recommended.
WFD-C2-331	The submission seeks to have existing land at Railway Square, Waterford City which is currently zoned Mixed / General Green / Recreation / Conservation, rezoned to City / Town / Village Centre	The content of the submission is noted. It is considered that retaining the amenity/conservation buffer space on land to the northwest of Railway Square would be important due to its close proximity to the Medieval city walls however the rezoning of lands between the building and along the river walk to city centre use would be appropriate. It is recommended that the lands between the buildings and along the John's River be rezoned from mixed general conservation use to city centre use (TC).
WFD-C2-332	The submission requests that the Core Strategic Aims of the development plan refer to the	The content of the submission is noted. It is recommended that the following text be included as a final paragraph in Section 1.1 of the draft Plan:

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	social determinants.	<u>It is recognised that realising the Vision for Waterford will be predicated on a healthy society based on the following social determinants: Economic Stability; Social and Community Context; Neighbourhood and built environment; Access to health care; and Education. The Development Plan identifies key strategic aims and actions to address each of these determinants with a view to reducing inequality and improving the well-being, health and lives of all citizens and their communities.</u>
WFD-C2-335	The submission seeks to have land at Butlerstown Road, Ballynaneashagh, Waterford rezoned from Mixed / General Green / Recreation / Conservation / Other to Residential	The content of the submission is noted. The lands relating to this submission (c.6 ha) are zoned for agricultural use in the current city development plan while the draft Plan identifies the lands for amenity general conservation/buffer as part of a possible future green link between Kilbarry/Waterford Nature Park and Waterford Greenway. It is considered that the proposed rezoning of the land to a residential use would be inappropriate. No change recommended to the draft plan on foot of this submission.
WFD-C2-336	The submission requests that lands located at Coxtown, Dunmore East are retained for Residential Use. The lands are subject to a current planning application for 16 dwellings.	The content of the submission is noted which requests that 1.1 ha of land be retained for new residential development in the draft Plan. The lands are located on the periphery of Dunmore East. The quantum of residentially zoned land required for Dunmore East over the lifetime of the plan has been set out in the amended core strategy table and land use zoning for residential use has been reconsidered in response to submission ref. no. WFD-C2-363 made by the Office of the Planning Regulator. It is considered that the land subject of this submission is surplus to the requirements of the plan and no amendment is therefore recommended to the draft Plan on foot of this submission.
WFD-C2-337	<p>This submission relates to lands at Kilbarry, Waterford City. We would ask that clarity is provided on the school site location as it will form a large part of our overall layout of our scheme for the lands in question.</p> <p>Our preferred location for the school site is NC04 as this would allow the natural expansion residential development next to the existing Foxwood Estate. It is</p>	The content of the submission is noted. With regard to the optimal location of lands for school development, the submission correctly identifies the lands suggested for one of two number school campuses required for the neighbourhood as lying north of the Kilbarry Link Road opposite the existing Tesco unit. This has been identified in the draft Plan for residential use however it is recommended that this portion of land be rezoned to mixed general community services use by way of amendment to the draft Plan. In terms of the preferred location for the second school campus located to the east of Kilbarry Road, a total area of 3.6 ha is required to facilitate the school campus and the relocation of land zoned in the current city development plan for mixed general community services and general amenity. The draft Plan identifies these lands to the south of the future road that will link the Tesco roundabout on the Kilbarry Road to the newly improved and realigned Lacken Road (subject of the recent LIHAF scheme). The expressed preference in the submission to have these lands located to the north of the future road is acceptable in principle however the layout of the school campus will need to have regard to the existing surface water attenuation tank and other service infrastructure present. It is duly recommended that the 3.6ha of land identified for

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	<p>our understanding however that both Secondary and Primary National Schools will need to be provided in the City South West Neighbourhood, with the Primary School currently proposed on the lands east of the Kilbarry Roundabout i.e. lands in our ownership.</p> <p>In this case, our preferred location for a new primary school would be north of the LIHAF road and east of the Kilbarry Roundabout as identified in Figure 3.3 of the Draft Plan and KLO5</p>	<p>community infrastructure (CI) be switched to the north of the proposed link road, adjacent to Templar's Hall, and that new residential land use zoning (R1) be provided for on the lands to the south of the future link road.</p>
<p>WFD-C2-341</p>	<p>The submission relates to lands at Coleville Road, Clonmel. The primary objective of this submission is to seek a designation of part of the subject lands to be zoned, Zoning Objective R1.3 (New Residential –Medium Density) and the remainder of the site to be zoned Objective R4.6 (Strategic Residential Reserve). It is also proposed to retain the existing road infrastructure objective to provide for a link road between Coleville Road and Spa Road, to the south-west</p>	<p>The content of the submission is noted which requests that c. 5.8 ha of land be rezoned from strategic reserve to new residential development and that c. 3 ha of land zoned for general amenity/conservation buffer be rezoned to strategic residential reserve. The quantum of residentially zoned land required for Clonmel over the lifetime of the plan has been calculated on the growth target set out in the NPF/RSES and S28 Ministerial Guidance, based on the existing proportion of population of the Key Town resident in Waterford County. This figure has been set out in the amended core strategy table and the quantum of residential lands has been reconsidered in response to submission ref. no. WFD-C2-363 made by the Office of the Planning Regulator. It is considered that the provision of additional land for new residential use as set out in the submission is surplus to the requirements of the plan and that additional strategic reserve lands above the quantum already provided for is similarly not required. IN terms of facilitating improved access to these lands zoned for strategic residential reserve it is recommended that the following specific development objective be included in Appendix 2 of the draft Plan:</p> <p><u>Clonmel Environs: The development of the strategic residential reserve lands will be informed by a masterplan for the area with particular focus on access and linkages to Clonmel town centre, permeability, servicing and amenity provision.</u></p>

URN	Submission Summary	Chief Executive Response & Recommendation
	thereof	No further amendment is recommended to the draft Plan on foot of this submission.
WFD-C2-342	<p>The submission requests the Rezoning of 7.4 ha (Area B on attached Map) at Couse / Ballindud, Waterford</p> <p>The submission request that the 7.3 ha in Area B Lands be rezoned residential to allow future development when the drainage scheme is upgraded during the period of the next development plan.</p> <p>We would also support the proposed “mixed use” zoning objective on the Area D lands as it would provide for a range of suitable development opportunities in the future such as the pumping station.</p>	<p>The content of the submission is noted. The quantum of residentially zoned land required for Waterford City over the lifetime of the plan has been set out in the amended core strategy table and land use zoning for residential use has been reconsidered in response to submission ref. no. WFD-C2-363 made by the Office of the Planning Regulator. In terms of the individual parcels of land the following response refers:</p> <p>Area A: These are identified for new residential development phase 1 & 2 in the draft Plan and no change is recommended at this time.</p> <p>Area B: This area of (7.2 ha) will not be required during the lifetime of the Development Plan. It would be inappropriate to zone the lands for development at this time given the location immediately adjacent to Kilbarry pNHA and lying remote from the built up area of the city.</p> <p>Area C: No change to the land use zoning is recommended but a specific development objective is recommended as follows: <u>Waterford City Kilbarry Bog pNHA: We will seek to enhance the viability of this wetland habitat by directing surface water runoff from development on neighbouring lands into the wetland and ensure that where development takes place on adjoining lands that an appropriate buffer is provided for to prevent disturbance and encroachment into the habitat.</u></p> <p>Area D: This area of 1 ha lies partially within floodzone B and is located remote from the existing built up area of the city. No change to the land use zoning is recommended.</p>
WFD-C2-345	<p>This submission seeks the Sustainable Master planning of the Carrickphierish Road Area. The submission requests that Waterford City carefully consider the zoning proposals in this area before repeats of the same mistakes of the past are made. The area requires a more thoughtful masterplan to be put</p>	<p>The content of the submission is noted in addition to WFD-C2-69 and other submission relating to neighbourhoods 1 and 2 City North West Neighbourhood. In this regard it is reiterated that significant public consultation will be undertaken in order to prepare a Local Area Plan for the area. Comments in relation to the appropriate housing type and tenure mix are also noted and amended housing policies have been included to give effect to the amended HNDA and HST which is attached as Appendix xx of this report. It is recommended that the following specific development objective be included by way of amendment to the draft Plan: <u>Carrickphierish: The future development of lands bounded by the Carrickphierish Road, Knockhouse Road, Butterfield and Mount Suir Manor apartments will be informed by a masterplan for the entirety of the undeveloped lands to be prepared by the developer(s) in consultation with the planning authority.</u></p>

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	<p>in place. This needs to be produced in conjunction with all stakeholders – including local residents and land owners in the area. We would suggest as a minimum requirement no further apartment type developments are allowed on these lands. Furthermore there is simply not enough amenity space, green space and community facilities available to the residents in the area to accommodate any further development.</p>	
<p>WFD-C2-346</p>	<p>The submission requests that lands at Roselawn, Tramore are rezoned from mixed/general green/recreation/conservation to Residential</p>	<p>The content of the submission is noted which requests that 0.13 ha of land be rezoned from open space to new residential use. The lands are located centrally within the Roselawn housing estate. The quantum of residentially zoned land required for Tramore over the lifetime of the plan has been set out in the amended core strategy table and land use zoning for residential use has been reconsidered in response to submission ref. no. WFD-C2-363 made by the Office of the Planning Regulator. It is considered that the land subject of this submission is surplus to the requirements of the plan, act as active open space for the Roselawn area and no amendment is therefore recommended to the draft Plan on foot of this submission.</p>
<p>WFD-C2-347</p>	<p>This submission seeks to have existing land rezoned from Mixed / General Green / Recreation / Conservation / Other to Tourism at Greenway Manor Hotel, Old Court, Killotteran, Waterford</p> <p>The rezoning of the land around the property will allow for the further development of the hotel.</p>	<p>The content of the submission is noted. The lands relating to this submission (c8.8 ha) are zoned greenbelt in the current county development plan and this has been reflected in the general amenity conservation buffer zoning in the draft Plan. The proposed lands lie adjacent to the Woodstown Viking site and the N25 bypass and contain the lands on which the Greenway Manor Hotel is located. Given the close proximity to the archaeological site and the potential national/international significance of the site it is considered that until such time as further investigative work and management/conservation plans/actions have been identified for the Woodstown site that it would be premature to zone the lands as requested. It is however recommended that an amendment be made to the draft Plan rezoning the lands on which the hotel is located and its immediate curtilage for tourism development (TM).</p>

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WFD-C2-348	<p>At a strategic level the submission supports the draft plan. Additional consideration should however be given to how the TUSE can effect deeper change across the society and economy of the region and how best the draft plan can support the scaling up and enhanced function of the university in this regard.</p>	<p>The content of the submission is noted in terms of the broader role to be played by TUSE in the sustainable development of our communities, economies and society across Waterford and the South Region. In support of the submission as it relates to Chapters 1 – 3 the following amendment is recommended to point b) in section 1.6:</p> <p><u>The plan will also support access for all, to a range of quality education facilities, which is a defining characteristic of attractive, successful and competitive places. This will be achieved by supporting the scaling up of higher education provision and the deepening of the impact on the society and economy of the South East Region through increased high quality research and innovation activity through our growth and upgrade of all academic institutions, particularly the development of Waterford Institute Technology (WIT) to the Technological University of the South East (TUSE), and promoting and fostering links with business/enterprise and technological innovation.</u></p> <p>It is also recommended that a new paragraph be inserted by way of an amendment to the draft Plan in section 2.12 to read as follows: <u>In addition to the resident population targets of the NPF/RSES, it is estimated that a university in the region would attract an additional 1,500 learners annually and within five years this would equate to in excess of 6,000 additional learners. The scale of the population specifically in Waterford would grow to about 12,000- 14,000 learners over that period. A doubling of graduate student numbers and of international learners would bring that population to about 15,000. There would be expected to be a pro-rata growth both in faculty and professional/ managerial/ support staff along with the growth in students, with an estimated additional staff complement of about 500 (to a total complement of about 1,300) based in Waterford.</u></p>
WFD-C2-356	<p>The submission seeks the retention of a residential land-use zoning designation at the site located at Duckspool, Dungarvan, Co. Waterford. Specifically, the application of a 'New Residential Medium Density - NR (M)' (GZT: R1.4) zoning is respectfully sought.</p> <p>Planning Justification Report and SSFRA submitted</p>	<p>The content of the submission is noted as is the recent decision of An Bord Pleanála on SHD Case No. 310782-21. While the submission contends that the lands in question would pass the development plan justification test and queries whether the SFRA has considered the use of the lands for residential development, it is considered that the plan making justification test cannot be passed at this location, that the area is undefended pending the implementation of future defence measures by the OPW and that it is inappropriate for the draft plan to accommodate highly vulnerable land uses within flood zones A & B. In addition this report has made recommendations in relation to achieving the core strategy in response to WFD-C2-363 which should also be noted. No change recommended to the draft plan on foot of the submission.</p>

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	<p>This site is the subject of an SHD application (ABP Ref. TA93.310782), which comprises 218 no. residential units, crèche, community car park, open space and associated site works</p>	
WFD-C2-358	<p>The summary is written in opposition to the proposed zoning of lands in Faithlegg from agricultural to residential. The area has neither the infrastructure nor capacity to cope with or maintain an influx of people to the area in the form of new housing.</p>	<p>Details of the submission are noted. The response and recommendation of this report to WFD-C2-28 should be noted.</p>
WFD-C2-360	<p>The submission lists a number of objectives in reimagining and rethinking Waterford (Metropolitan growth, town centres that work, strategy for reimagining and rethinking our town centres, urban living).</p>	<p>The content of the submission is noted relating to the need to provide zoned serviced land to facilitate housing development in line with the NPF and RSES. Amendments have been made pursuant to submissions from the OPR and SRA (WFD-C2-363 and 311 respectively) to ensure compliance with national and regional housing targets while the housing strategy has also been amended to have full regard the housing requirements over the plan period. No further amendment recommended on foot of this submission.</p>
WFD-C2-362	<p>This submission seeks to rezone c.7.3Ha of agricultural land from Strategic Residential Reserve to residential use in Shandon, Dungarvan.</p>	<p>The content of the submission is noted. The lands in question are located in an area of Dungarvan where the long term objective is to develop significant residential and supporting amenity, community and social uses. Having regard to the quantum of land required for the purposes of the core strategy it is considered that zoning the lands for residential development at this time would be inappropriate. The content of submission WFD-C2-363 and WFD-C2- 40 should also be noted and considered in tandem with this response and recommendation. No amendment to the draft plan is recommended on foot of this submission.</p>

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WFD-C2-368	The submission calls for the development of public park on lands at junction of Vincent White Road and Ashe Road in Waterford City. The public park is envisaged as having facilities for all ages, from a playground, skate park, walking paths, an outdoor gym, perhaps even a stretch tent structure which could be used as an area for yoga, movement classes for older people, community social events.	The content of the submission is noted. The area referred to is currently zoned for mixed general amenity use the junction of Mattie's Hill and Vincent White Road. It will be important that the policy objective W City 19 the citywide amenity recreation and blue green strategy will consider the use of the various amenity spaces across the city in conjunction with Healthy Waterford. No amendment to the draft Plan recommended on foot of the submission.
WFD-C2-369	In response to submission WFD-C2-28 this submission objects to the proposed re-zoning of the land at Faithlegg, Co. Waterford from agricultural to residential/amenity	The content of the submission and WFD-C2-28 is noted. The lands in question are located in a rural area at Faithlegg adjacent to Faithlegg House Hotel. The area is un-serviced and is excessively developed given its rural context. It is considered that the proposed rezoning would be inappropriate. No amendment to the draft plan is recommended on foot of this submission.
WFD-C2-370	The submission calls for the reinstatement of the Tourism (C5) zoning at Kilgrovan, Clonea, Dungarvan. Co Waterford.	The content of the submission is noted along with that of WFD-C2-204. It is recommended that the zoning for tourism related land use (TM) be included as an amendment to the draft Plan.
WFD-C2-371	The submission seeks to retain the residential land use zoning on lands in Killea, Dunmore East and not change to strategic reserve	The content of the submission is noted which seeks to retain residential and mixed use development on lands at Killea Dunmore East. The quantum of residentially zoned land required for Dunmore East over the lifetime of the plan has been set out in the amended core strategy table and land use zoning for residential use has been reconsidered in response to submission ref. no. WFD-C2-363 made by the Office of the Planning Regulator. It is considered that the land subject of this submission is surplus to the requirements of the plan and no amendment is therefore recommended to the draft Plan on foot of this submission.
WFD-C2-376	Population: Increase planned population growth in Portlaw for the period 2016-2031 to at least	The content of the submission is noted. The following response and recommendation relate: 1. The population/housing target set out in the draft Plan is representative of the target to grow the population of such towns by c. 23% above 2016 Census by 2040, in line with the NPF, RSES and the housing

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	<p>500 people.Zoning:In order for Portlaw to expand and develop, sufficient land must be zoned residential in order to cater for the expected increase in population. There has been a chronic lack of suitably zoned sites in the area for several years, particularly for local people that wish to build.Provision must also my made for a small hotel type development in order to cater for local events and attract tourist in to capitalise on our location to the Comeragh Uplands and Greenway.Suitable zoning must also be included to cater for a new fuel/petrol station which is required for the benefit of the local residents.</p>	<p>delivery targets of the Housing Strategy. The amended core strategy table has been prepared in response to WFD-C2-363.</p> <p>2. A new specific policy objective can be included in Appendix 2 to support the footpath between the town centre and the Church/Curraghmore Estate.</p> <p>3. Provision has been made for residential development in line with the core strategy and additional commercial development lands have been identified to facilitate a mix of commercial uses.</p> <p>It is recommended that the following specific development objective be included in Appendix 2 of the draft Plan: <u>Portlaw: to facilitate and support the provision of a new footpath to link the town centre to the St. Patricks Church and Curraghmore Estate.</u></p> <p>No further amendment to the draft plan is recommended on foot of this submission.</p>
WFD-C2-379	<p>Kilmeaden Creamery Cheese Factory Site - Kilmeaden, Waterford.</p> <p>The submission calls for engagement with landholders regarding a future master plan for the area - There is an opportunity to build high quality new family homes that provide for all strata of society. High density housing through the SHD</p>	<p>The content of the submission is noted. Specific development objective KLMD01 in Appendix 2 of the draft Plan provides the basis for any future development in this area of the village. The quantum of housing required over the lifetime of the plan and the function of the village has been set out in the amended core strategy, the amended Table 2.1. and associated narrative in section 2.9 of the draft Plan in response to WFD-C2-363. No further amendment is recommended to the draft Plan on foot of this submission.</p>

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	process should be resisted at this location.	
WFD-C2-379	<p>12. Faithlegg Land Zoning</p> <p>The submission includes support for the zoning of 3.5Ha of agricultural lands for residential use in Faithlegg</p>	<p>The content of the submission is noted. The lands in question are located in a rural area at Faithlegg adjacent to Faithlegg House Hotel. The area is un-serviced and is excessively developed given its rural context. It is considered that the proposed rezoning would be inappropriate. No amendment to the draft plan is recommended on foot of this submission.</p>
WFD-C2-381	<p>The submission supports the schools zoning as proposed in the Draft Plan - S5 mixed/general community services/facilities. The submission requests the following policy statement be added to the Waterford CDP:</p> <p>"The Council will, without prejudicing the other policy, zoning and planning objectives of the development plan, seek to locate nursing homes close to schools and other amenities that would benefit the lives of the older people who live in nursing homes.</p>	<p>The content of the submission is noted. The lands relating to the Gaelcolaiste are zoned S5 mixed general community services and accommodate the use of the lands as currently occupied (CI community infrastructure under the new GZTs set out in response to WFD-C2-363). Policy objectives SC 14 – 19 deal with the provision of school facilities. No amendment is recommended to the draft Plan on foot of this submission.</p>
WFD-C2-382	<p>The submission supports the schools zoning as proposed in the Draft Plan - S5 mixed/general community services/facilities. The submission requests the following policy statement be added to the Waterford CDP:"The Council will, without</p>	<p>The content of the submission is noted. In addition to policy objectives SC 14 – 19 relating to the location of school facilities, policy objectives H12 and 13 promote the location of nursing homes and similar accommodation types at appropriate locations within our towns and villages close to amenities and facilities. It is considered that these policies are sufficiently robust to ensure inclusivity and integration of such accommodation types. No amendment is recommended to the draft Plan on foot of this submission.</p>

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	prejudicing the other policy, zoning and planning objectives of the development plan, seek to locate nursing homes close to schools and other amenities that would benefit the lives of the older people who live in nursing homes.	
WFD-C2-383	This submission seeks to rezone land at Garranbaun, Dungarvan from agricultural to tourism use.	The content of the submission is noted. The lands are located in a rural un-serviced location, adjacent to the N25 and some distance from any tourism amenity or population centre. Policy objectives ECON 22 identifies how/where such tourism accommodation facilities referred to in the submission maybe developed and it would be inappropriate to zone parcels of lands for tourism development outside of the zoned settlements. No amendment is recommended to the draft Plan on foot of this submission.
WFD-C2-384	This submission seeks to rezoning land (originally Star of the Sea Convent and garden) at Old Waterford Road/ Convent Hill, Tramore from S5 Community Service to (A) Office and General Business, and (B) Residential Use Zoning.	The content of the submission is noted. The proposed reuse of the former residence is acceptable in principle. It is recommended that entire area of the former residence be rezoned from mixed/ general community services/facilities to a mixed use regeneration/ opportunity zoning (RE).
WFD-C2-385	This submission seeks to rezoning land (at the Gate Lodge of Star of the Sea Convent and garden) at Old Waterford Road/ Convent Hill, Tramore from S5 Community Service to Residential Use Zoning.	The content of the submission is noted. The proposed reuse of the former lodge associated with the former residence of the religious order is acceptable in principle. It is recommended that entire area of the former residence be rezoned from mixed/ general community services/facilities to a mixed use regeneration/ opportunity zoning (RE).
WFD-C2-386	This submission seeks to rezoning land at St. Stephen's Monastery Building, 25 Patrick Street, Waterford from S5 Community Service to M2 City Town Centre.	The content of the submission is noted. The proposed reuse of the former residence is acceptable in principle. It is recommended that entire area of the former residence be rezoned from mixed/ general community services/facilities to a city centre use (TC).

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WFD-C2-387	This submission seeks to rezoning land at St. Stephen's Monastery Building, 25 Patrick Street, Waterford from S5 Community Service to M2 City Town Centre.	The content of the submission is noted. The proposed reuse of the former residence is acceptable in principle. It is recommended that entire area of the former residence be rezoned from mixed/ general community services/facilities to a city centre use (TC).
WFD-C2-388	This submission welcomes the Proposed Zoning (G5 - mixed general green conservation) of lands at Bookie Woods, Tramore.	The content of the submission is noted as is the content of WFD-C2-79. No amendment to the draft Plan recommended on foot of the submission.
WFD-C2-389	This submission welcomes the Proposed Zoning (G5 - mixed general green conservation) of lands at Bookie Woods, Tramore.	The content of the submission is noted as is the content of WFD-C2-79. No amendment to the draft Plan recommended on foot of the submission.
WFD-C2-392	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>The content of the submission is noted. Policy objective CS 07, ECON 6, & 7, H 5 & 6 refer to the role of active land management in bring about regeneration. The preparation of viability assessments for the brownfield and infill sites would be appropriate but is not possible during the current plan making period. The following amended text is recommend to be added to Policy H 5: To maximise the efficient use of existing infrastructure and services and promote a positive modal shift towards sustainable transport use, we will facilitate the sustainable, compact, sequential regeneration and redevelopment of urban areas through the appropriate development of identified key infill and brownfield sites as per Table 3.1 for a mix of uses appropriate to the location. <u>To assist in this regard we will carry out a viability assessment for key brownfield sites during the lifetime of the development plan with a view to assisting in delivery of regeneration projects.</u></p> <p>No further amendment to the draft plan is recommended on foot of this submission.</p>
WFD-C2-392	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	The content of the submission is noted with regard to the quantum of land available for house building. 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. While these targets have been aligned to the NPF/RSES and S28 Guidelines, ample lands have been zoned to facilitate housing provision and as such no amendment is therefore recommended to the draft Plan on foot of this submission.

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	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.	
WFD-C2-393	This submission welcomes the Proposed Zoning (G5 - mixed general green conservation) of lands at Bookie Woods, Tramore.	The content of the submission is noted as is the content of WFD-C2-79. No amendment to the draft Plan recommended on foot of the submission.
WFD-C2-394	The submission seeks to ensure that the plan allows for development of this site as a solely residential development.	The content of the submission is noted. The area referred to will be capable of development for residential development and other uses which may arise at a future date. No amendment to the draft Plan recommended on foot of the submission.
WFD-C2-395	The submission is seeking a change in the proposed zoning of the land in Portlaw of the Northern Portion of his site (i.e. some 2.52 hectares) from R4.6: "Strategic Residential Reserve" to R1.3: "New/Proposed Residential, Medium Density"	The content of the submission is noted which seeks to rezone 2.5 ha land for new residential development. The quantum of residentially zoned land required for Portlaw over the lifetime of the plan has been set out in the amended core strategy table and land use zoning for residential use has been reconsidered in response to submission ref. no. WFD-C2-363 made by the Office of the Planning Regulator. It is considered that the land subject of this submission is surplus to the requirements of the plan and no amendment is therefore recommended to the draft Plan on foot of this submission.
WFD-C2-396	The submission recommends that 'Protection Status' be given to the Bilberry goats and that a permanent Habitat (Eco-corridor) is established to sustain the animals for future generations. The zoning of the lands at Bilberry as 'open space' does not provide adequate protection for	The content of the submission is noted. Lands zoned for residential development in the current city development plan have been rezoned for open space and amenity purposes for the broader use of the citizens of Waterford. These lands may provide additional habitat for the goats in Bilberry. No amendment to the draft Plan recommended on foot of the submission.

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	<p>the natural habitat of the Bilberry Goats.</p> <p>The rezoning of land in Bilberry for allocation of Habitat needs to be established, in this Development Plan, before it's too late for the Bilberry goats.</p>	
WFD-C2-398	This submission welcomes the Proposed Zoning (G5 - mixed general green conservation) of lands at Bookie Woods, Tramore.	The content of the submission is noted as is the content of WFD-C2-79. No amendment to the draft Plan recommended on foot of the submission.
WFD-C2-399	<p>The submission highlights concerns in relation to the following three areas:</p> <p>1 - The density housing levels set out in section 5 of the Area Action Plan.</p> <p>2 - The aims and objectives to avoid social segregation and promotion of social cohesion (section 8.4 of the current Draft Development Plan)</p> <p>3 - The proposal to "improve and upgrade" the Knockhouse Road and its future connection to the W.I.T. Arena Area.</p>	The content of the submission is noted along with that of WFD-C2-69, 139, 163, 301 & 345. The preparation of the LAP for Neighbourhood 2 Gracedieu as set out in the draft Plan will consider the challenges and opportunities to developing a sustainable neighbourhood in this area while having regard to the original action plan for Neighbourhoods 1 & 2. This will be informed by public consultation will all communities with an interest in the development of the area. The amended HNDA and Housing Strategy (appendix xx of this report) has considered further the relevant housing needs and demands for Waterford city and county over the development plan period and has provided the basis for amended housing policies set out in this report. No amendment recommended to the draft Plan on foot of this submission.
WFD-C2-403	This submission welcomes the Proposed Zoning (G5 - mixed general green conservation) of lands at Bookie Woods, Tramore.	The content of the submission is noted as is the content of WFD-C2-79. No amendment to the draft Plan recommended on foot of the submission.
WFD-	The submission seeks the	The content of the submission is noted which seeks to rezone .95 hectares of general amenity land to an

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C2-404	rezoning of land at Dungarvan Road, Clonmel. County Waterford from G3 conservation to C2.1 Industrial Enterprise Employment.	industrial enterprise use on the periphery of Clonmel. The lands lie within floodzone A, just south of the River Suir. The SFRA for lands within the floodplain in Clonmel recommends that lands currently zoned for amenity/open space should be so retained. It is considered therefore that the proposed rezoning would be inappropriate and as such no amendment is recommended to the draft Plan on foot of this submission.
WFD-C2-406	This submission welcomes the Proposed Zoning (G5 - mixed general green conservation) of lands at Bookie Woods, Tramore.	The content of the submission is noted as is the content of WFD-C2-79. No amendment to the draft Plan recommended on foot of the submission.
WFD-C2-407	The submission seeks the zoning of land lands at Lemybrien, Co. Waterford.	The content of the submission is noted which seeks to include 0.8 hectares of land within the settlement boundary of Lemybrien. The proposal will include the rear section of a field included within the boundary. The proposal is acceptable and it is recommended that the boundary of the village be amended accordingly to include the relevant area.
WFD-C2-408	The submission seeks to rezone lands to the rear of a Proposed Protected Structure to residential low density in Tramore	The content of the submission is noted which requests that 2.5 ha of land be zoned for residential development. The lands lie to the rear of Glebe House, Newtown. The quantum of residentially zoned land required for Tramore over the lifetime of the plan has been set out in the amended core strategy table and land use zoning for residential use has been reconsidered in response to submission ref. no. WFD-C2-363 made by the Office of the Planning Regulator. It is considered that the land subject of this submission is surplus to the requirements of the plan and no amendment is therefore recommended to the draft Plan on foot of this submission.
WFD-C2-417	The submission seeks the rezoning of land at Waterford Retail Park to M5 General Business to accommodate Phase 2 of the Retail Park.	The content of the submission is noted. In response it is considered that the proposed amendment to the land use zoning map is appropriate as per figure 4.1 of the submission and this amendment is duly recommended. The land should be zoned for general business (GB) by way of amendment to the draft Plan.
WFD-C2-418	The submission requests that all the sections within the plan begin with reference to Climate Change which would set and continue the tone throughout the document. It also submits that more emphasis is placed on the	The content of the submission is noted. In response the draft Plan has identified at the outset of each chapter the strategic outcomes which underpin each chapter, based on the UN SDGs. Each chapter with the exception of chapter 11 provides for tackling climate change as a strategic outcome. Policy objective UTL 17 identifies policies relating to waste and supports the principles of the circular economy in this regard along with the Southern Regional Waste Management Plan. In terms of climate resilient house design, policy objective H 18 provides for climate resilient measures to be incorporated in designs. It is considered that additional reference can be made to other green building design techniques to further enhance this policy

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	circular economy and that the Circular Economy Action Plan is referred to in its own right* Also could I suggest that Albedo enhancement is a core strategy within the document particularly regarding roofing.	by addition of the following bullet point: <u>Incorporates element of green building design through choice of efficient renewable materials, waste reduction, siting and design.</u>
WFD-C2-421	The submission requests the rezoning of land at Nymphall, Dunmore East, County Waterford from strategic reserve to low density residential use.	The content of the submission is noted which requests that 5.2 ha of land be zoned for residential development at Knockacurran. The quantum of residentially zoned land required for Dunmore East over the lifetime of the plan has been set out in the amended core strategy table and land use zoning for residential use has been reconsidered in response to submission ref. no. WFD-C2-363 made by the Office of the Planning Regulator. It is considered that the land subject of this submission is surplus to the requirements of the plan and no amendment is therefore recommended to the draft Plan on foot of this submission.
WFD-C2-423	The submission is written in opposition to the zoning of lands at Faithlegg	The content of the submission is noted in reference to WFD-C2-28. The lands in question are located in a rural area at Faithlegg adjacent to Faithlegg House Hotel. The area is un-serviced and is excessively developed given its rural context. It is considered that the proposed rezoning would be inappropriate. No amendment recommended.
WFD-C2-424	The submission requests the rezoning of lands at Knockancurran, Dunmore East, County Waterford from strategic reserve to Rl.4 Low Density Residential	The content of the submission is noted which requests that 1 ha of land be zoned for residential development at Knockacurran. The quantum of residentially zoned land required for Dunmore East over the lifetime of the plan has been set out in the amended core strategy table and land use zoning for residential use has been reconsidered in response to submission ref. no. WFD-C2-363 made by the Office of the Planning Regulator. It is considered that the land subject of this submission is surplus to the requirements of the plan and no amendment is therefore recommended to the draft Plan on foot of this submission.
WFD-C2-425	The submission requests the rezoning of lands at Nymphall, Dunmore East, Waterford from open space to low density residential use.	The content of the submission is noted which requests that 1 ha of land be rezoned from amenity to residential development at Nymphall/Rear of Wellington Terrace. The lands are elevated and poorly accessible. The quantum of residentially zoned land required for Dunmore East over the lifetime of the plan has been set out in the amended core strategy table and land use zoning for residential use has been reconsidered in response to submission ref. no. WFD-C2-363 made by the Office of the Planning Regulator. It is considered that the land subject of this submission is surplus to the requirements of the plan and no amendment is therefore recommended to the draft Plan on foot of this submission.
WFD-C2-	This submission requests that lands are zoned for Residential	The content of the submission is noted in reference to WFD-C2-28. The lands in question are located in a rural area at Faithlegg adjacent to Faithlegg House Hotel. The area is un-serviced and is excessively

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426	use at Faithlegg	developed given its rural context. It is considered that the proposed rezoning would be inappropriate. No amendment to the draft plan is recommended on foot of this submission.
WFD-C2-427	The submission seeks the rezoning of lands at Pickardstown, Tramore from 'Light industrial, enterprise and employment' to Opportunity Site/ Mixed use/ general business.	The content of the submission is noted. In response it is considered that the proposed amendment to rezone the land from industry/enterprise and employment use to mixed general business (GB) use is appropriate. The proposed amendment to the draft Plan is duly recommended.
WFD-C2-428	The submission requests the zoning of land at Summerhill, Tramore, Co. Waterford continue in their present classification 'Town Centre'.	The content of the submission is noted. In response it is considered that the proposed amendment to rezone the land from general business use to town centre use (TC) is appropriate and will facilitate a broader spectrum of uses to be accommodated. The proposed amendment to the draft Plan is duly recommended while it is also recommended that the adjacent general business lands at Summerhill be duly rezoned as town centre (TC).
WFD-C2-433	This submission welcomes the Proposed Zoning (G5 - mixed general green conservation) of lands at Bookie Woods, Tramore.	The content of the submission is noted as is the content of WFD-C2-79. No amendment to the draft Plan recommended on foot of the submission.
WFD-C2-434	This submission welcomes the Proposed Zoning (G5 - mixed general green conservation) of lands at Bookie Woods, Tramore.	The content of the submission is noted as is the content of WFD-C2-79. No amendment to the draft Plan recommended on foot of the submission.
WFD-C2-436	This submission is made in response to submission WFD-C2-28. It objects to the proposed rezoning of the land at Faithlegg, Co. Waterford from agricultural to residential/amenity.	The content of the submission is noted in reference to WFD-C2-28. The lands in question are located in a rural area at Faithlegg adjacent to Faithlegg House Hotel. The area is un-serviced and is excessively developed given its rural context. It is considered that the proposed rezoning would be inappropriate. No amendment to the draft plan is recommended on foot of this submission.
WFD-C2-437	This submission is made in response to submission WFD-C2-28. It objects to the proposed rezoning of the land at Faithlegg,	The content of the submission is noted in reference to WFD-C2-28. The lands in question are located in a rural area at Faithlegg adjacent to Faithlegg House Hotel. The area is un-serviced and is excessively developed given its rural context. It is considered that the proposed rezoning would be inappropriate. No amendment to the draft plan is recommended on foot of this submission.

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	Co. Waterford from agricultural to residential/amenity.	
WFD-C2-441	The submission seeks the rezoning of lands at Knockateemore, Dungarvan, Co. Waterford from greenbelt to residential.	The content of the submission is noted which requests that c.2 ha of land be zoned for residential development within the greenbelt bounding Dungarvan, north of Cruachán. There are numerous houses located across rural parts of Waterford and on green belt zoned lands and it would be inappropriate to zone each of these for residential use. Policy objectives H 27 – 30 deal with housing in rural locations and on greenbelt lands and it is considered appropriate that any proposal for development of the lands be duly considered in terms of those policy objectives. No amendment is therefore recommended to the draft Plan on foot of this submission.
WFD-C2-445	The submission raises concern with regards to the removal of the protections afforded to the Knockhouse Road in the Area Action Plan of 1999, increase the housing density levels on lands adjacent to the Knockhouse, Gracedieu and Bilberry Roads and the apparent removal of limits on social and affordable housing in the current Development Plan, which had the aim of avoiding undue social segregation.	The content of the submission is noted along with that of WFD-C2-69, 139, 163, 301, 345 and 399 and the recommendations pertaining to same. No further amendment recommended to the draft Plan on foot of this submission.
WFD-C2-446	The submission seeks the rezoning of land The Burgery, Dungarvan, Co. Waterford	The content of the submission is noted which requests that c.4.6ha of land be zoned for residential development during the life of the Plan between the N25 and Abbeyside GAA. The quantum of residentially zoned land required for Dungarvan over the lifetime of the plan has been set out in the amended core strategy table and land use zoning for residential use has been reconsidered in response to submission ref. no. WFD-C2-363 made by the Office of the Planning Regulator. It is considered that the land subject of this submission is surplus to the requirements of the plan and no amendment is therefore recommended to the draft Plan on foot of this submission.
WFD-C2-	The submission seeks the rezoning of land at Piltown,	The content of the submission is noted which seeks to include 1 ha of land for residential development. No map of the land has been provided. The draft Plan has identified a development boundary for Piltown which

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447	Kinsalebeg, Co. Waterford	<p>includes some land previously zoned for development. Having regards to the submission details it is recommended that an amendment be made to the settlement boundary to include an additional 0.5ha be included within the settlement boundary in the vicinity of specific development objective PKD02. The text of PKD02 should be amended as follows:</p> <p>Development on the site shall not detract from the visual setting of the Youghal Estuary and shall retain future vehicular access to lands adjacent to the west..</p>
WFD-C2-448	The submission seeks the rezoning of land Westtown, Tramore from agriculture to residential	The content of the submission is noted which requests that c.4.6ha of land at Westtown be zoned for residential development during the life of the Plan. No map is provided to identify the exact location however lands in the vicinity are identified as conservation/amenity or buffer space. The quantum of residentially zoned land required for Tramore over the lifetime of the plan has been set out in the amended core strategy table and land use zoning for residential use has been reconsidered in response to submission ref. no. WFD-C2-363 made by the Office of the Planning Regulator. It is considered that the land subject of this submission is surplus to the requirements of the plan and no amendment is therefore recommended to the draft Plan on foot of this submission.
WFD-C2-449	The submission requests that lands in the village of Clashmore are zoned for residential use	The content of the submission is noted which requests that c.1ha of land be zoned for residential development in Clashmore. The lands are located within the development boundary of the village as defined in the draft Plan and as such residential development may be considered. As such no amendment is therefore recommended to the draft Plan on foot of this submission.
WFD-C2-451	The submission requests that lands shown are to be included with the Settlement boundary of Tallow and zoned for residential/community use	The content of the submission is noted which requests that land be zoned for housing and community related development in Tallow. The lands are located within the development boundary of the town as defined in the draft Plan and as such the uses suggested may be considered. No amendment is therefore recommended to the draft Plan on foot of this submission.
WFD-C2-452	This submission requests that lands in use as a car-park in Tallow are zoned for residential use	Submission withdrawn.
WFD-C2-453	This submission seeks to change the proposed zoning of 6.5Ha of lands at Duckspool, Dungarvan to "RI.3 New Residential - Medium Density" or failing that change	The content of the submission is noted which requests that c.6.5ha of land be rezoned from mixed/general conservation to either new residential or strategic residential reserve. The lands are located between St. Augustine's and Abbeyside GAA. The quantum of residentially zoned land required for Dungarvan over the lifetime of the plan has been set out in the amended core strategy table and land use zoning for residential use has been reconsidered in response to submission ref. no. WFD-C2-363 made by the Office of the

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	the zoning to "R4.6 Strategic Residential Reserve" from the zoning of "GS Mixed/general 'green' /recreational/conservation" proposed in the Draft Development plan.	<p>Planning Regulator. It is considered that the land subject of this submission is surplus to the requirements of the plan. It is also considered that there is no requirement to identify additional strategic residential reserve lands at this time. It is recommended that the following specific development objective be included as an amendment to the draft Plan:</p> <p><u>Dungarvan: Promote and facilitate enhanced active travel infrastructure across and within the Duckspool area from the Clonea Road to Scoil Garabhain, St. Augustine's College and the GAA grounds in addition to new vehicular access from Friary College Road to the GAA grounds.</u></p> <p>No further amendment recommended to the draft Plan on foot of this submission.</p>
WFD-C2-454	The submission requests that the current residential zoning on the lands at the subject site on the Old Waterford Road, Tramore remain in situ.	<p>The content of the submission is noted and the issues raised considered reasonable. The following amendments are recommended;</p> <ol style="list-style-type: none"> 1. The entire area including the narrow strip of existing residential land along the Old Waterford Road be zoned for regeneration purposes (RE). 2. <u>The land use zoning matrix in Table 11 be amended to facilitate multiple residential developments on lands zoned for mixed use/opportunity (this is in addition to the review of Table 11 and the associated general zoning types of the draft Plan on foot of WFD-C2-363 and S 28 Development Plan: Guidelines for Planning Authorities, consultation draft August 2021.</u>
WFD-C2-455	The submission seeks to have 3.85Ha of lands zoned for residential use to cater from local housing need in An Rinn	<p>The content of the submission is noted which seeks to zone 3.5ha of land to the south of Mooney's Bar and neighbouring Cluain na Sí housing scheme for residential use. Public sewer and water services are available. The quantum of residentially zoned land required for Gaeltacht na nDéise over the lifetime of the plan has been set out in the amended core strategy table and land use zoning for residential use has been reconsidered in response to submission ref. no. WFD-C2-363 made by the Office of the Planning Regulator. It is considered that the entirety of land subject of this submission would be surplus to the requirements of the plan. It is recommended that c. 1 ha of land on the lower portion of the land identified be zoned for new residential development (R1) so as to facilitate some choice in housing market in support for the housing needs of the Gaeltacht community.</p> <p>A specific development objective is also recommended for inclusion in Appendix 2 of the draft Plan to read as follows:</p> <p><u>An Rinn: New residential development shall be accompanied by developer provided public lighting, footpath and junction alignment works to link the new development the existing footpath on Church Road prior to occupation of any dwelling houses.</u></p>
WFD-	The submission seeks the	The content of the submission is noted which seeks to remove c. 2ha of amenity land and the provision of an

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C2-459	rezoning of land off the Waterford City Ring Road between Old Tramore Road (Kilcohan) and Killure Road (John's Park). Waterford from G5 open space to R1.3 new proposed residential use.	equivalent area to be included within new residential development in the vicinity. In principle the proposal is acceptable. It is recommended that the lands be rezoned for new residential (R1) (Phase 2) and the following specific development objective for the area be included in Appendix 2 of the Plan: <u>Couse Stream: The landscaping and provision of open space for the development of new residential areas shall provide for the following: Incorporating the Couse Stream and buffer as a central element in public open space and ensure habitat restoration along the length of the watercourse, c. 2 ha of usable open space and habitat areas to be provided across new housing areas to include enhanced tree planting and permeable active travel routes for cyclists/pedestrians along the boundary with the outer ring road and links between the new housing and existing housing areas.</u>
WFD-C2-460	This submission relates to an area of land within a proposed housing estate development on the Waterford Ring Road that is designated as open space but where there is a request for it to be rezoned as residential. The submission calls for a full evaluation of the lands prior to any rezoning and recommends :as a minimum that the stream boundary be kept as a 10m band and enhanced as an ecological corridor. From a landscape point of view the corridor could be expanded to include additional public open space offset from other areas and be enjoyed by a wider public.	The content of the submission is noted which relates to development of lands in the vicinity of the Couse stream. Further details relating to the response and recommendation can be found under WFD-C2-459. No further amendment recommended to the draft Plan on foot of this submission.
WFD-C2-461	The submission seeks the extension of the settlement boundary at Cheekpoint.	The content of the submission is noted which requests that c.6ha of land be included within the settlement boundary of Cheekpoint. The lands are partially contiguous to the settlement boundary overlooking the Suir. The quantum of residential development land required for Cheekpoint over the lifetime of the plan has been set out in the amended core strategy and settlement strategy in response to submission ref. no. WFD-C2-

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		363 made by the Office of the Planning Regulator. It is considered that the land subject of this submission is surplus to the requirements of the plan and as such no amendment is recommended to the draft Plan on foot of this submission.
WFD-C2-462	This submission requests that a disused building and associated lands in the village of Aghish are zoned for residential use	The content of the submission is noted which seeks to include a small portion of land in which a disused structure exists within the settlement boundary of Aghish and use the property as a residence. The lands are immediately adjacent to the village boundary. It is recommended that the boundary of the village be extended to include the site by way of an amendment to the draft Plan.
WFD-C2-463	The submission seeks the extension of the settlement boundary at Rathgormack.	The content of the submission is noted which seeks to include 2.5ha of land within the settlement boundary of Rathgormack. The lands are immediately adjacent to the village centre. It is recommended that the boundary of the village be extended to include the site by way of an amendment to the draft Plan.
WFD-C2-464	The submission seeks the rezoning of lands at Mountain Road, Clonmel from G3 Conservation, Amenity or Buffer Space to Residential use.	The content of the submission is noted which seeks to rezone an area of greenbelt to existing residential development. The lands are located remote from zoned development land in the Clonmel Environs area. There are numerous residential properties within the greenbelt area surrounding Clonmel and it would be inappropriate to zone all for an existing residential use. As such no amendment is recommended to the draft Plan on foot of this submission.
WFD-C2-466	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.	The content of the submission is noted which seeks to include an amended subdivision of the former CBS site in Tramore. It is recommended that the land use zoning be amended accordingly on foot of this submission to facilitate community infrastructure (CI) and new residential development (R1).
WFD-C2-467	The submission requests the expansion of the Tallow Settlement boundary to accommodate an additional 1.4 acre site for residential development.	The content of the submission is noted which requests that 1.4ha of land be included within the development boundary of Tallow. The lands are located adjacent to the boundary of the town and were previously zoned as strategic residential reserve. The quantum of development land and housing targets for Tallow over the lifetime of the plan has been set out in the amended core strategy and settlement strategy which has been reconsidered in response to submission ref. no. WFD-C2-363 made by the Office of the Planning Regulator. It is considered that the lands are surplus to the quantum required for the period of the Plan and as such no amendment is recommended to the draft Plan on foot of this submission.
WFD-C2-469	This submission request the zoning of 19 acres of agricultural lands at Coolcormuck, Dungarvan to low density residential use	The content of the submission is noted which requests that c.7.5ha of land be zoned for residential development at Coolcormuck adjacent to West Waterford Golf Club, c. 4km west of Dungarvan. The lands are remote from any public services and amenities. It is considered that the zoning of the lands would be and as such no amendment is recommended to the draft Plan on foot of this submission.

URN	Submission Summary	Chief Executive Response & Recommendation
WFD-C2-470	This submission welcomes the Proposed Zoning (G5 - mixed general green conservation) of lands at Bookie Woods, Tramore.	The content of the submission is noted as is the content of WFD-C2-79. No amendment to the draft Plan recommended on foot of the submission.
WFD-C2-471	This submission welcomes the Proposed Zoning (G5 - mixed general green conservation) of lands at Bookie Woods, Tramore.	The content of the submission is noted as is the content of WFD-C2-79. No amendment to the draft Plan recommended on foot of the submission.
WFD-C2-472	This submission welcomes the Proposed Zoning (G5 - mixed general green conservation) of lands at Bookie Woods, Tramore.	The content of the submission is noted as is the content of WFD-C2-79. No amendment to the draft Plan recommended on foot of the submission.
WFD-C2-473	This submission welcomes the Proposed Zoning (G5 - mixed general green conservation) of lands at Bookie Woods, Tramore.	The content of the submission is noted as is the content of WFD-C2-79. No amendment to the draft Plan recommended on foot of the submission.
WFD-C2-474	This submission welcomes the Proposed Zoning (G5 - mixed general green conservation) of lands at Bookie Woods, Tramore.	The content of the submission is noted as is the content of WFD-C2-79. No amendment to the draft Plan recommended on foot of the submission.
WFD-C2-475	This submission welcomes the Proposed Zoning (G5 - mixed general green conservation) of lands at Bookie Woods, Tramore.	The content of the submission is noted as is the content of WFD-C2-79. No amendment to the draft Plan recommended on foot of the submission.
WFD-C2-477	This submission welcomes the Proposed Zoning (G5 - mixed general green conservation) of lands at Bookie Woods, Tramore.	The content of the submission is noted as is the content of WFD-C2-79. No amendment to the draft Plan recommended on foot of the submission.
WFD-C2-478	The submission seeks the rezoning of land at Watersgate, Bilberry, Waterford City from open space to residential to	The content of the submission is noted which seeks to zone land zoned for mixed general conservation/buffer adjacent to Waters Gate, Bilberry to new residential development. The proposal is considered appropriate and it is recommended that the land use zoning be altered to accommodate new residential use (R1) by way of amendment to the draft Plan.

URN	Submission Summary	Chief Executive Response & Recommendation
	reflect the current zoning in the City Development Plan.	
WFD-C2-479	<p>The submission seeks a number of land use zoning changes which are listed below:</p> <ul style="list-style-type: none"> • The rezoning of land at Kilcohan from R1 .3 'New/Proposed Residential' (medium density) to GS 'Mixed/General 'Green'/Recreation/Conservation, Other'. • The Proposed Zoning (G5 - mixed general green conservation) of lands at Bookie Woods, Tramore. • The rezoning of land at Crobally, Tramore from Residential to Open Space. • The rezoning of land at St. John's College, Waterford City from M1 to G5. 	<p>The content of the submission is noted and the following response and recommendation pertains with regard to land use zoning elements thereof:</p> <ol style="list-style-type: none"> 1. The comments regarding the zoning of lands at the Couse stream is noted and has been considered along with the content of submissions ref WFD-C2-460 and WFD-C2-459. There is a recommendation to accommodate the Couse Stream and additional amenity/habitats spaces as part of future development included under the latter submission in this report. No further amendment to the draft Plan recommended in this regard. 2. With regard to the lands at Crobally Upper, Tramore, it is considered that the zoning of the open space area associated with the housing development as open space and amenity would be appropriate. It is recommended that the lands be duly zoned for open space (OS) by way of amendment to the draft Plan. 3. With regard to zoning of lands at St. John's College, Waterford City, it is considered that the identification of the trees on the site as amenity trees as recommended in the draft Plan and within the vision for the John's College Regeneration Site in Appendix 21 will be sufficient to ensure development thereon will be appropriately designed. No amendment to the draft Plan recommended in this regard.
WFD-C2-482	<p>This submission welcomes the Proposed Zoning (C5 – Tourism and Related Uses) of lands at The Sand Dunes Car Park, The Promenade, Tramore.</p>	<p>Response and Recommendation: The content of the submission is noted. The lands straddle the area between the lower prom, tourism zoned land and the back strand which is designated in the main as an SAC/SPC/pNHA. The former municipal landfill is located to the north. In principle the use of part of these lands for additional tourism development would be considered acceptable; however the extent of land so zoned should be such as to avoid encroachment into any flood zone, the area to the immediate rear of the beach or any designated habitat area. It is recommended that c. 1.5 ha be zoned for tourism development (TM) by way of amendment to the draft Plan.</p>

3.2.3 Chapter 4 – Economy, Education and Retail

URN	Submission Summary	Chief Executive Response & Recommendation
Economy		
WFD-C2-27	<p>Greater emphasis needs to be placed on the role of social enterprise as a powerful socio-economic sector at work in the city and county. It is responsible for a significant number of jobs, income and in the development of new services, facilities, infrastructure throughout city and county in areas such as voluntary housing, credit unions, childcare, waste and recycling projects, second chance education, enterprise, climate action, sport and recreation, elderly care and homecare, group water schemes, tourism and heritage projects, arts and leisure, community centres and halls, inclusion and equality and diversity projects. It is an essential pillar in the regeneration of urban and rural communities in Waterford city and county today and so many people are dependent on social enterprises for essential supports. Reference is made to a number of significant policy papers. Policy should focus on:</p> <ol style="list-style-type: none"> 1. Building Awareness of Social Enterprise 2. Growing and Strengthening Social Enterprise 3. Achieving Better Policy Alignment <p>Reference is also made to a report: Social Enterprise in Waterford: Mapping Survey & Case Studies 2019 which identified 325 social enterprises across Waterford and estimated that with a more complete study it would have found close on 400 social enterprises in city and county. Furthermore in 2019/2020 an EU Project RUBIZMO run in Ireland by Irish Rural Links registered Dunhill and Copper Coast Global Geopark as an EU social enterprise hotspot with 25 social enterprises located in the seven villages of Copper</p>	<p>The CE notes the content of the submission.</p> <p>Social Enterprise forms an important part of the wider social economy and should be recognised and specifically referred to in the Plan. Section 4.4 of the Plan has been amended through the CE response to the Submission from the Southern Regional Assembly (WFD-C2-311)</p> <p>Recommendation:</p> <p>Add the following text to the end of Section 4.4 Clustering, Innovation and Enterprise Hubs, <u>Social Enterprise</u></p> <p><u>Social Enterprise is considered to be critical to the continuing improvement in welfare and living standards of people living in rural and urban communities in Waterford and will continue to be supported by the Council. It acts on enterprise, employment, second chance education, climate action, security, mental and physical health, transport, childcare and elderly care, performing arts, sport and recreation, social and economic inclusion, community services, infrastructure, facilities and all types of people and infrastructural programmes.</u></p> <p>Amend Policy Objectives ECON 03 & ECON 06 as follows:</p> <p>ECON 03 To encourage, promote and facilitate economic and employment growth, resilience, diversity, <u>social enterprise</u> and the regeneration of underutilised areas. Development proposals will be supported which demonstrate that:.....</p> <p>ECON 06</p>

URN	Submission Summary	Chief Executive Response & Recommendation
	<p>Coast, Dunhill, Fenor, Boatstrand, Annestown, Bonmahon, Stradbally and Kill. Social enterprise is critical to the continuing welfare and living standards of so many people living in rural and urban communities in Waterford.</p> <p>Dunhill Rural Enterprises CLG is requesting that Waterford City & County Council include in its Development Plan 2022-2028 a commitment to support and develop current social enterprises and the many new opportunities for social enterprise development in city and county in the future. Legally registered social enterprises will play an important role in improving the economic and social well being of the people of Waterford throughout the period of the Development Plan.</p>	<p>We will facilitate and participate in regeneration projects so as to revitalise under-utilised business parks and industrial estates and promote the regeneration of obsolete and/or under-utilised buildings and lands that could yield economic benefits <u>and/or social enterprise</u>, with appropriate uses, subject to compliance with the policies and development management standards of the Development Plan.</p>
<p>WFD-C2-38</p>	<p>Dunhill Social Enterprise Network</p> <p>The submission states that In 2019/2020 an EU Project RUBIZMO run in Ireland by Irish Rural Links registered Dunhill and Copper Coast Global Geopark as an EU social enterprise hotspot with 25 social enterprises located in the seven villages of Copper Coast, Dunhill, Fenor, Boatstrand, Annestown, Bonmahon, Stradbally and Kill.</p> <p>The submission calls for the Draft Development Plan to include a commitment to support and develop social enterprises and the many new opportunities for social enterprise development in city and county in the future. It further highlights that legally registered social enterprises will play an important role in improving the economic and social well- being of the people of Waterford throughout the period of the Development Plan.</p>	<p>The CE notes the content of the submission</p> <p>Recommendation See CE Response as per WFD-C2-27</p>
<p>WFD-C2-</p>	<p>The submissions requests that greater policy support be give for the role of Social Enterprise, recognising its capacity to</p>	<p>The CE notes the content of the submission</p>

URN	Submission Summary	Chief Executive Response & Recommendation
11	improve the economy and quality of life for all communities. Particular reference is made to amended text for policy objectives ECON 1, ECON 2 and ECON 6.	<p>Recommendation See CE Response as per WFD-C2-27</p>
WFD-C2-59	<p>The submission welcomes the inclusion of extractive industry within Chapter 4 and suggests that the Draft CDP could be revised to adequately outline the economic value and significance of the aggregates sector, emphasising the sector's significance in terms of economic development and employment.</p> <p>It is stated that the Draft CDP should acknowledge that aggregate resources are not evenly distributed across the country or county and can only be worked where they occur naturally. As well as providing essential building materials for the construction industry, aggregate resources are also essentially a finite resource, in that, once extracted they cannot be replaced.</p> <p>The submission also considers that the Draft CDP should offer a policy objective with respect to the after use of quarry and extractive sites with a suggested text as follows: "To encourage the rehabilitation of disused quarries and extractive sites, to include backfilling with inert soil and stone, to possible uses including habitat restoration, sustainable forestry, agriculture, recreation/amenities, commercial, industrial, and residential, or a combination of same, subject to normal planning and environmental considerations"</p>	<p>The CE notes the contents of the submission.</p> <p>It is recognised that the extractive industry plays an important role in the construction sector and provides rural based employment opportunities within the County. It is considered necessary to expand upon this issue in Section 6.4 of The DM Standards (Volume 2) to reflect the comments raised.</p> <p>In relation to the the after use of quarries it is considered necessary to include a new DM Policy in Section 6.4 of The DM Standards (Volume 2) to address the issues raised.</p> <p>Recommendation: Add the following text at the beginning of Section 6.4 of The DM Standards (Volume 2): The Council recognises that the extractive industry plays an important role in the construction industry and with appropriate care in initial site selection, process design and environmental monitoring, mineral extraction can be compatible with a wide range of appropriate adjacent land uses and habitats.....</p> <p>Add a new Objective after DM Objective 34 in Section 6.4 of The DM Standards (Volume 2): DM35: Reclamation and restoration of quarries/Other land infilling /reclamation projects Where it is proposed to reclaim, regenerate or rehabilitate old quarries by filling or re-grading with inert soil or similar material, or to use worked-out quarries as disposal locations for inert materials, the acceptability of the proposal shall be evaluated against the following key criteria:</p>

URN	Submission Summary	Chief Executive Response & Recommendation
		<ul style="list-style-type: none"> • <u>The impact of the proposal on the landscape</u> • <u>Any possible loss of biodiversity that may have developed in the worked-out quarry</u> • <u>The impact such proposals may have on natural ground and surface water flows or networks in the area and the potential to give rise to flooding or new surface water flows onto adjoining lands or roads</u> • <u>the suitability of the road network in the area to accommodate the traffic flows of heavy vehicles that may be generated</u> <p><u>The Council will resist development that would significantly or unnecessarily alter the natural landscape and topography, including land infilling /reclamation projects or projects involving significant landscape remodelling, unless it can be demonstrated that the development would enhance the landscape and / or not give rise to adverse impacts.</u></p>
WFD-C2-103	<p>The submission refers to the designation of Portlaw as an 'Urban Town' in the Core Strategy and welcomes Policy ECON 13 in the context of Portlaw. The submission requests that Table 4.0 of Chapter 4 Strategic Employment Location be amended as Portlaw is omitted from the list of settlements for Additional/ New Enterprise Centres/ Co-working hubs: Dungarvan, Tallow, Lismore, Cappoquin, An Rinn (Gaeltacht), Villierstown. it is considered that this is a serious omission and could seriously hinder future attempts to obtain funding for such a development in the town</p>	<p>The CE notes the contents of the submission.</p> <p>It is considered that Portlaw should be added to the list of settlements for additional/new enterprise centres/co-working hubs. Section 4.4 of the Plan has been amended through the CE response to the Submission from the Southern Regional Assembly (WFD-C2-311)</p> <p>Recommendation: Amend Table 4.0 as follows: Additional/ New Enterprise Centres/ Co-working hubs:Dungarvan, <u>Portlaw</u>, Tallow, Lismore, Cappoquin, An Rinn (Gaeltacht), Villierstown</p>
WFD-C2-124	<p>The submission calls for a bottom-up integrated village development plan to service the needs of the local community.</p>	<p>The contents of the submission are noted.</p> <p>Bottom-up integrated development plans for villages as referred to that involve all the stakeholders, service providers and policy agencies are not possible in their own right under the current County Development Plan due to time constraints and resources. Policy Objective ECON 05 seeks to ensure collaborative approach between the Local Authority and local communities ,</p>

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		<p>interests groups etc in the implementation of the Development Plan. It is also possible for the Council to engage with the local community to provide guidance in relation to the development of non-statutory Village Design Plans for specific villages if the local community wish to engage in this process. The Heritage Council's run a Community-led Village Design Statement [VDS] programme which is a collaborative and participative approach to village planning and design that gives local communities – working in partnership with local authorities and statutory agencies – a real voice in deciding how their villages are planned and shaped for the future. Further details are available at https://www.heritagecouncil.ie/projects/community-led-village-design-statements</p> <p>Recommendation No Change to Draft Plan</p>
<p>WFD-C2-201</p>	<p>The submission requests that reference be made within the Draft Plan to the Gteic – The National Network of digital hubs throughout the Gaeltachta. This should fall under the context of the development of enterprise and of remote working facilities/services which are available in the county. The hubs provide a wide range of facilities and services, for example:</p> <ul style="list-style-type: none"> • Private office facilities • Shared office space • Meeting facilities • Teleconferencing facilities 	<p>The CE notes the contents of the submission.</p> <p>In relation to the development of a digital hub in An Gaeltacht, this is supported though Policy Objective Econ 14. It is recognised that the development of such facilities will enhance the infrastructure and the facilities available to those in business or working remotely from the Gaeltacht. It is considered that the addition of the wording “Gteic”, to the Objective is appropriate.</p> <p>Recommendation: Amend policy Objective ECON 14 as follows: An Gaeltacht To support the implementation of Plean Teanga na nDéise 2018 – 2024 in collaboration with Údarás na Gaeltachta, Comhlucht Forbartha an nDéise, and the broader community by:.....</p> <p>Facilitating and supporting digital innovation through the 'Gteic' digital hub concept;</p>

URN	Submission Summary	Chief Executive Response & Recommendation
WFD-C2-233	<p>The need for an increased focus on the delivery of infrastructure in the strategic employment area at Belview.</p> <p>The submission welcomes the policy objectives and associated narrative in the draft plan relating to the strategic employment location at Belview and adjacent IDA lands. The submission identifies that an Economic Impact Study of the Belview Industrial Zone (2017) identified the area generates 632 jobs directly and a Gross Value Added of €91 million. Considering the multiplier effect these figures stand at 980 jobs and €190 million GVA respectively. This will be further enhanced through consolidation and expansion of services at the POW and by increased critical mass across Waterford City.</p> <p>The need for specific measures to promote the active use of the Ports rail freight connection.</p> <p>Belview port is served by existing connections to the rail network and is well positioned to contribute towards reducing Co2 emissions where adequate rolling stock and additional inland freight depots come on stream.</p> <p>Finally, in terms of renewable energy projects, the POW will continue to be an important facilitator of on -shore wind energy projects. Belview will also support the off-shore wind industry through facilitation of support vessels and long term operations and maintenance activities. There is potential to develop engineering, training and a range of other businesses related to this critical area where we expect to see very considerable investments made in the near future.</p>	<p>The CE notes the contents of the submission.</p> <p>Strengthening the role and status of the port and surrounding industrial lands, and the expansion of rail freight connections is supported through Objective ECON 10 and its implementation will be monitored as part of the 2 year review of the Plan.</p> <p>In terms of renewable energy projects/potential this is supported in the Plan through Objective UTL 13</p> <p>Recommendation: No Change</p>
WFD-C2-252	<p>1) By including reference to the circular economy in the introduction section to Chapter 4 would show that the circular economy is linked with economic activities as much as with environmental parameters.</p>	<p>The CE notes the contents of the submission.</p> <p>The Circular Economy is referenced throughout the Draft Plan in particular in Section 6.8 Waste Services/ Infrastructure and Objectives UTL 12 (Energy</p>

URN	Submission Summary	Chief Executive Response & Recommendation
	<p>2) New technologies in the area of the circular economy and resource efficiency are emerging all the time along with new job opportunities and that this could be encouraged within Section 4.4.</p> <p>3) The development of social enterprises running repair, reuse and recycling initiatives, a number of such enterprises have been set up around the country and there is opportunity for many more. Therefore this specific area of social enterprise is worth mentioning within Policy Objectives ECON 12 and ECON 13, both of which include a general reference to social enterprises.</p>	<p>Strategy/ Masterplan) and UTL 17 (Waste Services (Infrastructure & Management)).</p> <p>The benefits of and opportunities within the circular economy are widely acknowledged and the suggestions raised by the SRWMPO shall be incorporated as suggested.</p> <p>Section 4.4 of the Plan has been amended through the CE response to the Submission from the Southern Regional Assembly (WFD-C2-311)</p> <p>Recommendation:</p> <p>1) Add additional text to Section 4.0 Introduction as follows: This will be facilitated by creating places that can foster enterprise and innovation, and attract investment and talent, and can be achieved by building regional economic drivers for Waterford as listed in the SRSES and by supporting opportunities to diversify and strengthen the economy, <u>including the circular economy</u>, to leverage the potential of places.</p> <p>2) Add additional text to Section 4.4 Clustering, Innovation and Enterprise Hubs as follows: In addition to the active land management of economic sectors, the council aims to support and facilitate clustering/ innovation hub initiatives within and across sectors. Strengthening and developing clustering or innovation hub potentials (e.g. engineering, food, <u>circular economy</u>, creative industries, ecommerce, crafts, and tourism) will further attract and embed foreign owned companies, and stimulate the growth and start-up of more innovative Irish owned enterprises.</p> <p>3) (a) Amend Policy Objective ECON 12 as follows: To facilitate farm or rural resource related enterprises and diversification, including food production and processing on farm/ agricultural holdings, mineral and aggregate extractive industry, aquaculture and marine, <u>the</u></p>

URN	Submission Summary	Chief Executive Response & Recommendation
		<p><u>circular economy</u> and proposals which support rural tourism initiatives which are developed upon rural enterprise, social enterprise, natural/ cultural heritage assets and outdoor recreational activities, subject to the capacity of the site and the location to facilitate the proposal.</p> <p>3) (b) Amend Policy Objective ECON 13 as follows: To engage in local partnerships with stakeholders/ community groups, and social enterprise, together with other funding organisations, to assist in identifying, facilitating and promoting smart working locations and economic enterprise and growth/ regeneration, by encouraging and facilitating the provision (subject to funding availability), of local workspaces, small business units, new Enterprise Centres /Co-working hubs, and/ or grouped 'units' or spaces which can provide a multi-functionality of purpose and use, adding vitality and vibrancy to an area. <u>Social enterprises running repair, reuse and recycling initiatives will also be encouraged where considered appropriate.</u></p>
WFD-C2-289	<p>The submission seeks to secure the viability of shellfish production with a particular emphasis on ensuring discharge for land based activities and waste water treatment plants do not adversely impact on water quality. The submissions suggests that long established shell fish activities should be given full consideration when determining development proposals which may impact on viability and water quality. In this regard where compatibility is not possible, proposals for new development must demonstrate that they will, in order of preference: a) avoid, b) minimise, or c) mitigate significant adverse impacts on aquaculture. If it is not possible to mitigate significant adverse impacts, proposals should state the case for proceeding.</p>	<p>The CE notes the contents of the submission.</p> <p>The issues raised are considered to be addressed by Policy Objective ECON 12 which seeks to facilitate the development of rural and marine resources while ensuring all necessary protections are in place to ensure any impacts on the environment are minimised and ECON 16 which seeks to facilitate the development of the aquaculture sector and improving water quality.</p> <p>Recommendation: No change to Draft Plan</p>
WFD-C2-354	<p>Section 4.7 – Rural & Marine Economy - suggest the inclusion of and reference to the economic benefits of offshore renewable energy development in this section and the inclusion of a specific policy objective after ECON 16,</p>	<p>The CE notes the contents of the submission.</p> <p>CE Response: The importance of Renewable Energy is addressed in Section 6.6 of the Plan and through Objective UTL 13. See Response to WFD-C2-375</p>

URN	Submission Summary	Chief Executive Response & Recommendation
	demonstrating a specific objective to support the development of the coastal and harbour infrastructure required to support the construction, operation and maintenance of offshore renewable energy developments.	<p>which proposes an alteration to Objective UTL 13 to support onland infrastructure associated with offshore energy.</p> <p>Recommendation: Amend Objective UTL 13 as per WFD-C2-375</p>
WFD-C2-360	The submission lists a number of objectives with regards to supporting Local Enterprise Development through the Local Enterprise Office and ensuring quality of life factors are incorporated into enterprise policies. Quality of life is critical to productivity and a key part of a value proposition to attract and retain businesses and workers.	<p>The CE notes the contents of the submission.</p> <p>The vital role Local Enterprise Offices (LEOs) play in local economies is recognised in the Plan itself and in the monitoring and implementation of the Plan . Policy Objective ECON 08 seeks to work in conjunction with the Waterford Local Enterprise Office (LEO), LEADER and all relevant stakeholders to support and deliver the further development and expansion of new workspace for SMEs, the creative industries, film industry, artists, and the fashion and craft industries in Waterford, and particularly in new commercial and mixed-use developments, or where underutilised buildings are being brought back into use.</p> <p>'Quality of life factors' are widely recognised throughout the Plan as a key attractor to Waterford and 'Quality of Life' is an intrinsic element to the 'Vision' and '8 High Level Goals of the Plan'.</p> <p>Recommendation: No Change to Draft Plan</p>
WFD-C2-372	<p>ECON 07 - Active Land Management (pg 91) This economic policy objective relates to the co-ordinated targeting of underutilised, vacant and derelict lands and buildings for pursuing policy objectives of the Development Plan. We ask that the focus of any Active Land Management is broader than economic and that the availability, provision and needs for open space, community and sporting facilities is included in any considerations with regard to pursuing opportunities.</p> <p>ECON 12 - Rural Resources (pg 96)/ECON 23 Tourism Product</p>	<p>The CE notes the content of the submission.</p> <p>The Active Land Management team will have due regard to provision and needs for open space, community and sporting facilities when assembling/designing solutions as part of their key design considerations.</p> <p>The value of the small rural projects/walking trails etc are recognised within Policy Objective ECON 23. Improvements to such amenities will be carried out in consultation with local landowners/interest groups.</p>

URN	Submission Summary	Chief Executive Response & Recommendation
	<p>& Infrastructure (pg 102) There are many small rural projects developed mainly for local use eg family walking trails, forest walks. These add to sense of place, community etc. While they may not be large tourist attractions they add to the overall offering of Waterford as an active and healthy destination. We ask that they are also considered for their indirect economic value.</p>	<p>Recommendation: No change to Draft Plan</p>
<p>WFD-C2-375</p>	<p>Chapter 4: Economy Wind Energy Ireland outlines the significant economic return to communities derived from wind development. In terms of initial capital investment, every megawatt (MW) of wind energy capacity installed gives rise to an investment of approximately €1.25 million. Ongoing investment and economic development benefits during the 30+ year operational lifespan of wind farms, take the form of rents payable to landowners, financial support for local communities in the form community benefit schemes and commercial rates payable to local authorities. Combined, these amount to approximately €25,000 per MW per annum. TO support such economic outcomes WEI suggest the inclusion of and reference to the economic benefits of offshore renewable energy development in this section and the inclusion of a specific policy objective after ECON 16, demonstrating a specific objective to support the development of the coastal and harbour infrastructure required to support the construction, operation and maintenance of offshore renewable energy developments. This is an emerging energy sector that will develop substantially within the lifetime of the 2022-2028 Development Plan and will provide significant economic benefits to Waterford City and County.</p>	<p>The CE notes the contents of the submission.</p> <p>It is considered that the issues raised with are generally dealt with through Policy Objective UTL 13 (Renewable Energy) contained in Section 6.9 of the Draft Plan. Some additional text shall be incorporated into the objective to include support for the development of infrastructure required to facilitate offshore renewable energy developments where deemed appropriate.</p> <p>Recommendation: Amend Objective UTL 13 as follows: 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. This will be achieved by:</p> <p>Facilitating and encouraging, where appropriate, proposals for renewable energy generation, transmission and distribution and ancillary support infrastructure facilities <u>including the necessary infrastructure required for the development of offshore renewable energy developments developed fully</u> in accordance with the Waterford Renewable Energy Strategy, 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;.....</p>

URN	Submission Summary	Chief Executive Response & Recommendation
WFD-C2-465	The submission requests that the draft amended plan support the promotion of Waterford City as the ideal centre for service and knowledge-based business, the city needs to offer. It lists a number of objectives required to achieve this. The submission also highlights a number of benefits for locating services-based industry close to city centre.	<p>The CE notes the contents of the submission.</p> <p>A number of the enablers that are identified to support the promotion of Waterford City as the centre for service and knowledge based business are identified in Section 3.5 (Strategic Employment Locations Policy Objectives) and Section 3.10 of the Draft Plan (Waterford City and MASP Policy Objectives)</p> <p>Recommendation: No change to Draft Plan</p>
Tourism		
WFD-C2-102	The submission highlights that improved water treatment facilities to ensure water quality is essential to secure the Blue Flag Status to beaches along the Copper Coast. It also highlights a number of sustainable tourism projects for the copper coast i.e. coastal walks, improvement of GeoPark exhibition, underground mining experience, increased off street car parking, enhanced street parking and disabled parking, camper van facilities and upgrade of public toilets.	<p>The CE notes the contents of the submission.</p> <p>There are a number of issues raised that fall outside the remit of the Development Plan, eg improvement to water services which are now the responsibility of Irish Water, local car-parking issues, provision of toilets etc.. A number of other issues are already addressed in the Plan, support for Blue Flag Beaches, Copper Coast Geopark, Blueways, coastal walks etc..</p> <p>Recommendation: See expanded Tourism section 4.10 as per Fáilte Ireland submission (WFD-C2-270).</p>
WFD-C2-103	The submission highlights the potential of Portlaw as a tourism centre be specifically recognised in the plan, that the omission of the Portlaw walks from the list at 10.4 be rectified, and that ancillary objectives relating to the development of riverside walks in the town, the facilitation of tourist accommodation, the development of a link to the Waterford Greenway, the development of water amenities, the development of the Coillte woodlands, and the further development of Curraghmore House also be included as	<p>The CE notes the contents of the submission:</p> <p>Objective CS08 states that a Local Area Plan will be developed for Portlaw where a number of the issues can be addressed at a local level -</p> <p>A number of the issues raised are addressed in the amended Section 4.10 as per Fáilte Ireland submission - eg inclusion of Portlaw and Curraghmore as a tourist attractors, support for different accommodation types at suitable locations ECON 21 etc..</p> <p>The feasibility of the expansion of the Greenway to Portlaw can be</p>

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	specific objectives within the plan. This should also recognise that more specific locations may be identified in the LAP.	<p>incorporated into Objective BGI 06 and is incorporated within Objective ECON 22 - Key Flagship Tourism Projects (See Fáilte Ireland submission response) The addition of the Portlaw Woodland Walks to Table 10.0 is considered to be reasonable.</p> <p>Recommendation: Amend Table 10.0 to include The Portlaw Woodland Walks - Portlaw woods, Kilbunny woods, Tower Hill woods, Curraghmore woods and Glenhouse woods. Amend Objective BGI 06 as follows: To support the enhancement of the existing Waterford Greenway and expansion of the Greenway network in Waterford City and County by examining the feasibility of developing a Waterford to Tramore Greenway, a Waterford to Portlaw/Carrick-on-Suir Greenway and by extending the Waterford Greenway to the west of Dungarvan.</p> <p>Also see new Objective ECON22 - as per Fáilte Ireland submission response WFD-C2-270.</p>
WFD-C2-134	The submission call for an objective that maximises the use of the coastal area from Helvick to Clonea to be included in the draft amended development plan.	<p>The CE notes the contents of the submission.</p> <p>CE Comment: The merits of the submission are acknowledged and the Council supports such proposals. There are a number of Objectives contained within the Plan which are relevant to the submission such as: Objective CS08 which provides that a Local Area Plan will be produced for Dungarvan where the proposal may further develop and focus in on. Objective ECON 21 which supports 'Sustainable tourism 'products' and activities/ attractors in appropriate locations which are based on and reflect the city and county's distinctive history, natural and/ or cultural heritage, agri-food, marine and horticultural sector, and outdoor pursuits and recreation'; Objective BGI09 which has been amended to support the 'The Irish Sea Way'</p>

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		<p>program or similar sustainable tourist attraction initiatives as per the submission from Fáilte Ireland.</p> <p>Recommendation: No additional changes required, the proposals are supported within the Plan and may further develop as part of the Local Area Plan process.</p>
<p>WFD-C2-135</p>	<p>The submission states that the WSVR wishes to explore practical ways of linking Bilberry to Waterford (Grattan Quay) by rail.</p>	<p>The CE notes the contents of the submission.</p> <p>The Waterford Suir Valley Railway is recognised in the revised Section 4.10 as a High Value Tourist Attractor (see Fáilte Ireland submission response). The merits of linking from the line from Bilberry to Waterford (Grattan Quay) are noted and recognised.</p> <p>Recommendation: As per Fáilte Ireland submission Objective BGI xx is proposed to be added in support of such a proposal: <u>Identify and implement existing and historic routes, railways etc. and their associated infrastructure i.e. railway buildings for the creation of new greenways and associated recreation and tourist amenities including the extension of the Waterford Suir Valley Railway from Bilberry to Waterford (Grattan Quay).</u></p>
<p>WFD-C2-179</p>	<p>This submission requests that Clashmore and Kinsalebeg are included within the Blackwater Valley Rural economic Cluster Area Map</p>	<p>The CE notes the contents of the submission.</p> <p>The Rural Economic Cluster Map referred to is conceptual in nature and is not intended to be an accurate depiction of all settlements that may lie within the relevant cluster areas.</p> <p>Recommendation: No change to Draft Plan</p>
<p>WFD-C2-265</p>	<p>The submission seeks better management of camper van bays in Dungarvan along with enhanced signage and traffic control measures.</p>	<p>The CE notes the contents of the submission.</p> <p>Some of the issues raised are outside the remit of the Development Plan and are more of an Enforcement/Garda issue. As per The response to Fáilte</p>

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		Ireland Submission Objective ECON 23 has been included: Recommendation: Amend Objective ECON 23 as per Fáilte Ireland submission response (WFD-C2-270)
WFD-C2-270	<p>1) The draft Plan does not set out the value of tourism as a key economic driver, the potential development and the role tourism will play for the future of Waterford. Tourism needs to be included in the vision.</p> <p>2) Tourism could be more strongly referenced throughout the Draft Development Plan and in particular the inclusion of a dedicated Tourism Chapter, or a more detailed and robust Tourism Section, would ensure that all aspects of tourism policy are captured in a clear and robust manner within the Development Plan.</p>	<p>1) CE Response: It is agreed that Tourism is an important economic driver and needs to be included in the vision. Recommendation: Amend Section 4.0 as follows: Our vision is to support a strong, sustainable, resilient and successful economy, underpinned by <u>tourism</u>, enterprise, innovation and skills, and access to quality education for all.</p> <p>2) CE Response: Having regard to the overall structure of the Plan, it is not considered necessary to provide a separate Tourism Chapter. Tourism is recognized in the Plan as an economic driver for the City and County and is heavily referenced throughout the Plan including in the Vision (Section 1.1), The Core Strategy Strategic Aims (No 13) and Chapter 4: Strategic Objective 3.</p> <p>Recommendation: A more robust Tourism section is proposed incorporating other Fáilte Ireland comments and wider submissions received. Add additional text to Section 4.10 as follows:</p>
	<p><u>4.10 Sustainable Tourism</u></p> <p><u>Sustainable Tourism is defined as 'tourism that takes full account of its current and future economic social and environmental impacts, addressing the needs of visitors, the industry, the environment and host communities'.</u></p> <p><u>Waterford is a destination that is rich in assets, with a historic city, picturesque towns and villages, beautiful mountains, tranquil countryside, stunning coastline, world class visitor attractions, a wide range of festivals, activities and accommodation options , as well as a vibrant food tourism and entertainment industry.</u></p> <p>Waterford has a reputation as an urban/ coastal/rural/cultural/ heritage destination with a mix of attractions and activities that appeal to a wide variety of visitors. Waterford's being 'Ireland's oldest city' sits well within Fáilte Ireland's branding</p>	

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	<p>Ireland's Ancient East, and is underpinned by the strong heritage and culture theme of the Waterford Viking Triangle, Waterford's historic area. The unique combination of accessible city breaks with authentic heritage, coastal and rural outdoor activities and value for money has placed Waterford in a strong position to become one of the top visitor destinations in Ireland.</p> <p>Tourism in Waterford has undergone a considerable transformation over the past ten years with significant investment in flagship tourism attractions, activity tourism and the establishment and support of high quality festivals and events. The transformation came about as the result of several policy decisions and from the enormous effort by key organizations including Waterford City & County Council, Fáilte Ireland and key industry stakeholders who together initiated and/or supported tourism related developments that include, but are not limited to the following:</p> <ul style="list-style-type: none"> • The development of the Viking Triangle; • The relocation of the global brand and visitor centre House of Waterford Crystal; • The opening of three five Waterford Treasures Museums: Medieval Museum, Bishop's Palace, Reginald's Tower; Irish Silver Museum and Irish Museum of Time • The Waterford Greenway 46km off road cycling /walking trail; • The development of Lismore Heritage Centre • UNESCO Global Geopark status for the Copper Coast • The development of 39 accredited recreational walking and cycling trails • Investment in infrastructure and public realm; and, • Investment in flagship festivals, including Winterval, Spraoi, Tall Ships, West Waterford Festival of Food, Waterford Harvest Festival, Blackwater Valley Opera Festival and Comeragh's Wild. <p>Waterford is the main regional centre for the South East and has an environment that encourages entrepreneurship and investment. This factor, together with the upturn in the Irish economy, have in turn helped to stimulate private sector investment, with the potential of further tourism related developments to come, all of which combine to ensure that Waterford is now considered to be one of the fastest growing tourism destinations of choice in Ireland.</p> <p>Valued at over 100 million Euros, Waterford's tourism economy needs to keep growing in real terms to ensure Waterford, its businesses, communities and its residents benefit. While the tourism sector took a significant hit as a result of the Covid-19 pandemic, the rise in staycations will continue to add value to the Tourism Industry in County Waterford into the future. A successful, sustainable and accessible tourism industry will provide the backbone for Waterford as a desirable place in which to live, work, invest and to visit.</p>	

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	<p><u>Tourism development must be balanced with the protection of the natural environment, a key attractor itself, and the people who live in these areas. Ongoing environmental management of amenities and managing visitor expectation is crucial to the promotion of sustainable tourism in the County.</u></p> <p><u>Sustainable tourism facilities, when properly located and managed and particularly if they are easy to get to by a range of transport modes, will encourage longer visitor stays, help to extend the tourism season and add to the vitality of settlements throughout the year. In this regard, tourist accommodation facilities (hotels, B&Bs, Guest Houses, self-catering, caravan & camping, glamping etc), visitor centres and commercial/retail facilities serving the tourism sector will be supported (where deemed appropriate) and should generally be located within towns and villages and developed with the principles of universal design to ensure they are accessible for all. This will help to foster strong links to a range of other economic and commercial sectors and sustain the host settlement and its community. Proposals for tourist accommodation in towns and villages must be proportionate in size, appropriate in scale, siting and design to its host settlement. There are some exceptions where tourist related developments will be considered outside of towns and villages, this will be location/site specific and subject to the scale of the proposal and the receiving capacity of the area.</u></p> <p><u>Waterford has a broad range of tourist amenities and attractions which include, <i>inter alia</i>:</u></p> <ul style="list-style-type: none"> • <u>Ardmore Round Tower & Cathedral</u> • <u>Blackwater Valley</u> • <u>Blue Flag Beaches - Clonea, Counsellors' Strand in Dunmore East, Dunmore Strand, Tramore Beach and Ardmore Beach</u> • <u>Coastal Destination Towns - Dungarvan, Tramore, Dunmore East etc</u> • <u>Comeragh Mountains</u> • <u>Copper Coast UNESCO Global Geopark</u> • <u>Countywide accredited recreational walking and cycling trails, woodlands and parks</u> • <u>Countywide Food and Restaurant Tourism</u> • <u>Curraghmore House, Portlaoise</u> • <u>Heritage towns of Ardmore, Lismore and Portlaoise</u> • <u>House of Waterford Crystal</u> • <u>King of the Vikings – Virtual Reality Experience in the Waterford Viking Triangle</u> • <u>Lafcadio Hearn Japanese Garden, Tramore</u> • <u>Lismore Castle and Heritage Centre</u> 	

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	<ul style="list-style-type: none"> • <u>Little Island and Waterford Castle</u> • <u>Mahon Falls</u> • <u>Mount Congreve House and Gardens</u> • <u>Mount Melleray Abbey</u> • <u>Saint Declan's Way</u> • <u>Tomb of Edmund Rice</u> • <u>Tramore Racecourse</u> • <u>Waterford Greenway</u> • <u>Waterford Viking Triangle</u> • <u>Waterford Treasures Museums: Medieval Museum, Bishop's Palace, Reginald's Tower; Irish Silver Museum and Irish Museum of Time</u> • <u>Waterford and Suir Valley Railway</u> • <u>Waterford County Museum</u> 	<p><u>Waterford, and the city in particular, has a strategic location in the south east and key access and regional connectivity (high quality road/rail) to the surrounding counties such as Kilkenny, Wexford and Cork, as well as its own airport and port positioning it as a focal point of the South East Region.</u></p> <p><u>While in recent years tourism development has focused on Waterford City, and the coastal destination towns such as Dunmore East, Tramore and Dungarvan and in particular with the recent success of the Waterford Greenway, there are many other areas in County Waterford that have significant sustainable tourism potential such as the West and North of the County including the Comeragh Mountains and its numerous historic towns and villages and the Blackwater Valley with its unspoiled scenery along a historic river.</u></p> <p><u>The Council will seek to develop its key flagship tourism projects within the lifespan of the Plan including the North Quays Regeneration Project which has the potential to act as a significant catalyst for both the City and the wider County in terms of economic investment and attractiveness to tourists and will include a new transport hub for Waterford City, the 'Guardian of the Déise' which will be a landmark of international standard overlooking Waterford, the further development of the Waterford Experience centred on the Waterford Viking Triangle and Waterford Crystal Visitor Centre, the extension of the Waterford Greenway through the city centre to connect with the New Ross Greenway as well as extending the Greenway to the west of Dungarvan and developing a Waterford to</u></p>

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	<p><u>Tramore and a Waterford to Portlaw/Carrick-on-Suir Greenway, the development of the Waterford Cultural Quarter, the development of Blueways along the River Blackwater, River Suir and Waterford Estuary, improved access to the River Suir and Waterford Harbour, the development of a regional scale park within the Waterford Metropolitan Area, the development of Mount Congreve House and Gardens as a major tourist attractor, improved access to the Metal Man in Tramore, Interpretation of Waterford Medieval City Walls, and the development of world class activity facility centres for water-sports in Ardmore and Tramore in association with Failte Ireland.</u></p> <p>The tourism objectives of the County Development Plan have been prepared in line with national, regional and local strategies. The Government's Tourism Policy Statement '<i>People, Place and Policy Growing Tourism to 2025</i>' sets the Government's primary objectives for tourism i.e. to increase overseas visitors and revenue and the associated employment whilst protecting our natural, built and cultural assets. The '<i>Action Plan for Rural Development Realising our Rural Potential</i> (Department of Rural and Community Development 2018) highlights the potential of activity tourism to contribute to economic growth in rural areas.</p> <p>Waterford has also developed a Tourism Statement of Strategy and Work Plan (2017-2022) which will build on the existing co-operation between the public and private sectors to arrive at a 'whole-of-sector' approach to tourism. A unity of purpose between Waterford City & County Council, state agencies, the tourism industry and other stakeholders will result in an overall improvement in tourism performance that will contribute even more significantly to communities throughout Waterford. <u>The Council will continue to support the goals and objectives of this Strategy as well as any updates to the Tourism Strategy that are adopted.</u></p>	<p>Tourism Policy Objectives</p> <table border="1"> <tr> <td data-bbox="360 1058 506 1086">ECON 21</td> <td data-bbox="506 1058 1617 1401"> <p><u>Sustainable Tourism</u></p> <p><u>We will cooperate with various stakeholders and tourism agencies to build on the strengths of Waterford City as the regional capital, Dungarvan as a Key Town and County Waterford in their promotion as a tourism destinations of choice. To this end, we will facilitate and encourage:</u></p> <ul style="list-style-type: none"> Sustainable tourism 'products' and activities/ attractors in appropriate locations which are based on and reflect the city and county's distinctive history, natural and/ or cultural heritage, agri-food, marine and horticultural sector, and outdoor pursuits and recreation; <u>and,</u> </td> </tr> </table>	ECON 21	<p><u>Sustainable Tourism</u></p> <p><u>We will cooperate with various stakeholders and tourism agencies to build on the strengths of Waterford City as the regional capital, Dungarvan as a Key Town and County Waterford in their promotion as a tourism destinations of choice. To this end, we will facilitate and encourage:</u></p> <ul style="list-style-type: none"> Sustainable tourism 'products' and activities/ attractors in appropriate locations which are based on and reflect the city and county's distinctive history, natural and/ or cultural heritage, agri-food, marine and horticultural sector, and outdoor pursuits and recreation; <u>and,</u>
ECON 21	<p><u>Sustainable Tourism</u></p> <p><u>We will cooperate with various stakeholders and tourism agencies to build on the strengths of Waterford City as the regional capital, Dungarvan as a Key Town and County Waterford in their promotion as a tourism destinations of choice. To this end, we will facilitate and encourage:</u></p> <ul style="list-style-type: none"> Sustainable tourism 'products' and activities/ attractors in appropriate locations which are based on and reflect the city and county's distinctive history, natural and/ or cultural heritage, agri-food, marine and horticultural sector, and outdoor pursuits and recreation; <u>and,</u> 			

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	<ul style="list-style-type: none"> • Ancillary tourism services and accommodation which will assist in providing a range of accommodation options across Waterford, in terms of type/ experience, choice, location and quality. • <u>Sustainable modes of transport – public transport, active transport (cycling and walking) etc.</u> • <u>Encourage and support investment in digital technology in the tourism sector, with a particular focus on sectors such as visitor attractions and activities with low digital presence and/or integration.</u> 	
	<p><u>ECON 22</u> <u>Key Flagship Tourism Projects</u></p> <p><u>The Council will seek to develop its key flagship tourism projects within the lifespan of the Plan including:</u></p> <ul style="list-style-type: none"> • <u>The North Quays Regeneration Project,</u> • <u>The 'Guardian of the Déise' Project'</u> • <u>The further development of the Waterford Experience centred on the Waterford Viking Triangle and Waterford Crystal Visitor Centre,</u> • <u>The extension of the Waterford Greenway through the city centre to connect with the New Ross Greenway'</u> • <u>Extending the Greenway to the west of Dungarvan,</u> • <u>Developing a Waterford to Tramore and a Waterford to Portlaw/ Carrick-on-Suir Greenway,</u> • <u>Development of sites of interest along the existing Waterford Greenway eg. Woodstown Viking Site, Train Station in Kilmacthomas</u> • <u>The development of the Waterford Cultural Quarter,</u> • <u>Improved access to the River Suir and Waterford Harbour</u> • <u>The development of Blueways along the River Blackwater, River Suir and Waterford Estuary,</u> • <u>The development of a regional scale park within the Waterford Metropolitan Area.</u> • <u>The development of Mount Congreve House and Gardens as a major tourist attractor</u> • <u>The development of world class activity facility centres for water-sports in Ardmore and Tramore in association with Fáilte Ireland.</u> • <u>Improved public access to the Metalman in Tramore</u> 	

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	<ul style="list-style-type: none"> <u>Interpretation of Waterford Medieval City Walls.</u> 	
	<p><u>ECON 23</u> <u>Tourism Accommodation</u></p> <p><u>We will continue to support the development of a variety of accommodation types at appropriate locations throughout Waterford City and County (hotels, B&Bs, Guest Houses, self-catering, caravan & camping, glamping etc), which can improve the economic potential of increased visitor revenue, increase dwell time and meet visitor needs. Tourist accommodation should generally be located within towns and villages (unless otherwise justified to the satisfaction of the Planning Authority) and developed with the principles of universal design to ensure they are accessible for all.</u></p>	
	<p><u>ECON 24</u> <u>Camping/Campervan Sites</u></p> <p>We will ensure that all camping/campervan sites are of a standard which do not adversely impact on environmental and landscape quality and amenity, avoid adverse effects on Natura 2000 sites and build and uphold the reputation of Waterford as a high quality destination for guests from home and abroad. Proposals for camping/campervan sites should be consistent with the development management standards of Volume 2 and comply with one of the following:</p> <ul style="list-style-type: none"> Settlements: Camping/campervan sites should be located at appropriate locations within or adjacent to existing settlements where such proposals demonstrate the provision of safe pedestrian links to the settlement. High Potential Tourism Attractors: Camping/campervan sites to service a high potential tourism attractor such as the Waterford Greenway, coastline, rivers, Comeragh Mountains, walking and tourism trails, outdoor recreational amenities or Blueways, should be located at existing settlements or at established centres which provide existing services to tourists, subject to the capacity of the site and the location to facilitate the proposal. All Other Locations: We may facilitate proposals for camping/campervan sites which support rural tourism initiatives developed upon rural enterprise, natural heritage assets and outdoor recreational activities and which are located at a rural location 	

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	<p>removed from any settlement or high potential tourism attractor, subject to the capacity of the site and the location to facilitate the proposal. The scale of any tourism accommodation will be determined by the nature and scale of the existing tourist attractions and/or the extent of existing underutilised agricultural/commercial/ancillary building stock available for reuse for the purposes of tourist accommodation and ancillary services.</p> <p>Proposals for the provision of standalone campervan facilities i.e. designated parking bays/electrical supply, within car parks will be considered in terms of the availability of surplus car parking and the capacity of the site and the location to facilitate the proposal.</p>	
	<p><u>ECON 25</u> Tourism Product and Infrastructure <u>In collaboration with landowners, local communities, relevant stakeholders and social enterprise</u>, we will promote, facilitate, encourage investment, and deliver improvements to our tourism product, infrastructure and facilities, including improved car, bus and bicycle parking, walking and cycling trails, directional signage/information boards, and service/rest facilities. Proposals for development shall ensure no adverse impacts on ecological integrity including the Natura 2000 Network.</p> <p>Tourism product developments and infrastructure/ facilities will be subject to normal planning and environmental criteria. The potential environmental effects of a likely increase in tourists/tourism-related traffic volumes in particular locations/along particular routes shall be considered and mitigated as appropriate. Such a consideration should include potential impacts on existing infrastructure (including drinking water, wastewater, waste and transport) resulting from tourism proposals.</p> <p>Any such works shall incorporate and integrate elements of green infrastructure, where appropriate, and be designed in accordance with the principles of universal design. In particular we will continue to advance initiatives <u>such as the INTERREG 'Local Flavours' programme</u> aimed at encouraging, strengthening and delivering investment and improvement to rural economic development and <u>tourism and heritage assets</u> in the following principle (rural cluster) areas and tourism-related initiatives:</p>	

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		<ul style="list-style-type: none"> • Blackwater Valley • Waterford Blueways; • Coastal Walks; • Comeragh Uplands; • Waterford Greenway; • Copper Coast Geopark; and • Waterford Estuary. • Gaeltacht na nDéise 	
	<u>ECON 26</u>	<p><u>DEDPs/ Ireland's Ancient East</u></p> <p>a) <u>To support the delivery and implementation of Destination Experience Development Plans (DEDPs) through continued collaboration with Fáilte Ireland and other tourism stakeholders</u></p> <p>b) <u>To continue to actively engage, invest, encourage and promote the development of the Ireland's Ancient East regional experience brand through sustainable tourism, which will enable visitors to have enjoyable experiences while having regard for the social, cultural heritage and environmental impacts, including the protection of designated sites.</u></p>	
	<u>ECON 27</u>	<p><u>Tourism Strategy</u></p> <p><u>To support the development of any update to Waterford's Tourism Statement of Strategy and Work Plan (2017-2022), and to support the creation of a Strategy for the further development of Greenways, Blueways and Trails in County Waterford incorporating walking, cycling and other activities to support tourism development, and to assist in seeking funding opportunities for their development.</u></p>	

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	<p><u>ECON 28</u></p>	<p><u>Tourism Marketing</u> <u>To support the marketing and promotion of Waterford City and County, as a significant tourism destination, by continuing to work with and develop the Visit Waterford Destination Marketing Group.</u></p>	
	<p><u>ECON 29</u></p>	<p><u>Tourism Cluster</u> <u>To support the development of a Tourism Cluster in the South-East focused around key tourist sites and attractions in conjunction with adjoining local authorities, Fáilte Ireland, Tourism Ireland and other key stakeholders.</u></p>	
	<p>3) The identification of the City and County's strategic tourism locations; transport routes; scenic routes and views; tourism attractions and facilities; and transportation hubs in the Development Plan maps, serves as an effective tool to highlight the importance of tourism in the strategic planning of the County.</p> <p>4) Fáilte Ireland requests that additional text is incorporated in respect of the relevant framework i.e. alignment with National Tourism Policy, National Planning Framework and the Regional Spatial and Economic Strategy, Tourism development priorities applicable to Waterford and alignment with Fáilte Ireland's plans and programmes</p> <p>5) Fáilte Ireland request specific reference to Fáilte Ireland Destination Experience Development Plans (DEDPs) and request an objective acknowledging and supporting these plans with objectives supporting continued collaboration with Fáilte Ireland and tourism stakeholders.</p>		<p>3) CE Response : The Core Strategy Map identifies the main settlements and transport routes. Scenic routes and views are mapped and will be incorporated into the Plan. It is considered that an update of the Council's Tourism Strategy (2017-2022) and the visitwaterford.ie website would be a more appropriate location for such a map. Recommendation: No Change</p> <p>4) CE Response: The Plan states that the tourism objectives have been prepared in line with national, regional and local strategies which are further detailed in Section 4.10. Recommendation: No Change</p> <p>5) CE Response: It is considered appropriate to include reference to Fáilte Ireland Destination Experience Development Plans (DEDPs) Recommendation: Add new Objective <u>ECON 26</u> <u>a) To support the delivery and implementation of Destination Experience Development Plans (DEDPs) through continued collaboration with Fáilte Ireland and other tourism stakeholders</u></p>

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	<p>6) Fáilte Ireland request that the 'Ireland's Ancient East' identification and branding is more fully integrated into the Development Plan and that a specific objective aligning with, supporting and promoting this initiative is also included.</p> <p>7) Fáilte Ireland request that the 'Destination Towns' initiative launched in 2019 by Fáilte Ireland within which funding was allocated for Waterford is referenced in the Plan.</p> <p>8) Fáilte Ireland request that a Section/ Objective is included to promote Accessible Tourism in the county.</p> <p>9) The plan should place a stronger emphasis on 'Sustainable Tourism' which should be enshrined in Policy.</p>	<p>6) CE Response: The importance and value of 'Ireland's Ancient East' is recognised and a specific objective should be included as requested. Branding is not considered to be appropriate as the The County Development Plan is a statutory land use document. Recommendation: Add new Objective ECON 26 <u>b) To continue to actively engage, invest, encourage and promote the development of the Ireland's Ancient East regional experience brand through sustainable tourism, which will enable visitors to have enjoyable experiences while having regard for the social, cultural heritage and environmental impacts, including the protection of designated sites.</u></p> <p>7) CE Response – It is not considered necessary to specifically mention all tourism related projects in the Plan. Waterford has a number of 'Destination' towns. Recommendation: No Change</p> <p>8) CE Response - The Council has and continues to be very proactive in the areas of improving accessibility to and the provision of accessible facilities at key tourism sites in the county. The Council will continue to support this approach. The Development Management Standards set out in Volume 2 state that the Council will seek to implement universal access with regard to both indoor and outdoor environments. Recommendation: Add additional text to Section 4.10 as follows: A successful, sustainable and accessible tourism industry will provide the backbone for Waterford as a desirable place in which to live, work, invest and to visit.</p> <p>9) CE Comment: Section 4.10 is to be entitled is Sustainable Tourism with a definition incorporated below - Sustainable Tourism is defined as 'tourism that takes full account of its current and future economic social and environmental impacts, addressing the needs of visitors, the industry, the</p>

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	<p>10) Fáilte Ireland request that a Section/ Objective is included to promote digital technology and to focus on sectors such as visitor attractions with a low digital presence.</p> <p>11) Fáilte Ireland suggest that a dedicated Walking/Cycling</p>	<p>environment and host communities'.</p> <p>Sustainable Tourism is referenced throughout the revised Section 4.10 and in revised Objective ECON 21</p> <p>Recommendation: See Revised Section 4.10 Sustainable Tourism and Amend Objective ECON 21 as follows;</p> <p><u>Sustainable Tourism</u> <u>We will cooperate with various stakeholders and tourism agencies to build on the strengths of Waterford City as the regional capital, Dungarvan as a Key Town and County Waterford in their promotion as a tourism destinations of choice. To this end, we will facilitate and encourage:</u></p> <ul style="list-style-type: none"> • Sustainable tourism 'products' and activities/ attractors in appropriate locations which are based on and reflect the city and county's distinctive history, natural and/ or cultural heritage, agri-food, marine and horticultural sector, and outdoor pursuits and recreation; and, • Ancillary tourism services and accommodation which will assist in providing a range of accommodation options across Waterford, in terms of type/ experience, choice, location and quality. • <u>Sustainable modes of transport – public transport, active transport (cycling and walking) etc.</u> • <u>Encourage and support investment in digital technology in the tourism sector, with a particular focus on sectors such as visitor attractions and activities with low digital presence and/or integration.</u> <p>10) CE Response: It is considered reasonable to include an Objective in support of investment in Digital Technology as requested.</p> <p>Recommendation: Add additional text to Objective ECON 21 as follows: • <u>Encourage and support investment in digital technology in the tourism sector, with a particular focus on sectors such as visitor attractions and activities with low digital presence and/or integration.</u></p> <p>11) CE Comment: It is generally considered that walking cycling</p>

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	<p>section should form part of the Tourism Chapter complemented with a map identifying the routes. It is also requested that additional Objectives be included to promote Greenways and Blueways in the County and historic routes/railway lines for the creation of greenways and recreation/tourist amenities.</p> <p>12) Fáilte Ireland welcomes the identification of Coastal Tourism in Section 10.1 however it is suggested that the section could benefit by further identifying that tourism in coastal areas has the potential to enhance the destination offering in Waterford. A new objective to promote at local level the development of the Irish Sea Way as highlighted as a priority in the Programme for Government should be included in the Development Plan.</p>	<p>routes/greenways and blueways are adequately dealt with in Chapters 5 & 11 and through Objectives BGI06-BGI09. Walking Trails identified in Table 10.0 are mapped in Digital Format accompanying the Plan and are also available on visitwaterford.ie (Trails Brchure). See also response to OPR submission which responds that 'Table 10.0 be removed from Volume 1 and placed in Appendix 11 and the routes be mapped accordingly'.</p> <p>In relation to historic routes/railways it is considered appropriate to add an additional objective as suggested.</p> <p>Recommendation Add Objective <u>BGI xx</u> as follows: <u>Identify and implement existing and historic routes, railways etc. and their associated infrastructure i.e. railway buildings for the creation of new greenways and associated recreation and tourist amenities including the extension of the Waterford Suir Valley Railway from Bilberry to Waterford (Grattan Quay).</u></p> <p>also add Objective <u>BGI xx</u> <u>To preserve the abandoned Waterford to New Ross rail alignment for future public transport use</u></p> <p>12) CE Comment: The current Programme for Government includes a commitment to initiate a consultation process with communities along the coastline from Carlingford Lough in Louth to Cobh in Cork with a view to creating the 'Irish Sea Way' to boost tourism in these regions. This trail, similar to the Wild Atlantic Way, could have significant economic potential for tourism and will benefit towns and villages along the coast and is supported by the Council.</p> <p>Recommendation: Amend Objective BGI09 as follows: To support the sustainable environmental and economic development of Blueways on Waterford's waterway corridors and coastline and the development of water based sport activities, improvement of quays and slipways and enhanced interpretation and safety that do not cause landscape or environmental degradation and avoid adverse impacts on ecological</p>

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	<p>13) Fáilte Ireland recommends that the Plan would benefit from the inclusion of additional text/policy in respect of Food Tourism.</p> <p>14) Fáilte Ireland recommends that the Plan would benefit from the inclusion of additional text in respect of Festivals as a driver for tourism growth.</p> <p>15) Fáilte Ireland recommends that Strategic Aim 13 in Section 2.1 be amended in order to ensure a greater alignment with tourism objectives.</p> <p>16) Fáilte Ireland recommend that Objective ECON 21 is amended to support a variety of accommodation types:</p>	<p>integrity including the Natura 2000 Network and built heritage. <u>The Council will also support the 'The Irish Sea Way' program or similar sustainable tourist attraction initiatives.</u></p> <p>13) CE Comment: Waterford has experienced a significant growth resulting from Food Tourism. For example through the 'Food The Waterford Way' Initiative a number of popular food tours, farmers markets and artisan producers are all packaged together in a dedicated website with a countywide map of food destinations produced to promote this sector. Recommendation: Include additional text in Section 4.10 referencing the <u>vibrant Food Tourism Industry</u> in Waterford.</p> <p>14) CE Comment: The contribution of Festivals and the wider entertainment industry as a driver for economic growth is recognized within the Plan and is specifically referenced in Section 4.10. Recommendation: See revised Section 4.10:</p> <p>15) CE Response: It is considered reasonable to amend Strategic Aim 13 as requested. Recommendation: Amend Section 2.1 Core Strategy Strategic Aims as follows: <u>Acknowledging the vital importance of the tourism sector to economic development,</u> continue to encourage and promote the sustainable development of a range of quality tourism facilities, attractions and accommodation types across Waterford.</p> <p>16) CE Response: It is considered reasonable to amend the Objective as requested. Recommendation: Add Objective <u>ECON 23</u> as follows: <u>Tourism Accommodation</u> <u>We will continue to support the development of a variety of accommodation types at appropriate locations throughout Waterford City and County (hotels,</u></p>

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	<p>17) Fáilte Ireland request that an additional policy objective is included in Section 3.4.1 to support the night-time economy.</p> <p>18) Fáilte Ireland request that that some of the key tourism assets and attractions should be referenced and identified on the associated mapping in the Landscape & Seascape Character Assessment to ensure they are embedded into the Plan and considered at the decision-making stage of the planning process.</p>	<p><u>B&Bs, Guest Houses, self-catering, caravan & camping, glamping etc), which can improve the economic potential of increased visitor revenue, increase dwell time and meet visitor needs. Tourist accommodation should generally be located within towns and villages (unless otherwise justified to the satisfaction of the Planning Authority) and developed with the principles of universal design to ensure they are accessible for all.</u></p> <p>17) CE Comment: It is agreed that the night-time economy is an important aspect of ensuring a vibrant town and village centres and means more than just developing a bar and restaurant culture. It entails encouraging different activities, in particular cultural experiences, through longer opening hours that appeal to a broader range of people. There is an opportunity to develop a night-time economy that appeals to both visitor and resident, to the greater benefit of the county as a whole.</p> <p>Recommendation: Add Objective <u>WCITY xx</u> in Section 3.4.1 as follows: <u>Support proposals for development involving evening and late-night commercial, retail, cultural, food and beverage or entertainment uses within, or immediately adjacent to, the defined town centres or local service centre, where it can be demonstrated that the development will enhance the character and function of the area; this may include extended opening hours, proposals for outdoor dining and event space, and proposals for the greater utilisation of existing heritage assets.</u></p> <p>18) CE Comment: This is not considered to be necessary. Impacts on key tourism assets and on other environmental assets will be fully considered in the decision-making stage of the planning process.</p> <p>Recommendation: No Change</p>
WFD-C2-	The submission lists a number of recommendations in supporting the experience and night-time economies	The CE notes the content of the submission. The issues raised are dealt with in the response to the Fáilte Ireland

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360	(tourism, tourism promotion and marketing, night-time economy).	<p>submission.</p> <p>Recommendation: See Fáilte Ireland submission response (WFD-C2-270)</p>
WFD-C2-293	The submission welcomes that the Gaeltacht na nDéise is included as one of the “principle (rural cluster) areas” in relation to the promotion of tourism-related initiatives under ECON 23. However, it seeks a specific acknowledgment of its role in promoting “cultural tourism”, in particular in Waterford.	<p>The CE notes the content of the submission.</p> <p>The role of Gaeltacht na nDéise in promoting Cultural Tourism is addressed in Policy Objective ECON 14.</p> <p>Recommendation: No change to Draft Plan</p>
WFD-C2-465	The submission highlights that out of the 7 Tourist Regions in Ireland the South East Region is ranked 4th for visitor numbers but 7th for tourism revenue. It submits that the lack of a 5 Star Hotel is a significant issue and that there is a need to upgrade 'first impressions' of the City's South Quays. The submission states that this is of paramount importance and at present are drab, uninspiring, and indicate dereliction. The submission lists a number of opportunities in relation to tourism in Waterford City.	<p>The CE notes the content of the submission.</p> <p>CE Comment: The issues raised are dealt with in the response to the Fáilte Ireland submission.</p> <p>Objective WCity 11 seeks to improve the experience of visitors and residents in the city centre.</p> <p>Amended Objective ECON 23 supports the development of a variety of accommodation types at appropriate locations (hotels, B&Bs, Guest Houses, self-catering, caravan & camping, glamping etc), which can improve the economic potential of increased visitor revenue, increase dwell time and meet visitor needs.</p> <p>Objective Trans 27 supports the development of Waterford Airport</p> <p>Recommendation: Relevant issues raised are dealt within Fáilte Ireland submission response WFD-C2-270</p>
Education		
WFD-C2-34	The submission highlights that the lack of a University in Waterford is having a negative impact in relation to investment within the city and calls for a full time campus	<p>The CE notes the contents of the submission.</p> <p>Section 4.11 of the Draft Plan relates to 'Education and Learning City/ Region'</p>

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	<p>presence within the city centre itself and suggests that a new school be developed in the North Quays in order to develop the "after five" economy and also stimulate footfall and investment within the city core.</p> <p>It calls for more of a joined up or symbiotic relationship between the Council and WIT/TUSE which could stem the brain drain and subsequent lack of investment within the region. The submission also indicates that a 'pan Council / Institute / Chamber' think tank should be established which could help drive and re imagine Waterford as a City of the future.</p>	<p>and states that 'The expansion and enhancement of activity in higher education in Waterford, including that associated with the transformation of WIT through its merger with Institute of Technology, Carlow into a university, represents an opportunity for Waterford to place learning and education to the fore in its future development'. It is considered that this statement can be expanded upon to include reference to the potential to unlock underutilised city centre sites to expand future schools/campus development or possibly develop new schools within the North Quays area in order to drive investment and increase vitality within these areas.</p> <p>Recommendation: Add new text to Section 4.11 as follows: The expansion and enhancement of activity in higher education in Waterford, including that associated with the transformation of WIT through its merger with Institute of Technology, Carlow into a university, represents an opportunity for Waterford to place learning and education to the fore in its future development <u>and also presents opportunities for future schools/campus expansion within the city core by unlocking underutilised sites and/or by developing new schools/campus(es) within the North Quays area.</u></p> <p>Add new text to Policy EDU02 as follows: 'To support the continued enhancement of the facilities and campus (es)/ consolidation of the WIT/ TUSE, in a manner consistent with the policy objectives of the TSES and MASP. This will include the Cork Road Campus expansion, Waterford Knowledge Campus, the provision of third and fourth level research, <u>unlocking underutilised sites within the city core and/or by developing new schools/campus(es) within the North Quays area,</u> collaboration and course provision in centres throughout the city and county.....</p>
WFD-C2-	The submission is made on behalf of the Board of Management of St John's Special School, Dungarvan, is	The CE notes the contents of the submission.

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56	addresses, specifically, plans for education as set out in draft form in Chapter 4 of the Draft Development Plan. The submission requests that a suitable and adequate site be designated by Waterford City and County Council, with a view to the development, construction and equipping of a new St. John's Special School by the Department of Education and Skills at an early date. It submits that St John's urgently need a new and purpose-built single-storey school on a green field site of 3-4 hectares, in close proximity in or near Dungarvan Town.	<p>The Executive further notes the submission from The Department of Education (WFD-C2-322) which states that 'In terms of special schools, we have no immediate need identified to provide an additional special school in Co. Waterford at present, but if a need arises the Department will get in touch with the Council'.</p> <p>Recommendation: No change to Draft Plan</p>
WFD-C2-134	The submission highlights that the draft plan omits the mention of Satellite Campus potential for Dungarvan. It is considered that is potential, particularly since Covid, to exploit online and blended learning and offer opportunities from Satellite campus by partnering with Educational institutes in Ireland and abroad.	<p>The CE notes the contents of the submission.</p> <p>Section 4.11 of the Draft Plan relates to 'Education and Learning City/ Region' and states that 'The expansion and enhancement of activity in higher education in Waterford, including that associated with the transformation of WIT through its merger with Institute of Technology, Carlow into a university, represents an opportunity for Waterford to place learning and education to the fore in its future development'. It is considered that this statement can be expanded upon to include reference to the potential for national/international satellite campus potential in Dungarvan.</p> <p>It is noted that Policy Objective SC18 contained in Section 7.27 of the Draft Plan seeks to 'support the development and ongoing provision of Further and Higher Level Institutions in the City and County including WIT/TUSE, Waterford College of Further Education Institute and any new Further and Higher Level Institutions – including Irish colleges or major overseas universities whether within established campuses or in new campuses.</p> <p>Recommendation: Add new text to Section 4.11 as follows: The expansion and enhancement of activity in higher education in Waterford,</p>

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		<p>including that associated with the transformation of WIT through its merger with Institute of Technology, Carlow into a university, represents an opportunity for Waterford to place learning and education to the fore in its future development <u>and also presents opportunities for future schools/campus expansion within the city core by unlocking underutilised sites and/or by developing new schools/campus(es) within the North Quays area. There is also potential for a higher education satellite campus being developed in Dungarvan by partnering with Educational institutes in Ireland and abroad.</u></p> <p>Add new text to Policy EDU02 as follows: 'To support the continued enhancement of the facilities and campus (es)/ consolidation of the WIT/ TUSE, in a manner consistent with the policy objectives of the TSES and MASP. This will include the Cork Road Campus expansion, Waterford Knowledge Campus, the provision of third and fourth level research, <u>unlocking underutilised sites within the city core and/or by developing new schools/campus(es) within the North Quays area,</u> collaboration and course provision in centres throughout the city and county such as Nemeton TV – an outreach campus in the Gaeltacht <u>and supporting the potential for a higher education satellite campus in Dungarvan by partnering with Educational institutes in Ireland and abroad.</u> Development proposals for the WIT/ TUSE should ensure that:.....</p>
WFD-C2-322	<p>The DES welcomes the general Education Policy Objective (EDU 01) to facilitate the provision of schools. However, the submission suggests that it could be made even more explicit/stronger and offers potential text to be included in EDU01.</p> <p>Waterford City At primary level the DES anticipates a potential future requirement for up to two new primary schools; at least one of which would need to be located in the Ferrybank area.</p>	<p>The CE notes the contents of the submission.</p> <p>The DES request that Policy EDU01 is expanded upon in order to 'ensure that existing and new schools are protected for educational use and that lands adjacent to existing schools are protected for future educational use in order to allow for expansion of these schools'.</p> <p>It is considered that a request to reserve lands adjoining schools for educational use where no specific need for expansion has been identified would have a sterilising effect on the adjoining lands and would be contrary to</p>

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	<p>There may also be small increased requirements at some of the existing schools, depending on population increase.</p> <p>At post-primary level the anticipated level of the increase is of a scale that could potentially be met at existing facilities. However, the DES is actively seeking a site for one of the existing post- primary schools, Gaelcholaiste Phort Lairge.</p> <p>Dungarvan At primary and secondary levels the existing schools could meet the requirements arising from the increased population.</p> <p>Tramore At primary and secondary levels the existing schools could meet the requirements arising from the increased population.</p> <p>Dunmore East At primary levels the existing schools could meet the requirements arising from the increased population. At post-primary level, it is considered that the schools in Waterford City will continue to be in a position to meet the requirements from Dunmore East.</p> <p>Portlaw The Department anticipates no increase in school place requirements and existing facilities in the town and Carrick-on-Suir will meet future needs.</p> <p>Lismore The Department anticipates no increase in school place requirements for Lismore.</p> <p>Rural Towns and Villages</p>	<p>the proper planning of the area and sequential development. Where adjoining green field lands are zoned for residential purposes in the Draft Plan, educational uses are 'open for consideration' in the zoning matrix.</p> <p>The DES request that all current and future education sites are zoned and mapped in order to aid the DES in the school mapping function. It is considered that this request can be accommodated at this stage as part of the review of the standardised zoning objectives as per Appendix B of the Draft Development Plan Guidelines for Planning Authorities 2021.</p> <p>The Draft Plan has reserved lands for a new school in Kilbarry, any additional education zoned lands in Ferrybank will form part of a new local area plan for Ferrybank/Belview by Kilkenny City and County Council. The Draft Plan has zoned the site Gaelcholaiste Phort Lairge in Ballygunner for Education use which would allow for the construction of a permanent school at this site.</p> <p>The DES have not identified any other significant requirements for additional mainstream school place provision that cannot be met by within the existing local schools in the City and County.</p> <p>Recommendation: No additional change to Draft Plan</p> <p>The standardised zoning objectives shall be implemented as per Appendix B of the Draft Development Plan Guidelines for Planning Authorities 2021.</p>

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	<p>The Department anticipates that these requirements can be met by existing facilities (of an expansion thereof if required).</p> <p>Special Schools The DES have not identified any immediate need to provide an additional special school in Co. Waterford at present, but if a need arises the Department will get in touch with the Council.</p>	
<p>WFD-C2-218 WFD-C2-219 WFD-C2-229 WFD-C2-230 WFD-C2-232 WFD-C2-236 WFD-C2-343 WFD-C2-</p>	<p>The submissions support the schools zoning as proposed in the Draft Plan - S5 mixed/general community services/facilities and identifies a number of reasons for its continued location on a permanent basis in the Ballygunner area of the city.</p> <p>Recommended Additions to Policy Objective EDU 01: 'Schools and educational facilities should be located in areas that would result in minimal disruption to the education of students and the ability of schools to maintain their enrolment'.</p> <p>'The council recognizes the unique contribution of gaeloideachas to preserving and strengthening Waterford's heritage and culture. In this vein, the council will facilitate efforts of Waterford's gaelscoileanna and gaelcholaiste to attend to the growing demand for gaeloideachas in Waterford City and surrounding environs thus ensuring that secondary level students have the opportunity to become fully fluent and competent speaking Gaeilge'.</p> <p>In recognition of the positive relationship between schools and nursing homes the following policy statement should be</p>	<p>The CE notes the contents of the submissions and welcomes the support for the zoning of the lands in the Draft Plan as 'S5 mixed/general community services/facilities'.</p> <p>The Executive recognises the demand for a permanent Gaelcholaiste at this location and is supportive of this proposal in principle. It is the remit of the Department of Education to invest in Ireland's school buildings through its building programmes and, through improved demographic planning, to ensure that every student has access to a school place which meets their needs. The Executive will assess any planning application for a permanent school at this location on its own merits and the lands have been appropriately zoned to allow for this use.</p> <p>The Executive further notes the submission from The Department of Education (WFD-C2-322) which states that 'The Department is actively seeking a site for one of the existing post primary schools, Gaelcholaiste Phort Lairge, an Irish-medium secondary school serving the area of Waterford City, Tramore, Portlaw, Dunmore East & environs. A site identification and assessment exercise is currently underway by the Department to secure a permanent site for this school to meet their needs, accommodate up to 400 post primary school places and serve this catchment area. It is anticipated that the school will remain in interim accommodation on their current site in Ballygunner, for which planning permission has been secured for the next 5 years, until permanent accommodation is secured'.</p>

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<p>276 WFD- C2- 284 WFD- C2- 302 WFD- C2- 379 WFD- C2- 390 WFD- C2- 391 WFD- C2- 400 WFD- C2- 402 WFD- C2- 411 WFD- C2- 414 WFD- C2- 429 WFD-</p>	<p>added to the Waterford CDP: 'The Council will, without prejudicing to the other policy, zoning and planning objectives of the development plan, seek to locate nursing homes close to schools and other amenities that would benefit the lives of the older people who live in nursing homes'.</p>	<p>In relation to additional policy amendments: re - the disruption of students and the ability of schools to maintain their enrolment it is considered that this issue is addressed under bullet point 4 of Policy EDU 01 - (increased capacity of schools) re - the co-location of nursing homes near schools, it is not considered necessary to amend policy to accommodate this proposal as the 'S5' land use zoning and zoning matrix already permits such co-location. Any future planning applications will be assessed on their own merits and site specific considerations.</p> <p>Recommendation: No Change to Draft Plan</p>

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<p>C2-442 WFD-C2-457 WFD-C2-458 WFD-C2-476</p>		
<p>WFD-C2-348</p>	<p>The submission relates to the role of WIT and the emerging TUSE as a key growth changer for Waterford and the broader region.</p> <p>The extensive submission suggests a wide ranging number of text/policy amendments in order to further emphasise the importance of the TUSE to the future growth and development of Waterford.</p> <p>The submission is broken down into the following Sections:</p> <p>General Remarks Enhancing Higher Education The Role of the University The Scale of the University The University and the Economy Culture and Community</p>	<p>The CE notes the contents of the submission.</p> <p>The Council recognises and supports the planned transition of WIT to The Technological University for the South East (TUSE). This development will act as a key enabler to transform Waterford into the South-East Regional Capital and into a modern European University City. The submission raises many important points and a number of text amendments will be incorporated into the Plan to reflect the comments received.</p> <p>The issue of the future growth of TUSE has been considered in the core strategy and housing strategy underpinning the Plan.</p> <p>Recommendations:</p> <p>1) Amend text within Section 4.11 as follows Key Economic Goal 6 of the Waterford Local Economic and Community Plan (2015-2020) seeks to “Support pathways to economic participation and opportunity”. Such a goal is founded on a number of factors, including that of an improved quality of human capital and the availability of a skilled workforce. <u>For more than fifty years WIT has acted as an important change agent for Waterford city and county and the wider South East, generating intellectual and human capital assets for use by civil society and the economy, and facilitating, moderating and sustaining partnerships in support of positive</u></p>

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		<p><u>change with and between various other agents including the state and the private sector.</u> The expansion and enhancement of activity in higher education in Waterford, including that associated with the transformation of WIT through its merger with Institute of Technology, Carlow into a university, represents an opportunity for Waterford to place learning and education to the fore in its future development.</p> <p>2) Amend text within Section 1.6 (b) as follows: The plan will also support access for all, to a range of quality education facilities, which is a defining characteristic of attractive, successful and competitive places. This will be achieved by supporting the growth and upgrade <u>enhanced performance</u> of all academic institutions, particularly the development of Waterford Institute Technology (WIT) to the Technological University of the South East (TUSE), and promoting and fostering links with business/ enterprise and technological innovation.</p> <p>3) Amend Strategic Objective No 4 as follows: To develop and market Waterford as a 'UNESCO Learning City', and to provide the necessary infrastructure, education and employment opportunities, complete with a University of significance, and associated accommodation, amenities and the quality of life to enable Waterford to compete at a national and international level as a modern European city of scale and significance. <u>Key elements to this will be 'talent retention and talent attraction' with the University playing an active part in creating the kinds of educational and employment opportunities to support this.</u></p> <p>4) Amend text within Objective UTL16 ICT/Communications: We will work in collaboration with service providers to deliver a more enhanced connectivity service experience in a way that protects our footway and road surfaces and delivers the economic and community benefits of technology. We will facilitate the continued provision of communication networks, <u>smart infrastructure</u>, broadband and appropriate</p>

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		<p>telecommunications infrastructure and services, subject to environmental considerations, in order to contribute to economic growth, development, resilience and competitiveness. In considering proposals for such infrastructure and associated equipment, the following will be taken into account:</p> <p>5) Add additional text to Section 4.4 as follows: Within the urban context, Waterford has existing clusters/ innovation hubs, including life sciences, communications technology, and manufacturing, centred around and supported by a number of high quality research centres. These include TQS in Lismore, the Telecommunications, Software and Systems Group (TSSG), the Pharmaceutical and Molecular Biotechnology Research Centre (PMBRC), Crystal Valley Tech and the South Eastern Applied Materials Research Centre (SEAM), as well as the ArcLab Research and Innovation Centre which is a focus for tech start-ups, and RIKON, a centre of Innovation in Business Technology Management, all with links to WIT. A number of these also support the wider city region.</p> <p><u>The Council will support the construction, and enhancement, of an extensive city and county-wide innovation network that will link all enterprise centres and related facilities through the WIT ArcLabs Innovation centre into one powerful ecosystem with significant resources, access to high quality research, business support, and other infrastructure.</u></p> <p>6) Amend Objective EDU 02 WIT/TUSE as follows: To support the continued enhancement of the facilities and campus (es)/ consolidation of the WIT/ TUSE, in a manner consistent with the policy objectives of the RSES and MASP. <u>Future developments of university campuses in Waterford should take a “smart campus” approach to design and development.</u> This will include the Cork Road Campus expansion, Waterford Knowledge Campus, the provision of third and fourth level research, collaboration and course provision in centres throughout the city and county on an outreach/ remote campus basis, such as Nemeton TV – an outreach</p>

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		<p>campus in the Gaeltacht. Development proposals for the WIT/ TUSE should ensure that:</p> <p>7) Amend Objective ECON 17 SIFP for Waterford Estuary as follows: In collaboration with relevant local authorities, the Southern Regional Assembly, government departments and state agencies, <u>and the TUSE</u>, and in order to support the implementation of Waterford MASP Policy Objective 21, during the life of the Development Plan we will prepare an Integrated Framework Plan for the sustainable development of Waterford Harbour, in order to harness the economic, <u>cultural</u> and recreational potential and protect the environmental and <u>heritage qualities</u> of the area for all users.</p> <p>8) Amend Section 4.0 as follows: 4.0 Introduction Our vision is to support a strong, sustainable, resilient and successful economy, underpinned by <u>tourism</u>, enterprise, innovation and skills, and access to quality education for all.</p> <p>This will be facilitated by creating places that can foster enterprise and innovation, and attract investment and talent, and can be achieved by building regional economic drivers for Waterford as listed in the SRSES and by supporting opportunities to diversify and strengthen the economy, to leverage the potential of places.</p> <p>Access for all to a range of quality education facilities is a defining characteristic of attractive, successful and competitive places. <u>There is an acknowledged link between educational attainment and quality of life: education is positively related to economic growth, with greater levels of attainment giving access to wider sections of the labour market; and education reduces the risk of social exclusion and poverty, and encourages social participation.</u> We will achieve this by supporting the growth and development of all learning institutions, and promoting and fostering links</p>

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		<p>with business/ enterprise and technological innovation. The development and enhancement of Lifelong Learning and Healthy City initiatives in Waterford will be essential components of achieving UNESCO Learning City/ Region status. The Development Plan will also support the development of the Learning City/ Region initiative to other urban and rural centres of population through existing networks (e.g. the Library Service), and support the preparation and implementation of a Learning Region Strategy.</p> <p><u>The Council supports the planned transition of WIT to The Technological University for the South East (TUSE). This development will act as a key enabler to transform Waterford into the South-East Regional Capital and into a modern European University City. The new university will engage in a wide variety of activities, its contribution to the city and county will be far reaching and will involve the following:</u></p> <p><u>(a) a scaling up of higher education provision</u></p> <ul style="list-style-type: none"> <u>i. to increase the level of educational attainment amongst the regional population,</u> <u>ii. to address the outward migration of talent from the region, and</u> <u>iii. to increase the flow of students and others into the region;</u> <p><u>(b) the deepening of impact on regional society and the economy through increased high-quality research and innovation activity</u></p> <ul style="list-style-type: none"> <u>i. increasing the knowledge capital of the region through enhancing the excellence of the research from within the academy,</u> <u>ii. focusing the application of that knowledge to drive the social and economic development of the region in domains of regional specialism and high impact,</u> <u>iii. as well as providing high-end, high-impact, well-paid employment opportunities for graduates, post-graduates, researchers and technical professionals.</u> <p>Employment and economic growth</p>

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WFD-C2-397	<p>The submission outlines the following with regards to members of the Travelling Community and Education:</p> <ul style="list-style-type: none"> • Given the reality of Travellers' inter-generational disadvantage and exclusion from the education system, the new WCCDP needs to name specific supports to Traveller education, inclusive of Community and 'Second Chance' Education. • The contribution of the Yellow Flag Diversity Schools Programme to a diverse and socially inclusive education sector should be recognised, and the new WCCDP should name an ongoing commitment to Yellow Flag (or a potential successor programme). • The WTCDP has been in existence since the mid 90s, and has had to move premises a number of times in the intervening period. It never had a dedicated premises for a Traveller Project in the city or the county. In consultation with WTCDP, a dedicated premises for the Waterford Traveller Project should be identified and this should be named in the new WCCDP. 	<p>The CE notes the contents of the submission.</p> <p>Waterford City and County Council will continue to liaise with the Department of Education in relation to the requirements for school place provision and any other educational requirements.</p> <p>In relation to second chance education and Yellow Flag schools etc the Council is supportive of these programmes and will continue to liaise with Education providers in these matters and implement measures to facilitate any such programmes on an ongoing basis.</p> <p>In relation to the identification of a dedicated premises for the Waterford Traveller Project, the Draft Plan has zoned lands for community purposes throughout the City and County and will assess all planning applications on their own merits.</p> <p>Recommendation: No change to Draft Plan</p>
Retail		
WFD-C2-92	<p>TII recommends cross referencing of the requirement of the "Spatial Planning and National Roads Guidelines for Planning Authorities (2012)" in Section 4 and Section 5.9 of the Draft Plan and Section 8 of the DM Standards.</p>	<p>The CE notes the contents of the submission.</p> <p>The requirements for access(es) onto the National Roads Network are considered to be adequately addressed by Objective Trans 41 in Chapter 5 and Objective DM 43 in the Draft Plan.</p> <p>Recommendation: No Change to Draft Plan</p>
WFD-C2-465	<p>The submission lists a number of opportunities for retail in Waterford City these include the following:</p> <p>1) Tourism & Heritage Area — Create Wrap Around Retail</p>	<p>The CE notes the contents of the submission.</p> <p>1) Proposals to allow for the small streets around the Viking Triangle to</p>

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	<p>Experience</p> <p>2) Cultural Area — Enhance Area by Promoting Street/Market Trade</p> <p>3) Retail Core — Delineate further between High Street and Outlet Experience</p>	<p>support a Tourism-based distinct retail community is generally supported. Care should be taken to ensure that such proposals do not have a detrimental impact on the primacy of the Core Retail Streets. The re-use of vacant retail/commercial units and derelict properties shall therefore be prioritised and a sequential approach shall be adopted for new developments. Table 3.3 in Section 3.6.5 shall therefore be amended to allow for such proposals in the wider city centre area.</p> <p>A number of other mechanisms are suggested which fall outside the remit of the Plan and can be addressed locally through amendments to bye-laws, rates scheme etc</p> <p>2) Proposals to expand the proposed “Cultural” area to promote street food and alternative experiences such as music venues, art galleries etc are welcomed and are facilitated within the Plan and bolstered by the addition of of 'Other Areas' to Table 3.3 in Section 3.6.5 as per Subsection 1.</p> <p>A number of other mechanisms are suggested which fall outside the remit of the Plan and can be addressed locally through amendments to bye-laws etc</p> <p>3) The submission suggests that the proposed development in New Street or the new retail units on the North Quay could be used the create outlet retail experience. It is stated in Section 4.11.4 of the Retail Planning Guidelines that 'Outlet centres are unlikely to succeed commercially in close proximity to the main urban centres in Ireland because retailers do not normally choose to trade at a large discount in direct competition with their high street outlets. Consequently, the most appropriate location for outlet centres is likely to be where commercial synergy can be achieved between an outlet centre and an urban centre which would lead to economic benefits for the overall area'. Any proposals/applications will therefore be considered on their own merits and assessed having regard to any impacts on the City Core Retail Area.</p>

URN	Submission Summary	Chief Executive Response & Recommendation
		<p>Recommendation:</p> <p>1) Amend Table 3.3 in Section 3.6.5 as follows: Insert additional row: <u>Other Areas: Within other areas of the City Centre the Planning Authority will seek to promote the revitalisation of vacant / derelict properties / shop units as a priority. Any proposals for new retail/commercial developments or the conversion of existing residential buildings for retail/commercial uses will be assessed on their merits and in accordance with the sequential approach to retail/commercial development.</u> <u>Applications for other retail service outlets and other uses such as internet cafés, call centres, bookmakers, take-aways, off-licences, amusement arcades, 'vape-shops', 'cash for gold' and 'Pound' type shops, and other uses that can adversely affect the character of an area will be assessed on their merits, and may only be permitted where such development would not result in a proliferation of such similar frontages/uses on the street.</u></p> <p>2) No Change to Draft Plan 3) No Change to Draft Plan</p>
WFD-C2-131	<p>The submission requests that as part of the Waterford City and County Development Plan 2022-2028, the Council undertakes the following:</p> <ol style="list-style-type: none"> 1. Provides flexible land use zoning objectives that will allow sites to be brought forward in the County's towns and settlements for convenience retail development over the lifetime of the Plan. 2. Includes policies and objectives that can spur investment in the convenience retail sector and provides for adequate convenience floorspace to be allocated in settlements across the County that have been identified in the Plan. 3. Acknowledges the requirements of modern retailers including appropriate floorplates, car parking and servicing access, where possible, and the Waterford City and County Development Plan and associated Retail Strategy should 	<p>The CE notes the contents of the submission.</p> <p>A comprehensive Retail Strategy (Appendix 4) was carried out as part of the of the CDP process. The Retail Strategy informs the policies and objectives of the CDP, sets out the Retail Hierarchy and determines the retail requirements in County Waterford over the period of the development plan 2022-2028. The provision of new retail development shall accord with the policies and objectives outlined in the Draft Plan, the recommendations of the Retail Strategy and National Planning Guidelines. It is considered that the issues raised are adequately addressed within the Draft Plan.</p> <p>Recommendation: No Change to Draft Plan</p>

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	include reference to these requirements. 4. Supports and accommodates the growth of 'Click and Collect' retail services and Grocery Home Shopping.	

3.2.4 Chapter 5 – Transport and Mobility

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WFD-C2-13	The submission seeks enhanced bus facilities such as bus priority measures, bus shelters and real time information on Commuter Bus Services between Waterford, Dunmore East, Portlawn and Passage East. Route Numbers 608, 609, 610 and 611.	<p>The CE notes the issues raised.</p> <p>With regards to the provision of public transport it must be noted that the Council is a facilitator of said service rather than a provider. It should also be noted that the provision of such services is a matter for the NTA. Nonetheless, it is considered that the Draft Plan supports the provision of public transport and associated infrastructure through Policy Objective Trans 19.</p> <p>Recommendation No change to Draft Plan.</p>
WFD-C2-4	The submission deals with transportation and traffic in Waterford City. It calls for the removal of the central median on the Quay and return it to a managed and controlled 4 lane thoroughfare.	<p>The CE notes the issue raised.</p> <p>However, this issue is a traffic management issues. This will be addressed through the WMATS for Waterford City.</p> <p>Recommendation No change to Draft Plan.</p>
WFD-C2-17	<p>This submission is made by Local Link Waterford. The submission welcomes a number of the policies and objectives included in the plan. However, it calls for the rewording of Trans 04 Policy to exclude the word 'As necessary', rephrasing of Trans 06 to include a timeframe for completion of the County Transport Plan and the renaming of Rural Link to Local Link on Page 115.</p> <p>The submission highlights the positive engagements between individual staff members within Waterford City and County Council and Local Link Waterford. However it requests that there needs to be more structured engagement between the Local Authority and Local Link, not only around service and</p>	<p>The CE notes and welcomes the submission from Local Link Waterford.</p> <ol style="list-style-type: none"> 1. Trans 04 Please see CE's response to Submission Reference WFD-C2-355. 2. Trans 06 Please see CE's response to Submission Reference WFD-C2-355. <p>Recommendation Please see CE's changes as per Submission Reference WFD-C2-355.</p>

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	route planning but also with the Council's programme of road works where route diversions appear to take little cognisance of the level of service we provide and the impact of decision on our scheduled services.	
WFD-C2-36	This submission centres around the deficiency of cycling infrastructure in Waterford City. It calls for increased safety for cyclists with segregated junctions away from roundabouts/intersections and the creation of a bi-directional cycle route stretching from the city centre to WIT and on to the IDA industrial park/Outer Ring Road.	<p>The CE notes the issue raised.</p> <p>With regards to bi-directional cycle route it must be noted that cycle routes are designed on a case by case basis in accordance with the DMURS and the National Cycle Manual 2011. The Draft Plan supports the development of active travel routes from the City Centre to the IDA and Outer Ring Road as identified in Volume 4 Map 3 Transport Map. Transport Objective Trans 07 further supports safe active travel. It is further noted that WMATs will assist in providing safe cycle routes.</p> <p>The issue in relation to deficiency of cycling infrastructure will be addressed through WMATS.</p> <p>Recommendation No change to Draft Plan.</p>
WFD-C2-69	The submission requests the removal of bullet point 5 titled Tans 50 on page 126 of the draft development plan as no rationale is given for its inclusion and it is totally at odds with the previous external professional assessments of the road objectives for the locality.	<p>The CE notes the issue raised.</p> <p>Recommendation: Amend Policy Objective Trans 50 (page 126) of the Draft Plan as follows by omitting the following text from bullet point 5: Trans 50 Seek to implement the following Road Proposal/ Improvement Schemes: > R710 Waterford city Outer Orbital Route; > R671/R672 Regional Road from Dungarvan to Clonmel; > Dunmore Link Road; > R685 Glen Road from Waterford Road to Quarry Road; > Knockhouse Road (L5507) Proposal/ Improvement from Cumann Na mBan Ring at WIT Arena to Carrickphierish Road Junction-Enhanced link from Cumann na mBan Road at WIT Arena to Industrial Zoned Lands east of the</p>

URN	Submission Summary	Chief Executive Response & Recommendation
		<p><u>Roundabout;</u></p> <ul style="list-style-type: none"> > Quarry Road (L15011), Waterford City – Improvement > R666 Ballyduff Road Junction with the N72 at Ballyrafter. <p>Amend Policy Objective W City 26 (page 78) of the Draft Plan as follows by amending and omitting the following text from bullet point 4:</p> <p>W City 26</p> <ul style="list-style-type: none"> > Enhanced link along Knockhouse Road from Cumann na mBan Road at WIT Arena to Carrickphierish Road junction Industrial Zoned Lands east of the Roundabout;
WFD-C2-163	The submission requests the removal of bullet point 4 from section titled W City 26 on page 78 and Tans 50 on page 126 of the draft development plan.	<p>The CE notes the issue raised.</p> <p>Recommendation:</p> <p>Amend Policy Objective Trans 50 (page 126) of the Draft Plan as follows by omitting the following text from bullet point 5:</p> <p>Trans 50</p> <p>Seek to implement the following Road Proposal/ Improvement Schemes:</p> <ul style="list-style-type: none"> > R710 Waterford city Outer Orbital Route; > R671/R672 Regional Road from Dungarvan to Clonmel; > Dunmore Link Road; > R685 Glen Road from Waterford Road to Quarry Road; > Knockhouse Road (L5507) Proposal/ Improvement from Cumann Na mBan Ring at WIT Arena to Carrickphierish Road Junction <u>Enhanced link from Cumann na mBan Road at WIT Arena to Industrial Zoned Lands east of the Roundabout;</u> <ul style="list-style-type: none"> > Quarry Road (L15011), Waterford City – Improvement > R666 Ballyduff Road Junction with the N72 at Ballyrafter. <p>Amend Policy Objective W City 26 (page 78) of the Draft Plan as follows by amending and omitting the following text from bullet point 4:</p>

URN	Submission Summary	Chief Executive Response & Recommendation
		<p>W City 26 > Enhanced link along Knockhouse Road from Cumann na mBan Road at WIT Arena to Carrickphierish Road junction Industrial Zoned Lands east of the Roundabout;</p>
<p>WFD-C2-71</p>	<p>The submission outlines a number of transport, infrastructural and amenity objectives which it hopes will deliver connectivity, services and supports that will support an improved quality of life for all citizens especially older people. The submission encompasses following topics:</p> <ol style="list-style-type: none"> 1. The provision of a number of transport hubs and park and ride facilities on the outer periphery of the Waterford City (MASP Area), Tramore and Dungarvan; 2. Proper facilities at key transport hubs; 3. The continuous development of low platform vehicles; 4. More involvement and controls on the delivery of refined transport services by local authority rather than by a central body such as the NTA; 5. A review of hackney licences to accommodate late night services; 6. An overall assessment of the need for more age friendly and disability parking within the cities and towns; 7. The removal of some of the general on-street public car parking spaces in towns and in the city to allow for increased sustainable modes of movement; 8. A feasibility study to help improve the quality of minor road access to main roads and footpath replacement involving OPC input; 9. Development of the "Greenway" to include a management control system on cyclists, demarcation lines for walking and the provision of toilet facilities and seating; 	<p>The CE notes the issue raised and welcomes the Older People's Council (OPC).</p> <p>A number of issue raised within this submission such as Point 2, 3, 4, 5 and 9 are not Development Plan issues.</p> <p>In relation to Point 1 and 8 the CE notes that WMATS will provide a comprehensive review of land use planning and transport within the Waterford MASP area which will cover transport hubs and park and ride. It is further noted that the LTPs for Dungarvan and Tramore will provide detail of same for these areas.</p> <p>With regards Point 6 Age Friendly and Disabled Parking Spaces this is supported by the existing Transport Policy Objective Trans 58 which states: <i>"To ensure that the needs of people with disabilities and older people are met with regards to car parking provision within urban centres as well as in existing and new developments"</i>.</p> <p>Point 7 is supported by Transport Policy Objective Trans 57 which states: <i>"We will support the removal of excess on-street and surface car parking in urban centres in favour of edge of centre location which will assist in the creation of new spaces for people and improve existing streetscapes"</i>.</p> <p>However, it is accepted that an assessment of Age Friendly and Disabled Parking should be carried out in our city and towns.</p> <p>Recommendation: Amend text to Transport Policy Objective Trans 54 as follows: <i>"We will complete a review of Waterford City Car Parking Strategy, which will</i></p>

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		<u>include Age Friendly and Disabled Parking Spaces, over the lifetime of the Development Plan".</u>
WFD-C2-92	TII's submission advises that the Waterford Metropolitan Area Transport Strategy (WMATS) will be a key component in facilitating compact growth and sustainable transport in the Waterford MASP area and will supersede Waterford PLUTS. The submission welcome the WMATS will inform the land use and transport strategy to be developed by the Council for the new Development Plan in line with o Regional Policy Objective Waterford MASP Policy Objective 6 (a) of the SRA RSES.	The CE notes the issues raised. It is important to highlight that Waterford City and County Council, Kilkenny County Council and Transport Infrastructure Ireland have collaboratively commenced the preparation of the Waterford Metropolitan Transport Strategy (WMATS). Recommendation No change to Draft Plan.
WFD-C2-96	The submission outlines a number of points with regards to transport that it wishes the draft amended plan to include these are centered around: > Highlighting specific modal shift targets to be achieved; > Objective to for an effective, attractive, and affordable public transport service in urban and rural locations; > Invest in significantly upgrading walking and cycling infrastructure in all settlements; > Creation of a plan to disincentives the private car; > Reduce the speed limit to 30km/hr in city/town/village centres, school zones, and in residential areas; > Adopt car parking management and enforcement practices to discourage the inappropriate and unsustainable use of private motor vehicles while protecting access for vulnerable road users; > Further develop the Waterford Greenway; > Provide an Active Transport Hub;	The CE notes the issue raised. With regards to ' . Specific Modal Shift Targets to be achieved' Section 5.4 of the Draft Plan outlines Achieving Modal Change. It is considered that the draft plan already supports the points raised in this submission through Policy Objective Trans 01, Trans 08, Trans 14 - 26, Trans 62 - 64, Trans 49, BGI 06 - 07. With regards to active transport hub please see CE's response and recommendation to Submission WFD-C2-323. In relation to changing facilitates please refer to Volume 2 DM Standards Section 7.5. Recommendation No change to Draft Plan.
WFD-C2-102	The submission call for the protection and enhancement of local link bus services in the area for the use of local people and visitors.	The CE notes the issues raised. It is considered that the Draft Plan supports the provision of Local Link through Policy Objective Trans 21.

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		<p>Recommendation No change to Draft Plan.</p>
<p>WFD-C2-103</p>	<p>The submission wishes to include the following objective in the draft amended plan: "to develop and improve public transport links to and from the town and to facilitate the development of a public transport hub/park and ride facility which will accommodate bus drop-off and pick-up, a taxi/hackney rank, car-parking and electric vehicle charging points and passenger waiting room facilities".</p>	<p>The CE notes the issues raised.</p> <p>With regards to the provision of public transport, park and ride facilities and taxi ranks it must be noted that the Council is a facilitator of said service rather than a provider. It should also be noted that the provision of such services is a matter for the NTA.</p> <p>Nonetheless, it is considered that these issues will be addressed through the Local Transport Plan for Portlaw.</p> <p>Recommendation No change to Draft Plan.</p>
<p>WFD-C2-110</p>	<p>Chapter 5 Transport and Mobility GNI would welcome the development of CNG infrastructure in Waterford City and County as a mechanism for supporting sustainable transport, particularly in the Heavy Goods Vehicle (HGV) sector through use of Compressed Natural Gas (CNG) and bio-CNG.</p> <p>In the 2019 Climate Action Plan there is an action to develop the CNG fuelling network to support the uptake of CNG vehicles (Action 76) and there are currently four public CNG refuelling stations operational across the country. GNI asks that the Council consider the inclusion of wording in the Transport and Mobility section of the new Waterford City and County Development Plan which supports CNG infrastructure as follows: "Compressed Natural Gas (CNG) CNG is natural gas that has been compressed to fit into a vehicle's tank and is particularly suitable for use in commercial vehicles. The development of CNG Infrastructure will enable</p>	<p>The CE notes the issue raised. The Draft Plan prioritises the support of renewable energy and the transition to a low carbon climate resilient County as set out in Policy Objective UTL 01 and UTL 13.</p> <p>Furthermore Policy Objective Trans 60: <i>"To support investment in the sustainable development of Electric Vehicle charging facilities at on and off street car parking locations and within new developments in accordance with the parking standards set out in Volume 2"</i>.</p> <p>Compressed Natural Gas (CNG) is an alternative fuel type. It can be both renewable and non-renewable. The Plan supports renewable energy and the transition to a low carbon climate resilient County. However, this is an evolving area there may be national guidance available in due course to give more clarity to the matter and the Council will be guided by this.</p> <p>Recommendation: No change to Draft Plan.</p>

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	<p>fuel switching from diesel to CNG for HGVs and buses. CNG is an established technology that is used in many countries around the world. CNG contains virtually no particulate matter (PM) and also has low emission levels of nitrogen oxides (NOx)[2] which is beneficial from an air quality perspective. CNG vehicles can be run on 100% renewable gas. This is a renewable and carbon neutral fuel, produced using Anaerobic Digestion technology from existing waste streams and a variety of sustainable biomass sources, including grass, animal waste, crop residues and food waste. Infrastructure development for CNG is already underway in Ireland, with 14 fast fill CNG stations being installed across the Core TEN-T road network via a project called the Causeway Study[3] that is supported by the European Commission through the CEF Transport Fund[4] and the Commission for Regulation of Utilities (CRU). The Council will support the use of gas in transport by a presumption in favour of applications for CNG refuelling infrastructure, provided planning and environmental criteria are satisfied.”</p> <p>[2] https://www.ngva.eu/policy-priorities/air-quality/ [3] National Policy Framework: Alternative Fuels Infrastructure for Transport in Ireland (2017-2030) https://assets.gov.ie/26377/3075c29a37b84b10acae95da89d756ea.PDF [4] CEF Transport Fund: https://ec.europa.eu/inea/en/connecting-europe-facility/cef-transport</p>	
WFD-C2-120	The submission raises the issue of car parking in and around the Ballyrafter Service Station, Lismore, Co Waterford.	The CE notes the issue raised. However, this issue is a traffic management issues. This will be addressed through the Local Transport Plan for Lismore Recommendation

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		No change to Draft Plan.
WFD-C2-122	The submission highlights the danger of walking on rural county roads as many grass verges due to road widening and maintenance.	<p>The CE notes the issue raised.</p> <p>This is not Development Plan issue but is an operational issue.</p> <p>Recommendation No change to Draft Plan.</p>
WFD-C2-143	<p>The submission wishes to enhance the pedestrian safety, and Non Motorised vehicle safety in the City and County, enhancing the attractiveness of sustainable transport, by making the pedestrian travel as a safer, quicker, calmer and more affordable option. It also seeks a number of new bus routes in the city and light rail links from Waterford city to New Ross, Dungarvan and Tramore to be included.</p> <p>It submits a number ways this could be achieved - including data available on road traffic accidents, standards from established people-centred urban planning systems, Survey Private/public Motorised Vehicle (PMV) ownership in Waterford city and county, 2016 – 2028. (see submission for full list).</p>	<p>The CE notes the issue raised.</p> <p>The CE sets out the response to the various transport related requests below.</p> <p>Request 9: Include data available on road traffic accidents; Request 10: Pedestrian prioritisation</p> <p>Point A - It is considered that the plan supports this point with regards to Transport Strategic Objective No.1 Point B - The setting of speed limits is through Bye laws and is a reserved function. In this regard there is an ongoing review of speed limits. This is not a Development Plan issue. Point C - It must be noted that cycle routes are designed on a case by case basis in accordance with the DMURS and the National Cycle Manual 2011. The Draft Plan supports the development of a number of active travel routes as identified in Volume 4 Map 3 Transport Map. Transport Objective Trans 07 further supports active travel. Point D/E - See response above to Request 10 Point C. Point F - It is considered that the plan supports pedestrian safety around schools though a number of Policy Objective in particular Trans 33, 34, 37 and 38.</p> <p>Request 11 - 16: Survey Data The CE respectfully consider that the observation which suggests carrying out a number of surveys with respect to N25 Toll Bridge/ Rice Bridge and surrounding road network so as to inform policy, comprises a body of work that would have been more appropriate to have been carried out at pre-draft</p>

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		<p>stage prior to the preparation of the Draft Plan. It is a body of background work that it was not envisaged could be carried out in any meaningful way in the statutory time that is available for the preparation of the Chief Executives Report on the Draft Plan. However, survey for journey to work place and school is provided for in Appendix 18.</p> <p>Request 17: Rice Bridge The CE notes the issues raised with regards to Rice Bridge. However, this issue is a traffic management issues and will be addressed through WMATS.</p> <p>Request 18: Optimised usage of the N25 bypass It is considered that this is traffic management issues and could be addresses under WMATS.</p> <p>Request 19: South Quays redevelopment It is considered that the plan supports the redevelopment of the South Quays through Policy Objective W City 11 and W City 29.</p> <p>Request 20: Separated cycle way from Bilberry to Dunmore Road Please see response above to Request 10 Point C.</p> <p>Request 21 and 22: A skateboarder park/BMX bike track The CE notes the issues raised. The issues raised are operational in nature and not Development Plan issues.</p> <p>Request 23 - 26: Traffic management The CE notes the issues raised. It is considered that issues are traffic management issues and will be addressed through WMATS.</p> <p>Request 27: City cycling network Please see response above to Request 10 Point C.</p> <p>Request 28/29: City to country town cycleways The CE notes the issues raised. It is considered that the plan supports such an initiative through Policy Objective Trans 06 and Trans 46.</p> <p>Request 30/31: One way traffic on the Coppercoast road/ removal of all ramps with raised zebra crossings The CE notes the issues raised. The issue with regards to Copper Coast Traffic is a traffic management issues and not Development Plan issues. The removal of ramps is an operational issue and not a Development Plan issue.</p>

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		<p>Request 32 and 41: Bicycle parking The CE notes the issue raised. With regards to the Car Parking Targets it is considered that the plan already supports this. The provision of cycle parking in new developments is set out in Volume 2 DM Standards 7 Table 6-8.</p> <p>Request 33: Proposed pedestrian & cycling bridge The Sustainable Transport Bridge forms an integral part of the physical infrastructure required to deliver the Waterford North Quays SDZ Planning Scheme 2018. The bridge will be c.8m wide and will provide sufficient room to accommodate bus, bike and pedestrians. The bridge was planned to allow the river to be navigable by ships and boats. The River Suir Sustainable Transport Bridge received full approval from An Bord Pleanala in 2019.</p> <p>Request 34: Retail centre The CE notes the issues raised. In relation to the provision of public transport it must be noted that the Council is a facilitator of public transport services rather than a provider. It should also be noted that the licensing and operation of bus services is a matter for the NTA. With regards to the location of out-of-town shopping centres as required by the Planning and Development Act the Planning Authority have had regard to the Retail Planning Guidelines (Section 28 Guidelines) when formulating the Draft Plan policy. The draft plan outlines has a general presumption against large out-of-town retail centres.</p> <p>Request 35: Light rail link to New Ross, Dungarvan, Tramore The CE notes the issues raised. With regards to the provision of rail and light rail infrastructure it must be noted that the Council is a facilitator of said infrastructure rather than a provider. It should also be noted that the provision of such infrastructure is a matter for the TII and NTA. Nonetheless, it is considered that the Draft Plan supports such an initiative through Policy Objective Trans 22 and Trans 23.</p> <p>Request 37: One-way streets and roads The CE notes the issues raised. It is considered that the issue is a traffic management/ operational issues and will be addressed through WMATS.</p> <p>Request 38: Car-pooling opportunities</p>

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		<p>It is considered that the Draft Plan supports carpooling through Policy Objective Trans 26.</p> <p>Request 39: Eliminating on-pavement parking The CE notes the issues raised. It is considered that the issue is a traffic management/ operational issues and not Development Plan issues.</p> <p>Request 40: Minimising on-street parking The CE considers that the Draft Plan supports this issue through Policy Objective Trans 57.</p> <p>Request 42: Alternative transport options for small business The CE notes the issues raised. It is considered that this issue is addressed through Policy Objective Trans 12.</p> <p>Request 43: Bicycle maintenance supports for districts The CE notes the issue raised. This is not a Development Plan issue.</p> <p>Request 45: Re-purposing car parks The CE notes the issues raised. It is considered that this issue is addressed through Policy Objective Trans 61.</p> <p>Request 46: Converting existing car parking in Bolton Street, Johnstown and Millers' March to create a recreational amenity (park) The CE notes the issues raised. The inclusion of such an objective is considered premature. It is noted that the Waterford City Car Parking Strategy will be reviewed during the life time of the Development Plan. Any such review will need to take account of the recommendations of the WMATS.</p> <p>Recommendation No change to Draft Plan.</p>
WFD-C2-159	This submission requests that Council must prioritise developing a segregated cycling route along the Dunmore Road	<p>The CE notes the issue raised.</p> <p>It must be noted that cycle routes are designed on a case by case basis in accordance with the DMURS and the National Cycle Manual 2011. The Draft Plan supports the development of active travel routes along the Dunmore Road as identified in Volume 4 Map 3 Transport Map. Transport Objective Trans 07 further supports active travel. It is further noted that WMATs will</p>

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		<p>assist in providing safe cycle routes.</p> <p>Recommendation No change to Draft Plan.</p>
WFD-C2-170	<p>The submission welcomes permeability measures included in the draft plan namely W City 03 and traffic calming measures W City 04. The submission requests that both these policy objectives be considered together, to ensure the best possible safety standards are achieved when it comes to the school community.</p>	<p>The CE welcomes the positive submission with regards to permeability and traffic calming in the North West neighbourhood. These two policies will be considered together when assessing any new development in the area.</p> <p>Recommendation No change to Draft Plan.</p>
WFD-C2-185	<p>1 - The submission identifies a number of issues with regards to active travel as set out in the draft plan. It requests that Tramore be included in the Waterford WMATS.</p> <p>2 - It also notes that the draft plan lacks ambition to address the climate emergency and call for a greater ambition with regards to the 10% target for cycling.</p> <p>3 - It also submits that the development plan objectives should be specific, have an established graded, or hierarchical list of objectives that can be achieved within the lifetime of the plan and come with review dates so that its success can be measurable.</p> <p>4 - The submission outlines a number of specific comments with regards to transport that it wishes the draft amended plan to include these are mainly cantered around bicycle provision, bike parking standards and facilities, modal shift targets.</p>	<p>The CE notes the issues raised.</p> <p>1 - The MASP area was defined under the NPF and hence the issue raised is not considered to be a Development Plan issue.</p> <p>2 - In relation to Modal Shift please see CE's response to submission ref. WFD-C2-355/363.</p> <p>3 - The Draft Plan introduces, for the first time, a framework for measuring the outcomes of Policy Objectives. The implementation and monitoring framework is set out in Appendix 16 of the Draft Plan and Policy Objectives are assessed against the strategic goals as well as listing key stakeholders responsible for implementation and monitoring delivery of the Policy Objective. With regard to timeframes and identifying key priorities, many Policy Objectives are continual or may take a number of Plan cycles to be fully realised. In this context, the framework is intended to provide a first step towards assessing the progression towards the delivery of desired planning outcomes which may continue through successive Development Plans. Furthermore, it is noted that the delivery of desired planning outcomes, may be subject to a range of external factors, most notably wider economic circumstances and availability of resources, and as such the specification of a timeframe would necessitate a firm means of ensuring implementation.</p> <p>4 - In relation to the Cycle Plan, Downstream Crossing, Bike Parking, Transport Hubs, Park and Ride, Segregated cycle paths and Speed limits, it is considered</p>

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		<p>that these issues will be addressed through the WMATS for Waterford City. Regarding the retrofitting of bike parking this is an operational issue which is beyond the scope of the Development Plan. With regards to the Car Parking Strategy any such review will need to take account of the recommendations of the WMATS. The provision of cycle parking in new developments is set out in Volume 2 DM Standards 7 Table 6-8. It is considered that the Draft Plan allows for sufficient flexibility to accommodate sufficient flexibility as set in Section 7.4 sets which states the following:</p> <p><i>"The cycle parking standards set in Tables 6-8 are the minimum provisions (sum of both short-stay and long-stay), and a higher quantum may be required to meet national sustainable travel targets as per 'Smarter Travel', or higher targets associated with a Travel Plan for a proposed development".</i></p> <p>Recommendation No change to Draft Plan.</p>
<p>WFD-C2-191</p>	<p>This submission provides the context of the current Rail Transport provision within the wider Waterford area. It also highlights the benefit of enhanced Rail Freight to the region along with supporting the new proposed Waterford Rail Station. The submission covers electrification/modernisation of the rail network as well as an overview of The Strategic Rail Review with particular reference to the southern region. Finally the submission highlights the requirement to include the potential of rail in the Waterford Metropolitan Area Transport Strategy.</p> <p>The submission highlights a number of editions to be made to the amended draft plan with regards to the promotion of rail and the integration of rail with active/public transport.</p>	<p>The CE notes the issue raised.</p> <p>In relation to integration of rail transport the Draft Plan already supports this through updated Policy Objective W City 26 please see CE Response to WFD-C2-323. However, the CE considered that the role of rail could be further strengthened in providing an alternative to mode of transport within the wider Waterford MASP area.</p> <p>Recommendation Add the following to bullet point to Section 5.2 of the Draft Plan on Page 113 after 'A Metropolitan Area cycle network' which will read as follows:</p> <ul style="list-style-type: none"> ● <u>Develop enhanced integration between rail transport with the Metropolitan Area bus and cycle network to ensure the optimal use of the rail network, connecting Waterford at a regional and national level, in catering for the movement of people and goods including development of commuter rail services into Waterford.</u>

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		<p>With regards to Transport Modes Table 'Bus' on Page 119 of the Draft Plan the CE considered a reference to integrating transport solutions between rail, regional/ metro bus, and active travel should be inserted.</p> <p>Recommendation Add the following additional text to the first bullet point to Transport Modes Table 'Bus' on Page 119 of the Draft Plan which will read as follows:</p> <ul style="list-style-type: none"> • Bus services are the backbone of the regional <u>and Metro</u> public transport system and investment will be focused on improving connectivity between <u>Waterford and Regional</u> settlements and enhancing the reliability and the level of service within key settlements. <u>Integrating transport solutions between rail, regional/ metro bus, and active travel will also be supported.</u> <p><u>The CE agrees that the the following change in relation to reference to 'RSES' in Transport Modes Table 'Rail' on Page 119 of the Draft Plan be made.</u></p> <p>Recommendation Add the following text to Transport Modes Table 'Rail' on Page 119 of the Draft Plan after the sentence 'It also includes improvements to the Rosslare-Waterford-Limerick Junction line...' which will read as follows: '<u>...It also includes improvements to the Rosslare-Waterford-Limerick Junction line. The RSES recognises that strategic importance of the Rosslare-Waterford Line and it's importance to the region'.</u></p> <p>With regards to naming the Waterford Railway Station as a key destination and establish Park and Ride to Waterford City along the Limerick-Junction-Waterford-Rosslare/ Wexford rail line these will be addressed through the WMATS. It is considered that the Draft Plan supports the Regional Greenway Network and the Additional BGI.</p> <p>Recommendation No change to Draft Plan.</p>

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WFD-C2-233	<p>The need for a strategic, plan-led approach to city centre parking provision.</p> <p>The POW supports the preparation of a city centre parking strategy and would reiterate the need to ensure a suitable provision of parking to service the city centre, not just for car parking but also as event space. The POW looks forward to full engagement with WCCC in the preparation of the parking strategy.</p>	<p>The CE notes the issues raised with regards to the review of the Waterford City Car Parking Strategy. Any such review will need to take account of the recommendations of the WMATS.</p> <p>Recommendation No change to Draft Plan.</p>
WFD-C2-241	<p>The submission seeks to strengthen the plan monitoring and implementation particularly in terms of measuring increased pedestrian and cyclists activity. In particular there should be a rebalancing of how road space is used with a mover towards facilitating sustainable modes. Other issues raised include:</p> <p>1 - 30km/hr should be the default speed limit on all roads within the inner ring road of Waterford City, and within county town centres and villages.</p> <p>2 - If there is not enough room for two-way traffic and segregated cycle lanes, then one-way systems should be implemented.</p> <p>3 - Safe cycling infrastructure along the Dock Road in Ferrybank and between WIT and Waterford City.</p> <p>4 - Permeability must be improved and needs to be a standard feature of all new developments.</p> <p>5 - A plan for dealing with footpath parking throughout the county is required.</p> <p>6 - Safety should be paramount in all transport infrastructure, particularly for women and children.</p> <p>7 - The needs of older people and people with disabilities must be considered when planning and building public transport.</p>	<p>The CE notes the issue raised.</p> <p>In relation to Point 1 the setting of speed limits is through Bye laws and is a reserved function. In this regard there is an ongoing review of speed limits. This is not a County Development Plan issue.</p> <p>A number of points raised are considered to be a traffic management issues (i.e. Point 2, 3 and 5). These will be addressed through the WMATS.</p> <p>In relation to Points 4 Permeability this is supported by the existing Policy Objective W City 03, W City 27, Trans 01, Trans 09, H 02, Place 03, Uni Des 01, Uni Des 03 and Place 27.</p> <p>With regards to Point 7 the needs of older people and People with disabilities with regards to planning and building public transport it is considered that the Draft Plan supports this by existing Policy Objective Uni Des 01 and Trans 58 which states:</p> <p>Uni Des 01 <i>"To ensure that all new developments are connected and integrated to both existing and proposed developments by:</i></p> <ul style="list-style-type: none"> <i>> Providing for safe and convenient alternatives to the car in their design.</i> <i>> Prioritising permeability, walking, cycling and public transport accessibility, and</i> <i>> Integrating physical activity for and between all ages".</i> <p>Trans 58 <i>"To ensure that the needs of people with disabilities and older people are met with regards to car parking provision within urban centres as well as in</i></p>

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		<p><i>existing and new developments".</i></p> <p>Recommendation No change to Draft Plan.</p> <p>Safety It is considered that the issue of safety, particularly for women and children can be expanded within the Transport Chapter.</p> <p>Recommendation Amend Transport and Mobility Strategic Objective No.3 (Page 111) and add the following text as follows: > 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. <u>Such infrastructure should be designed to be universally accessed, sustainable and safe, particularly for women and children (Please see 'Travelling in a Woman's Shoes' TII 2020).</u></p>
WFD-C2-280	In relation to the Greenway car park, Ballinroad Community Group contends that the Council should take reasonable steps to ensure safer parking at peak visitor times	<p>The CE notes the issue raised. However, this issue is a traffic management issues. This will be addressed through the Local Transport Plan for Dungarvan/Ballinroad.</p> <p>Recommendation No change to Draft Plan.</p>
WFD-C2-281	The submission seeks to rationalise traffic movement in and around GSK and other industrial operators in Dungarvan.	<p>The CE notes the issue raised. However, this issue is a traffic management issues. This will be addressed through the Local Transport Plan for Dungarvan/Ballinroad.</p> <p>Recommendation No change to Draft Plan.</p>
WFD-C2-297	The submission seeks to strengthen the policy objective content relating to sustainable and public transport modes and enabling infrastructure.	<p>The CE notes the issues raised.</p> <p>1 - Modal Shift: Please see CEs response to OPR Submission Reference WFD-</p>

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		<p>C2-363;</p> <p>2 - Speed limits: The setting of speed limits is through Bye laws and is a reserved function. In this regard there is an ongoing review of speed limits. This is not a Development Plan issue.</p> <p>3 - Park and Ride/ Bike Scheme: With regards to the provision of park and ride and bike share scheme it must be noted that the Council is a facilitator of said service rather than a provider. It should also be noted that the provision of such services is a matter for the NTA. However, it is considered that the draft plan supports such initiative through Policy Objectives Trans 25 and Trans 12.</p> <p>4 - Outer Orbital Route: Please see CEs response to Point 6 of Submission Reference WFD-C2-355</p> <p>5 - Cycling Infrastructure: With regards to the provision of transport infrastructure it must be noted that the Council is a facilitator of said infrastructure rather than a provider. It should also be noted that the provision of such infrastructure is a matter for the NTA. However, the Draft Plan supports the development of active travel routes across the City as identified in Volume 4 Map 3 Transport Map. Transport Objective Trans 07 further supports safe active travel. It is further noted that WMATs will assist in providing safe cycle routes.</p> <p>Recommendation No change to Draft Plan.</p>
WFD-C2-302	<p>The Cliff Road in Tramore should be transformed from a two-way road into a one-way, single-lane road. The unused road lane should then be used, not for extra parking spaces, but for a widened footpath. This change would attract tourists, reduce car usage and provide health benefits.</p> <p>The submission highlights the problems of cars parking on footpaths and suggests the following policy addition: NEW POLICY "The council will promote walking by taking measures to discourage parking on footpaths, including:</p>	<p>The CE notes the issue raised. However, this issue is a traffic management issues. This will be addressed through the Local Transport Plan for Tramore.</p> <p>Recommendation No change to Draft Plan.</p>

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	<p>Traffic calming measures; Maintaining kerb heights; and Installing metal or flexible plastic barriers</p>	
<p>WFD-C2-323</p>	<p>The submission provides the background and context in relation to Iarnród Éireann core objectives and benefits for rail with regards to Waterford and the South East. It also outlines the current rail services in Waterford and sets out CIEs high-level measures that should be a priority for the draft Development Plan which are listed below:</p> <ol style="list-style-type: none"> 1. Increased passenger service levels. Intercity - future plan for the Waterford to Dublin services is to provide a 100% increase in services to hourly all-day with some improvement in journey times; Regional - Iarnród Éireann will continue to operate this service over the period of the Development Plan as a sustainable transport link for Waterford, providing an alternative to private road transport for both passengers and freight. 2. Facilitate the New Waterford Station within the Waterford North Quays Strategic Development Zone - Iarnród Éireann, along with our colleagues in CIÉ, will continue to work in collaboration with WCCC. 3. Rail Freight - Iarnród Éireann believe WCCC should consider the findings of Iarnród Éireann's Rail Freight 2040 Strategy when finalising the new Development Plan, and it should support the continued operation and enhancement of rail freight services. 4. Electrification - The submission states that there is major sustainability benefits to be gained by electrification of rail services on existing lines, and this will only be further enhanced with the shift long-term towards renewable energy 	<p>The CE notes and welcomes the submission from Iarnród Éireann/ Irish Rail.</p> <p>The Draft Plan supports sustainable modes including optimal use of rail network, the development of rail freight and park and ride in a number of Policy Objectives which addresses aspects of the issues raised as follows:</p> <ul style="list-style-type: none"> • Policy Objective Trans 01: Integration of Land Use Planning and Transport Policy Objective; • Policy Objective Trans 02 - 06: Waterford Metropolitan Area Transport Strategy (WMATS) and Local Transport Plans (LTPs) Policy Objective; • Policy Objective Trans 14 - 19: General Public Transportation Policy Objective; and • Policy Objective Trans 22 and 23: Rail Transportation Policy Objective; and • Policy Objective Trans 25: Park and Ride. <p>The CE notes the issues raised in relation to the Waterford-Rosslare Europort line. It must be noted that this line has the potential to realise enhanced sustainable regional connectivity between the South East Regional City of Waterford, the Key Town of Wexford and Port of Waterford - Rosslare Europort WCCC will continue to support IE to develop this line for passenger or freight services. The CE further notes that the existing and disused regional rail network centred around Waterford City has the potential to cater for increased commuter and recreational passengers as well as assisting in achieving our modal shift.</p> <p>Recommendation Add the following sentence to Policy Objective Trans 22: on page 121 which will read as follows: "We will support the optimal use of the rail network, in catering for the</p>

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	<p>sources.</p> <p>5. Accessibility Programme - The Development Plan should support the further expansion of our Accessibility Programme.</p> <p>6. Customer Information Services - CIS should be supported in the plan as it greatly supports the Development Plans objective Trans 53.</p> <p>7. Development of Multimodal Facilities - Sustainable Interchange Programme - Iarnród Éireann believes the Development Plan should support the implementation of the Sustainable Interchange Programme.</p> <p>8. Park and Ride Strategy - Iarnród Éireann is currently engaging with Councils and the National Transport Authority to develop a Park and Ride Strategy, which will be implemented in line with growing demand. The Development Plan should support the implementation of this Park and Ride Strategy when it is agreed by all parties.</p> <p>9. Waterford-Rosslare - The submission states that the line currently has plans to reinstate passenger or freight services on the closed Waterford-Rosslare Europort line. This is subject to change following the outcomes of the Allisland Strategic Rail Review by DoT/DfI(NI) and any assessment it undertakes on the line.</p>	<p>movement of people and goods and thereby enhance the economic corridor between Dublin and Waterford City and Dublin, the Key towns of Kilkenny, and Carlow, Clonmel and Wexford Town <u>as well as commuter towns such as Carrick On Suir and New Ross.</u></p> <p>Add the following sentence to Policy Objective Trans 23: on page 121 which will read as follows: <i>"Support the Retention of the Waterford -Rosslare <u>and the New Ross</u> Rail lines for future freight and passenger rail connectivity between Waterford City, Waterford Port (Belview), <u>Wexford Town, Rosslare Town and Europort.</u></i></p> <p>It is considered appropriate to refer to the Policy Objective Trans 14 which includes reference to the need for WCCC to support and co-operate with public and private transport operators in the provision of an effective, accessible, attractive and sustainable transport service.</p> <p>Recommendation Add the following paragraph to Policy Objective Trans 14: on page 120 which will read as follows: <i>"To support and co-operate with public and private transport operators in the provision of an effective, accessible, attractive and sustainable transport service and in the development of key infrastructural requirements such as bus lay-byes and set-down locations in appropriate urban and rural locations, turning areas for buses in larger housing estates which:</i></p> <ul style="list-style-type: none"> • <i>Strive for universal accessibility for pedestrians;</i> • <i>Provide adequate, safe and convenient access; and,</i> • <i>Reduce the dependence on the private motor car.</i> <p><u><i>The Accessibility Programme of Iarnród Éireann, which provides for the upgrade of rail stations in terms of accessibility is anticipated to deliver improvements for persons with reduced mobility in the rail network."</i></u></p> <p><i>The CE notes the point raised in relation to the New Waterford Station and</i></p>

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		<p><u>considers that Policy Objective W City 26 on Page 78 of the Draft Plan can be expanded to address the issue further.</u></p> <p>Recommendation Add the following bullet point to Policy Objective W City 26 on page 78 ('Old Kilmeaden Road') which will read as follows:</p> <ul style="list-style-type: none"> • <u>To support and facilitate the development of an integrated transport hub within Waterford City Centre.</u>
WFD-C2-355	<p>The NTA acknowledges that the Draft Development Plan is generally consistent with the objectives of the SRSES and Waterford MASP in its support for:</p> <ul style="list-style-type: none"> · a compact and connected city and county; · a tiered and infrastructure-led approach to new residential development; · the delivery of 10-minute neighbourhoods; · the preparation of LTPs based on the ABTA approach; · the development a metropolitan area bus network, cycle network and a more walkable city; <p>and</p> <ul style="list-style-type: none"> · other supporting measures including transport demand management and transport integration. <p>The NTA also welcomes the references to WMATS throughout the draft Plan and the Council's commitments to the implementation of its recommendations, when complete.</p> <p>The following Recommendations are specified by the NTA:</p> <ol style="list-style-type: none"> 1. Waterford Metropolitan Area Transport Strategy (WMATS) <p>-</p> <p>The NTA recommends that the intention to review the PLUTS</p>	<p>The CE notes and welcomes the support of the NTA to the key objective of the Plan.</p> <p>1. Waterford Metropolitan Area Transport Strategy (WMATS) It is considered that Section 5.2 and Policy Objective Tran 06 can be expanded to address the issue raised.</p> <p>Recommendation Amend Policy Objective Section 5.2 (end of Page 113) and add supporting paragraph below and amend Tran 06 on (Page 114) as follows:</p> <p><u>The County Transport Plan will be informed by an assessment of inter-settlement travel patterns across the county and to key settlements in neighbouring counties, in order to better understand travel patterns and associated transport infrastructure and services requirements. Of particular importance in this process will be the examination of commuting patterns to Waterford City, the key town of Dungarvan and the large town of Tramore. This profiling will be used to better understand the relationship between current land use patterns and associated travel patterns. In doing so, it will also inform the formulation of land use policies which can affect more sustainable travel pattern outcomes, as well as the transport infrastructure and services need to meet future inter-settlement travel demand. The development of a County Transport Plan in time will also inform and be informed by the preparation of Local Transport Plans for designated</u></p>

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	<p>during the lifetime of the Development Plan should be reconsidered in light of the preparation of WMATS. It is also recommended that further detail should be provided on the preparation of a County Transport Plan, and that such a plan should take account of WMATS, other NTA public transport programmes and the development of Local Transport Plans.</p> <p>2. Integration of Land Use Planning and Transport - The NTA is supportive of Policy Objective Trans 01, which states that the Council will actively support the integration of land use planning and transport through a number of specific measures.</p> <p>3. Local Transport Plans - The NTA recommends that Local Transport Plans should be prepared; using the Area Based Transport Assessment (ABTA) process, for all proposed Local Area Plan areas</p> <p>4. Planning for Bus Service Provision, including Rural Areas- The NTA is supportive of Policy Objective Trans 16, which requires the incorporation of appropriate public and active modes of transport infrastructure as part of any significant residential, educational, community or commercial development proposal. The NTA welcomes the Council's commitment to supporting the 'Connecting Ireland' programme through its inclusion in Policy Objective Trans 03. The NTA also acknowledges the Council's support for the Local Link programme as included in Policy Objective Trans 21.</p> <p>5. Achieving Modal Change- The NTA recommends that the Development Plan should aim</p>	<p><u>settlements across the County.</u></p> <p>Policy Objective Tran 06 <i>"To prepare a County Transport Plan, during the life of the Development Plan, and that such a plan should take account of WMATS, Connecting Ireland, other NTA public transport programmes and the development of Local Transport Plans". having regard to Local Transport Plans, WMATS and PLUTS review.</i></p> <p>3. Local Transport Plan The CE notes the issue raised. The requirement for Local Transport Plans is set out in the NTA and TII Guidance Note on Area Based Transport Assessments, 2018.</p> <p>Recommendation: It is recommended to amend the following Policy Objective Trans 04 to Chapter 5 (page 114) as follows: <i>"As necessary, we will prepare Local Transport Plans for neighbourhoods within Waterford City and the urban towns of Dungarvan and Tramore based on ABTA guidance produced by the NTA and TII-It is a Policy Objective to prepare Local Transport Plans(LTPs) (Area Based Transport Assessments (ABTAs)) in tandem with the preparation of Local Area Plans (LAPs) and also prepare ABTAs 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."</i></p> <p>5.Achieving Modal Change The CE notes the issue raised. Please see CE response and recommendation to OPR Submission WFD-C2-363.</p>

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	<p>to identify mode share targets for each mode, for designated settlements as well as for the county as a whole.</p> <p>6. Roads - The NTA recommends that the list of regional and local roads included in the Development Plan should be qualified by the inclusion of a statement to the effect that such roads are included 'subject to their consistency with the recommendations of the WMATS'</p> <p>7. Parking- The NTA recommends that the review of the Waterford City Car Parking Strategy should take account of the recommendations of WMATS.</p>	<p>6. Roads The CE notes the issues raised. Subsequent to amendments to Policy Objective Trans 50 to Chapter 5 (page 126) from WFD-C2-69 and WFD-C2-163 submission it is further intended to amend this policy as follows:</p> <p>Recommendation: It is recommended to amend the following Policy Objective Trans 50 to Chapter 5 (page 126) as follows: <u>Seek to implement the following Road Proposal/ Improvement Schemes It is an objective to support the following sustainable 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:</u></p> <ul style="list-style-type: none"> > R710 Waterford city Outer Orbital Route; > R671/R672 Regional Road from Dungarvan to Clonmel; > Dunmore Link Road; > R685 Glen Road from Waterford Road to Quarry Road; > <u>Knockhouse Road (L5507) Proposal/ Improvement from Cumann Na mBan Ring at WIT Arena to Carrickphierish Road Junction-Enhanced link from Cumann na mBan Road at WIT Arena to Industrial Zoned Lands east of the Roundabout;</u> > Quarry Road (L15011), Waterford City – Improvement > R666 Ballyduff Road Junction with the N72 at Ballyrafter. <p>7. Parking The CE notes the issues raised with regards to the review of the Waterford City Car Parking Strategy.</p> <p>Recommendation: It is recommended to amend the following Policy Objective Trans 54 to Chapter 5 (page 128) as follows:</p>

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		<p>"We will complete a review of Waterford City Car Parking Strategy over the lifetime of the Development Plan. <u>The review should take account of the recommendations of the WMATS</u>".</p>
<p>WFD-C2-360</p>	<p>The submission lists a number of objectives in relation to Connectivity -(sustainable mobility, active travel, international connectivity).</p>	<p>The CE notes the issue raised.</p> <p>It is considered that the below points will be addressed through LTPs and WMATs.</p> <ul style="list-style-type: none"> > Waterford's transport network more connected, integrated, and efficient; > Investment in sustainable transport infrastructure; > Successfully connect transport to land use policies; > Implement and promote sustainable travel projects across Waterford; > Transport investment should be integrated with land use; > Enhance Park & Ride facilities; and > Support the delivery of strategic sustainable transport projects including BusConnects. <p>With regards to the two points raised below it must be noted that the Council is a facilitator of transport infrastructure and services rather than a provider. It should also be noted that the provision of such infrastructure and services is a matter for the TII and NTA. Nonetheless, it is considered that the Draft Plan supports such an initiative through Policy Objective Trans 39 -43.</p> <ul style="list-style-type: none"> > Ensuring the enhanced connectivity between regions including the N25 to Cork (and N24 to Limerick); and > Ensuring that sufficient funding should be made available to improve the existing stock and to implement substantial works on the existing road network.
<p>WFD-C2-372</p>	<p>Active Transport – Cycling and Walking Policy Objective (pg 117) Trans 09 – Connectivity and Permeability Add 'and Waterford Greenway' after road network. This would ensure any new development would have safe connectivity and access to the Greenway eg</p>	<p>The CE notes the issue raised.</p> <p>In relation to modal shift targets the Draft Plan already supports this through Policy Objective Trans 01 - also please see CE response to the OPR Submission No. WFD-C3-363.</p>

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	<p>footpaths/cyclepath from new housing development in Ballinroad to the Greenway.</p> <p>Trans 13 – Support Facilities (pg 117) Please add the following to this objective – ‘We will require all new developments to provide support facilities to promote modal shift to walking and cycling.’</p> <p>The submission would welcome a commitment to specific targets for modal shift to be achieved within the lifetime of this development plan including the actions that will be taken to achieve these targets. ‘Green Modes’ in Table 5.0 should be broken down into walking and cycling, and targets for each should be set.</p>	<p>Recommendation Add the following to Policy Objective Trans 09: on page 117 which will read as follows: “Ensure that all developments can provide full connectivity/permeability to the adjacent road network (pedestrian, cycle and vehicular) and/or to adjacent lands which are zoned for development and lands which may be zoned for development in the future. <u>Access should be also provided to adjoining amenities such as Greenways, Walkways and other recreational areas</u>”.</p> <p>It is also felt that Policy Objective Trans 01 on page 112 could be strengthened with regards to walking infrastructure.</p> <p>Recommendation Add the following text to the last bullet point in Policy Objective Trans 01: on page 112 which will read as follows: “...● Designing <u>and develop permeable city links</u> for walking and cycling in new development areas and retrospectively implementing <u>safe walking and cycling facilities and infrastructure</u> into existing neighbourhoods, <u>particularly at peripheral locations of our urban areas</u>, where feasible and practicable. <u>This will be done through the provision of appropriate segregated footpaths and cycle lanes.</u>”</p>
WFD-C2-422	<p>This submission welcomes the proposed "low density" G4 ZONING proposed for the lands on Convent road. However, we would recommend that the new Development Plan takes cognisance of serious carparking and traffic issues in front of these future residential lands on Convent road.</p> <p>A new Development Plan Objective for Dunmore East is recommended: DMD012 To provide carparking on both sides of Convent road</p>	<p>The CE notes the issue raised. However, this issue is a traffic management issues. This will be addressed through the Local Transport Plan for Dunmore East</p> <p>Recommendation No change to Draft Plan.</p>

URN	Submission Summary	Chief Executive Response & Recommendation
	opposite The Lemon Tree and to ensure any development of the Residential zoned lands include setbacks for this new carparking and careful consideration of any access plans for these lands including provision of possible single access to all these lands.	
WFD-C2-465	<p>The submission highlights that Waterford Airport is a key piece of infrastructure required to be enhanced and expanded upon as an essential tool to assist the primacy and growth of the South Eastern Region.</p> <p>It submits that the Airport's Masterplan doesn't identify the opportunities and how the public and private sector can maximise these opportunities.</p> <p>The submission highlights a number of suggested Waterford Airport policies focusing on Services (Irish Water), Broadband, Sustainability (Energy policy), Economic evaluation for Airport, SDZ for Airport and Marketing programme.</p>	<p>Services This is not a County Development Plan issue. This is a matter for Irish Water. WCCC is no longer the statutory body for providing or maintaining public water supplies.</p> <p>Broadband The provision of broadband and telecommunications infrastructure is addressed in Section 6.9 of the Draft Plan, which states as follows: Policy Objective UTL 16 ICT/ Communications <i>"We will work in collaboration with service providers to deliver a more enhanced connectivity service experience in a way that protects our footway and road surfaces and delivers the economic and community benefits of technology. We will facilitate the continued provision of communication networks, broadband and appropriate telecommunications infrastructure and services, subject to environmental considerations, in order to contribute to economic growth, development, resilience and competitiveness....."</i></p> <p>It is noted that the Council is not a provider of telecommunications infrastructure, but instead is a facilitator of such provision.</p> <p>Land use Strategic Development Zones (SDZs) are designated by the Government pursuant to Section 166 of the Planning and Development Act 2000. The Government may designate certain areas of land as an SDZ where their development is considered to be of strategic national economic and social importance. It is considered that this is not a Development Plan issue.</p>

URN	Submission Summary	Chief Executive Response & Recommendation
		<p>Identity/ Marketing/ Walton Institute The CE notes the issues raised. These issues are considered not to be Development Plan issue.</p> <p>Recommendation No change to Draft Plan.</p>
WFD-C2-480	The submission requests that a lock be constructed at the mouth of Passage East Pier along with associated upgrade works.	<p>The CE notes the issue raised.</p> <p>It is considered that this specific request is premature following the completion of the Strategic Integrated Framework Plan for Waterford Estuary as set out in Policy Objective ECON 17. Furthermore the Draft Plan supports the development of the Passage East harbour area and fishing industry through Appendix 2 Specific Development Objective PECDO1.</p> <p>Recommendation No change to Draft Plan.</p>
WFD-C2-480	The submission seeks for better pedestrian access to the Passage East Village and call for the upgrade of the footpath from the main Waterford Road. It also requests that a boardwalk be built to connect Passage with surrounding amenities.	<p>The CE notes the issue raised.</p> <p>It is considered that the Draft Plan already supports the provision of footpaths in smaller rural settlements in Appendix No. 2 'Principal Objectives for All Settlements' PODO3.</p> <p>Recommendation No change to Draft Plan.</p>

3.2.5 Chapter 6 – Utilities Infrastructure, Energy and Communications

URN	Submission Summary	Chief Executive Response & Recommendation
WFD-C2-14	<p>Fluoride and other harmful hazardous chemicals should be stopped and taken out of the public water supply immediately.</p> <p>The submission highlights concerns in relation to the use of weedkillers and its impacts on hedgerows and groundwater quality.</p> <p>No 5G masts or boosters should be cited within 250m of residential properties, schools or occupied premises. All 5G masts and boosters should require planning permission to give the community a say in where these hazardous emitters are located or used.</p>	<p>The CE notes the contents of the submission.</p> <p>CE Response: The issues raised are adequately dealt with within the Plan. The treatment of public water is now a matter for Irish Water. Objective UTL08 seeks to work with Irish Water to protect our drinking water as well as ground and surface waters. Objective WQ04 encourages catchment sensitive farming practices.</p> <p>Objectives BD02, DM01 & DM46 seek to enhance Biodiversity and protect natural features eg hedgerows/trees.</p> <p>Objective DM29 provides that In evaluating applications for telecommunications installations, the Council will have regard to “Telecommunications Antennae & Support Structures Guidelines for Planning Authorities” (1996), and Department Circular PSSP 07/12.</p> <p>Recommendation: No change to Draft Plan.</p>
WFD-C2-38	<p>This submission is made on behalf of Dunhill Rural Enterprises Group. It focuses on three areas (i) the need for clean water in Dunhill, (ii) promotion of a biodiversity program for Dunhill and (iii) Dunhill Social Enterprise Network. These points are further summarised below.</p> <p>1. Provision of clean water for Dunhill Village and Community</p> <p>The submission calls for the inclusion of a 'clean water supply' to be included in the draft plan as it will enable the community to grow providing new housing and other buildings required to maintain community prosperity and allow the area to continue with its development. The</p>	<p>The CE notes the contents of the submission.</p> <p>CE Response: The Council is aware of the issues with the water supply in Dunhill. Irish Water are the responsible body for the delivery and operation of all public water and wastewater services in the country. Objectives UTL02 & UTL03 seek to collaborate with Irish Water to ensure the provision of water services infrastructure and compliance with Drinking Water Regulations. See also CE Response to Irish Water Submission.</p> <p>Recommendation: No Change to Draft Plan</p>

URN	Submission Summary	Chief Executive Response & Recommendation
	<p>submission highlights that the lack of investment in a water supply will lead to decline in population in the future and will reverse the progress of previous decades and lead to stagnation and decay. It calls for the Council has to support villages with a proven record on development of public facilities and infrastructure along with the implementation of the regeneration plans for deprived areas. The submission highlights a number of goals that the community group have achieved since the early 1990's and a number of future plans.</p>	
<p>WFD-C2-59</p>	<p>The submission suggests that the CDP highlights areas containing proven deposits on an appropriate map, in order to protect them from the future development of incompatible land use.</p>	<p>The CE notes the issue raised.</p> <p>Recommendation With regards to mineral deposits a new map has been included in the CE response to the OPR please see Submission No. WFD-C2-363.</p>
<p>WFD-C2-86</p>	<p>This submission requests that the Development Plan include a strongly worded policy which provides that, telecommunication mast providers that do not clearly demonstrate, beyond all doubt, that all alternatives to provide masts away from towns and villages, including the alternatives of mast sharing on existing masts, clustering masts outside towns and villages and demonstrating all landowners surrounding towns and villages have been approached to provide suitable alternative sites, proposals will be considered to Materially Contravene the Development Plan.</p> <p>The submission highlights that such a policy would make it difficult for An Bord Pleanala to grant permission on foot of a Council decision based on policy grounds in Material Contravention of the Development Plan (generally, An Bord Pleanala is prohibited from materially contravening a Development Plan).</p>	<p>The CE notes the issue raised.</p> <p>All developments including those for telecommunications mast or antennae will be considered under on it own merits. Due regard will be paid to relevant legislation and guidelines (Telecommunications Antennae and Support Structures – Guidelines for Planning Authorities - 1996), Landscape Character Assessment and visual impact in rural areas.</p> <p>Recommendation No change to Draft Plan</p>
<p>WFD-</p>	<p>The submission requests that consideration of a new</p>	<p>The CE notes the issues raised.</p>

URN	Submission Summary	Chief Executive Response & Recommendation
C2-92	<p>Objective or amended UTL 09 and DM 53 be included in the Draft Development Plan outlining that; 'The capacity and efficiency of the Strategic road network drainage regimes in County Waterford will be safeguarded for national road drainage purposes'.</p> <p>The submission also requests that the Waterford Renewable Energy Strategy (Appendix 7) and Section 6.4 and Section 6.6, Objectives UTL 12, UTL 13 of Chapter 6 of the Draft Plan as well and Section 5.21 Electricity & Other Cables and Section 5.24 Renewable Energy Developments, Objective DM 30 of Volume 2 Development Standards include objectives that indicate that it should be demonstrated that an assessment of all alternative grid connection routing options have been undertaken prior to any proposals being brought forward for grid connection routing utilising the road network including national roads.</p>	<p>With regards to UTL 09 it is felt that the Policy Objective can be expanded further to cover national road drainage purposes as follows:</p> <p>Recommendation Amend Policy Objective Policy Objective UTL 09 (Page 142) and add a fourth bullet point after "Greater Dublin Regional Code of Practice for Drainage Works" which reads as follows:</p> <p><u>"...The capacity and efficiency of the Strategic road network drainage regimes in County Waterford will be safeguarded for national road drainage purposes."</u></p> <p>With regards to utilising the strategic national road network as a grid connection route to date the Council are not aware of any proposals for ungrounding of cables in the County. Local roads, public and private lands option are also usually examined depending on the specifics of any undergrounding. Various options would be examined in any detailed feasibility and design study and then those options are balanced up having regard to surface water drainage, archaeology, environmental and other impacts including impacts on material assets. This is considered to be an issue for discussion between TII and the providers carrying out the undergrounding at design stage when alternatives would be examined as opposed to a higher level City and County Development Plan policy issue.</p> <p>Recommendation No change to Draft Plan</p>
WFD-C2-102	<p>The submission recommends that the improvement of broadband would be welcomed, helping students with distant learning and professionals working from home.</p>	<p>The CE notes the issue raised.</p> <p>Policy objective ULT 16: ICT/ Communications support the provision and enhancement ICT infrastructure across the County.</p>

URN	Submission Summary	Chief Executive Response & Recommendation
		<p>Recommendation No change to Draft Plan</p>
<p>WFD-C2-103</p>	<p>The submission requests that the following:</p> <ol style="list-style-type: none"> 1) The excess treatment capacity in the Wastewater Treatment Plant be clarified, 2) That Portlaw be added to the towns for which additional wastewater treatment is planned, and 3) The importance of the extension of the EWWSS to the town be included as an objective in the Development Plan. 	<p>The CE notes the issue raised.</p> <p>It must be noted that Waterford City and County Council is no longer the statutory body for providing public water supply and wastewater service in Waterford, this is now under the authority of Irish Water. Nonetheless, the Draft Plan supports Irish Water through Policy Objective UTL 02 which states that the Council will “...collaborate support and work, in conjunction with Irish Water, to ensure the timely delivery and provision, extension and upgrading of existing and new high quality, climate resilient, water services infrastructure, in order to facilitate the sustainable growth and development of our City and County, in accordance with an ecosystem services and integrated catchment management approach, and the Development Plan Core and Settlement strategies”.</p> <p>With regards to point 1 & 2 the Core Strategy adjusted figures as set out in the CE's response to the OPR (Submission Number WFD-C2-363) identifies that Portlaw will experience modest residential growth during the life of the development plan (c. 42 housing units). Table 6.0 of the Draft Plan indicates that there is capacity to accommodate this growth. Furthermore, Irish Water in their submission (Submission Number WFD-C2-329) states in reference to Portlaw that “currently it is envisaged that capacity is available to cater for proposed population targets in Draft CDP”.</p> <p>In relation to point 3 and the EWWSS and Portlaw the Planning Authority worked closely with Irish Water over a significant period of time with regards to required strategic enabling water service infrastructure delivery for County. Appendix 14 highlights that Irish Water has undertaken to investigate a possible extension of water supply to Portlaw from EWWSS.</p>

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		<p>Recommendation No change to Draft Plan.</p>
<p>WFD-C2-124</p>	<p>This submission raises issues in relation to the lack of servicing in the Dunhill area by Irish Water and the capacity of the area to survive in the absence of this infrastructure.</p>	<p>The CE notes the contents of the submission.</p> <p>CE Response: The Council is aware of the issues with the water supply in Dunhill. Irish Water are the responsible body for the delivery and operation of all public water and wastewater services in the country. Objectives UTL02 & UTL03 seek to collaborate with Irish Water to ensure the provision of water services infrastructure and compliance with Drinking Water Regulations. See also CE Response to Irish Water Submission.</p> <p>Recommendation: No change to Draft Plan.</p>
<p>WFD-C2-128</p>	<p>Greensource support the classification applied as:</p> <ol style="list-style-type: none"> 1) Wind speeds have been excluded as a criterion for developing and zoning areas for renewable energy development. 2) Grid constraints have been excluded as a criterion for developing wind energy zoning. <p>The submission requests the following in relation to wind energy developments over the course of the proposed 2022 – 2028 plan:</p> <ol style="list-style-type: none"> 3) Regional approach towards wind energy zoning taking changes to neighbouring county zoning patterns into account. 4) Adherence to the National Wind Energy Planning Guidelines which sets out recommendations in terms of siting and conditions at which wind farms should adhere to. 5) Refrain from limiting operating periods of projects to 25 years. 6) Support for projects which may enter the repowering stage during the lifetime of the development plan. 7) Support of alternative renewable energy technologies 	<p>The CE notes the issues raised.</p> <p>Please see comments below in relation to points raised in the submission.</p> <p>Point 1 to 4: Please see response to the OPR submission number WFD-C2-363 in Table 1 of this report.</p> <p>Point 5: In relation to placing limits on operating periods of projects to 25 years it is noted that the current Wind Energy Guidelines under Section 7.20 states that "<i>The inclusion of a condition which limits the life span of a wind energy development should be avoided, except in exceptional circumstances</i>". Any grant of planning permission will be in accordance with relevant legislation and ministerial guidelines in place at the time.</p> <p>Point 6: It is considered that Policy Objective UTL supports the development of renewable energy projects.</p> <p>Point 7: Please see CE's recommendation to submission number WFD-C2-373 in particular the update to Policy Objective UTL 13.</p> <p>Recommendation No change to Draft Plan.</p>

URN	Submission Summary	Chief Executive Response & Recommendation
	<p>including biogas, battery storage, hydrogen or other technologies which may become available over the duration of the development plan.</p> <p>8) Support for upgrading and reinforcement of the transmission network to fully harness the county's renewable energy potential.</p>	
WFD-C2-207	<p>The protection and designation (Landscape and habitat) afforded to the Comeragh Mountains should be extended to include the Monavullagh mountains. The extend of such designations need to be agreed through a process of direct consultation with local communities. Furthermore public consultation should be a prerequisite in terms of future development of meteorological masts and with particular regard to wind energy development, areas in which existing infrastructure exists should take precedence ahead of areas identified as preferable in the current 2011 - 2017 county development plan.</p>	<p>The CE notes the contents of the submission.</p> <p>CE Response: CLASS 20A of Part 1 of Schedule 2 and Class 19 of Part 3 of Schedule 2 of the Planning and Development Regulations 2001 (as amended) sets out exemptions for the development of masts for mapping meteorological conditions subject to 6 no. conditions and limitations. There is no requirement for community engagement within these exemptions.</p> <p>It is noted that condition and limitation (1) states that it shall not be erected for more than 15 months out of any 24 months.</p> <p>Section 4.3 of The Draft Wind Energy Guidelines require community engagement and the submission of a community report as part of the planning application. The Planning Authority will implement the recommendations of the Guidelines once adopted by the Minister.</p> <p>In response to the submission from the OPR a revised wind energy designations map is now developed which will assist in the identify:</p> <ul style="list-style-type: none"> • Preferred Areas, • Areas Open to Consideration, • No Go Areas. <p>All applications for wind energy developments should be compatible with the 2006 Wind Energy Development Guidelines issued by the DoEHLG (or any updated revision of same), the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change (2017), and the</p>

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		<p>Waterford Renewable Energy Strategy (Appendix 7 of the Development Plan and in particular the wind energy designation map (Appendix 2)) and the renewable energy targets set out in Table 6.2 of the Development Plan, while regard should also be had to the Waterford Landscape and Seascape Character Assessment (Appendix 8 of the Development Plan).</p> <p>Recommendation: See CE response to OPR Submission WFD-C2-363</p>
WFD-C2-212	<p>This submission seeks the provision of a waste water treatment facility for Bunmahon as a matter of urgency. in order to provide modern infrastructure for the village and improve water quality in the Mahon River.</p>	<p>The CE notes the contents of the submission.</p> <p>CE Response: The Council is aware of the issues with wastewater in Bunmahon/Knockmahon. Irish Water are the responsible body for the delivery and operation of all public water and wastewater services in the country. Objectives UTL02 & UTL06 seek to collaborate with Irish Water to ensure the provision of wastewater services infrastructure. See also CE Response to Irish Water Submission</p> <p>Recommendation: No Change to the Draft Plan.</p>
WFD-C2-221	<p>The submission specifies a number of amendments to the draft plan in relation to the following:</p> <p>1. Renewable Energy</p> <ul style="list-style-type: none"> • Amendments proposed to Policy Objective UTL 13 Renewable Energy along with amendments to Appendix 8 • References to Celtic and Green Link interconnectors should be removed form the draft plan. • The reliance of the draft plan on the out-dated Renewable Energy Strategy from 2016 undermines the Draft Development Plan and does not support a more integrated energy-plan led framework. The RES needs to be reviewed. • Appendix 8 Landscape and Seascape Character Assessment requires review in terms of spatial references on maps, 	<p>The Contents of the submission are noted.</p> <p>CE Response:</p> <p>1) The issues raised are considered to be dealt with in response to the OPR Submission. 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). The capacity to absorb offshore wind will be dealt with as part of the Maritime Consent Process and the Strategic Infrastructure Development Process for such applications.</p> <p>Recommendation: Alterations as per OPR submission WFD-C2-363.</p>

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	<p>increased extent of low sensitivity landscape and constraining of most sensitive landscape types, the changing scale of wind energy development information.</p> <p>6. BESS - Battery Energy Storage Systems A new objective UTL 24 should be added as follows: UTL 24: BESS should be subject to major hazard risk assessment and the Major Accident Directive will apply</p> <p>Note - Issues 2,3,4 &5 are addressed in Chapter 10</p>	<p>6) Major Accidents are adequately dealt with in Section 4.9 which relates to SEVESO Directive/Major Accidents and Objective ECON 20. Any future application for BESS will be assessed on its own merits, all relevant Guidelines and in accordance with the proper planning and development of the area.</p> <p>Recommendation: No Change to Draft Plan</p>
<p>WFD-C2-241</p>	<p>Chapter 6: Objective UTL 09: Storm and Surface Water Management</p> <p>This objective is to be welcomed, but it should be expanded to include any road or public realm works too. SuDS could be implemented at the sides of many roads, leading to an attenuation of the storm water entering the sewers during heavy rainfall.</p> <p>Objective UTL 10: Flooding/ SFRA</p> <p>All of the measures in this objective are welcome. In addition, I suggest that existing areas suitable for temporary storage of water during heavy storms be identified. These could be green areas in estates etc. Additionally, a flood warning system for residents and an evacuation plan may be required in some areas.</p>	<p>The CE notes the contents of the submission.</p> <p>CE Response: It is considered reasonable to include the incorporation of SuDS to roads and public realm works in Objective UTL 09 and the identification of temporary storage/overflow areas to Objective UTL 10.</p> <p>Recommendation:</p> <p>1) Amend Objective UTL 09 as follows: Storm and Surface Water Management To require the use of Sustainable Drainage Systems to minimise and limit the extent of hard surfacing and paving, and require the use of SuDS measures to be incorporated in all new development (<u>including roads and public realm works and extensions to existing developments</u>)</p> <p>2) Amend Objective UTL 10 as follows: Flooding/ SFRA</p> <p>To reduce the risk of new development being affected by possible future flooding by:</p> <ul style="list-style-type: none"> • Avoiding development in areas at risk of flooding, • Where possible, reducing the causes of flooding to and from existing and future development;

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		<ul style="list-style-type: none"> • Increase the application of SuDS such as permeable paving, bioretention/infiltration ponds, swales and Natural Water Retention Measures; <u>and the identification of existing areas which may be suitable for temporary storage/overflow of water during heavy storms;</u> • Where development in floodplains cannot be avoided, taking a sequential approach to flood risk management based on avoidance, reduction and adaptation to the risk; and, • Ensuring that all proposals for development falling within Flood Zones A or B are consistent with the “The Planning System and Flood Risk Management – Guidelines for Planning Authorities 2009”, “Climate Action and Low Carbon Development Bill” (2020), and any amendment thereof, and the “Waterford Strategic Flood Risk Assessment” (2021) as included in Appendix 13. • Proposals for development identified as being vulnerable to flooding must be supported by a site specific Flood Risk Assessment, and demonstrate to the satisfaction of the Planning Authority that the development and its infrastructure will avoid significant risks of flooding and not exacerbate flooding elsewhere.
WFD-C2-252	<p>Chapter 6: Utilities, Infrastructure, Energy and Communication</p> <p>6.8 Waste Services/ Infrastructure</p> <p>It is commendable that this section includes a strong reference to the Circular Economy.</p> <p>Where it states:</p> <p>A new Southern Region Waste Management Plan is likely to be adopted in Q1, 2022, and will contain siting guidelines for waste infrastructure, including Civic amenity sites, bottle banks and other waste infrastructure which has set back distances and suitable land uses for the locating of these sites.</p> <p>We suggest the following wording instead:</p> <p>The upcoming National Waste Management Plan for a Circular Economy (NWMPCE), which is likely to be made in Q1, 2022, will replace the Southern Region Waste Management Plan</p>	<p>The CE notes the contents of the submission.</p> <p>CE Response: The issues raised are considered to be reasonable and suggested amendments to text shall be incorporated.</p> <p>Recommendation:</p> <p>1) Amend Section 6.8 as follows:</p> <p>The Southern Region Waste Management Plan 2015 – 2021 is a framework for the prevention and management of wastes in a safe and sustainable manner, and Waterford City and County Council has been actively involved in facilitating the delivery of a more sustainable approach to waste management in the City and County. A new Southern Region Waste Management Plan is likely to be adopted in Q1, 2022, and will contain siting guidelines for waste infrastructure, including Civic amenity sites, bottle banks and other waste infrastructure which has set back distances and suitable land uses for the</p>

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	<p>2015-2021 and the regional waste management plans for the other two regions. The NWMPCE will include the new guidance document 'Waste Management Infrastructure – Guidance for Siting Waste Management Facilities', the scope of which includes broad siting criteria and facility specific guidance for consideration when siting a waste facility.</p> <p>6.9 Utility, Energy & Communication Policy Objectives UTL 17 Waste Services (Infrastructure & Management) Proposed changed wording is as follows: Promoting and facilitating high quality sustainable waste recovery and disposal infrastructure/ technology at appropriate locations in Waterford, subject to the protection of the amenities of the surrounding environment including European Sites, the siting guidance 'Waste Management Infrastructure – Guidance for Siting Waste Management Facilities' that will be incorporated into the new National Waste Management Plan for a Circular Economy and in keeping with the EU waste hierarchy;</p> <p>UTL 21 Construction and Environmental Management Plan Within this objective, item k wording is currently as follows: k. disposal of construction/demolition waste and details of how it is proposed to manage excavated soil, including compliance with 2006 Best Practice Guidelines on the Preparation of Waste Management Plans for Construction and Demolition Projects, Department of the Environment, Heritage and Local Government; Please note that the Environmental Protection Agency published draft 'Best Practice Guidelines for the preparation of Resource Management Plans for Construction & Demolition Waste Projects', published in April 2021, and for which public</p>	<p>locating of these sites.</p> <p><u>The upcoming National Waste Management Plan for a Circular Economy (NWMPCE), which is likely to be made in Q1, 2022, will replace the Southern Region Waste Management Plan 2015-2021 and the regional waste management plans for the other two regions. The NWMPCE will include the new guidance document 'Waste Management Infrastructure – Guidance for Siting Waste Management Facilities', the scope of which includes broad siting criteria and facility specific guidance for consideration when siting a waste facility.</u></p> <p>2) Amend Objective UTL 17 Waste Services as follows: The Council will continue to promote and facilitate the principles of the circular economy in minimising waste going to landfill and maximise waste as a resource, with prevention, preparation for reuse, recycling and recovery prioritised in that order, over the disposal of waste. This will be assisted by:</p> <ul style="list-style-type: none"> • Promoting and facilitating high quality sustainable waste recovery and disposal infrastructure/ technology at appropriate locations in Waterford subject to the protection of the amenities of the surrounding environment including European Sites, <u>the siting guidance 'Waste Management Infrastructure – Guidance for Siting Waste Management Facilities' that will be incorporated into the new National Waste Management Plan for a Circular Economy and in keeping with the EU waste hierarchy;</u> <p>3) Amend Objective UTL21 (k) as follows: <u>k. disposal of construction/demolition waste and details of how it is proposed to manage excavated soil, including compliance with 'Best Practice Guidelines for the preparation of Resource Management Plans for Construction & Demolition Waste Projects' EPA: 2021, (or any final updates thereof).</u></p> <p>"</p>

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	<p>consultation closed in June 2021. These draft guidelines, which will be finalised shortly, supersede the 'Best Practice Guidelines on the Preparation of Waste Management Plans for Construction and Demolition Waste Projects' which were published in July 2006, so therefore reference to the 2006 guidelines should be removed.</p> <p>Under the new Guidelines, the Resource Management Plan could also provide an opportunity for addressing designing out and preventing waste, during construction phase and in subsequent use and later repurposing. Consideration of circularity in design, including design for disassembly should be considered. Especially in the commercial / industrial sector, avoidance of demolition should be the aim which would promote circularity – through repurposing of buildings and thus extending their life, rather than demolition and rebuild.</p>	
<p>WFD-C2-290</p>	<p>This submission seeks to ensure that new public lighting is of an appropriate type to Villierstown and its rural setting.</p>	<p>The CE notes the contents of the submission.</p> <p>CE Response: Any public lighting proposals will be carried out in accordance with Waterford City and County Council's Public Lighting Specification and the requirements of the MD Engineers Office.</p> <p>Recommendation: No change to Draft Plan.</p>
<p>WFD-C2-291</p>	<p>The submission is highly supportive of the policy objectives of the draft development plan and the associated appendices, particularly Appendix 7 & 8. The submission does highlight the following for the attention of WCCC:</p> <p>In order to provide greater clarity to developers of wind energy projects the proposed update/review of the RES should incorporate the standardised methodology for Local Authority Renewable Energy Strategies, published by the Sustainable Energy Authority of Ireland (SEAI). Other Local</p>	<p>The CE notes the issues raised.</p> <p>1. Wind Energy Strategy - In relation to renewable energy target please see response to the OPR in Table 1 of this report.</p> <p>Recommendation See CE's recommendation to submission number WFD-C2-363.</p> <p>2. Hybrid Renewable - in relation to connecting offshore wind developments</p>

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	<p>Authorities have adopted this detailed step-by-step approach and it has resulted in a comprehensive Wind Energy Strategy and it provides clear guidance for the development of wind energy projects in the County. This review should be cognisant of Regional Policy Objective (RPO 98 and RPO 99) of the RSES. There is an opportunity to strengthen the plan with the inclusion of Development Objective to support the life-extension and repowering of existing wind farms. This entails extending the planning lifetime of existing windfarm with no or minimal new development.</p> <p>On shore facilities for maintenance and operation for servicing off shore wind developments are essential. In this regard the commitment under Policy Objective ECON 17, to prepare a Strategic Integrated Framework Plan (SIFP) for the Waterford Estuary offers an opportunity to consider more detailed Objectives and Targets that will ensure the development of this key supporting ancillary onshore infrastructure required to support this emerging industry in Co. Waterford.</p> <p>The submission highlights that the overall guidance on solar developments could be strengthened with the provision for extension of duration of permission. Currently, Solar PV developments can take in excess of 5 years to develop to construction phase. In addition, the lifetime of solar developments is extending with most technologies now suitable for a minimum of 30 years operation. Investment decisions for projects are being made on project lifetimes of up to 40 years. In this regard, ESB request that permissions are granted with a lifetime up to a maximum of 40 years. Concerns regarding the deterioration of the infrastructure can be addressed by the lodgement of a financial security in the form of a bond and the requirement to provide a Decommissioning Plan, as specified. This will ensure that the</p>	<p>to the gird please see response to submission WFD-C2-354.</p> <p>Recommendation See CE's recommendation to submission number WFD-C2-354.</p>

URN	Submission Summary	Chief Executive Response & Recommendation
	<p>development is maintained until decommissioned and appropriately restored to agricultural use.</p> <p>The submission would also welcome the inclusion of Objectives in support of Battery Storage as an appropriate renewable energy resource in the final Plan as these will form a vital element in the renewable energy network, servicing demand at peak times. In addition, ESB wish to highlight, that Green Hydrogen, which is produced from renewable energy sources, offers potential for large scale seasonal storage of variable renewable energy. This enables zero carbon backup to the power system when intermittent renewables such as wind and solar are not available. While section 12.8 of the RES recognises the importance of energy storage systems, there is scope to further expand the Draft CCDP with the inclusion of specific policy as set out below for supporting these new technologies and also consider a broadening of the RES when its review is undertaken.</p> <p>“Support the research and development of green hydrogen as a fuel for power generation, manufacturing, energy storage and transport.”</p> <p>The submission encourages Waterford City and County Council to consider the inclusion of a Policy Objective relating to Hybrid Renewables that includes similar text as set out below.</p> <p>“To support and facilitate the co-location of renewable energy developments and technologies to ensure the most efficient use of land identified as suitable for renewable energy generation”.</p> <p>Notwithstanding the Government’s aim to increase the</p>	

URN	Submission Summary	Chief Executive Response & Recommendation
	<p>percentage of electricity generation from renewables to 70% by 2030, the contribution from non-renewable sources will still consist of 30%. Given that Waterford City & County has access to Gas Network, the inclusion of the text below as a promotional Objective for the development of Renewable Enabling Plant will assist in the transition to a low carbon economy.</p> <p>“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.”</p> <p>The roll out of smart metering across the ESB network is an essential part of tackling Climate Change and reducing CO2 emissions. Due to the extent and reach of the electricity network, additional masts may be required in some locations to ensure the delivery of ‘smart metering’ to all areas. ESB supports the Telecommunications policy that promotes co-location. ESB encourages policies consistent with national guidance to allow for the improved development of telecommunications infrastructure, particularly broadband capability in the area.</p> <p>ESB welcome the inclusion of supportive Objectives such as Trans 60 under Transport & Mobility, in Chapter 5. Through Table 5 – Car Parking Standards, contained in Volume 2 of the Draft CCDP, Waterford County Council has incorporated the latest standards for the provision of EV Charge points as set out in S.I. No. 393/2021. The implementation of the latest standards will facilitate growth in charge point infrastructure, to ensure it becomes a comprehensive network of public and domestic charge points with open systems and platforms</p>	

URN	Submission Summary	Chief Executive Response & Recommendation
	<p>accessible to all supply companies and all types of electric cars. ESB wish to highlight, that the latest standards for EV Charging Points as outlined in Table 5, exceed the 10% referenced in the first part of Development Management DM 37. ESB request that this standard is re-worded to align with Table 5.</p> <p>“All developments should provide facilities for charging battery operated cars in accordance with the parking standards set out in Table 5. at a rate of up to 10% of the total car parking spaces. The remainder of the parking spaces should be constructed so as to be capable of accommodating future charging points, as required.”</p>	
WFD-C2-294	<p>The submission identifies a number of issues relating to the discharge of waste water at locations in Bunmahon village.</p>	<p>The CE notes the contents of the submission.</p> <p>CE Response: The Council is aware of the issues with wastewater in Bunmahon/Knockmahon. Irish Water are the responsible body for the delivery and operation of all public water and wastewater services in the country. Objectives UTL02 & UTL06 seek to collaborate with Irish Water to ensure the provision of wastewater services infrastructure. See also CE Response to Irish Water Submission</p> <p>Recommendation: No Change to Draft Plan</p>
WFD-C2-329	<p>The submission welcomes the opportunity to assist Waterford Council in preparation of the draft Plan and in identifying suitable zoned lands from a water services perspective, as per Appendix 3 and NPO 72 of the National Planning Framework. In order to maximise the use of existing water services, Irish Water encourages sequential development in areas with existing water services infrastructure and spare capacity. With regard to its infrastructure assets I.W. set out a baseline in terms of network extensions, wastewater capacity,</p>	<p>The CE notes the issues raised.</p> <p>1) Table 6.0 will be replaced to accord with Irish Water Information as provided.</p> <p>Recommendation: Replace existing Table 6.0 with Table 6.0: Water and Wastewater Capacity Assessment - (Source - Irish Water: August 2021)</p>

URN	Submission Summary	Chief Executive Response & Recommendation
	<p>wastewater networks (Drainage Area plans), water treatment/source capacity and water networks. Specific suggested amendments to the draft Plan are set out as follows while additional baseline data on I.W. assets is included in the submission:</p> <p>Vol 1 Chapter 6, Table 6: Table 6 appears to reference spare WW treatment capacity which doesn't correlate with IW information. Also there are no notes accompanying the table to provide information on the colour coding. See attached Table 1 which IW has now included as an update on capacity in WWTPs and WTPs/sources for the county. Full details are provided in the submission documentation.</p> <p>Vol 1 Chapter 6, Section 6.2 and Policy Objective UTL 06 Vol 2 Chapter 9, Section 9.4: There are references in both Volume 1 and Volume 2 of the Draft CDP to the potential for developer provided infrastructure to be provided where 'a connection to public drainage infrastructure is demonstrated to be unfeasible, and/or is not available'. In response, IW would direct the Council's attention to Section 5.3.1 of the Draft Water Services Guidelines for Planning Authorities which states: 'It is the policy of Irish Water to facilitate connections to existing infrastructure, where capacity exists, in order to maximise the use of existing infrastructure and reduce additional investment costs. There is a general presumption that development will be focused into areas that are serviced by public water supply and wastewater collection networks. Alternative solutions such as private wells or wastewater treatment plants should not generally be considered by</p>	<p>2) The response is noted. It is considered that connection to existing waste water treatment infrastructure will generally be the preferred option which is consistent with Section 5.3.1 of the Draft Water Services Guidelines for Planning Authorities. However in the absence of investment in water service infrastructure in rural towns and villages these areas will stagnate and additional pressure for one-off housing in the open countryside will result. Furthermore the objectives of the core and settlement strategies will not be achieved. Alternative options such as appropriately designed Developer Provided Infrastructure to support resilient community building in our settlements and prevent rural decline must therefore be considered as an option. In such cases the applicant/developer will be required to liaise with Irish Water prior to submission in order to agree design details and specifications. The Council may attach security and holding conditions where appropriate in order to ensure completion of services prior to the occupation of any permitted dwellings.</p> <p>Recommendation: Amend policy objective UTL 06 as follows:</p> <p>Where a connection to public drainage infrastructure is demonstrated to be unfeasible, and/or is not available, alternative developer provided infrastructure, in collaboration with the Local Authority or otherwise, may be required/ facilitated if it is satisfactorily demonstrated that disposal of foul water can be achieved without negative impacts on public health, amenity or the environment. Such alternative developer provided infrastructure to service new development within our settlements, may be considered in the following order of priority preferences:</p> <p><u>Where a connection to public drainage infrastructure is demonstrated to be unfeasible, and/ or is not available, alternative developer-provided infrastructure, developed in collaboration with the Local Authority or</u></p>

URN	Submission Summary	Chief Executive Response & Recommendation
	<p>planning authorities. Irish Water will not retrospectively take over responsibility for developer provided treatment facilities or associated networks, unless agreed in advance.</p> <p>Vol 2, Chapter 9, Section 9.4: The first paragraph in this Section refers to a database of wastewater treatment capacities in each of the settlements in Appendix 15. There doesn't appear to be any such database in Appendix 15. IW would refer the Council to the amended capacity details accompanying the submission</p> <p>Appendix 14, Section 2.2: In Section 2.2, reference is made to the West Waterford Regional Supply Scheme, and the Councils Assessment of Needs 2007-2016 which outlined some works to be progressed. It should be noted that the NWRP is now the overarching framework which will outline how we move towards a sustainable, secure and reliable public drinking water supply over the next 25 years, and through the NWRP water resource zones are being assessed in consultation with the Council.</p>	<p><u>otherwise, may be required/ facilitated if it is satisfactorily demonstrated that disposal of foul water can be achieved without negative impacts on public health, amenity or the environment. 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 and may be considered in the following order of priority preferences:</u></p> <p>Also Amend Section 9.4 of DM Standards as follows:</p> <p><u>Option 3</u> 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 Services Section to ensure that their proposals for wastewater treatment are acceptable to the Council. <u>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.</u></p> <p>3) Noted. Irish Water Table 1 will be included as Table 6.0 in Volume 1: Chapter 6. This will be referred to in Section 9.4 of Volume 2: DM Standards</p> <p>Recommendation: Amend Section 9.4 of Volume 2: DM Standards as follows: A significant number of settlements in County Waterford have wastewater treatment systems that require upgrading before they can cater for any additional loading. There are some settlements that do not have any existing wastewater treatment systems. A database of the wastewater treatment facilities and capacities in each of the settlements is set out in Appendix 15 <u>Volume 1: Chapter 6 – Table 6.0.</u></p> <p>4) Section 2.2 of Appendix 14 will be updated as requested.</p> <p>Recommendation:</p>

URN	Submission Summary	Chief Executive Response & Recommendation
		<p>Update Section 2.2 of Appendix 14 as per IW comments. Insert the following text at the end of Section 2.2:</p> <p><u>National Water Resource Plan:-</u> <u>Irish Water is preparing for the future by developing the National Water Resources Plan (NWRP). The strategic plan for water services will outline how we move towards a sustainable, secure and reliable public drinking water supply over the next 25 years, whilst safeguarding our environment. The NWRP will outline how Irish Water intends to maintain the balance between our supply from water sources around the country and demand for drinking water over the short, medium and long-term. This will allow preparation for the future and ensure the provision of sufficient safe, clean drinking water to facilitate the social and economic growth of our country.</u></p> <p><u>A three-pillar approach will be used in the NWRP:</u></p> <ol style="list-style-type: none"> <u>1. Lose Less- leakage reduction and network efficiency</u> <u>2. Use Less- water conservation measures</u> <u>3. Supply smarter – sustainable supplies</u> <p><u>Following public consultation, the NWRP Framework Plan was adopted in Spring 2021. The next stage of the NWRP is now underway which will involve the development of four regional water resources plans which will identify plan-level approaches to address the identified need in a sustainable manner.</u> <u>Consultation on the regional plans will commence later in 2021.</u></p> <p><u>In addition the Full Options Assessment stage (FOA) of the NWRP for the Waterford water resource zones has been progressing, in consultation with the water services department of Waterford Council, and is due to be finalised in Q3 2021.</u></p> <p><u>Water treatment/source capacity:</u></p>

URN	Submission Summary	Chief Executive Response & Recommendation
		<p><u>There are 48no. water resource zones (WRZ) in Waterford County. The largest water resource zone is the East Waterford WRZ, and serves Waterford city and Tramore as well as a large rural hinterland and several villages. The Dungarvan WRZ serves Dungarvan town, as well as some smaller villages and rural hinterland. The water resource zones serving Waterford city, Tramore, Dungarvan, Dunmore East and Lismore are all envisaged to have capacity to cater for the proposed population targets in the Draft County Development Plan. There is currently limited capacity in the Portlaw WRZ, which is being reviewed through the NWRP.</u></p> <p><u>Irish Water has a project at concept design stage to provide a new water treatment plant and new reservoir for Dungarvan.</u></p> <p><u>In addition, for Water Resource Zones with constraints or deficits in water capacity, the NWRP is progressing through the Full Options Assessment (FOA) stage, with preferred approaches to address constraints for numerous schemes anticipated to be available in Q3 2021.</u></p> <p><u>Water Networks:</u></p> <p><u>Tramore: Irish Water has a project at design stage which includes for the upgrade of sections of the network to increase supply from Ballydrislane Reservoir.</u></p> <p><u>In addition, mains rehabilitation works are planned for sections of the Dungarvan networks, and ongoing leakage reduction measures are being implemented in Lismore.</u></p> <p><u>Irish Water and Waterford Council are continually progressing leakage reduction activities, mains rehabilitation activities and capital maintenance activities in various settlements in Waterford. Irish Water and the Council will continue to monitor the performance of the networks to ensure that the most urgent works are prioritised as required.</u></p>

URN	Submission Summary	Chief Executive Response & Recommendation																		
		<p>5) The suite of policy objectives are noted. The Objectives contained within the Draft Plan are considered to suffice. Some of the IW Objectives would be in conflict with the proposed Objectives of Draft Plan - eg</p> <p>m) To refuse residential development that requires the provision of private waste water treatment facilities (i.e. Developer Provided Infrastructure), other than single house systems;</p> <p>o)The provision of single house septic tanks and treatment plants in the Plan area will be strongly discouraged to minimise the risk of groundwater pollution. Where such facilities are permitted, full compliance with the prevailing regulations and standards, including the EPA's Code of Practice for Domestic Waste Water Treatment Systems (PE. ≤10) (EPA 2021), as may be amended, will be required</p> <p>Recommendation: No Change to Draft Plan</p>																		
<p>Table 6.0: Water and Wastewater Capacity Assessment - (Source - Irish Water: August 2021)</p>																				
<table border="1"> <thead> <tr> <th data-bbox="315 868 454 963">Settlement:</th> <th data-bbox="454 868 667 963">Water Resource Zone (WRZ):</th> <th data-bbox="667 868 1028 963">Water source/treatment capacity update:</th> <th data-bbox="1028 868 1151 963">WWTP:</th> <th data-bbox="1151 868 1863 963">Wastewater treatment capacity update:</th> </tr> </thead> <tbody> <tr> <td data-bbox="315 963 454 1166">Waterford City & suburbs</td> <td data-bbox="454 963 667 1166">East Waterford & South Kilkenny</td> <td data-bbox="667 963 1028 1166">Currently it is envisaged that capacity is available to cater for proposed population targets in Draft CDP.</td> <td data-bbox="1028 963 1151 1166">Belview WWTP</td> <td data-bbox="1151 963 1863 1166">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.</td> </tr> <tr> <td data-bbox="315 1166 454 1299">Dungarvan (Key Town) & Ballinroad</td> <td data-bbox="454 1166 667 1299">Dungarvan & Deelish/Ballynacourty</td> <td data-bbox="667 1166 1028 1299">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.</td> <td data-bbox="1028 1166 1151 1299">Dungarvan WWTP</td> <td data-bbox="1151 1166 1863 1299">Currently it is envisaged that capacity is available to cater for proposed population targets in Draft CDP.</td> </tr> </tbody> </table>						Settlement:	Water Resource Zone (WRZ):	Water source/treatment capacity update:	WWTP:	Wastewater treatment capacity update:	Waterford City & suburbs	East Waterford & South Kilkenny	Currently it is envisaged that capacity is available to cater for proposed population targets in Draft CDP.	Belview WWTP	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.	Dungarvan (Key Town) & Ballinroad	Dungarvan & Deelish/Ballynacourty	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.	Dungarvan WWTP	Currently it is envisaged that capacity is available to cater for proposed population targets in Draft CDP.
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URN	Submission Summary			Chief Executive Response & Recommendation	
	Stradbally	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	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	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.
	Aglish	Aglish/Curraheen	Currently it is envisaged that there is capacity available, but population targets are unknown.	Aglish WWTP	Currently it is envisaged that there is capacity available, but population targets are unknown.
	Villiarstown	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	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	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	Kilrossanty	Very limited capacity available. Currently being reviewed through the Small Towns and Villages Growth Programme; review process due to be completed in Q3 2021.	Lemybrien WWTP	No capacity available. Currently being reviewed through the Small Towns and Villages Growth Programme; review process due to be completed in Q3 2021.
	Dunhill	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	Clashmore/Coolboa	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.
	Ballymacarbry	Ballymacarbry/Knockalish een	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.	Ballymacarbry WWTP	Currently it is envisaged that there is capacity available, but population targets are unknown.
WFD-C2-354	Section 6.4 – Energy - suggests the inclusion of “offshore wind/renewable energy” in this section Strengthen the role that the county can play in facilitating the onshore infrastructure required for the construction,			The CE notes the issues raised. In relation to Section 6.4 Energy it is considered that the section should include reference to offshore wind.	

URN	Submission Summary	Chief Executive Response & Recommendation
	operation and maintenance of offshore wind farm developments.	<p>Recommendation</p> <p>Amend the paragraph that starts with 'Waterford's growth and development includes...' in Section 6.4 Energy on Page 136 and add the following statement to the last sentence as follows:</p> <p>"A focus on renewable energy will thus also require the integration and implementation of projects which provide a wider range of renewable energy sources, such as <u>offshore and onshore wind/renewable energy</u>, hydro, wave, biogas (i.e. anaerobic digestion) and heat.</p> <p>With regards to upgrades to the electrical transmission and distribution systems it is considered that Policy Objective UTL 13 can be expanded further to read as follows:</p> <p>Recommendation</p> <p>Amend Policy Objective Policy Objective UTL 13 (Page 143/144) and add the following sentence to the bullet point No. 1 to read as follows:</p> <p>"...Facilitating and encouraging, where appropriate, proposals for renewable energy generation, transmission and distribution and ancillary support infrastructure facilities in accordance with the Waterford Renewable Energy Strategy, 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. <u>The Council recognising and support 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 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...."</u></p>
WFD-C2-	Section 6.6 – Renewable Energy would welcome stronger reference to offshore wind projects	The CE notes the issues raised.

URN	Submission Summary	Chief Executive Response & Recommendation
354	<p>in "Policy Objective UTL 13- Renewable Energy". We respectfully request the following text is added to this policy objective.</p> <p>"Facilitating, promoting and supporting the development of offshore renewable energy projects, the associated onshore support infrastructure and upgrading of the electrical distribution and transmission systems to support energy offtake from offshore developments."</p>	<p>Recommendation See CE's recommendation to submission number WFD-C2-373 in relation to Policy Objective UTL 13.</p>
WFD-C2-360	<p>The submission lists a number of objectives with regards to</p> <ol style="list-style-type: none"> 1) climate action, 2) water and wastewater infrastructure, and 3) digital infrastructure. 	<p>The CE notes the issue raised.</p> <p>Please see comments below in relation to points raised in the submission.</p> <p>1) Climate Action - In relation to Climate Action Plan and long term emission reduction obligations please see CE's response to submission number WFD-C2-373.</p> <p>Recommendation See CE's recommendation to submission number WFD-C2-373 and Irish Water WFD-C2-329 and Southern Region Waste Management Plan Lead Authority WFD-C2-252</p> <p>With regards to supporting new energy infrastructure/ supporting the development of renewable energy projects in support of national climate change objectives and becoming carbon neutral it is considered that the plan already supports these issues through Policy Objective CA 01 and UTL 13.</p> <p>2) Water and Wastewater Infrastructure In relation to retrofitted infrastructure please refer to Policy Objective H19. Policy Objective UTL 02 highlights that the Council will collaborate and support the work of Irish Water to ensure the timely delivery and provision, extension and upgrading of existing and new high quality, climate resilient, water services infrastructure.</p>

URN	Submission Summary	Chief Executive Response & Recommendation
		<p>Recommendation No change to Draft Plan.</p> <p>3) Digital Infrastructure. The Council supports the National Broadband Plan in Section 6.7 and through Policy Objective UTL 16 ICT/ Communications. The Draft Plan also supports smart rural settlements through Policy Objectives ECON 04 "...Supporting a transition from traditional villages to Smart Villages status (EU Action for SMART Villages Initiative), and the revitalisation of rural communities through social and digital innovation, and connectivity...".</p> <p>It is noted that the Council is not a provider of telecommunications infrastructure, but instead is a facilitator of such provision.</p> <p>Recommendation No change to Draft Plan.</p>
WFD-C2-373	<p>The submission relates to the development of the proposed Celtic Horizon Offshore Wind Farm. The site proposed for the Celtic Horizon Offshore Wind Farm is located in the east Celtic Sea off the coasts of Counties Wexford and Waterford. The submitted Foreshore Licence Application has identified three plausible Cable Route landfall locations with the Western Cable route located from Coxstown East to Brownstown located in Co. Waterford.</p> <p>Ocean Winds actively supports Waterford City & County Council's vision in implementing and supporting the Maritime Area Planning (MAP) Bill 2021 and the National Marine Planning Framework (NMPF).</p> <p>Ocean Winds actively supports Waterford City & County Council's vision in implementing and supporting renewable</p>	<p>The CE notes the issues raised.</p> <p>It should be noted that the jurisdiction of planning authorities for determining applications for offshore wind farms is limited and relates only to the landside infrastructure. The Draft Development Plan only relates to the jurisdiction of the County and does not cover infrastructure that falls outside its terrestrial area which will be covered by the Maritime Plan. However, the Council supports the "National Marine Planning Framework" (2021, DHLGH) through Policy Objective C&M 01 and C&M 02. Furthermore, in relation to 'Green Industries' such as the mentioned green linked data centres it is considered that the Draft Plan already supports such industries through Policy Objective ECON 19.</p> <p>Please see comments below in relation to points raised in the submission.</p>

URN	Submission Summary	Chief Executive Response & Recommendation
	<p>energy development.</p> <p>A number of high level strategic goals are suggested for inclusions in the CDP</p>	<p>1. In relation to renewable energy target please see response to the OPR in Table 1 of this report.</p> <p>Recommendation See CE's recommendation to submission number WFD-C2-363.</p> <p>2. With regards to Marine Renewable Energy Infrastructure it is considered that Policy Objective UTL 13 can be expanded further to cover renewable energy as follows:</p> <p>Recommendation Amend Policy Objective Policy Objective UTL 13 (Page 143/144) and add the following sentence to the bullet point No. 2 to read as follows: "<u>...Promote and encourage the use of renewable energy and low carbon resources, namely solar photovoltaic, geothermal, heat pumps, district heating, solar thermal, hydro, tidal power, offshore and onshore wind, biomass as well as including micro-generation among business, agriculture, education, health and other sectors...</u>".</p> <p>3. The CE considered it necessary to expand the policy in the Draft Plan to further support offshore wind and associated infrastructure as follows:</p> <p>Recommendation Amend Policy Objective Policy Objective UTL 13 (Page 143/144) and add an additional bullet point (bullet point No.7) after 'The Preparation and implementation...' to read as follows: "<u>...To support in conjunction with other relevant agencies, wind energy initiatives, both on-shore and offshore, and wave energy, and onshore grid connections and reinforcements to facilitate offshore renewable energy development when these are undertaken in an environmentally acceptable manner</u>".</p>

URN	Submission Summary	Chief Executive Response & Recommendation
WFD-C2-375	<p>Chapter 6: WEI welcomes the inclusion of section 6.6 “Renewable Energy” in the draft Development Plan. However, there is limited mention of offshore wind. Given the scale of the proposed offshore wind developments on the East and South coasts, particularly DP Energy’s Inis Ealga Marine Energy Park development, we would welcome stronger reference to offshore wind projects in “Policy Objective UTL 13- Renewable Energy”. We respectfully request the following text is added to this policy objective: “Facilitating, promoting and supporting the development of offshore renewable energy projects, the associated onshore support infrastructure and upgrading of the electrical distribution and transmission systems to support energy offtake from offshore developments.”</p>	<p>The CE notes the issues raised.</p> <p>Please see CE's response to submission number WFD-C2-363 and 373.</p> <p>Recommendation See CE's recommendation to submission number WFD-C2-363 and WFD-C2-373 in particular the update to Policy Objective UTL 13.</p>
WFD-C2-376	<p>Infrastructure: Include a new footpath to Portlaw Church and Curraghmore Estate Work with National Broadband Ireland to ensure delivery of fibre broadband to all areas of Portlaw in the short term Capacity of treatment plant must be increased in line with/in advance of development needs</p>	<p>The CE notes the contents of the submission.</p> <p>CE Response:</p> <ol style="list-style-type: none"> 1) It is considered reasonable to investigate the extension of the footpath network to Portlaw Church and Curraghmore Church given the importance of these local amenities. 2) As stated in 6.7 and UTL 16 The council will support the rollout of the National Broadband Plan 3) Irish Water are the responsible body for the delivery and operation of all public water and wastewater services in the country. Objectives UTL02 & UTL06 seek to collaborate with Irish Water to ensure the provision of wastewater services infrastructure. See also Irish Water Submission where it states that currently it is envisaged that capacity is available in the Portlaw WWTP to cater for proposed population targets in Draft CDP. <p>Recommendation: 1) Amend Appendix 2 'Portlaw' & Map Specific Development Objective PLD01</p>

URN	Submission Summary	Chief Executive Response & Recommendation
		<p>as follows:</p> <ul style="list-style-type: none"> ● <u>PLDO1 To investigate the extension of the footpath network during the Plan period to a) the sporting facilities on the outskirts of the Town; b) to Portlaw Church; and c) to Curraghmore Estate.</u> <p>2) No change to Draft Plan. 3) No change to Draft Plan.</p>
WFD-C2-392	<p>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>The CE notes the contents of the submission.</p> <p>CE Response: 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> <p>Recommendation: No change to Draft Plan.</p>

3.2.6 Chapter 7 – Housing and Sustainable Communities

URN	Submission Summary	Chief Executive Response & Recommendation
WFD-C2-8	The submissions calls for the rewording of Policy Objective SC33 with regards to the provision of a 25m community pool in Dungarvan/ West Waterford, the provision of aquatic sports needs and or a 25m swimming pool in Dungarvan/ West Waterford Area as well as creatively provide suitable and sufficient access to public swimming opportunities and/or infrastructure, both indoor and outdoor.	<p>The CE notes the issues raised.</p> <p>It is considered that the plan already supports the provision of a public swimming pool in Dungarvan through Policy Objective SC 33. However, the CE notes that this could be further strengthened through a Specific Development Objective for Dungarvan in Appendix 2.</p> <p>Recommendation: Amend Policy Objective SC 33 to read as follows: > <u>"To facilitate and support the development of a new sustainable 25m community swimming pool facilities in Waterford City, Tramore and Dungarvan/West Waterford Region, to achieve maximum accessibility to the residents of Waterford, including the integration with and development of existing associated sports facilities, accompanied by appropriate infrastructure. The Council will also facilitate and support suitable and sufficient access to public swimming opportunities at outdoor locations".</u></p> <p>Appendix 2 to add an additional Specific Development Objective for Dungarvan 'DGD015' on Page 14: <u>"To facilitate and support the development of a new sustainable 25m community swimming pool facilities in Dungarvan/West Waterford Region, to achieve maximum accessibility to the residents of Waterford, including the integration with and development of existing associated sports facilities, accompanied by appropriate infrastructure".</u></p>
WFD-C2-20 WFD-C2-22 WFD-C2-23 WFD-C2-24 WFD-C2-63 WFD-C2-64	WFD-C2-196 WFD-C2-197 WFD-C2-199 WFD-C2-200 WFD-C2-208 WFD-C2-234	<p>The CE notes the issues raised.</p> <p>Recommendation: Please see Submission Summary and CE response and recommendation to WFD-C2-8</p>

URN	Submission Summary	Chief Executive Response & Recommendation
WFD-C2-65	WFD-C2-239	
WFD-C2-67	WFD-C2-240	
WFD-C2-68	WFD-C2-247	
WFD-C2-70	WFD-C2-249	
WFD-C2-93	WFD-C2-253	
WFD-C2-98	WFD-C2-256	
WFD-C2-100	WFD-C2-258	
WFD-C2-104	WFD-C2-268	
WFD-C2-108	WFD-C2-269	
WFD-C2-114	WFD-C2-273	
WFD-C2-119	WFD-C2-278	
WFD-C2-123	WFD-C2-280	
WFD-C2-136	WFD-C2-295	
WFD-C2-137	WFD-C2-296	
WFD-C2-138	WFD-C2-298	
WFD-C2-145	WFD-C2-299	
WFD-C2-146	WFD-C2-300	
WFD-C2-147	WFD-C2-308	
WFD-C2-148	WFD-C2-315	
WFD-C2-149	WFD-C2-338	
WFD-C2-150	WFD-C2-340	
WFD-C2-151	WFD-C2-344	
WFD-C2-152	WFD-C2-349	
WFD-C2-153	WFD-C2-352	
WFD-C2-154	WFD-C2-359	
WFD-C2-155	WFD-C2-361	
WFD-C2-156	WFD-C2-364	
WFD-C2-164	WFD-C2-366	
WFD-C2-171	WFD-C2-367	
WFD-C2-173	WFD-C2-372	
WFD-C2-177	WFD-C2-378	
WFD-C2-181	WFD-C2-379	

URN	Submission Summary	Chief Executive Response & Recommendation
WFD-C2-186 WFD-C2-192	WFD-C2-432 WFD-C2-456	
WFD-C2-14	Submission raises concerns on the creeping level of urbanism in rural areas, which affects the demands upon the rural environment, and will lead to further exponential demands of urbanisation to these rural areas.	<p>The CE notes the issue raised.</p> <p>The Planning Authority is required to prioritise the sequential development of more favourably located lands, in terms of access to quality public transport (including with regards to the projected delivery of same) in order to better achieve meaningful compact growth in accordance with the National Planning Framework and to achieve meaningful reductions on energy use and GHG emissions associated with future development through sustainable settlement and transport strategies. However, it must be noted that to deliver plan-led growth in our urban settlements it is considered necessary to pursue a balanced approach to spatial development which supports both a compact growth agenda, through the densification of the existing built-up areas, and also through the identification of strategically located greenfield sites, which support the principles of sustainable development.</p> <p>Recommendation No change to Draft Plan</p>
WFD-C2-21	<p>There are 4 areas across Waterford City which offer great potential and opportunity for public parks and which would enhance amenities for residents and visitors alike:</p> <ol style="list-style-type: none"> 1. The South Quays: Need to retain capacity for car parking possible by way of a multi storey car park in the vicinity. 2. Former Waterford Stanley at Bilberry: This would act as a fantastic amenity near the terminus of Waterford Greenway along the riverside but would require purchase by the Waterford City & County Council. 3. Lands to the rear Gracediue & Carrickperrish (south west?) of Sherlock: This area commands a fantastic view and is semi-wilded. Some minor public amenities could be provided such as paths etc but the area should be retained primarily for 	<p>The CE notes the issues raised.</p> <p>Development of open space/ parks will be considered in the forthcoming Waterford and Environs Local Area Plan/ City North West Local Area Plan with reference to Policy Objectives W City 19, SC 34, SC 39 and SC 40. It is further noted that the following Policy Objective of Appendix 2 of the Draft Plan states the following:</p> <p>WCD01 - Provision of accessible open space/ public park to service the Dunmore Road/ Williamstown Road area of Waterford City.</p> <p>WCD02 - 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.</p>

URN	Submission Summary	Chief Executive Response & Recommendation
	<p>habitat and biodiversity purposes.</p> <p>4. Lands near the Williamstown Golf Course: Serving the Sacred Heart parish & the Dunmore Road, located in and around the entrance to the former Williamstown House.</p>	<p>In relation to the four points raised the CE notes the following:</p> <ol style="list-style-type: none"> 1. It is considered that the Draft Plan supports the development of the South Quays through Policy Objective W City 29 and WCD02 South Quays Design Framework. This framework will be dominated by public amenity and biodiversity spaces building. 2. It is noted the the Former Waterford Stanley Site is identified as an Opportunity Site in Table 3.1 of the Draft Plan. We will collaborate closely with the landowner/ developers of this site, in a manner that implements the place making strategy of the Development Plan, of which Open Space/ Public Parks play a central element. 3. See point above in relation to City North West Local Area Plan. 4. See WCD02 above. <p>Recommendation No change to Draft Plan.</p>
<p>WFD-C2-39 WFD-C2-410 WFD-C2-412 WFD-C2-413 WFD-C2-415 WFD-C2-416</p>	<p>These submissions calls for additional playing pitches for Dungarvan Utd AFC to be identified on lands zoned open amenity lands.</p>	<p>The CE notes the issue raised.</p> <p>As per response to Submission WFD-C2-180 it is considered that the plan supports the future provision of sporting and recreational infrastructure throughout Waterford City and County through Policy Objective SC30.</p> <p>Recommendation See recommendation to Submission WFD-C2-180 which amends Policy Objective SC30 on Page 173 of the Draft Plan.</p>

URN	Submission Summary	Chief Executive Response & Recommendation
WFD-C2-435		
WFD-C2-41	<p>The submission seeks that the Draft Development Plan include an intention to continue to support the contributions that volunteers provide to the growth and development of Waterford. It also calls for the recognition of these efforts-and the ability for Waterford Volunteer Centre to act as a supportive body-is important to ensure our communities continue to embrace inclusion, equality and sustainability. Furthermore the it recommends amendments to Chapter 7 Sustainable Communities Policy Objectives whereby Waterford City & County Council will promote and recognise the efforts of volunteers and organisations that involve volunteers, while supporting and developing initiatives in collaboration with Waterford Volunteer Centre in line with the National Volunteering Strategy 2021-2025.</p>	<p>The CE notes the issues raised.</p> <p>It is considered that the plan supports the contributions of volunteer groups through Policy Objective Place 28 and voluntary housing groups through H09.</p> <p>Recommendation No change to Draft Plan.</p>
WFD-C2-48	<p>The submission identifies the following:</p> <ol style="list-style-type: none"> 1. The benefit of 'Backland' development in relation to energy efficiency. 2. It requests that correct building orientation (south facing) should be factored in when deciding on granting planning permission. 	<p>The CE notes the issues raised.</p> <p>Please see comments below in relation to points raised.</p> <ol style="list-style-type: none"> 1. It is considered that the plan supports 'backland development' through compact growth objectives design in rural villages through Policy Objective H01, H 04, H 05, CS 03, Econ 04 and Place 08. <p>Recommendation No change to Draft Plan.</p> <ol style="list-style-type: none"> 2. Building Orientation: Section 2.3 Sustainable Design and Construction of Volume 2 DM Standards states that "<i>Buildings shall be designed to minimise resource consumption, reducing waste, water and energy use. Design shall also optimise natural ventilation and minimise glare and excess solar gain,</i>

URN	Submission Summary	Chief Executive Response & Recommendation
		<p><i>avoiding large areas of glazing and providing an appropriate balance between solid and void elements". However, the CE notes that this point can be expanded to address the issue raised.</i></p> <p>Recommendation Amend Policy Objective H18 to add an additional bullet point No. 1 (Page 156) to read as follows: <i>"We will require all new residential development to incorporate the following measures to enhance climate resilience:..... > <u>Maximize orientation & passive solar gain;...</u>";</i></p>
WFD-C2-55	The submission calls for a community theatre and arts centre for the town of Tramore.	<p>The CE notes the issues raised.</p> <p>It is considered that the plan supports the provision of Community Facilities through Policy Objective SC 13 and through Appendix 2 Specific Development Objective TRD09.</p> <p>Recommendation No change to Draft Plan.</p>
WFD-C2-71	<p>The submission highlights a number of areas with regards to Age Friendly Housing that the draft amended plan could include to make towns, neighbourhood and new/existing housing developments more inclusive particularly for older people.</p> <p>The submission encompasses following topics: 1. The housing strategy should be more than ensuring a supply of suitable houses and apartments, it should integrate older people into it; 2. A housing policy for older people is broader and more complex than the mere provision of houses; 3. Age Friendly Strategy adopted by Waterford City and County Council and the Age Friendly Alliance in 2017</p>	<p>The CE notes the issue raised and welcomes the Older People's Council (OPC).</p> <p>A number of issue raised within this submission such as Point 2, 3, 4, and 13 are not Development Plan issues.</p> <p>It is considered that the plan already supports the following points: 5. Policy Objective H12 of the draft plan. However, the CE notes that this point can be expanded to address the issue raised.</p> <p>Recommendation Amend Policy Objective H12 on Page 154 to add an additional text to read as follows: <i>"We will support <u>facilitate independent living for people with disabilities and</u></i></p>

URN	Submission Summary	Chief Executive Response & Recommendation
	<p>highlights the very significant growth in the older population relative to total population;</p> <p>4. The requirements of the population in the 60 plus age group are taken into account in each of the programme groups of the new County Development Plan;</p> <p>5. We believe that the option of independent living should be central to our housing strategy: Therefore, adapting and retrofitting houses to make them secure, environmentally safe and less costly to run needs to be prioritised in keeping with the principle of Universal Design;</p> <p>6. 50% of apartment construction exceed the current minimum space and design requirements e.g. width of doors, larger rooms, larger bathroom, etc making mobility considerations paramount;</p> <p>7. 30% of all new housing should incorporate Universal Design principles;</p> <p>8. The new Waterford Development Plan should promote Age Friendly Neighbourhoods which provide a range of services including transportation links;</p> <p>9. The provision by the Council and or Voluntary Housing Associations of suitable accommodation to meet the needs of an Ageing Population adjacent to appropriate services;</p> <p>10. Private Developers provide an appropriate mix of house sizes a percentage of which should be suitable for older people;</p> <p>11. Universal Housing Design, facilitating lifelong living especially for older people in their own homes should be promoted;</p> <p>12. Voluntary/community groups to provide small groups of sheltered housing for the older people on the lines of scheme provided by the Community in Ballymacarbry or the various schemes across the country;</p>	<p><i><u>older people by supporting the adaptation and retrofitting of existing houses, to ensure they are more environmentally safe and less costly, and the provision of specific purpose built accommodation and, the provision of nursing homes, retirement villages, residential care facilities at appropriate locations in towns and villages. These facilities should be serviceable by infrastructure and amenities including accessible footpaths, local shops and public transport in order to allow the resident to be socially included and to allow better care in the community, independence and access."</u></i></p> <p>6. The CE considers that the Section 28 Apartment Guidelines sets out general requirements for apartment developments. The DM standards in Table 1 further sets out the requirements for open space within residential developments.</p> <p>7/ 11. The CE considers that the Section 28 Apartment Guidelines sets out general requirements for apartment developments. The Building Regulations, which are a separate code to the planning code, place requirements in relation to accessibility (under Part M). The Draft Plan does support Access for All/ Universal Design through Policy Objective Uni Des 01 and H 03.</p> <p>Recommendation No change to Draft Plan.</p> <p>8. The Draft Plan is underpinned by the concept of the 10 minute neighbourhood and the creation of compact urban centres and the transition to a climate resilient low carbon County where all trips can be made by sustainable modes. However, the CE notes that this point can be expanded to include the needs of older people within the 10 minute neighbourhood.</p> <p>Recommendation <i>Amend Policy Objective Place 26 on Page 187 and add additional text to read</i></p>

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	<p>13. Waterford Council has an opportunity in this matter to lead the way by including in the Plan provision for a pilot scheme of housing for older people.</p>	<p><i>as follows:</i></p> <p><i>"To develop a 10-minute neighbourhood framework for all new and existing urban areas across Waterford which allows the everyday needs of <u>younger and older</u> people to be met within a safe walking distance of their homes, for example schools, childcare, health services, shops, public transport and parks. We will collaborate with local communities to identify constraints and implement measures to deliver sustainable 10 minute neighbourhoods".</i></p> <p>9/ 10/ 12/ 13. The Draft Plan contains Policy Objectives in Chapter 7 that support voluntary housing associations and encourage a mix of housing types and 'housing for all', including housing for older persons, under Policy Objectives H10, H 11, H 13 and H17. It must be noted that the Council works in partnership with several AHBs to deliver homes for older people and persons with a disability, through the Capital Assistance Scheme.</p> <p>Recommendation No change to Draft Plan</p>
<p>WFD-C2-72</p>	<p>The submission requests the that the zoning objective on tourism zoned land is adjusted to facilitate 'open for consideration of the local housing need to relevant land owners'.</p>	<p>The CE notes the issues raised.</p> <p>It must be noted that any planning application for rural housing is assessed on its own merits. It is further noted that the rural housing policy in the Draft Plan is consistent with Section 28 Ministerial Guidelines. Any applicant must comply with Policy Objective H27 and or H28 and demonstrate a genuine economic and or social need to live in a rural area.</p> <p>Recommendation No change to Draft Plan.</p>
<p>WFD-C2-87 WFD-C2-215</p>	<p>The submission requests that consideration be given to additional text in Section 7.11 (Housing in Rural Villages and the Open Countryside) of the Draft Plan and an additional policy under the heading of "New Homes in Small Towns and Villages and Rural Cluster Policy Objectives" as follows:</p>	<p>The CE notes the issues raised.</p> <p>It is considered that the policies and objectives contained in the current development plans have formed the strategic policy base on which existing planning decisions have been made. The policy objectives of the Draft Plan</p>

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WFD-C2-228	"Objective HXX - The Council will support, in principle, planning applications for change of use of permitted short term housing within housing estates to permanent housing in the City and County where it can be demonstrated the houses generally meet the residential development standards for permanent houses, to assist address the ongoing housing crisis, reduce homelessness and increase the permanent housing stock. In rural situations, rural housing policy will not be applied to applicants and occupants".	<p>have not been designed to undermine existing planning permissions particularly with regards the provision of sustainable residential accommodation.</p> <p>Recommendation No change to Draft Plan.</p>
WFD-C2-91	This submission highlights that the draft development plan does not refer to mews and townhouse type developments. It set out 11 points for inclusion in the development plan around this type of development.	<p>The CE notes the issue raised.</p> <p>The guidance requested in relation to mews lane developments is too detailed level for a Draft Development Plan. However, the CE notes that mews and townhouse type should be included in the Draft Plan.</p> <p>Recommendation Amend Policy Objective H 01 on Page 150 to add an additional text to read as follows:</p> <p>"To promote compact urban growth through the consolidation and development of new residential units on infill/ brownfield sites <u>and mews and townhouse developments</u>, and support the most efficient use of publicly owned lands for residential and mixed use developments. This will be achieved through working in collaboration with landowners, the Land Development Agency, The Housing Agency and other statutory and voluntary agencies and by the utilisation of available funding (URDF and RRDF) for plan and nature based infrastructure led development".</p>
WFD-C2-92	The submission seeks that cross reference is included in Section 7.11 ' Housing in Rural Villages and the Open Countryside' to Section 5.9 and Section 8.0 Roads Access	<p>The CE notes and welcomes the issues raised by the TII.</p> <p>It considered that the changes requested are acceptable.</p>

URN	Submission Summary	Chief Executive Response & Recommendation
	Policy in Volume 2 Development Standards of the Draft Development Plan.	<p>Recommendation Insert the following text after the third paragraph on p.158 as follows:</p> <p><u>It must be noted that the Council will facilitate the protection all National routes and associated junctions in accordance with TII's Policy and the Department of Environment, Community and Local Government's 'Spatial Planning and National Roads Guidelines for Planning Authorities' (2012) as well as Section 3.3.4 of the Sustainable Rural Housing Guidelines (2005) in the interests of road safety.</u></p>
WFD-C2-102	The submission highlights that priority should be given to family homes as opposed to second homes or holiday homes.	<p>The CE notes the issues raised.</p> <p>It must be noted that any planning application for rural housing is assessed on its own merits. It is further noted that the rural housing policy in the Draft Plan is consistent with Section 28 Ministerial Guidelines. Any applicant must comply with a with Policy Objective H27 and or H28 and demonstrate a genuine economic and or social need to live in a rural area.</p> <p>Recommendation No change to Draft Plan.</p>
WFD-C2-118	The submission seeks that the definitions of "Landowner", currently defined as owning land "prior 118to the 4th March 2004", to be revised to owning land "prior to 2022" to coincide with New Waterford City and County Development Plan 2022-2028 adoption. The submission also recommends the definition of "Immediate Family Member (son, daughter, mother, father, sister, brother, heir)" be broadened to include the extended family of the landowner, and any person(s) of the landowners choice that can rank above another.	<p>The CE notes the issues raised in relation to rural housing.</p> <p>It is considered that the Draft Plan already supports the issues raised in the submission with regards to the definition of landowner and the definition of immediate family member though Section 7.11.2 'Housing in the Open Countryside' along with Policy Objective H 27 and H28.</p> <p>Recommendation No change to Draft Plan.</p>
WFD-C2-172	The submission is based upon major concerns about the future of Dunmore East by The Dunmore East Tidy Towns Committee, The Woods and Park Trustees, and the Cliff Path	The CE notes the issues raised by The Dunmore East Tidy Towns Committee, The Dunmore East Woods and Park Trustees and The Cliff Walk Committee in their joint submission on the Draft Plan.

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	<p>Committee</p> <p>The objectives of this submission are as follows;</p> <p>1) To ensure the Council is working with correct population statistics on which to base its planning</p> <p>2) We are delighted with the commitment to produce a Local Area Plan but are concerned about the time-frame of its emergence, given the critical development of this area which appears to proceed without apparent consideration of the needs of the future urban town status.</p> <p>3) To make certain that the appropriate infrastructure occurs before or during any major property development, to ensure an orderly transition to a genuine urban town status and that haphazard pre-planning suggestions for the density of dwellings per hectare cease</p> <p>4) To secure Architectural Conservation Area status expeditiously</p> <p>5) As part of the Council's agreement to protect the Cliffs at Dunmore East remediation work to commence immediately</p> <p>6) To ensure, (as part of the Local Area Plan), that the Woods and Park trustee's request that the Council open up access to two additional woodlands, (eight acres) within Dunmore East be granted. A series of looped walkways encompassing all three woodlands is proposed</p> <p>7) The Cliff Path Committee wants to see the following included in the County Development Plan</p> <ul style="list-style-type: none"> • (i) An agreement that there will not be any further development along the coastline from Dunmore East to Brownstown Head • (ii) The building of a pedestrian pathway from Dunmore East to Ballymacaw, (L4068) • (iii) The Council to include the next stage of the Cliff Path 	<p>Please see comments below in relation to points raised.</p> <p>1 - The base line data for the Draft Plan was compiled by the Airo. This report forms Appendix 17 of the Draft Plan and provides extensive and comprehensive data in respect of the composition of Waterford's population using the most up to date data available at the time (CSO Census 2016);</p> <p>2 - The CE welcomes the support for a LAP for Dunmore East.</p> <p>3 - The Draft Plan is accompanied by an Infrastructure Capacity Assessment (Appendix 14) and a Tiered Approach to Zoning (Appendix 17) the primary focus of these documents is on the provision of infrastructure within Settlements and on new residential land. As stated in Section 2 of Appendix 14 the assessment does not comprise an exhaustive list of requisite infrastructures across the zoned settlements and furthermore, while it is intended to inform, it is not to be relied upon for development management purposes. The purpose of these assessments, particularly Appendix 18, is to demonstrate how lands zoned in the Draft Plan with potential for residential development, are either sufficiently serviced (Tier 1) or have potential to become fully serviced within the timeframe of the Plan (Tier 2) (in compliance with Appendix 3 of the NPF). The assessment is point-in-time and acknowledges that infrastructure requirements may change. The full extent of requisite enabling infrastructure will continue to be assessed through the development management process whereupon detailed assessment will be undertaken. Section 4.3 of Appendix 14 identifies infrastructure requirements for Dunmore East village while Table 7 of Appendix 17 highlights 4 No. new residential development sites proposed for Dunmore East which are considered to be Tier 1.</p> <p>4 - Appendix 10 of the Draft Plan (Page 21) Outlines a description and location of the proposed Dunmore East Architectural Conservation Area.</p> <p>5 - As stated in the submission the draft plan supports the development of coastal walks. The CE notes that Policy Objective Econ 23 and C&M 06 specifically mention coastal walks. With regards to remediation work on the</p>

URN	Submission Summary	Chief Executive Response & Recommendation
	<p>from Ballymacaw to Brownstown Head in the County Development Plan.</p> <ul style="list-style-type: none"> • (iv) G3 zoning for the area between Portally and Brownstown Pillars and also the area of Ballymacaw • (v) Car parking and toilet facilities to be made available in Ballymacaw 	<p>Dunmore East Coastal Walk it is considered that these are operational issues and not a Development Plan issue.</p> <p>6 - It is considered that the plan supports access to two additional woodlands through Appendix 2 Specific Development Objective DMD011.</p> <p>7 - (i) Any proposed development on the seaward side along the L 4068 will be dealt with on its merits having regard to the policies and objectives of the plan in particular Housing Need in Chapter 7 and LCA in Chapter 10 as well as the DM Standards in Volume 2.</p> <p>(iii) See response to Point 5 above.</p> <p>(iv) Zoning request is dealt with in Section ## of the Report.</p> <p>(v) It is considered that the plan supports tourist infrastructure in Ballymacaw (service/rest facilities and car park) through Policy Objective Econ 23.</p> <p>Recommendation No change to Draft Plan.</p> <p>7 (ii) It is considered that the plan supports the provision of sustainable and active travel links along rural local roads through Policy Objective Trans 46. However, the CE notes that this point can be expanded to specifically mention 'settlements'.</p> <p>Recommendation Amend Policy Objective Trans 46 on Page 126 to read as follows: "Using Beta Project initiative identify and deliver a network of sustainably connected traffic calmed rural local roads which will act as active transport and 'green finger' biodiversity corridors linking settlements and our rural economic cluster areas (as set out in Table 4.0) and enhancing potential for sustainable mobility".</p>
WFD-C2-176	<p>The submission calls for long-term vacant & derelict buildings to be regenerated to increase the available housing. Thereby increasing housing stock and reducing the demand for one off rural houses.</p>	<p>The CE notes the issues raised in relation to vacant & derelict buildings being used for housing.</p> <p>It is considered that the Draft Plan already supports the issues raised in the</p>

URN	Submission Summary	Chief Executive Response & Recommendation
		<p>submission with regards long-term vacant & derelict buildings to be regenerated to increase the available housing through Policy Objectives Econ 04, Econ 12, BH 12 and H 24</p> <p>Recommendation No change to Draft Plan.</p>
<p>WFD-C2-178</p>	<p>The submission welcomes the existing policies in the Draft Plan relating to Gaeltacht na nDéise</p> <p>List of Additional Recommendations:</p> <ol style="list-style-type: none"> 1) Adopting a policy requiring a linguistic impact statement, reflecting the impact of the development of the linguistic viability of the Gaeltacht, as part of planning applications in the Gaeltacht. 2) The occupancy condition under H34 (p. 164) to be applied for a period of twenty five years. 3) The 'local or other requirement' (p. 165) to replace a 'local, social need or economic 'of a residence in the Gaeltacht. 4) A point from Waterford County Development Plan 2011, in relation to housing development in the Area to focus on meeting the natural growth of the Gaeltacht community to be included in the new plan. 5) Include a policy in the plan that ensures that signs erected in the Gaeltacht by the Council, on behalf of the Council, or the approval of the Council, in Irish only. 6) Adopt a policy that supports the preparation of an Irish and Gaeltacht plan for a city and County Waterford, a policy similar to 'Heritage 01' (p 223). 7) Essential work on the Sewerage system to be included among the deficiencies on Gaeltacht infrastructure Appendix 14. 	<p>The CE notes the issues raised.</p> <p>Please see comments below in relation to points raised.</p> <ol style="list-style-type: none"> 1) Section 7.13 of the Draft Plan sets out 'Housing in Gaeltacht na nDéise'. Policy Objective H 34 requires that when authorising proposals for two or more house developments on land zoned for residential use the Council will require the application of a Language Enurement Clause (LEC) of a minimum of 80% (rounded up) of the occupants of the proposed development be capable of using the Irish Language on a daily basis. Policy Objective ECON 14 seeks to support the implementation of Plean Teanga na nDéise 2018 – 2024 in collaboration with Údarás na Gaeltachta, Comhlucht Forbartha an nDéise, and the broader community by facilitating a mix of social and affordable housing that supports the aim of the Language Plan. It is considered that these Policy Objectives will protect the linguistic integrity of Gaeltacht na nDéise. 2) It is considered that 15 years occupancy condition coupled with the LEC from the date of first occupancy of dwelling is sufficient protect the linguistic intergrity of Gaeltacht na nDéise. 3) It must be noted that any planning application for housing in a rural or urban area is assessed on its own merits. It is further noted that the rural housing policy in the Draft Plan is consistent with Section 28 Ministerial Guidelines. Any applicant must comply with Policy Objective H27 and or H28 and demonstrate a genuine economic and or social need to live in a rural area. 4) With regards to the natural growth of the Gaeltacht and the County as a

URN	Submission Summary	Chief Executive Response & Recommendation
		<p>whole the Draft Plan sets out details with regard to specific housing needs in Appendix 3: 'Draft HNDA and Housing Strategy'.</p> <p>5) It is the intention of the Council to prepare a Local Area Plan for Gaeltacht na nDéise area during the lifetime of the Development Plan. The forthcoming Local Area Plan for Gaeltacht is the most appropriate policy document for Irish Road Signage Policy Objectives.</p> <p>6) Please see CE's response to point 5 above.</p> <p>7) Irish Water are progressing Dungarvan DAP – which includes Gaeltacht na nDéise. This plan will identify constraints and deficiencies in the network.</p> <p>Recommendation No change to Draft Plan.</p>
WFD-C2-180	<p>The submission requests that as part of any future amenity planning (particularly towards to the east of the city) that the Council will lease with Bohemians FC as a key stakeholder in the community and identify a suitable location for future expansion of the football club.</p>	<p>The CE notes the issue raised.</p> <p>It is considered that the plan supports the future provision of sporting and recreational infrastructure in Waterford City and County through Policy Objective SC30.</p> <p>However, the CE notes that the community consultation element of how this objective will be achieved can be strengthened.</p> <p>Recommendation Amend Policy Objective SC30 on Page 173 as follows:</p> <p><i>"To promote the provision, and management of high quality sporting, and recreational infrastructure throughout the City and County, <u>in collaboration with local communities</u>, in accordance with the National Sports Policy 2018-2027, and WCCC, to ensure that the particular needs of different groups are incorporated into the planning and design of new facilities".</i></p>
WFD-C2-184	<p>The submission focuses in rural Green Belts. A schedule of proposed exceptions are submitted in order to allow for families with long established links to area who are proposing low impact dwellings</p>	<p>The CE notes the issues raised in relation to the four points highlighted in the submission:</p> <ol style="list-style-type: none"> 1) Proven long established links to an area, 2) Proven need,

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		<p>3) Low/no impact on local services, and 4) Low/no visual impact.</p> <p>It is acknowledged that the Green belt and conservation 'GBC' land use zoning place restrictions on land-uses permitted within the green belt area. However, it is considered that the plan already supports the above points through the following Policy Objectives explained below.</p> <p>Table 11 'Zoning Matrix' in Section 11 of Volume 2 Development Management Standards indicates that a 'Dwelling/ Principal Private Residence' is Open for Consideration within this General Zoning Type.</p> <p>Furthermore Section 7.11.5 of Volume 1 of the Draft Plan sets out in detail 'Housing in Green Belt Areas..'. Policy Objective H30 states that '...We will facilitate development proposals by existing landowners with a genuine social and economic need for a first home for their own permanent occupation, subject to consideration of available alternatives and sequential testing, as well as general siting and design criteria as set out in this plan and in relevant statutory planning guidelines'.</p> <p>Recommendation No change to Draft Plan.</p>
WFD-C2-193	The submission provides a map of the current rural area types for Waterford County. It seeks to include Dunabrattin in the area type "Stronger Rural Area". The area currently falls marginally in the area under urban pressure.	<p>The CE notes the issue raised.</p> <p>The submission refers to the current rural area type classification in the Waterford County Development Plan 2011 – 2017. Volume 4 Map 6 Miscellaneous identifies the proposed Rural housing Classification.</p> <p>The classification type is consistent with national and regional policy. This typology is premised largely on two categories as follows Rural Area under Strong Urban Influence and Other Rural Areas.</p>

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		<p>Recommendation No change to Draft Plan.</p>
<p>WFD-C2-201</p>	<p>The submission highlights the need with regard general policy for the Council in relation to housing development, social and otherwise, to make specific reference to a language condition and to deliver a certain percentage of housing for native Irish language speakers in the Gaeltacht.</p> <p>The goals outlined in this chapter should be closely aligned to the goals specified in the local Language Plan and to what is being currently implemented.</p>	<p>The CE notes the issue raised.</p> <p>Section 7.13 of the Draft Plan sets out 'Housing in Gaeltacht na nDéise'. Policy Objective H 34 requires that when authorising proposals for two or more house developments on land zoned for residential use the Council will require the application of a Language Enurement Clause (LEC) of a minimum of 80% (rounded up) of the occupants of the proposed development be capable of using the Irish Language on a daily basis. Policy Objective ECON 14 seeks to support the implementation of Plean Teanga na nDéise 2018 – 2024 in collaboration with Údarás na Gaeltachta, Comhlucht Forbartha an nDéise, and the broader community by facilitating a mix of social and affordable housing that supports the aim of the Language Plan.</p> <p>Recommendation No change to Draft Plan</p>
<p>WFD-C2-209 WFD-C2-224 WFD-C2-235 WFD-C2-280 WFD-C2-350</p>	<p>The submissions seeks the (i) inclusion of a specific development objective or the provision of an inclusive and accessible public playground, (ii) the development of a play ground in Ballinroad by the Council in Ballinroad,</p>	<p>The CE notes the issue raised.</p> <p>It is considered that the plan already supports the specific development objective for a playing facility in Ballinroad through Appendix 2 Specific Development Objective POD04 which states: <i>"Where public open space exists within the village boundary it is an objective of the Council to preserve and provide for recreational uses and amenity facilities on the site. In settlements where no public play or pocket park exists, opportunities will be facilitated in order to provide same".</i></p> <p>Recommendation No change to Draft Plan.</p>

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WFD-C2-211	<p>The submission requests the identification of the former railway station in Tramore as an arts hub.</p>	<p>The CE notes the issue raised.</p> <p>It is considered that the plan already supports redevelopment of the former station house in Tramore and its curtilage for community and commercial purposes which could facilitate an arts hub through Appendix 2 Specific Development Objective TRD09.</p> <p>Recommendation No change to Draft Plan.</p>
WFD-C2-225 WFD-C2-280	<p>The submission states that Ballinroad Soccer Club welcomes the inclusion of the Recreational and Sporting Facilities Policy Objectives (SC 30 to 38) and the continued inclusion of a specific development objective (DGD09), which states, in relation to land adjoining Ballinroad Soccer Club, that it is an objective to facilitate future expansion of the soccer pitch. However, we note that this is a longstanding specific development objective that has been carried over from previous development plans but which has not resulted in facilitating our expansion despite being a development plan objective for many years. It is considered that a stronger specific development objective in relation to facilitating the expansion of Ballinroad Soccer Club, and a stronger policy more generally in relation to facilitating the expansion of clubs that find themselves similarly hemmed in, are required to be formalised in the new Development Plan.</p> <p>Finally, while we understand from the zoning map online that Ballinroad Soccer Club has the same zoning (G5) as Dungarvan Rugby Club, which is also in Ballinroad, we note from the Waterford County Core Strategy Map online that there is an area shaded green for strategic open space corresponding with the playing fields of Dungarvan Rugby Club in Ballyrandle</p>	<p>The CE notes the issue raised.</p> <p>As per response to Submission WFD-C2-180 it is considered that the plan supports the future provision of sporting and recreational infrastructure throughout Waterford City and County through Policy Objective SC30. It must be noted that the draft plan also facilitates the future expansion of the soccer pitch in Ballinroad through Appendix 2 Specific Development Objective DGD09.</p> <p>Recommendation See recommendation to Submission WFD-C2-180 which amends Policy Objective SC30 on Page 173 of the Draft Plan.</p> <p>The CE notes the issue with regards to the Core Strategy Map and considers that Ballinroad Football club should be identified as strategic open space on the Core Strategy Map.</p> <p>Recommendation Update the Waterford County Core Strategy Map to reflect Ballinroad FC as Strategic Open Space.</p>

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	<p>but the area corresponding to Ballinroad Soccer Club is not similarly colour coded and denoted as strategic open space on the core strategy map. It is considered that both clubs' grounds be mapped as strategic open space.</p>	
<p>WFD-C2-251</p>	<p>The submission calls for the development of leisure facilities in Dungarvan - swimming pool, athletics track, skate park, multipurpose playing courts,</p>	<p>The CE notes the issues raised.</p> <p>In relation to a swimming pool for Dungarvan please see CE's response and Recommendation for Submission No. WFD-C2-250.</p> <p>A Part 8 proposal for a new Skate Park has been approved by the Elected Member. A tender is currently being prepared for this scheme.</p> <p>It is considered that the plan supports the provision of Community Facilities, for example athletics track and multipurpose playing courts, through Policy Objective SC 30, SC 32.</p> <p>Recommendation No change to Draft Plan.</p>
<p>WFD-C2-254</p>	<p>The Arts Council welcome the value given to arts and culture infrastructure in the draft Waterford Development Plan, however, the draft Plan is unclear in its strategy and development management provisions, how it intends to provide or to encourage the provision of such art and cultural infrastructure, or locations or spaces for same throughout the county. Furthermore, the Arts Council would welcome greater synergy where appropriate, between land use planning provisions in the development plan, and spatial objectives set out in the Waterford County Arts Strategy and Culture and Creativity Strategy.</p> <p>The submission would seek the following is considered further in the preparation of the development plan:</p> <p>1. Value and Function of 'Arts and Culture' in Planning</p>	<p>The CE notes the issues raised.</p> <p>Please see comments below in relation to points raised.</p> <p>1. The Draft Plan identifies and supports the cultural development of Gaeltacht na nDéise through Policy Objective CS 10. It is considered that the Draft Amended Plan needs to place a more significant emphasis on the value and function of 'Arts and Culture'.</p> <p>Recommendation Amend Policy Objective Place 17 on Page 185 as follows: "Support investment in urban and village centres, for example on arts and cultural activities, so that they can become more diverse, sustainable and vibrant places for communities to live, work and enjoy".</p> <p>2. The CE considers that the Draft Plan could provide more clarity on how the</p>

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	<p>The Arts Council would welcome greater reference to 'arts and culture' in the development plan, as an increasingly essential part of social, economic and tourism infrastructure including identification of land use requirements to serve settlement needs for the purpose of contributing to the creation of healthy and attractive locations to live and visit. Furthermore, whilst the draft Plan contains objectives in support of development and preservation of the Gaeltacht, the Arts Council would welcome acknowledgement of the Gaeltacht in the development plan as an essential part of the cultural dynamic of Waterford.</p> <p>2 Clarity in Development Plan Policy The Arts Council would welcome greater clarity in the development plan in terms of its intent, in land use planning terms, to provide for, or facilitate new arts and cultural facilities throughout the County in addition to those settlements stated in policy objective SC13 and whether it is the intention of the local authority, or responsibility of/private developments to provide such infrastructure/spaces at specific locations (in addition to that planned for the Waterford Cultural Quarter) within the lifetime of the Plan.</p> <p>3 Responsiveness to and Collaboration with County Arts Strategies The Arts Council note and welcome that the provisions of policy SC26 support the development of arts and culture infrastructure 'in accordance with the Culture and Creativity Strategy'. That said, the Arts Council would welcome: greater recognition of the spatial objectives set out in the Culture and Creativity Strategy including Action 5.1 which aims to 'Identify opportunities for shared use of spaces locally for cultural engagement and activities' and, with the County Arts Strategy Objective 4 (I.P.4.2) for "maximising usage and improving arts</p>	<p>Council intend to provide, facilitate or encourage for cultural facilities across the City and County.</p> <p>Recommendation Amend Policy Objective SC 03 on Page 171 as follows: Support the planned provision of easily accessible social, community, cultural and recreational facilities throughout the City and County and ensure that all communities have access to a range of facilities that meet the needs. "To collaborate, support and work, in conjunction with local communities, social and community service providers, Waterford Council Arts Office, The Arts Council and other key stakeholders to provide for the provision of social, community, cultural and recreational facilities throughout the City and County, which are easily accessible, to ensure that all communities have access to a range of facilities that meet the needs".</p> <p>3. It is considered that the Draft Plan could provide more clarity on the spatial objectives set out in the WCCC Culture and Creativity Strategy.</p> <p>Recommendation Delete and add the following text to Policy Objective SC 26 on Page 173 as follows: Facilitate the continued development of arts and cultural facilities throughout Waterford City and County in accordance with the Culture and Creativity Strategy, 2018–2022 and any subsequent City and County Arts Development Policy.</p> <p>The Council will encourage the preservation, enhancement and provision of Arts and Culture identified as being of value in terms of contributing towards physical, social and economic benefit for the County. <u>The Council will also facilitate the continued development of general arts and cultural facilities throughout Waterford through an evidence based local needs assessments taking into account – current and future population and age dynamics,</u></p>

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	<p>infrastructure throughout the county". We would note that the latter policy has a legislative basis.</p> <p>4. Future Planning for Arts and Culture</p> <p>The Arts Council would encourage the County Development Plan to adopt a policy approach for the preservation, enhancement and provision of Arts and Culture which have been/are identified of value in contributing toward physical, social and economic benefit for the County. Future arts and cultural requirements could be informed by an evidence based local needs assessments taking into account – current and future population and age dynamics, current arts and cultural assets provision and access, community aspirations, opportunity for place making enhancement through physical infrastructure and development including provision of communal multi-use open space where it can have the most impact.</p>	<p><u>current arts and cultural assets provision and access, community aspirations, opportunity for place making enhancement through physical infrastructure and development including provision of communal multi-use open space where it can have the most impact. This will be done in accordance with the Council's Culture and Creativity Strategy (2018- 2022) and the Arts Strategy (2016 - 2021) or update of these as well as any subsequent Arts Development Policy. Particular attention should be paid to the spatial objectives set out in Action 5.1 of the Culture and Creativity Strategy (2018- 2022) which aims to 'Identify opportunities for shared use of spaces locally for cultural engagement and activities 'and, the County Arts Strategy Objective 4 (I.P.4.2) which seeks to "Commission an Infrastructure Research Report to determine current arts infrastructure and strategies for maximising usage and improving arts infrastructure throughout the county".</u></p> <p>4. With regards to the preservation, enhancement and provision of Arts and Culture in Waterford please see response to point 3 above and amended Policy Objective SC 26. It is considered that the future planning for Arts and Culture in Waterford can be expanded on further.</p> <p>Recommendation: Amend Policy Objective SC 27 on Page 173 as follows: "Support and develop existing arts and cultural facilities and festivals in Waterford and encourage the provision of new or improved arts and cultural facilities and the establishment of new festivals and events, in particular those of national and international distinction and in parts of the County where there is a deficiency in such provision. <u>To assist in this a county register of arts and cultural assets shall be compiled during the life time of the Development Plan".</u></p>
WFD-C2-288	<p>The submission stresses that careful attention should be given to the future development of rural villages and in particular Villierstown and the Architectural Conservation Area. Public lighting should be appropriate and open spaces should be</p>	<p>The CE notes the issues raised.</p> <p>It is considered that the plan supports sensitive design in rural villages through Policy Objective H 02 which states "<i>In granting planning permission</i></p>

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	retained and enhanced for community benefit.	<p><i>we will ensure new residential development: > Is appropriate in terms of type, character, scale, form and density to that location;....> Is integrated and connected to the surrounding area in which it is located."</i> It further protects historic town and village cores through Policy Objective BH 29.</p> <p>Recommendation No change to Draft Plan.</p>
<p>WFD-C2-292</p>	<p>Public Participation and People-led Policy</p> <ul style="list-style-type: none"> • WCCC should ensure full community participation in performance of its functions. • Community energy projects should be put in place during the lifetime of the development plan. • Climate Action should be fully supported by the council with full public engagement processes at the core of all activities. 	<p>The CE notes the issue raised.</p> <p>The Council supports our transition to a low-carbon society and economy through various land use Policy Objectives within the plan (i.e. CS 09, H18, H19 and W City 20). In support of this process The Council will collaborate with key stakeholders such as CARO, SEAI, EPA, DECC, WIT (TUSE), Kilkenny Co. Co., the SRA and other business operators and representative groups such as, PPN and Waterford Chamber to fully devise and implement actions to achieve.</p> <p>The staffing of Waterford's Climate Action and Environment Office is an operational matter and not a Development Plan Issue.</p> <p>It is considered that the plan supports community energy projects through Policy Objective UTL 13.</p> <p>Recommendation No change to Draft Plan.</p>
<p>WFD-C2-293</p>	<p>The submission supports the statements and policy objectives included in the draft plan relating to Gaeltacht na nDéise. Further policy support for the development of cultural tourism would be welcomed along with a commitment to monitor the implementation of the Language Enurement Clause provision relating to residential and commercial development.</p>	<p>The CE notes the issue raised.</p> <p>Section 7.13 of the Draft Plan sets out 'Housing in Gaeltacht na nDéise'. Policy Objective H 34 requires that when authorising proposals for two or more house developments on land zoned for residential use the Council will require the application of a Language Enurement Clause (LEC) of a minimum of 80% (rounded up) of the occupants of the proposed development be capable of</p>

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		<p>using the Irish Language on a daily basis. Policy Objective ECON 14 seeks to support the implementation of Plean Teanga na nDéise 2018 – 2024 in collaboration with Údarás na Gaeltachta, Comhlucht Forbartha an nDéise, and the broader community by facilitating a mix of social and affordable housing that supports the aim of the Language Plan. ECON 14 further notes that the Council will require all proposals for commercial development in Gaeltacht na nDéise to be accompanied by a Language Impact Assessment which should demonstrate that the proposal will not have a negative impact on the linguistic viability of the area.</p> <p>Recommendation No change to Draft Plan</p>
WFD-C2-302	The submission welcomes (policy SC 33) to develop sport facilities in Tramore and highlights the need and benefits of skateparks .	<p>The CE notes the issue raised.</p> <p>As per response to Submission WFD-C2-180 it is considered that the plan supports the future provision of 'skate parks' with reference to sporting and recreational infrastructure throughout Waterford City and County in Policy Objective SC30.</p> <p>Recommendation See recommendation to Submission WFD-C2-180 which amends Policy Objective SC30 on Page 173 of the Draft Plan.</p>
WFD-C2-303	This submission relates to the importance of Play and social connectedness as identified by children and young people in Waterford. The submission provides feedback from young children and middle years' children. It specifically identified the importance of spending time with their friends and playing. Teenagers and young adults refer to spaces to hang out and opportunities to meet friends informally and in clubs and groups.	<p>The CE notes the issue raised.</p> <p>It is considered that the Draft Plan supports the provision of accessible play areas for young people to socialise though Policy Objective SC 30 to SC35.</p> <p>Recommendation No change to Draft Plan.</p>
WFD-C2-	The submission requests that the council identify a suitable location and land zoning within the Ballygunner area for an	The CE notes the issue raised.

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310	appropriate permanent football facility.	<p>As per response to Submission WFD-C2-180 it is considered that the plan supports the future provision of sporting and recreational infrastructure in Waterford City through Policy Objective SC30.</p> <p>Recommendation See recommendation to Submission WFD-C2-180 which amends Policy Objective SC30 on Page 173 of the Draft Plan.</p>
WFD-C2-330	<p>The submission provides a schedule of recommendations in order to improve Traveller Accommodation in County Waterford which are outlined below:</p> <p>i) Projects committed to under the 2019-2024 Traveller Accommodation Programme should be listed as objectives in the Development Plan with clear timelines as per the Housing (Traveller Accommodation) Act 1998 PART III (27) (10);</p> <p>ii) Sites should be identified and zoning of land for Traveller specific accommodation, including transient accommodation, should be mapped and illustrated in the programme, in line with the Planning and Development Act, (2000) as amended, particularly s10(2)(i);</p> <p>iii) The Development Plan should reference the work being done on a national level to implement the recommendations of the Expert Review on Traveller Accommodation and commit to incorporating the work and decisions of the programme board into its future processes.</p> <p>iv) The Draft Plan should also reference the local authorities' strategy to implement the relevant recommendations of the Irish Human Rights and Equality Commission's recent Equality Reviews of local authority provision of Traveller</p>	<p>The CE notes the issues raised.</p> <p>i) The locations, delivery, quantum and specific requirements of Traveller accommodation across Waterford are determined by and set out within the Council's 'Traveller Accommodation Programme 2019-2024' (TAP) or any superseding programmes. Policy Objective H16 in the Draft Plan provides policy support for the implementation of the TAP. The Zoning Matrix Table 11 of Volume 2 Development Management Standards will be updated to provide more flexibility for Traveller Accommodation within the landuse zoning.</p> <p>ii) In the CE's response to the OPR (see submission number WFD-C2-363) sets out the location of traveller accommodation in Waterford on a map.</p> <p>iii) & iv) The Draft Plan seeks to facilitate and support the provision of housing for all, including Members of the Travelling Community, therefore, it must be consistent with the Housing Strategy and the HNDA to deliver sustainable housing in the right locations. It is considered that UN Charter on Sustainable Housing (2015), Human Rights & Equality Impact Assessment and associated Poverty Impact Assessment, the recommendations from the Expert Group on Traveller Accommodation/ IHREC Equality Review are not a Development Plan issue and should form part of the review of the Traveller Accommodation Programme in time. The naming of footpaths is not a development plan issue.</p> <p>Recommendation No change to Draft Plan.</p>

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	accommodation.	
WFD-C2-333	<p>The submission requests that Rural Housing Policy be altered so appropriate plot splitting can be considered to allow retirement/ independent living / downsizing where development management standards can be achieved and in accordance with the ribbon development guidelines.</p> <p>In terms of visual intrusion it is requested that the new plan provide clarification as to where it is considered the visually vulnerable viewpoint is taken from, is it from the landside or the seaside and clarity on what is acceptable or not visually?</p> <p>We would request that the new development plan make provision for high quality design solutions using appropriate materials and design mitigations to be considered to address appropriate dwellings in visually vulnerable areas.</p>	<p>The CE notes the issue raised.</p> <p>Meeting the housing needs of all sectors of society is a significant challenge and adaptation through different life stages presents difficulties both for rural and urban dwellers. Having a policy to allowing a second rural house could in the longer term affect the viability of rural practices through the urbanisation of the country side. The Council does at present operate a policy of allowing a second home on the basis of the original home satisfying the housing need of a family member. In the context of the Core Strategy and proposed distribution of population in the settlement hierarchy this is considered reasonable. It must be noted that any planning application for rural housing is assessed on its own merits. It is further noted that the rural housing policy in the Draft Plan is consistent with Section 28 Ministerial Guidelines. Any applicant must comply with a with Policy Objective H27 and or H28 and demonstrate a genuine economic and or social need to live in a rural area.</p> <p>Recommendation No change to Draft Plan.</p> <p>The CE accepts the issue raised in relation to the Landscape and Seascape Character Assessment's Scenic View.</p> <p>Recommendation Amend Landscape and Seascape Character Assessment to include direction of viewing point for Scenic Views.</p>
WFD-C2-360	<p>The submission lists a number of objectives in relation to Housing:</p> <ul style="list-style-type: none"> • Develop transport and land use through a coordinated approach to support compact, urban growth. • Change housing design guidance to allow greater density of new home development. 	<p>The CE notes the issue raised.</p> <p>In relation to the 7 points raised the CE notes the following:</p> <p>i) It is noted that the Draft Plan will identify investment priorities to deliver the concentric city model founded on the principle of transport-orientated and infrastructure led development. Furthermore Policy Objective Trans 01</p>

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	<ul style="list-style-type: none"> • Continue investment on social housing. The demands for purpose-built social housing have not dissipated and only been exacerbated by the economic shock brought on by Covid. • Increase the availability of zoned and serviceable land. • Seek to promote the creation of sustainable places and healthy communities, while ensuring that development occurs at an appropriate pace and that infrastructure is delivered in tandem to support this growth. • Encourage compact growth, through the development of infill sites, brownfield lands, underutilised land/buildings, vacant sites and derelict sites. • Support redevelopment and reuse, including energy retrofitting, of existing housing stock. 	<p>seeks the Integration of Land Use Planning and Transport.</p> <p>ii) Any planning application for housing will be assessed on its own merits and will need to comply with local, regional and national policy as well as Section 28 Guidelines in particular Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009).</p> <p>iii) The Draft Plan supports the provision of social housing. All residential developments must comply with the provisions of Part V of The Planning and Development Act, 2000 (as amended). Policy Objective H08 'Social Housing and Part V' seeks to secure the provision of appropriate accommodation to meet the housing needs of all households, including social housing, in a manner consistent with the Housing Strategy and in accordance with Part V of the Planning & Development Act 2000 (as amended).</p> <p>iv) It is considered that the Draft Plan has provided for an adequate supply of zoned land for primarily residential purposes, and the projected demand for new housing. In accordance with the proposed settlement strategy for the City and County there are already more than sufficient residentially zoned land to cater for forecast demands and targets set by the NPF and RSES. It is not considered warranted to zone additional residential land for the 2022-2028 Development Plan.</p> <p>v) The Draft Plan includes a number of Policy Objectives that supports the sustainable development of both Urban and Rural Settlements. Policy Objective Place01 makes specific references '<i>to provide a sustainable mix of local services such as commercial, community and cultural activities including provision for enterprise, residential, retail, commercial, tourism, and leisure and community facilities</i>'.</p> <p>vi) The Draft Plan supports compact growth through Policy Objective CS 03, CS 07, Trans 05 and Place 01.</p> <p>vii) The Draft Plan supports the redevelopment and reuse of existing housing stock, including energy retrofitting through Policy Objective H 18, H19 and BH 22.</p> <p>Recommendation</p>

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		No change to Draft Plan.
WFD-C2-372	<p>The submission requests the update and insertion of the following policy objectives:</p> <p>SC38A - To facilitate and support the development of multipurpose covered outdoor areas for all year-round outdoor activities such as Yoga, Pilates, outdoor swimming etc.</p>	<p>The CE notes the issue raised.</p> <p>Recommendation Add the following to Policy Objective SC 31 on page 174 which will read as follows: <u>"To improve access to recreational spaces, facilities and amenities for all citizens regardless of ability, age, socio-economic status and to support the development of multipurpose covered outdoor areas for all year-round outdoor activities such as Yoga, Pilates, outdoor swimming"</u>.</p>
WFD-C2-372	<p>7.18 Community Buildings (pg 166) Request the inclusion of 'Sporting facilities' under community buildings.</p> <p>The submission requests a number of changes to Section 7.25 which include the following major inserts of text and some minor additions:</p> <p>> 7.25a Waterford Sports Partnership (Please add this as a separate point) (pg 169) The Waterford Sports Partnership Strategic Plan 2018 - 2022 was prepared in inline with the National Sports Policy, National Physical Activity Plan and the Sport Ireland Strategy. The Development Plan seeks to provide an environment which encourages and supports active and healthy lifestyles in order to maximize participation in sport and physical activity for all across the lifecycle. The Council will continue to work closely with Waterford Sports Partnership to achieve this common goal.</p> <p>> The Council acknowledges the requirement under the National Sports Policy of all Local Authorities to develop a Local Sports Plan. To do this, each Local Authority will work with the Local Sports Partnership, with partners on the Local Community Development Committees (LCDC) and CYPSC, with</p>	<p>The CE notes the issue raised.</p> <p>Recommendation Add the following to text to Section 7.18 on Page 166 of the Draft Plan which will read as follows: "Sustainable neighbourhoods require a range of community facilities as stated in the Department of Environment, Heritage and Local Government Guidelines on Sustainable Residential Development in Urban Areas (2009). The Council will encourage the grouping of community, commercial and local employment facilities such as schools, <u>sporting facilities</u>, childcare facilities, community centres, primary health care centres and local commercial service of a scale appropriate to serve the local community through land use and zoning objectives".</p> <p>Add the following text to Section 7.25 Recreational and Sporting Facilities on Page 169 of the Draft Plan which will read as follows: ".....There are a variety of sporting and recreational facilities and grounds throughout the City and County, which provide for the active recreational needs of the community. It is important that facilities are located where they are of most value and accessible to the community being served. Accessibility should be promoted primarily through public transport links and by <u>walking/cycling as well as through accessible planning and design</u>. The Council</p>

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	<p>clubs, schools, leisure facility providers, community groups and other stakeholders locally. A locally-led, nationally supported approach will be a key feature of the Government's participation strategy. Sport Ireland will support the Council, Waterford Sports Partnership and other relevant stakeholders in developing the Local Sports Plan consistent with the overall vision and objectives of the National Sports Policy taking into account local priorities and plans.</p> <p>> Swimming Infrastructure The National Sports Policy identified swimming as one of the priority sports having the greatest potential for generating higher levels of active participation over the full life course. Swimming is also a fundamental life skill and one of the few sports that is accessible by all ages, genders and abilities, regardless of fitness levels or health status and as such the provision of facilities for swimming warrants specific consideration in the Development Plan.</p>	<p>will strive to provide facilities for sport and physical activity that are well maintained, sufficient in number and accessible to as many local people as possible, across a diverse range of sports. The Council will do this through relationships and interactions with Waterford Sports Partnership, local sporting clubs, regional and national sporting organisations, schools, community groups. In providing sporting and recreational facilities the following key policies and plans should be referred to:</p> <ul style="list-style-type: none"> • National Sports Policy 2018-2027; • National Physical Activity Plan (launched 14/1/16); • Sport Ireland Statement of Strategy 2018-2022; • Sport Ireland Participation Plan; • Waterford Sports Partnership Strategy 2018-2022; • Healthy Waterford Strategic Plan 2018-2022; • Healthy Waterford Report on Designing Communities: the importance of place in promoting health and wellbeing, July 2019. <p>The Waterford Sports Partnership Strategic Plan 2018 -2022 was prepared in inline with the National Sports Policy, National Physical Activity Plan and the Sport Ireland Strategy.The Development Plan seeks to provide an environment which encourages and supports active and healthy lifestyles in order to maximize participation in sport and physical activity for all across the lifecycle. The Council will continue to work closely with Waterford Sports Partnership to achieve this common goal.</p> <p>The Council acknowledges the requirement under the National Sports Policy of all Local Authorities to develop a Local Sports Plan. To do this, each Local Authority will work with the Local Sports Partnership, with partners on the Local Community Development Committees (LCDC) and CYPSC, with clubs, schools, leisure facility providers, community groups and other stakeholders locally. A locally-led, nationally supported approach will be a key feature of the Government's participation strategy. Sport Ireland will support the Council, Waterford Sports Partnership and other relevant stakeholders in</p>

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		<p><u>developing the Local Sports Plan consistent with the overall vision and objectives of the National Sports Policy taking into account local priorities and plans.</u></p> <p>The dual use of school facilities <u>sharing of school and community sports</u> facilities will be addressed through the development management process and in conjunction with the Department of Education and Skills.</p> <p>Add the following text to Section 7.25 after 'Water based uses' on Page 170 of the Draft Plan which will read as follows: <u>Swimming Infrastructure</u> <u>The National Sports Policy identified swimming as one of the priority sports having the greatest potential for generating higher levels of active participation over the full life course. Swimming is also a fundamental life skill and one of the few sports that is accessible by all ages, genders and abilities, regardless of fitness levels or health status and as such the provision of facilities for swimming warrants specific consideration in the Development Plan.</u></p> <p>Add the following text to the end of Section 7.26 Waterford Active City Initiative on Page 171 which will read as follows: <u>The Council will work closely with Waterford Sports Partnership and other key stakeholders to support and develop this initiative.</u></p> <p>Add the following text to Policy Objective SC06 on Page 171 which will read as follows: "To support and facilitate the creation of a Healthy City and County in accordance with the Healthy Waterford Strategic Plan 2018 – 2021 and any subsequent revision thereof. <u>The Council will also support the development of the Waterford Active City Initiative as a key partner and stakeholder</u>".</p> <p>Add the following text to Policy Objective SC09 on Page 172 which will read as</p>

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		<p>follows:</p> <p><u>".....are safely accessible by walking and cycling, are within walking or cycling, distance and physically integrated with residential and employment areas and are provided concurrently with new residential development. A policy of shared and multi use of facilities will be promoted.</u></p> <p>Add the following text to the end of Policy Objective SC15 on Page 172 which will read as follows:</p> <p><u>".....A policy of shared and multi use of school/community sports facilities will be promoted".</u></p>
<p>WFD-C2-379</p>	<p>7. Site dereliction at Ardri and Grand Hotels</p> <p>The submission requests that the development plan considers new sanctions for developments like these under the vacant sites levy and under dangerous sites legislation. Our city and county cannot continue to allow well heeled developers acquire and sit on properties for decades without any intention of developing but purely waiting for an economic return</p>	<p>The CE Notes the issue raised.</p> <p>The Urban Regeneration and Housing Act 2015 (as amended) make provision for a vacant site levy to incentivise the development of vacant and under-utilised sites in urban areas for housing and regeneration purposes. The Planning Authority actively implements the vacant site legislation as an important component part of its active land management strategy. This approach is supported through Policy Objective ECON 07 of the Draft Plan. It must be noted that Policy Objective CS 03 'Compact Growth' and CS 07 'Urban Regeneration' also seeks to address issues of vacancy and underutilisation of lands within the County and encourage and facilitate the re-use and regeneration of vacant site.</p> <p>Recommendation</p> <p>No change to Draft Plan.</p>
<p>WFD-C2-379</p>	<p>8. Rail Station Tramore</p> <p>The submission notes the potential of the rail station in Tramore and requests that the development plan reflects a desire to either acquire this site fully or to allow it pass into private ownership so that some new development may come to pass.</p>	<p>The CE notes the issue raised.</p> <p>Having regard to details provided by the Property Management section of the Council, the Old Railway building is in the ownership of WCCC. However, lands to the west are not currently in the Council's ownership. However, if the Council were to purchase this land at a future date, the zoning objective does not preclude any future extension or redevelopment of the</p>

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		<p>former railway station. Nonetheless the purchase of historic structures is not a County Development Plan issue and it is also considered that the draft plan already supports redevelopment of the redevelopment of the former station house in Tramore in the following ways:</p> <p>(i) Appendix 2 outlines a Specific Development Objective TRD09 for the site which states "To support the redevelopment of the former station house in Tramore and its curtilage for community and commercial purposes"; and</p> <p>(2) The Old Railway Station at Tramore is zoned for Tourism and Related (C5) purposes in the Draft Plan with an Objective to 'To provide for tourist uses'. There is a Specific Development Objective associated with the site TROD9 which states "To support the redevelopment of the former station house in Tramore and its curtilage for community and commercial purposes".</p> <p>Recommendation No change to Draft Plan.</p>
<p>WFD-C2-379</p>	<p>9. The ongoing North Quays development</p> <p>The submission requests that the local authority executives engage with the minister for higher education and with the board of the proposed university merger to locate a new faculty school on the North Quays development site.</p>	<p>The CE Notes the issue raised.</p> <p>Please see CE's response to submission number WFD-C2-34.</p> <p>Recommendation See CE's recommendation to submission number WFD-C2-34.</p>
<p>WFD-C2-379</p>	<p>11. The policy on rural one off housing</p> <p>The submission would like to see the county development plan give a clear commitment to the ongoing ability to develop one off rural housing in our regional towns and villages</p>	<p>The CE Notes the issue raised.</p> <p>The Rural Housing Policy is based on Ministerial Guidance on Rural housing under Section 28 of the Planning Act and NPO 19 of the National Planning Framework (NPF), which requires that the criteria should have regard to the viability of smaller towns and rural settlement. The draft Plan already supports rural housing through Policy Objective H23 - H28. The Draft Plan also supports through Policy Objective H26 the provision of Services Sites for small towns and villages under NPO 18b of the NPF and 'New Homes in Small Towns and Villages' as outlined in RSO 26 of the RSES.</p>

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		<p>Recommendation No change to Draft Plan.</p>
WFD-C2-397	<p>The submission highlights that the draft amended plan needs to give an explicit commitment to the delivery of a minimum of three transient sites in the county (Waterford City, Dungarvan & Tramore), and that the current TAP will be reviewed and is intended to be amended on this matter as part of its statutory mid-term review in 2022, taking into account the findings of the IHREC Equality Review.</p>	<p>The CE notes the issue raised.</p> <p>The locations, delivery and specific requirements of Traveller accommodation across Waterford are determined by and set out within the Council's 'Traveller Accommodation Programme 2019-2024' (TAP) or any superseding programmes. Policy Objective H16 in the Draft Plan provides policy support for the implementation of the TAP.</p> <p>Recommendation No change to Draft Plan.</p>
WFD-C2-397	<p>The submission requests that the draft amended plan name specific commitments to facilitate Traveller horse ownership, and that WCCC will facilitate Traveller culture and economic activities in its accommodation provision (ECON15/SC07/SC08). The UN Geneva Charter on Sustainable Housing and its commitments to 'cultural adequacy' should be specifically named as well.</p>	<p>The CE notes the issue raised.</p> <p>The locations, delivery and specific requirements of Traveller accommodation across Waterford are determined by and set out within the Council's 'Traveller Accommodation Programme 2019-2024' (TAP) or any superseding programmes. Policy Objective H16 in the Draft Plan provides policy support for the implementation of the TAP.</p> <p>Recommendation No change to Draft Plan.</p>
WFD-C2-397	<p>The submission requests that a Human Rights & Equality Impact Assessment be undertaken for the new WCCDP, and an outline of this assessment should be referenced in the published new WCCDP and linked to a Poverty Impact Assessment.</p>	<p>The CE notes the issue raised.</p> <p>The Draft Plan seeks to facilitate and support the provision of housing for all, including Members of the Travelling Community. The Draft Plan must be consistent with the Housing Strategy and the HNDA to deliver sustainable housing in the right locations. It is considered that Human Rights & Equality Impact Assessment and associated Poverty Impact Assessment is not a Development Plan issue and should form part of the review of the Traveller Accommodation Programme in time.</p>

URN	Submission Summary	Chief Executive Response & Recommendation
WFD-C2-409	<p>This submission raises a number of points where policy with regards to people with disabilities could be improved in the draft amended plan. These areas include the following:</p> <ol style="list-style-type: none"> 1) Changing places and facilities in public areas; 2) Designated Parking Spaces - increased size and unique colour 3) Inclusive Communication Boards - inclusive for those who are hard of hearing/deaf or who are on the autistic spectrum. 4) Road works - footpath improvements to remove obstacles for wheelchair users, tactile paving in the right location. 	<p>Recommendation No change to Draft Plan.</p> <p>The CE notes the issues raised.</p> <p>Please see comments below in relation to points raised.</p> <ol style="list-style-type: none"> 1. It is considered that the Draft Amended Plan needs to place a more significant emphasis on changing places and facilities for disabled people in our public areas. <p>Recommendation Amend Policy Objective SC03 on Page 171 as follows: "Support the planned provision of easily accessible social, community, cultural and recreational facilities throughout the City and County and ensure that all communities have access to a range of facilities that meet the needs <u>including `changing places bathrooms`</u>."</p> <ol style="list-style-type: none"> 2. The Draft Plan already supports Disabled Parking through Policy Objective DM 37. However, it is considered that designated and standard car parking spaces can be increased. <p>Recommendation Amend Policy Objective DM 37 on Page 47 of Volume 2 as follows: <u>Standard Car Parking</u></p> <ul style="list-style-type: none"> • <u>Parallel parking to kerb: 6.0m x 2.5m</u> • <u>Perpendicular parking (not including minimum 0.3m footpath overhang).</u> <p><u>Use only on roads with low traffic volumes and speeds: 5.0m x 2.5m</u></p> <p>Disabled Parking</p> <ul style="list-style-type: none"> • A minimum of 5% of car parking spaces provided should be designed for disabled car parking. • Where the nature of particular developments are likely to generate a

URN	Submission Summary	Chief Executive Response & Recommendation
		<p>demand for higher levels of disabled car parking, the Planning Authority may require a higher proportion of parking for this purpose.</p> <ul style="list-style-type: none"> • All disabled parking should be conveniently located in proximity to building entrance points and allocated and suitably signed/demarcated. We recommend that Disabled Spaces are painted blue to make them more easily recognisable. • Parking bays for disabled persons should be a minimum of 3.0m wide by 4.75m long 6.0m x 3.6m including 1.2m transfer hatching to side and rear for more information please see Section 1.4.2 Car Parking Spaces of Buidling for Everyone A Universal Design Approach visit https://universaldesign.ie/Built-Environment/Building-for-Everyone/1-External-Environment.pdf. <p>3. Inclusive Communication Boards - inclusive for those who are hard of hearing/deaf or who are on the autistic spectrum.</p> <p>Recommendation Amend Policy Objective SC 41 on Page 174 of the Draft Plan as follows: "Provide a hierarchy of attractive parks and public open spaces, which vary in size and nature, are all inclusive, by being readily accessible and at a convenient distance from people's home and/ or places of work. <u>We will also work with the Waterford Disability Network to provide where necessary inclusive communication boards in parks and other public spaces</u>".</p> <p>4. In relation to tactile paving and the need for clear planning in future projects it is considered that the Draft Plan supports this though Policy Objective Uni Des 02 which states "<i>Require all new developments, including proposals for public realm enhancements incorporate principles of universal design</i>". It is considered that the issue of roadwork inspection is not a Development Plan issues.</p> <p>Recommendation No change to Draft Plan.</p>

URN	Submission Summary	Chief Executive Response & Recommendation
WFD-C2-420	The submission requests that planning policy/zoning is put in place to ensure that family members can build on family lands outside Dungarvan	<p>The CE notes the issue raised.</p> <p>It must be noted that any planning application for rural housing is assessed on its own merits. It is further noted that the rural housing policy in the Draft Plan is consistent with Section 28 Ministerial Guidelines. Any applicant must comply with Policy Objective H27 and or H28 and demonstrate a genuine economic and or social need to live in a rural area.</p> <p>Recommendation No change to Draft Plan</p>
WFD-C2-465	<p>The submission provides a background to the housing and rental market in Waterford City. It highlights a number of opportunities in relation to housing and offers the following solutions:</p> <ol style="list-style-type: none"> 1. Introduce a planning by-law that a sub-let of a private house (Airbnb or student use) requires planning permission. 2. Introduce a one-stop-shop self-certification solution to simplify the process to assist owners to understand how to bring over-the-shop back into residential use. 3. Create a property register to identify vacant properties. 4. Address the affordable housing market in the city centre as the social market is over-saturated and the tenure mix is unbalanced. 5. Identify suitable city centre locations for student accommodation. 6. Consider how to create smart communities so that Waterford is at the forefront of remote working potential. 7. Create a planning exemption policy for provision of working from home garden rooms/offices. 	<p>The CE notes the issues raised.</p> <p>Please see comments below in relation to points raised.</p> <ol style="list-style-type: none"> 1. Short Term Residential Lets Planning Bye-Law As part of measures to help address pressures in the private housing rental market, new planning legislative reforms to regulate the short term letting sector - as provided for in the Residential Tenancies (Amendment) Act 2019 and supplementary regulations made by the Minister for Housing, Planning and Local Government entitled the Planning and Development Act 2000 (Exempted Development) (No. 2) Regulations 2019 - come into effect on 1 July 2019. The reforms are primarily aimed at addressing the impact on the private rental market by the use of residential homes for short-term tourism type letting in areas of high housing demand. Accordingly the new provisions will only apply in areas designated as "Rent Pressure Zones" (RPZ) under the Residential Tenancies Act 2004, as amended. Short term letting in areas outside the designated rent pressure zones are not impacted in any way by the new arrangements. Under the new arrangements applicable in rent pressure zones: <ul style="list-style-type: none"> o Short term letting is defined as the letting of a house or apartment, or part of a house or apartment, for any period not exceeding 14 days.

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		<p>o Home sharing (the letting of a room or rooms in a person's principal private residence) will continue to be permissible on an unrestricted basis and be exempted from the new planning requirements. Home sharers will be allowed to sub-let their entire principle private residence (house or apartment) on a short term basis for a cumulative period of 90 days where they are temporarily absent from their home.</p> <p>o Where the 90 day threshold is exceeded, change of use planning permission will be required.</p> <p>However, where a person owns a property in a rent pressure zone which is not their principal private residence and intends to let it for short-term letting purposes, s/he will be required to apply for a change of use planning permission unless the property already has a specific planning permission to be used for tourism or short-term letting purposes.</p> <p>Recommendation No change to Draft Plan.</p> <p>2. The CE notes the issue raised. However, the creation of a one stop shop for self certification is considered more of an operational matter and is not a Development Plan issues. It must be noted that the Council do, however, offer a generous 'Shopfront Improvement Grant' and a grant for occupying vacant premises.</p> <p>Recommendation No change to Draft Plan.</p> <p>3. Vacant Property Register Under Section 6 of the Urban Regeneration & Housing Act 2015 the Council is required to establish and maintain a Vacant Sites Register as and from January 1st 2017. Waterford Council's register is available to view on the following link: https://www.waterfordcouncil.ie/media/planning/VacantSitesRegister2019.p</p>

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		<p>df. Furthermore GeoDiectory also produces a quarterly report on residential building in Ireland which covers vacancy in each county.</p> <p>Recommendation No change to Draft Plan.</p> <p>4. The Draft Plan promotes a mix of housing type, size and tenure through a suite of Policy Objectives in Section 7.6 including, H17 'Housing Mix'.</p> <p>Recommendation No change to Draft Plan.</p> <p>5. Student Accommodation - Section 7.10 of the Draft Plan covers the topic of Student Accommodation. It is considered that this section could be strengthened to support student accommodation in Waterford City Centre.</p> <p>Recommendation Add additional Policy Objective after H22 numbered H ## on Page 158 as follows: <u>"The Council will support the sustainable distribution and provision of student accommodation in the city centre including through the development of 'over shop living' and the development of underutilised sites. Any development must have regard to the following:</u> <u>o The effect of the proposed development on the amenities of the area, including residential amenity;</u> <u>o The effect of the proposed development on the existing mix of land uses and activities including the existing student accommodation, in the particular locality."</u></p> <p>6. It is considered that the Draft Plan supports the development of a network of digital hubs in order to attract new and start-up business through Policy Objective ECON 02 and ECON 13.</p>

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		<p>Recommendation No change to Draft Plan.</p> <p>7. Exemption of planning permission is by way of Planning Legislation, and hence is beyond the remit of the Planning Authority.</p> <p>Recommendation No change to Draft Plan.</p>

3.2.7 Chapter 8 – Placemaking

URN	Submission Summary	Chief Executive Response & Recommendation
WFD-C2-143	The submission highlights a number of points of how placemaking can be improved in the draft amended plan.	<p>The CE notes the issue raised.</p> <p>The CE sets out the response to the various placemaking related requests below. It must be noted that Points 37 - 43 and 45/46 are responded to under Chapter 5 Transport.</p> <p>Request 36: The CE welcomes the positive reaction with regards to Strategic Objectives for Placemaking within the plan. A number of pilots projects are currently underway most notably the €27.6m URDF project for various public realm works across the city.</p> <p>Request 44: Greening the city - city amenity maintenance is considered a operational issue and not a development plan issue. However, it is considered that the plan supports biodiversity through a number of Policy Objectives in Chapter 9 of the Draft Plan in particular Policy Objectives BD01 - BD02, BD04, BD11 and BD 12.</p> <p>Request 47: Access to recreational areas and journey times - The CE notes the issues raised. It is considered that the draft plan supports access to recreational areas through the concept of the 10 minute neighbourhood which is embedded throughout the plan. The "10-minute" neighbourhood concept is founded on the availability of a range of community facilities and services (e.g. homes, open space, schools, cafe/restaurants, employment centres) being accessible in short walking and cycle timeframes, and/ or are accessible by high quality public transport services connecting people to larger scaled settlements that deliver these services. The Draft Plan also supports the idea of 'permeability' which seeks to ensure that all areas of our urban places have a variety of pleasant, convenient and safe routes through it (Policy Objective Trans 09, Uni Des 01, Uni Des 03, Place 03, Place 26, Place 27). With regards to the minimum area that should be converted to biodiversity purposes Volume 2 Table 1 of the DM Standards sets out a number of requirements for min open space and objectives relating to</p>

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		<p>biodiversity and nature based solutions.</p> <p>Request 48: A park for Ferrybank - Section 4.3.6 of The Waterford North Quays SDZ Planning Scheme 2018 deals with Public Open Space within the scheme. This section provides a number of Specific Objectives in relation to open space within the SDZ. The schemes seeks to develop two principle nodal public realm spaces – one at the proposed sustainable transport bridge landing and the second opposite the eastern end of the central retail zone in the vicinity of the Rockshire Road access. Each space should have a distinct character, act as a meeting/focal point in the development and have an integrated design solution.</p> <p>Request 49/50: Swimming baths for Ferrybank - It is considered that the plan supports the provision of swimming pools and associated infrastructure through Policy Objective SC33.</p> <p>Recommendation No change to Draft Plan</p>
WFD-C2-252	<p>Chapter 8: Placemaking</p> <p>There may be opportunity to expand on designing for sustainability with the Circular Economy in mind, for example avoidance of demolition now or in the future by repurposing buildings and through modular design which would facilitate future reuse of buildings. For example within Place 10 Policy Objective, it could be outlined that the design statement would include how the circular economy could be addressed from design through to planned end-use and beyond.</p>	<p>The CE notes the issues raised.</p> <p>It is submitted that the plan already supports Circular Economy in mind, for example avoidance of demolition now or in the future by repurposing buildings through the provision Policy Objective BH 22 and BH 23. Nonetheless, it is considered that Policy Objective Place 10 can be expanded to address the issue raised.</p> <p>Recommendation Amend Policy Objective Place 10 (Page 182) as follows: <i>"All medium to-large scale and complex planning applications (15 + residential units (or less depending on the site context), commercial development over 500 sqm. or as otherwise required by the Planning Authority) submit a 'Design Statement' and shall be required to demonstrate how the proposed development addresses or responds to the design criteria set out in the 'Urban Design Manual - A Best Practice Guide' (DoEHLG, 2009) and incorporates</i></p>

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		<i>adaptability of units and/or space within the scheme. <u>The design statement would include how the circular economy could be addressed from design through to planned end-use and beyond'.</u></i>
WFD-C2-265	Pedestrianisation of the Quays in evening hours would enhance the usability and attractiveness of the area.	<p>The CE notes the issue raised.</p> <p>This issue will be dealt with through the Local Area Plan and Local Transport Plan for Dungarvan/ Ballinroad.</p> <p>Recommendation No change to Draft Plan</p>
WFD-C2-372	The submission seeks the following additional text 'sports facilities' to be inserted in Policy Objective Place 26.	<p>The CE notes the issue raised.</p> <p>Recommendation Add the following to text to Policy Objective Place 26 on Page 187 of the Draft Plan which will read as follows:</p> <p>"To develop a 10-minute neighbourhood framework for all new and existing urban areas across Waterford which allows the everyday needs of people to be met within a safe walking distance of their homes, for example schools, childcare, health services, shops, public transport, <u>sports facilities</u> and parks. We will collaborate with local communities to identify constraints and implement measures to deliver sustainable 10 minute neighbourhoods".</p>

3.2.8 Chapter 9 – Climate Action, Biodiversity and Environment

URN	Submission Summary	Chief Executive Response & Recommendation
WFD-C2-19	<p>The submission highlights a number of measures to be included in the draft plan to tackle climate change and movement towards zero carbon. These include the following general principles for building design:</p> <ol style="list-style-type: none"> 1. Must be designed with carbon neutrality as the end goal. 2. All climate measures and those aimed at decarbonising the built environment should be cross-cutting. 3. Design out dependency and ‘lock-ins’: All new residential development and buildings must be designed to reduce and eliminate car-dependent travel. 4. Zero Carbon Buildings: All new development must be encouraged by DPs to move towards Zero Carbon across the full life cycle by 2025 (Life Cycle Assessment (LCA)). 5. Resource efficiency and circularity: Adopt renovation first policies, avoid unnecessary demolition. 6. Water efficiency first. 7. Comply with the ‘do no harm’ principle: No action should undermine environmental objectives and diminish ecosystem services and biodiversity. 8. Think Mitigation: How best to ensure that the plan mitigates against increasing the carbon load of the plan over its lifetime and beyond in buildings, infrastructure and transport. 9. Think Adaptation: How best to ‘design-in’ adaptation for climate change in buildings, infrastructure and transport. 10. Construction Waste Hierarchy: Reuse, Renovate, Demolish (first to last). 11. Biodiversity: Every development must have a biodiversity plan. Soil sealing must be minimised. 	<p>The CE notes the issues raised.</p> <p>Recommendation: Amend Policy Objective CA01 to read as follows: “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 <u>Plan 2021</u> and Low Carbon Development Act”.</p> <p>Policy BD 11, BD 12 and BD14 promote biodiversity enhancement in development management.</p> <p>Recommendation No change to Draft Plan</p>

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	<p>12. Minimum density guidelines must be followed for all types of housing development to ensure compact growth, to avoid soil sealing and maximise efficiency of infrastructure.</p> <p>13. Encourage 3rd party verification of all principles set out above and go beyond minimum standards. Local Authorities have a responsibility to lead by example. Encourage use of tools such as Home Performance Index, Passive House, BREEAM and LEED certifications on all developments. A number of toolkits and recommendations are proposed to deliver national targets on decarbonisation. These include:</p> <ul style="list-style-type: none"> • Measuring carbon across the full life cycle of buildings; • Sustainable homes, buildings and neighbourhoods; • Beyond net zero carbon buildings; • Reuse and renovation; • Planning for climate mitigation and adaptation; • Measuring carbon in the built environment; • Development management standards; • Development contributions; • Performance management indicators for development plans; and, • Green infrastructure. 	
<p>WFD-C2-14</p>	<p>Submission raises concerns with regards to widening of rural roads which increases speed and reduces biodiversity through hedgerow and grass verge removal. The submission also highlights the need to focus on retaining the natural functions of floodplains, hedgerows and corridors to protect our habitats and our watercourses. The submission calls for additional tree planting and habitat protection, enhancement and restoration, and call for a ban on pesticides and offending chemicals substances at source.</p>	<p>The CE notes the issues raised.</p> <p>Policy Objectives BD01, BD02, BD04, BD11, BD12, BGI01, BG02 and BG103 support this approach. Biodiversity objectives are also a key part of the Waterford Climate Adaptation Plan implementation of which is supported by Policy CA 01.</p> <p>Recommendation No change to Draft Plan</p>
<p>WFD-C2-</p>	<p>The Draft Development Plan needs to address the retention and enhancement of biodiversity assets to address the climate</p>	<p>The CE notes the issues raised.</p>

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26	<p>habitat and biodiversity crisis. In particular the protection of many small areas of habitat that exist between newly zoned residential areas is important.</p> <p>Particular reference is made to enhancing the biodiversity value of the Garraun Stream in Tramore and the pockets of woodland and other habitats that existing in the vicinity. This would approach would support the recommendations of S5.10 regarding the use of green corridors to mitigate flood risk as set out in Appendix 13 (Strategic Flood Risk Assessment).</p>	<p>Policy Objectives BD01, BD02, BD04, BD11, BD12, BGI01, BG02 and BG103 support this approach. The Tramore LAP will be reviewed in 2022 with a similar policy framework.</p> <p>Recommendation No change to Draft Plan</p>
WFD-C2-33	<p>This submission calls for the conservation of all Native Irish Bees (including the native Black Honeybee <i>Apis mellifera mellifera</i>). In conserving the Native Bees the submission suggests that biodiversity areas should be created similar to Special areas of conservation. It asks that the movement of people in these areas be restricted, example of restrictions would be 'No hunting' or dog exercising and only pathways in these areas can be used by people.</p>	<p>The CE notes the issues raised.</p> <p>The Protection of the Irish Native Honey Bee Bill 2021 shall inform local authority policy on this issue and we await provisions of same . Waterford City and County Council has signed a framework agreement in support of the All-Ireland Pollinator Plan and is a supporter of the Native Irish Bee project through funding of bee lodges and promoting partnerships with landowners and community groups. This work will continue through the Heritage Officer Work Programme. Policies for biodiversity in Chapter 9 support protection of local biodiversity, and by protection of habitats (food sources and nesting areas) this will in turn confer protection on species.</p> <p>Recommendation No change to Draft Plan</p>
WFD-C2-38	<p>2. Dunhill Biodiversity Strategy</p> <p>The submission call for the Draft Development Plan to include the development of public, community and private spaces as areas of bio-diversity throughout the city and county and build on the fine work already completed. This submission requests the Council to adopt Dunhill Ecopark at Ballyphilip as a community based demonstration area for bio-diversity.</p>	<p>The CE notes the issues raised.</p> <p>The activity at Dunhill Eco-Park is commended and it is considered the proposal may be suitable for LEADER or Community Foundation Ireland funding as a community/social enterprise demonstrating best practise in biodiversity. Such an enterprise may proceed without requiring a site specific objective in the City and County Development Plan. Chapter 8 policies Place 07, 12 and 13 support this type of development.</p>

URN	Submission Summary	Chief Executive Response & Recommendation
	<p>There is an opportunity to produce and implement a bio-diversity plan on the site which would excite locals and visitors on possibilities of replication and the enhancement of living conditions in the area. The ecopark site of 11.5 acres is ideally suited to such a development. The site currently includes.</p> <ul style="list-style-type: none"> • 2.5 acres of integrated constructed wetlands. • East Waterford Beekeepers project • Barefoot Farms with 1.2 acres of organic edible leaves and plants • Permaculture garden site which is now unmanaged • Fruit garden site growing wild • Three polytunnels used as nursery for vegetables and plants • Patio garden recently established • Three banks of shrubberies maintained • Hedges and trees. 	<p>Recommendation No change to Draft Plan</p>
WFD-C2-105	<p>This submission requests that the Development plan includes a paragraph supporting the native Irish honey bee, <i>Apis mellifera mellifera</i>, within Waterford city and county and that specific areas be designated conservation areas for this endangered bee.</p>	<p>The CE notes the issues raised.</p> <p>The Protection of the Irish Native Honey Bee Bill 2021 shall inform local authority policy on this issue and we await provisions of same. Waterford City and County Council has signed a framework agreement in support of the All-Ireland Pollinator Plan and is a supporter of the Native Irish Bee project through funding of bee lodges and promoting partnerships with landowners and community groups. This work will continue through the Heritage Officer work Programme. Policies for biodiversity in Chapter 9 support protection of local biodiversity, and by protection of habitats (food sources and nesting areas) this will in turn confer protection on species. Waterford City and County Council may consider site specific projects for the native honey bee on sites that are within the ownership of WCCC and that have potential to support the species. Survey work will be required to confirmed site suitability.</p> <p>Recommendation No change to Draft Plan</p>

URN	Submission Summary	Chief Executive Response & Recommendation
WFD-C2-134	The submission requests that targets be included in the draft amended development plan with regards to renewable energy. It also seeks a much greater emphasis on the support for a circular economy that would undoubtedly allow those sectors to work together to achieve one decarbonisation goal for Waterford.	<p>The CE notes the issues raised.</p> <p>It is considered that the Draft Plan already supports the Circular Economy through Policy Objective UTL 12 and UTL 17. In relation to Renewable Energy Targets please see the CE response and recommendation to the OPR Submission WFD-C2-363.</p> <p>Recommendation No change to Draft Plan</p>
WFD-C2-207	The protection and designation (Landscape and habitat) afforded to the Comeragh Mountains should be extended to include the Monavullagh mountains. The extend of such designations need to be agreed through a process of direct consultation with local communities.	<p>The CE notes the issues raised.</p> <p>Designation of sites under the EU Habitats Directive is the remit of the Department of Housing, Local Government and Heritage according to the presence and representatively of Annex I Habitats and Annex II species. The boundary of the Comeragh Mountains SAC has been drawn according to agreed criteria for designation of Natura 2000 sites by the European Commission. Any land outside the SAC is subject to policies and Development Management Standards of the Development Plan in relation to the natural environment and landscape. The Monavullagh area is included in the Most Sensitive Area classification in the Landscape Character Assessment Map for Co. Waterford.</p> <p>Recommendation No change to Draft Plan</p>
WFD-C2-217	This submission requests that Whiting Bay, Goat Island and the coastal habitats in the area are not identified for tourism development and that the area is protected as an amenity.	<p>The CE notes the issues raised.</p> <p>These sites are classed as most sensitive in the Landscape Character Assessment of the plan subject to policies L02 and L03 and policies for the natural environment and DM Standards in the plan.</p> <p>Recommendation No change to Draft Plan</p>

URN	Submission Summary	Chief Executive Response & Recommendation
WFD-C2-227	<p>The submission refers to the general protection of coastline and with particular reference to the preservation and protection of the Whiting Bay area and beach. While this area is a popular visitor attraction it also has a resident population of residents, two care homes and significant agricultural assets. The existing roads in the area are not capable of safely accommodating.</p> <p>The further development of tourist attractions in the area will put increased pressure on water services, the landscape and the coast habitats and this would not be consistent with the policies set out in the draft development plan. The area should be protected to ensure future generations can enjoy its amenity.</p>	<p>The CE notes the issues raised.</p> <p>These sites are classed as most sensitive in the Landscape Character Assessment of the plan subject to policies L02 and L03 and policies for the natural environment and DM Standards in the plan.</p> <p>Recommendation No change to Draft Plan</p>
WFD-C2-242	<p>Waterford Migrant Integration Forum welcomes the Waterford City & County Development Plan 2-22 – 2-28 especially the vision of creating a more open, diverse and inclusive society. The submission seeks to ensure that future amenity and open space provision facilitates the development of an International Cultural Park demonstrating the cultural diversity of the city and county. In addition new cultures need spaces in which to engage in religious and community activities and these facilities need to be duly accommodated within our communities.</p>	<p>The CE Notes the issue raised.</p> <p>The Draft Plan supports equality and inclusiveness through a number of Policy Objectives namely SC 08W City 27.</p> <p>Recommendation No change to Draft Plan</p>
WFD-C2-292	<p>The submission raised a number of issues as follows:</p> <p>Fossil fuels and new fossil fuel infrastructure</p> <ul style="list-style-type: none"> • Prevention of the gas grid expansion and banning of fracked gas usage • Large scale fossil fuel projects should be subject to climate change impact assessment. <p>Data Centres</p> <ul style="list-style-type: none"> • These development types have a huge energy demand and any proposals should only be considered acceptable where 	<p>The CE notes the issues raised.</p> <p>It must be noted that the Draft Plan is consistent with National and Regional Policy and Ministerial Guidelines as well as supporting the NPF, RSES, National Climate Adaptation Strategy and the Waterford Climate Adaptation Strategy with regards to climate action policies.</p> <p>Recommendation No change to Draft Plan.</p>

URN	Submission Summary	Chief Executive Response & Recommendation
	they provide their own energy. Added benefits of district heating should be provided for as part of any development proposal.	
WFD-C2-292	<p>Water and Water Quality</p> <ul style="list-style-type: none"> • Increased water capacity is required to prevent cut off of supply in periods of dry weather • Concrete groins at Cheekpoint should be removed from the river. • Discharge of untreated waste water to the River Suir at Passage East must be addressed. 	<p>The CE notes the issues raised.</p> <p>Chapter 9 deals with Water Quality issues. Issues raised will usefully inform public consultation on the Third River Basin Management Plan 2021-2027.</p> <p>Recommendation No change to Draft Plan.</p>
WFD-C2-318	<p>This submission relates to pollution issues in the Waterford Estuary which is categorised as an emergency.</p> <p>The submission states that the Waterford City & Council draft plan has many fine ambitions but no actions or plans that would be regarded and required in an emergency which is the current status of the Waterford Estuary.</p> <p>The volume of water in the rivers and Waterford Estuary are no longer able to cope with the amount of pollution being discharged. The EPA and Statutory bodies all know this.</p>	<p>The CE notes the issues raised.</p> <p>This is a regulatory issue for the EPA and will usefully inform public consultation on the Third River Basin Management Plan.</p> <p>Recommendation No change to Draft Plan.</p>
WFD-C2-327	<p>The submission seeks to raise awareness and improve the nesting conditions of the Swift population.</p> <p>It is suggested that a Policy addition similar to that used in the Kildare County Development Plan be incorporated into the final Waterford City and County Development Plan.</p> <p>GI 27-Requires all new developments to identify,protect and enhance ecological features by making provision for local biodiversity (e.g.,through provision of Swift nest boxes or towers, bat boxes, green roofs, etc) and providing links to wider Green Infrastructure network as an essential part of the</p>	<p>The CE notes the issues raised.</p> <p>Recommendation Additional policy to be included in Chapter 11 pg 228 as Policy BH09 in Section 11.5 Ecological Impact Assessment <u>"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 or nesting birds. The incorporation of biodiversity enhancement measures shall be a requirement in repair works to existing or design of new developments"</u>.</p>

URN	Submission Summary	Chief Executive Response & Recommendation
	design process	
WFD-C2-353	<p>The submission outlines the importance of the Irish Swift population and suggests some additional policy similar to that included in the Kildare County Development Plan in order to raise awareness and provide positive results for locally nesting Swifts</p> <p>GI 27 - Requires all new developments to identify, protect and enhance ecological features by making provision for local biodiversity (e.g. through provision of Swift nest boxes or towers, bat boxes, green roofs, etc) and providing links to wider Green Infrastructure network as an essential part of the design process.</p>	<p>The CE notes the issues raised.</p> <p>Recommendation See recommendation to Submission WFD-C2-327.</p>
WFD-C2-354	<p>Section 9.1 – Climate Change we believe that offshore renewable energy should have a specific mention in this section.</p>	<p>The CE notes the issues raised.</p> <p>Contribution of off-shore wind along with other forms of renewable energy are addressed in the Waterford Renewable Energy Strategy. UTL 13 includes ancillary support infrastructure facilities for renewable energy generation.</p> <p>Recommendation No change to Draft Plan.</p>
WFD-C2-365	<p>The Co. Waterford Beekeepers' Association seek to protect and conserve, propagate and promote the native Irish honey bee, Apis mellifera mellifera. It is requested that County Waterford is designated a conservation area for Apis m. Mellifera in accordance with The All Ireland Honey Bee Strategy 2021-2025, (which slots into the All Ireland Pollinator Plan, 2021 – 2025).</p>	<p>The CE notes the issues raised.</p> <p>The Protection of the Irish Native Honey Bee Bill 2021 shall inform local authority policy on this issue and we await provisions of same. Waterford City and County Council has signed a framework agreement in support of the All-Ireland Pollinator Plan and is a supporter of the Native Irish Bee project through funding of bee lodges and promoting partnerships with landowners and community groups. This work will continue through the Heritage Officer work Programme. Policies for biodiversity in Chapter 9 support protection of local biodiversity, and by protection of habitats (food sources and nesting</p>

URN	Submission Summary	Chief Executive Response & Recommendation
		<p>areas) this will in turn confer protection on species. Waterford City and County Council may consider site specific projects for the native honey bee on sites that are within the ownership of WCCC and that have potential to support the species. Survey work will be required to confirmed site suitability.</p> <p>Recommendation No change to Draft Plan.</p>
<p>WFD-C2-375</p>	<p>Chapter 9</p> <p>WEI highlights that in order to decarbonise we must develop offshore wind energy (OWE) in large volumes and as quickly as possible. The original Climate Action Plan set a target for 3.5 GW of offshore wind – roughly 5-7 wind farms – by 2030 with the Programme for Government setting out an enhanced target of 5 GW. The sustainable development of offshore wind can provide significant socio-economic opportunities for coastal communities like those in Co. Waterford. We would encourage WCC to note this in the County Development Plan. According to the SEAI's Wind Energy Roadmap, onshore and offshore wind could create thousands of operation and maintenance jobs by 2040[3]. While the Carbon Trust estimate that over 2,500 direct jobs in Ireland could be created during the development of 3.5GW of offshore wind, a target which now stands at 5GW.</p> <p>WEI recommends the inclusion of a policy in support of the development and expansion of the electricity transmission and distribution grid and facilitates the development of landing locations for offshore generated wind energy. Policy recommendations include:</p> <ul style="list-style-type: none"> • Alignment between national, regional and local planning policies is of critical importance to all those involved in infrastructure development. 	<p>The CE notes the issues raised.</p> <p>Renewable Energy Strategy Policy Objective UTL 13 has been amended with regards to supporting: Off-shore wind potential (Please see CE response to Submission No. WFD-C2-373) Operation & Maintenance and Transmission & Distribution (Please see CE response to Submission No. WFD-C2-354)</p> <p>Recommendation No change to Draft Plan.</p>

URN	Submission Summary	Chief Executive Response & Recommendation
	<ul style="list-style-type: none"> • WEI believes that offshore wind energy can act as an enabler to unlock new infrastructure investment in ports. Waterford should include a policy which commits to facilitating the development of offshore wind operation and maintenance bases. • WEI recommends the inclusion of a policy in support of the development and expansion of the electricity transmission and distribution grid and facilitates the development of landing locations for offshore generated wind energy. 	
WFD-C2-377	<p>The submission calls for the conservation of the native Irish honey bee, <i>Apis mellifera mellifera</i> in Waterford City and County and requests that Waterford County is designated a conservation area for <i>Apis m. Mellifera</i></p> <p>Waterford City and County Council should encourage the conservation of this genetic resource, through promotion and the allocation of areas for Amm breeding, within the county. The importation of honey bees and other strains of honey bees to the county should be discouraged.</p>	<p>The CE notes the issues raised.</p> <p>Waterford City and County Council has signed a framework agreement in support of the All-Ireland Pollinator Plan and is a supporter of the Native Irish Bee project through funding of bee lodges and promoting partnerships with landowners and community groups. This work will continue through the Heritage Officer work Programme. Policies for biodiversity in Chapter 9 support protection of local biodiversity, and by protection of habitats (food sources and nesting areas) this will in turn confer protection on species. Waterford City and County Council may consider site specific projects for the native honey bee on sites that are within the ownership of WCCC and that have potential to support the species. Survey work will be required to confirmed site suitability.</p> <p>Recommendation No change to Draft Plan.</p>
WFD-C2-380	<p>This submission sets out a proposal to revise the Development Plan and re-name it a 'Survival Plan'. The submission sets out seven key steps to achieving the changes needed:</p> <ol style="list-style-type: none"> 1) Put a Survival Plan in place of the Development Plan. 2) Make the Survival Plan an Action Plan in response to the IPCC AR6 2021 	<p>The CE notes the issues raised.</p> <p>A number of the issues raised are considered not development plan issues. However, it must be noted that the draft plan has been informed by a Strategic Flood Risk Assessment, Strategic Environment Assessment, has incorporated at a high level Agenda 2030 Sustainable Development Goals as well as taking into account our own Waterford Climate Action Plan as well as</p>

URN	Submission Summary	Chief Executive Response & Recommendation
	<p>3) Use what WCCC already has in place and build on it, like its Climate Change Adaptation Strategy as an Action Plan for Survival.</p> <p>4) WCCC Councillors and staff need to shift their mindset into Survival Action Plan mode from here until 2030</p> <p>5) Read the Alex Steffen report on How climate change and the planetary crisis are changing what works.</p> <p>6) Adapt the conclusions of the IPPCC AR6 into the Survival Plan</p> <p>7) Be prepared for the climate change restrictions that are going to have to be imposed on us all if we are going to survive past 2030 and until 2050.</p> <p>The submission contends that the whole development plan needs to be rewritten as the WCCC Survival Plan - the submission sets out examples of sections of where this is possible.</p>	<p>the Waterford City Decarbonising Zone(W City 20).</p> <p>The Draft Plan is also consistent with National and Regional Policy and Ministerial Guidelines as well as supporting the NPF, RSES, National Climate Adaptation Strategy and the Waterford Climate Adaptation Strategy with regards to climate action policies.</p> <p>Recommendation No change to Draft Plan</p>
WFD-C2-418	<p>The submission highlights a list of effects that are likely to occur over temperature increases between 1.5-6 Degrees Celsius.</p>	<p>The CE notes and welcomes the issues raised.</p> <p>Recommendation No change to Draft Plan</p>

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

URN	Submission Summary	Chief Executive Response & Recommendation
WFD-C2-58	<p>This submission requests that Waterford City and County Council match fund the contribution made by the Geological Survey of Ireland to the running of the The Copper Coast UNESCO Global Geopark and make this a policy objective within the Draft Development Plan. The submission highlights that the return on investment for doing so would be immense compared to the cost of attempting to either restore the Copper Coast designation where it was lost or to fund an alternative project in the area.</p>	<p>The CE Notes the issue raised.</p> <p>Recommendation Amend Policy G02 on page 215 to; We will <u>protect and support</u> promote the geological heritage of the UNESCO Copper Coast Geopark and support the work of the Geopark to ensure it retains and adds value to its designation status as a UNESCO Geopark.</p>
WFD-C2-113	<p>The submission requests that any design of any future signage in the Comeragh Mountain consider the use of information panels as appropriate to highlight the significance of a County Geological Site or an area of geological and/or geomorphological interest that are in the vicinity of waymarked and signposted walking routes/trails.</p>	<p>The CE Notes the issue raised.</p> <p>Heritage Policy 01 seeks To implement and review the Waterford Heritage Plan in partnership with all relevant stakeholders and subject to available resources. Action 3.1.7 of the Heritage Plan seeks to promote the heritage interest of existing, developing and future trails and route-ways.</p> <p>Recommendation No change to Draft Plan.</p>
WFD-C2-113	<p>The submission suggests that the Coastal Vulnerability Index datasets will be of benefit to Section 10.1 Coastal Zone Management and Marine Spatial Planning, and Coast and Marine policy objectives C&M 01 to C&M 06 of Chapter 10: Landscape, Coast/ Marine and Blue Green Infrastructure of the draft Development Plan.</p> <p>It submits that it would also be of benefit to Rural and Marine Policy Objectives Marine Development, (ECON 16) and SIFP for Waterford Estuary, (ECON 17), in Chapter 4: Economy, Tourism, Education and Retail of the draft Development Plan.</p>	<p>The CE Notes the issue raised.</p> <p>GSI datasets on Coastal Vulnerability to be incorporated to the WCCC internal GIS.</p> <p>Recommendation Additional text to be included at the end of paragraph 1 in Section 10.1 on page 213 as follows <u>Useful resources in planning for coastal development includes the Coastal Vulnerability Index (CVI) and coastal vulnerability mapping produced by Geological Survey Ireland indicates the susceptibility of the Irish coast to adverse impacts of sea level rise.</u></p>

URN	Submission Summary	Chief Executive Response & Recommendation
		<p>Amend policies C& M01 and C& M03 as follows;</p> <p>C& M01 Protecting our Coast and Marine All development proposals will be required to comply with standards and legal requirements of the following where they apply;</p> <p>National Seascape Character Assessment NMPF National Marine Planning Framework Marine Planning and Development Management Bill 2021 and Act when finalised.</p> <p>Geological Survey Ireland Coastal Vulnerability Index (CVI)</p> <p>C& M03 To incorporate the findings of the National Seascape Assessment and the Geological Survey Ireland Coastal Vulnerability Index (CVI) with the Waterford Landscape Character Assessment to inform future management and sustainable development of the Waterford coast and maritime area.</p>
WFD-C2-162	This submission welcomes the inclusion of the Coast and Marine Policy Objective – C & M 06 Public Coastal Access.	<p>The CE Notes the issue raised.</p> <p>Recommendation No change to Draft Plan.</p>
WFD-C2-188	This submission states that Save Boithrin na Lachan, Curragh, Ardmore, Co. Waterford is a public right of way and would request it to be recognised under the Planning and Development Act 2000 (as amended) and to be registered on the planning authority register of the relevant local authority.	<p>The CE Notes the issue raised.</p> <p>Recommendation See Response to OPR Submission Ref WFD-C2-363 where the issues raised are addressed.</p>
WFD-C2-189	This submission states that Cockle Lane, The Backstrand, Co. Waterford is a public right of way and would request it to be recognised under the Planning and Development Act 2000 (as amended) and to be registered on the planning authority register of the relevant local authority.	<p>The CE Notes the issue raised.</p> <p>Recommendation See Response to OPR Submission Ref WFD-C2-363 where the issues raised are addressed.</p>
WFD-C2-207	The protection and designation (Landscape and habitat) afforded to the Comeragh Mountains should be extended to include the Monavullagh mountains. The extend of such	<p>The CE notes and agrees the issues raised.</p> <p>Designation of sites under the EU Habitats Directive is the remit of the</p>

URN	Submission Summary	Chief Executive Response & Recommendation
	designations need to be agreed through a process of direct consultation with local communities.	<p>Department of Housing, Local Government and Heritage according to the presence and representatively of Annex I Habitats and Annex II species. The boundary of the Comeragh Mountains SAC has been drawn according to agreed criteria for designation of Natura 2000 sites by the European Commission. Any land outside the SAC is subject to policies and Development Management Standards of the Development Plan in relation to the natural environment and landscape. The Monavullagh area is included in the Most Sensitive Area classification in the Landscape Character Assessment Map for Co. Waterford.</p> <p>Recommendation No change to Draft Plan</p>
WFD-C2-221	<p>The submission specifies a number of amendments to the draft plan in relation to the following:</p> <p>2. Landscape/Seascape - Revisit the LCA to take cognisance of the impact of large scale commercial wind energy development on the landscape/seascape;</p> <p>3. Coillte Lands - Coillte lands should be recognised for their potential to address Climate Change.</p> <p>4. Blackwater Valley - The vision of the Plan should include an overarching objective to champion the promotion and secure the designation of the Blackwater Valley as a UNESCO World Heritage Site. Add a new Core strategy policy objective as follows: CS17 Support the promotion and secure the designation of the Blackwater Valley as a UNESCO World Heritage Site.</p> <p>5. Blueways - • Amendments to policy objectives relating to greenways and blueways.</p>	<p>The CE notes and agrees the issues raised.</p> <p>2) Review of Landscape Character Assessment and Wind Energy Suitability Maps complete and address issues raised.</p> <p>3) Management of Coillte lands is subject to the Forestry Act and role of local authority is limited to referral role in afforestation and clearfelling applications.</p> <p>4) The heritage value of the Blackwater Valley is acknowledged. The local authority have no plans to propose the area as a UNESCO World Heritage Site and the site was not put forward under the call for sites to be included in the Tentative List by the Department of Heritage in 2021.</p> <p>5) Issue of Jetskis is noted and will be explored in Feasibility Study for the Blackwater Blueway.</p> <p>Recommendation No change to Draft Plan</p>
WFD-C2-255	The submission requests that the entire Comeragh Mountain area be identified as a Special Area of Conservation.	<p>The CE notes and agrees the issues raised.</p> <p>Designation of sites under the EU Habitats Directive is the remit of the Department of Housing, Local Government and Heritage according to the</p>

URN	Submission Summary	Chief Executive Response & Recommendation
		<p>presence and representatively of Annex I Habitats and Annex II species. The boundary of the Comeragh Mountains SAC has been drawn according to agreed criteria for designation of Natura 2000 sites by the European Commission. Any land outside the SAC is subject to policies and Development Management Standards of the Development Plan in relation to the natural environment and landscape.</p> <p>Recommendation No change to Draft Plan</p>
WFD-C2-334	<p>The observation is that Waterford City and County Council (the Council), each year, for the duration of County Development Plan, clean a section of the riverbed, from the Scotch Quay to the Blackrock (aka Sheep's Bridge, near the Tramore road roundabout on the outer ring road). With an initial focus of the section at the Waterside, as this would have the greatest impact.</p>	<p>The CE notes and agrees the issues raised.</p> <p>This proposal is subject to resources available from the Environment Section. Protection of river water quality is covered by policies WQ1, WQ2 and WQ3 in Chapter 9 of the Draft Development Plan.</p> <p>Recommendation No change to Draft Plan</p>
WFD-C2-354	<p>Section 10.1 – Coastal Zone Management & Marine Spatial Planning recommend that an additional Policy Objective be included as follows: “C&M 07 Offshore Renewable Energy Development in the Coastal Zone. We will support and facilitate offshore wind projects, such as the 1GW Inis Ealga Marine Energy Park, and the required supporting infrastructure in the development of coastal zone planning, development control and management strategies.”</p>	<p>The CE notes and agrees the issues raised.</p> <p>Contribution of off-shore wind along with other forms of renewable energy are addressed in the Waterford Renewable Energy Strategy. UTL 13 includes ancillary support infrastructure facilities for renewable energy generation.</p> <p>Recommendation No change to Draft Plan</p>
WFD-C2-372	<p>The submission requests the following policies to be included in Chapter 10: > BG18 - We will support the development of the wider natural environment to promote outdoor recreation. This consideration will also take account of the type of activities</p>	<p>The CE notes and agrees the issues raised.</p> <p>Recommendation Include additional policies on page 221 BG18" To promote outdoor recreation and increase access to the natural environment</p>

URN	Submission Summary	Chief Executive Response & Recommendation
	<p>towards which adults are increasingly gravitating such as running, cycling, outdoor adventure pursuits, recreational walking, etc.</p> <p>> BG 19 - We will ensure that accessibility is taken in account at planning and design stage in the development of all outdoor recreation facilitates to ensure that there are opportunities for everyone to engage in the outdoors and facilities are developed for them to do so.</p> <p>> BG 20 – We will, by providing data, support the development of the National Digital Database of Sport and Recreational Amenities in Ireland with initial focus on Outdoor Recreation.</p>	<p><u>BG19 "We will ensure that accessibility is taken in account at planning and design stage in the development of all outdoor recreation facilitates to ensure that there are opportunities for everyone to engage in the outdoors and facilities are developed for them to do so."</u></p> <p>It is considered that the National Digital Database of Sport and Recreational Amenities in Ireland is not a Development Plan issue.</p> <p>Recommendation No change to Draft Plan</p>
WFD-C2-374	<p>The submission provides a number of suggested policy amendments and additions to Chapter 10 from the WCCC Trails Officer.</p> <p>Requests that the Plan separates our recreational trails and any published list of Rights of Way.</p> <p>Asks that the full and final list of recreational walks and cycles is included in the final Co. Development plan along with maps if possible.</p>	<p>The CE notes and agrees the issues raised.</p> <p>Table 10 Waterford Walking Trails will be included in Appendix 11of the Plan with illustrating maps. The response and recommendation to WFD-C2-363 should be noted in this regard. That response and recommendation has also proposed amendments to policy objective BG10 which will seek to protect Prow and develop better knowledge of this asset during the lifetime of the Plan.</p> <p>Recommendation No further amendment recommended to the draft Plan on foot of this submission.</p>
WFD-C2-375	<p>Chapter 10 WEI would recommend in policy 'C&M 02' to provide clear direction on the support to infrastructure to promote safe and efficient marine businesses i.e. marine renewable developments with coastal and onshore core and ancillary infrastructure including operations and maintenance bases.</p>	<p>The CE Notes the issue raised.</p> <p>Recommendation Please see CE's recommendation to submission number WFD-C2-373 in particular the update to Policy Objective UTL 13.</p>

URN	Submission Summary	Chief Executive Response & Recommendation
	<p>It is suggested that guidance is published for policy C&M 04. WEI further recommends that an additional Policy Objective be included as follows:</p> <p>“C&M 07 Offshore Renewable Energy Development in the Coastal Zone. We will support and facilitate offshore wind projects and the required supporting infrastructure in the development of coastal zone planning, development control and management strategies.”</p>	
<p>WFD-C2-379</p>	<p>5. Helvick Head – Pier and Lifeboat access</p> <p>The submission calls for the improvement of pier facilities and lifeboat access in Helvick</p>	<p>The CE notes and agrees the issues raised.</p> <p>Proposal is subject to capital funding. Policy ECON 16 covers marine development.</p> <p>Recommendation No change to Draft Plan</p>
<p>WFD-C2-379</p>	<p>6. Dunmore Harbour Processing</p> <p>The submission calls for the development of and Innovation Centre in Dunmore Harbour and requests that idle buildings in the harbour complex are prioritised for development</p>	<p>The CE notes and agrees the issues raised.</p> <p>Proposal is subject to capital funding. Policy ECON 16 covers marine development.</p> <p>Recommendation No change to Draft Plan</p>
<p>WFD-C2-468</p>	<p>The submission is focused upon how the Plan can be improved in areas relating to access to and protection of our heritage, the countryside and the provision of walking and cycle routes for recreational purposes. A number of Policy interventions and additions are included and examples are drawn upon from a number of other Local Authority Development Plans.</p> <p>The submission notes concern that a number of policy</p>	<p>The CE notes and agrees the issues raised. The response and recommendation relating to WFD-C2-374 and WFD-C2-363 should be noted also.</p> <p>Recommendation No further amendment recommended to the draft plan on foot of this submission.</p>

URN	Submission Summary	Chief Executive Response & Recommendation
	objectives from the 2011 County Plan have not been carried forward to the Draft Plan.	

3.2.10 Chapter 11 – Heritage

URN	Submission Summary	Chief Executive Response & Recommendation
<p>WFD -C2- 116</p>	<p>The submission outlines the following amendments to the draft plan:</p> <ol style="list-style-type: none"> 1) The relevant Government Department responsible for the protection of the archaeological heritage in the development plan should be amended to read “Department of Housing, Local Government & Heritage” as the National Monuments Service has been transferred into that particular Department. 2) Objective AH 03 ‘Preservation of Archaeological Material 3) Objective AH 05 Waterford City Walls and Towers 4) Objective AH 09 Community Archaeology 5) Recommends that the content of the Record of Monuments & Places for the planning area covered by Waterford City & County Development Plan be included as an appendix - including the link to the legal RMP documents at www.archaeology.ie. 6) Historic Towns likely to contain subsurface archaeological deposits associated with their early settlement, or the incorporation of early features in what are considered to later/modern structures, have also been identified and included in the RMP. 7) The Plan, however, lacks sufficient detail in regard to describing underwater cultural heritage and in including it in strategic sections within the Plan. 	<p>The CE welcomes the detailed submission from the Department of Housing, Local Government and Heritage and notes the issues raised. The wording as proposed by the Department shall be used and additional text with regard to underwater archaeology shall be included</p> <p>Recommendation The Sites and Monuments Record (SMR), which contains details of all monuments and places (sites) where it is believed there is a monument, has been provided by National Monuments Service, Department of Housing Local Government and Heritage. The SMR list and the link to https://maps.archaeology.ie, shall be included as a new Appendix 22, appended to this report.</p> <p>Changes to text in Chapter 11 11.17 Archaeology The archaeological heritage of Waterford is unique and a special resource, which forms a distinctive element of the landscape and local identity. The archaeological heritage is composed of structures, constructions, groups of buildings, developed sites, all recorded monuments as well as their contexts, and moveable objects, situated both on land and under water. The National Monuments Acts 1930 – 2004 provide for the protection of archaeological heritage. The principles set out in the <i>Framework and Principles for the Protection of the Archaeological Heritage</i> provide the national policy framework in relation to archaeological heritage <i>Archaeology in the Planning Process</i>, OPR and Department of Housing, Local Government and Heritage (2021) is a guide to understanding the issues which will arise in the planning process when development is proposed which might affect our archaeological heritage. archaeological sites and monuments are legally protected by way of inclusion in the statutory Record of Monuments and Places, established under Section 12 of the National Monuments</p>

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		<p>(Amendment) Act 1994. The Record of Monuments and Places (RMP) maps and details of the monuments can also be viewed as a layer on the Historic Environment Viewer at https://maps.archaeology.ie/HistoricEnvironment/</p> <p><u>Historic Towns are likely to contain subsurface archaeological deposits associated with their early settlement, or the incorporation of early features in what are considered to later/modern structures, have also been identified and included in the RMP. The RMP maps identify these Historic Towns and have de-lined a 'Zone of Archaeological Potential' (ZAP) around each town within which archaeological features/structures/sub-surface deposits are likely to be present. Historic wrecks are included in the Historic Wreck Viewer (www.archaeology.ie).</u></p> <p><u>Page 236</u></p> <p>AH03 Preservation of Archaeological Material</p> <p>It is the policy of the Council to secure the preservation 'in situ' (or where this is not possible or appropriate, as a minimum, preservation by record) of all archaeological monuments included in the Record of Monuments (Amendment) Act, 2000 and sites, features and objects of archaeological interest that become revealed through development activity. In securing such preservation, the Planning Authority will fully take into account the advice and recommendations of the relevant Government Department of Tourism, Culture, Arts, Gaeltacht, Sport and both in respect of whether or not to grant permission and in respect of the conditions to which permission, if granted, should be subjected.</p> <p><u>Waterford City & County Council shall, in an appropriate manner, secure either by preservation in-situ or preservation-by-record, the archaeological heritage. In this regard priority shall be given to the preservation in-situ of any archaeological monument/site/place as the first option considered. If preservation in-situ cannot be achieved, or can only be achieved in-part, then preservation-by-record of elements of the archaeological heritage will be</u></p>

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		<p><u>required –this will require the full archaeological excavation and recording of the monument/site, according to best professional practice. Where excavation is required this shall also include the preparation of appropriate reports, post-excavation analyses and publications. The costs of assessing and mitigating archaeological impacts shall form part of development costs as borne by the developer.</u></p> <p><u>Page 237</u></p> <p>AH04 Archaeological Impact Assessment <u>considerations</u></p> <p>It is the policy of the Council to:</p> <p><input checked="" type="checkbox"/> Ensure that development in the vicinity of a site of archaeological interest shall be designed and sited sympathetically and shall not be detrimental to the character of the archaeological site or its setting by reason of its location, scale, bulk or detailing. Where development is proposed within or in the vicinity of National Monuments the developer should consult and to have regard to the advice and recommendations of the National Monuments Service/ Department of Housing, Local Government and Heritage. Ministerial Consent may be required to proceed under Section 14 of the National Monuments Acts.</p> <p>> When considering development in the vicinity of all archaeological sites including remnants of the city and town walls, the planning authority will require the preparation of an archaeological assessment detailing the potential impact of any development on upstanding structures, buried structures and deposits. The report will also include a visual impact assessment to ensure adequate consideration of any potential visual impact the proposed development may have on any upstanding remains.</p> <p>> Proposed developments will be required to retain the existing street layout, including laneways, historic building lines and traditional plot widths where these derive from medieval or earlier origins.</p> <p>> When considering development in the vicinity of upstanding</p>

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		<p>archaeological/historical monuments, to aim to achieve a satisfactory buffer area between the development and the monument in order to ensure the preservation and enhancement of the amenity associated with the presence of upstanding monuments within the historic urban pattern.</p> <p>> For all developments, which have potential to impact on riverine, intertidal and sub-tidal environments to require an archaeological assessment prior to works being carried out.</p> <p><u>In addition to planning permission, development works at National Monuments of which the Minister or local authority is owner of, guardian of or in respect of which a preservation order is in force, may also require Ministerial Consent under Section 14 of the National Monuments Act 1930 (as amended) and this will be determined by the relevant authority (Department of Housing, Local Government & Heritage) on application.</u></p> <p><u>Page238</u></p> <p>AH05 Waterford City Walls and Towers</p> <p>We will protect the essential character and setting of the City Walls and Towers through the control of the design, location and layout of new development in their vicinity and through the control of changes of use of lands, by the protection of adjoining streetscapes and site features where appropriate and by protecting important views to and from the walls and towers from obstruction and/or inappropriate intrusion by new buildings structures, plant and equipment, signs and other devices; and where opportunities arise to create additional views of the walls and towers. We will continue to protect enhance and promote the City Walls by updating the City Walls Plan (2014) and implement an Interpretation Strategy <u>Plan</u> for Waterford Medieval City Walls and Towers.</p> <p><u>Page 240</u></p> <p><u>11.21Underwater Archaeology.</u></p> <p><u>Underwater environments may contain very well preserved archaeological</u></p>

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		<p><u>sites, monuments and objects which are completely invisible from the surface. The potential for underwater archaeology in Waterford is not just along the coasts and the banks of large Rivers such as the Suir and Blackwater but other freshwater and marine environments along quays in urban and rural areas, historic fording points over rivers and streams , estuaries, and flood plains. The Historic Wreck Viewer (www.archaeology.ie) notes finds such as the 5 wooden wrecks exposed at low tide at Tramore, 16th and 17th century wrecks in Waterford Harbour. Finds such ship timbers from excavations within the city, artefacts such as anchors and cannons have also been discovered. With underwater heritage can be exposed and/or impacted upon by improvement works along any waterways, harbour developments, marina developments, harbour dredging and dumping at sea, waterfront expansions, reclamation and excavations. Our underwater cultural heritage has to be acknowledged and protected</u></p> <p>AH10 Underwater archaeology <u>To preserve the integrity of existing and potential underwater archaeological sites and monuments in their setting and to ensure that development in the vicinity of a site of archaeological interest does not physically impact the character, there is a requirement to undertake Underwater Archaeological Impact Assessment (UAIA).</u></p>
WFD -C2- 135	The submission requests that the Council work in partnership and commit to exploring ways to preserve and promote the built heritage, leveraging it for all the benefits it brings, both social and economic. A good starting point would be the designation of the railway route as a Proposed Architectural Conservation Area protecting the bridges, existing buildings and and track bed infrastructure for future generations.	<p>The CE welcomes the proposals to promote the WSVR and the Greenway. It is considered that the wording of existing Draft Plan, in combination with all other Policy objectives as set out within Chapter 11: Heritage industrial heritage BH 20 and 21 and ACAs BH05 protect elements of the built heritage. The executive will consider the Greenway as part of the need to establish additional areas for designation as ACAs as is proposed for Demesnes under BH18</p> <p>Recommendation No change to Draft Plan</p>
WFD	The submission requests that the draft amended plan include	The CE welcomes the detailed submission. It is considered that the wording of

URN	Submission Summary	Chief Executive Response & Recommendation
-C2-143	a defined policy on continued and increased protection of built heritage, over the lifetime of the plan.	<p>in the existing Draft Plan, in combination with all other Policy objectives as set out within Chapter 11: Heritage, addresses the subject matter of this submission.</p> <p>Recommendation No change to draft plan</p>
WFD -C2-198	The submission seeks to further improve the built heritage of Villierstown by improving the public realm and ensuring any works/developments in the village do not detract from the ACA and setting of Protected Structures	<p>The CE notes the issues raised in the submissions. It is considered that the wording in the existing the Draft Plan, in combination with all other Policy objectives such as BH 05, BH 10, BH11 and BH29 as set out within Chapter 11: Heritage, addresses the subject matter of this submission.</p> <p>Recommendation No change to Draft Plan</p>
WFD -C2-201	<p>The submission states that a separate heading should be given in reference to the language heritage of the County and of the Gaeltacht area - reference should also be made to the Language Plan of na Déise. An tÚdarás looks forward to collaborating with the Council while implementing the language plans, in particular those relating to signage, delivery of services and planning and physical development. The submission request that the plan make particular reference to "the support Waterford County Council will provide to its language planning area in the county (na Déise and Dungarvan) and to make provisions in relation to the specific abovementioned measures and other measures which will arise as the process develops and when the Gaeltacht Service Town Language Plan of Dungarvan is sanctioned".</p> <p>An tÚdarás has developed a brand for the Gaeltacht. The submission request that the brand be recognised within the draft plan in order to promote the concept throughout the County and nationwide.</p>	<p>The CE notes and agrees with the issue raised.</p> <p>The Draft Plan supports the language plan for Gaeltacht na Déise and includes a Language Enurement Clause (LEC). It is the intention of the Council to prepare Local Area Plan's for Gaeltacht na Déise during the lifetime of the Development Plan. This process is likely to take place during 2024 when the Language Plan is being reviewed. The LAP plan-making process will incorporate a more detailed assessment of the Gaeltacht and it is felt that the unique language will be further strengthened during this process.</p> <p>Recommendation No change to Draft Plan</p>

URN	Submission Summary	Chief Executive Response & Recommendation
	<p>The submission states that it is necessary for the Council to have a strong language policy which would include the need for the community to continuously increase the number of Irish speakers who speak Irish daily, when sanctioning housing developments in the language planning area.</p>	
<p>WFD -C2- 288</p>	<p>The submission stresses that careful attention should be given to the future development of rural villages and in particular Villierstown and the Architectural Conservation Area. Public lighting should be appropriate and open spaces should be retained and enhanced for community benefit.</p>	<p>The CE notes the submission made with regard to ACA for Villierstown/ notes the issues raised in this submission. It is considered that the wording of existing the Draft Plan, in combination with all other Policy objectives such as BH 05 BH 10 and BH11 as set out within Chapter 11: Heritage addresses the subject matter of this submission.</p> <p>Recommendation No change to Draft Plan</p>
<p>WFD -C2- 283</p>	<p>The submission identifies the historic, archaeological, cultural and economic importance of Creadan and Waterford Estuary as one of Ireland's earliest human habitation sites. There is a need to work collaboratively to protect, conserve and consolidate our scientific understanding of the prehistory of the area given the vulnerable and exposed location of Creadan and the need for heritage related climate adaptation initiatives. Five key areas are identified for inclusion/enhancement in the draft development plan: Cultural landscape and access protection; Climate adaptation and cultural landscape heritage; Specific Archaeological, Geological and Environmental Heritage protection; Embedding a creative approach towards our cultural landscape through incentivised innovation and design thinking; and, Sustainable economic development specifically related to Creadan and the Waterford Estuary area.</p>	<p>The CE notes the issues raised</p> <p>The heritage significance of Creadan Head is recognised by Waterford City and County Council as supported through the Creadan Head Feasibility Study and representation on the project steering committee. Planning control in the area is guided by designation of the coastal zone as an area of most sensitive landscape character and Development Management Standards whilst Waterford Estuary is designated a SAC and development and activities therein are subject to Part X AB of the Planning and Development Act (as amended) and the 2011 Birds and Habitats Regulations. The National Monuments Act provides protection for the Archaeological Heritage and the Waterford Climate Adaptation Strategy includes actions (5.1 and 5.2) to expand ways to capitalise on new archaeological finds which have resulted from climate change impacts and to integrate climate change considerations and future risks into the maintenance of heritage structures and sites in the county. In this regard the regulatory and policy framework is considered robust for the conservation and enhancement of the heritage value of Creadan Head. The merit in recognising cultural landscapes is acknowledged</p>

URN	Submission Summary	Chief Executive Response & Recommendation
		<p>but in the absence of national guidelines on identification, assessment and designation it is considered this issue is more appropriately progressed under the National Landscape Strategy at a Department level. The local authority welcomes the preparation of a Conservation Plan for the site and will support delivery of actions within the remit of the local authority.</p> <p>Recommendation Revise structure of Section 11.20 as follows;</p> <p>11.20 <u>Community Archaeology</u> <u>Local communities take great pride in their local heritage and are well placed with support and partnerships to promote care, conservation and engagement with that heritage. Waterford has had the benefit of involvement with the Adopt a Monument Scheme at sites such as Gallows Hill, Dungarvan, Round Hill, Lismore and Knockboy Medieval Church.</u></p> <p>AH08 AH09 <u>Community Archaeology</u> We will promote community <u>based</u> archaeology projects such as the Adopt a Monument Scheme and avail of <u>funding such as the 'Community Monuments Fund' which is currently administered by the National Monuments Service, Department of Housing, Local Government & Heritage</u> to support same in the interests of conserving sites and monuments in the city and county.</p> <p><u>Creadan Head</u> <u>Creadan Head on the western side of Waterford Harbour and 4km north of Dunmore East is the first early Mesolithic Site to have been identified in Waterford Estuary and in County Waterford. The Creadan Head site and its encompassing landscape has been subject of a number of archaeological investigations uncovering prehistoric sites indicating activity along the coastline and further inland. A Conservation Management Plan for the site was prepared in 2020 by the Creadan- Waterford Estuary Steering Group.</u></p> <p><u>AH09</u> <u>We will support delivery of actions in the Creadan Head Conservation</u></p>

URN	Submission Summary	Chief Executive Response & Recommendation
		<p data-bbox="1070 240 1899 268"><u>Management Plan by the Creadan-Waterford Estuary Steering Group.</u></p> <p data-bbox="1070 312 1312 339">Historic Graveyards</p> <p data-bbox="1070 347 1984 627"><u>Many community groups are involved in the maintenance of their local historic graveyard.</u> Historic Graveyards include all graveyards and burial grounds established prior to the 20th century. A distinction is made between the terms "burial grounds" and "graveyards" where burial grounds are areas of land used for burials while graveyards are burial grounds associated with churches. There are 143 historic graveyards located in the city and county. Burial grounds and graveyards dating from pre-1700 A.D. are given statutory protection under the National Monuments Act 1930-2004.</p> <p data-bbox="1070 639 1144 667">AH10</p> <p data-bbox="1070 675 2007 842"><u>We will</u> apply best practice in the care and management of historic graveyards as detailed in <i>Care Conservation and Recording of Historic Graveyards in County Waterford</i> published by Waterford County Council in 2009 and <i>Places of Worship- Heritage Advice Series</i> of Department of Housing, Local Government.</p>

3.2.11 Volume 2 Development Management Standards

URN	Submission Summary	Chief Executive Response & Recommendation
<p>WFD -C2- 91</p>	<p>The submission highlights a discrepancy in Table 5, car parking standards in Draft Volume 2: Development Management Standards.</p>	<p>The CE notes the issues raised.</p> <p>The comments are noted. The car-parking provision for dwellings outside Designated Town Centre Areas should be 2 spaces per dwelling.</p> <p>Recommendation: Amend Table 5 - Car Parking Standards House /Dwelling: 0 spaces in Town Centre Area 1 2 spaces per dwelling in all other areas.</p>
<p>WFD -C2- 47</p>	<p>This submission proposes that new buildings (residential or commercial) be eligible for a discount in development contribution fees based on the extent to which the new buildings use green approaches and materials as part of their construction.</p>	<p>The CE notes the issues raised.</p> <p>It is noted that the Council will require financial contributions in accordance with a development contribution scheme adopted by the Council under Section 48 of the Planning & Development Act 2000 (as amended) - this sets the statutory basis for the calculation of development contributions applicable to new development in Waterford City and County seeking planning permission and that benefit from public infrastructure and facilities. Applicants and developers are advised to make themselves aware of the terms and levies associated with new development within this scheme. It is intended that a new Development Contribution Scheme will be made and adopted as soon as possible on adoption of this Development Plan (2022-2028); however the Development Contribution Scheme adopted by the Council in February 2015, will remain in force until such time as a new scheme is in place. The process of preparing the Schemes is a reserved function which has a separate legal process to the preparation of the County Development Plan.</p> <p>Recommendation No change to Draft Plan</p>

URN	Submission Summary	Chief Executive Response & Recommendation
WFD -C2- 91	The submission requests a lower percentage of open space than the figure quoted in Table 1 of the DM Standards.	<p>The CE notes the issues raised.</p> <p>The open space provision rate of 15% is considered to be reasonable to provide an adequate quantum of amenity space to future residents of developments.</p> <p>Recommendation: No change to Draft Plan</p>
WFD -C2- 92	The submission requests that cross reference is included in Chapter 4, Section 5.9 and Section 8.0 Roads Access Policy in Volume 2 Development Standards of the Draft Development Plan to ensure applicants/developers are fully aware of the provisions of official policy concerning access to national roads at the earliest stages of project development	<p>The CE notes the issues raised.</p> <p>Compliance with Spatial Planning and National Road Guidelines for Planning Authorities 2012 in explicit in Objectives Trans 41 & DM 43. This is considered to be adequate.</p> <p>Recommendation: No change to Draft Plan</p>
WFD -C2- 92	<p>The submission highlights that the text and table associated with Section 5.5 Traffic & Transport Assessment of Vol 2 DM Standards deal with sub-thresholds that relate specifically to development proposals affecting national roads. TII requests that this should be corrected and amended to ensure clarity with this matter.</p> <p>The submission further highlights that the Design Manual for Roads and Bridges (DMRB) has been subsumed into TII Publications. It is recommended that the Draft Development Plan text is checked to ensure that this matter has been dealt with consistently throughout the text.</p>	<p>The CE notes the issues raised.</p> <p>1) Noted. No Change</p> <p>2) The issues raised are noted and considered to be reasonable. Section 5.5 and Objective DM 16 shall be amended to ensure development proposals are in compliance with Section 2 of TII Traffic & Transport Assessment Guidelines (2014)</p> <p>Recommendation: Amend Section 5.5 of Volume 2 as follows:</p> <p><u>Traffic & Transport Assessments (TTA) will be required to be submitted where a proposed development may significantly impact on the capacity of the surrounding road network. The Traffic & Transport Assessment shall be prepared in accordance with the Traffic Management Guidelines Manual 2003</u></p>

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		<p><u>published by the Department of Transport (2003) and the Traffic and Transport Assessment Guidelines (2014) published by the NRA.</u></p> <p><u>Development Management DM 16 Traffic & Transport Assessments (TTA) will be required to be submitted for proposals that may affect the National Road Network in accordance with the thresholds set out in the Traffic and Transport Assessment Guidelines (2014) published by the NRA or any subsequent update thereof.</u></p>
<p>WFD -C2- 92</p>	<p>The submission requests that consideration of a new Objective or amended UTL 09 and DM 53 be included in the Draft Development Plan outlining that; 'The capacity and efficiency of the Strategic road network drainage regimes in County Waterford will be safeguarded for national road drainage purposes'.</p> <p>The submission also requests that the Waterford Renewable Energy Strategy (Appendix 7) and Section 6.4 and Section 6.6, Objectives UTL 12, UTL 13 of Chapter 6 of the Draft Plan as well and Section 5.21 Electricity & Other Cables and Section 5.24 Renewable Energy Developments, Objective DM 30 of Volume 2 Development Standards include objectives that indicate that it should be demonstrated that an assessment of all alternative grid connection routing options have been undertaken prior to any proposals being brought forward for grid connection routing utilising the road network including national roads.</p>	<p>The CE notes the issues raised.</p> <p>With regards to DM 53 it is felt that the Policy Objective can be expanded further to cover national road drainage purposes as follows:</p> <p>Recommendation Amend Policy Objective Policy Objective DM 53 (Page 65) and add a 8th bullet point after "Discharge rainwater to the combined sewer." which reads as follows:</p> <p><u>"...The capacity and efficiency of the Strategic road network drainage regimes in County Waterford will be safeguarded for national road drainage purposes."</u></p>
<p>WFD -C2- 113</p>	<p>The submission highlights that it would welcome the inclusion under DM 34, the assurance that development for aggregates/mineral extraction does not significantly impact on County Geological Sites.</p>	<p>The CE notes the contents of the submission.</p> <p>Objective G01 of Volume 1 provides for the Protection of our Geological Heritage and any planning applications for mineral extraction etc will have to have regard to this Objective. It is considered reasonable to also incorporate the protection of geological & archaeological heritage within Objective DM 34</p>

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		<p>as requested.</p> <p>It is also considered appropriate to amend Section 6.4 of Volume 2 to reflect the wording of Article 103 of the Planning Regulations.</p> <p>Recommendation:</p> <p>1) Amend Objective DM 34 within Volume 2 as follows: Details which should be submitted by the applicant as part of proposal:</p> <ul style="list-style-type: none"> • Likely environmental effects, proposed mitigation measures and restoration. • <u>Details of any possible impacts and proposed mitigation measures on any Geological or Archaeological Heritage sites.</u> <p>2) Amend Section 6.4 of Volume 2 as follows: Environmental Impact Assessment (E.I.A.) will be required with a planning application where the defined thresholds outlined in the Planning & Development Regulations 2001 (as amended) are exceeded for certain types of development. In cases where thresholds are not exceeded the Planning Authority may still exercise its powers under Article 103(1) of the Regulations 2001 (as amended), and require an E.I.A for sub-threshold development, where it considers the effect of the proposed development on the environment is likely to be significant.</p> <p><u>Environmental Impact Assessment (E.I.A.) and the submission of an Environmental Impact Assessment Report (EIAR) will be required with a planning application where the defined thresholds outlined in the Planning & Development Regulations 2001 (as amended) are exceeded for certain types of development. In cases where thresholds are not exceeded the Planning Authority may still exercise its powers under Article 103(1) of the Regulations 2001 (as amended), and require the applicant to submit to the authority the information specified in Schedule 7A for the purposes of a screening determination where there is significant and realistic doubt in regard to the likelihood of significant effects on the environment arising from the proposed</u></p>

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		<p><u>development, or where it is determined that there is a real likelihood of significant effects on the environment arising from the proposed development, to submit to the authority an EIAR in order for the Planning Authority to fully assess the impacts of proposed development on the surrounding area.</u></p>
<p>WFD -C2- 131</p>	<p>This submission calls for flexible land use zoning objectives that will allow sites to be brought forward for convenience retail development over the lifetime of the Plan.</p>	<p>The CE Notes the issue raised.</p> <p>A comprehensive Retail Strategy accompanies the Plan in Appendix 4 which informs the policies and objectives of the CDP, sets out the Retail Hierarchy and determines the Retail requirements in County Waterford over the period of the development plan 2022-2028.</p> <p>Retail developments will be subject to a sequential test as per the Retail Planning Guidelines and the submission of a Retail Impact Assessment Report will be required where deemed necessary by the Planning Authority. The zoning matrix (Table 11) contained within Volume 2 sets out the areas where Retail Developments are permissible eg Retail Food Supermarket - City/Town Centre, General Business, Opportunity Sites. Retail Convenience (corner/neighbourhood shop) are also set out in the Table and includes being open for consideration in residential areas. This is considered to provide adequate choice and flexibility to the Retail Sector whilst not impacting on the overall zoning objectives of the Plan.</p> <p>Recommendation: No change to Draft Plan</p>
<p>WFD -C2- 132</p>	<p>The submission highlights that the development management standards set out in Tables 3.1 and 4 of Volume 2 of the Draft Plan are generalised for all urban areas and do not appropriately consider the range of urban contexts existing across the entire County of Waterford. In particular, the submission suggests they should be revised to either provide more focussed standards for Waterford City in support of</p>	<p>The CE Notes the issue raised.</p> <p>Recommendation See Response to OPR Submission Ref WFD-C2-363 where the issues raised are addressed.</p>

URN	Submission Summary	Chief Executive Response & Recommendation
	compact growth or to make provisions for relaxation or deviation from the general standards within Waterford City in support of compact growth.	
WFD -C2- 132	The submission requests that the Development Plan should identify specific sites or geographic areas within Waterford City where increased densities and / or building heights should be encouraged, in line with the recommendations of the Urban Development and Building Height Guidelines. The Gasworks Site should be identified as one such site.	The CE Notes the issue raised. Recommendation See Response to OPR Submission Ref WFD-C2-363 where the issues raised are addressed.
WFD -C2- 133	<p>The submission requests that the draft amended plan provide flexibility under the land use zonings matrix and objectives in relation to An Post's facilities and operational requirements. The submission suggests that both An Post (retail) and An Post Mails & Parcels (distribution/logistics) as permissible or open for consideration land uses across all zoning objectives.</p> <p>The inclusion of policy objectives such as the above would provide a supportive policy framework that could assist An Post as they invest in the mails and parcels infrastructure in the County over the next decade</p> <p>The submission requests that more flexibility be provided in relation to car parking standards for postal facilities which, as demonstrated above, require sufficient car parking spaces to operate in an efficient manner.</p>	<p>The CE notes the issues raised.</p> <p>Section 5.0 of Volume 2 sets out the development management objectives for Non-Residential Development for Waterford City and County and Table 11 indicates the type of development most appropriate to each land use category. The development and expansion of An Post services can be provided for in these objectives.</p> <p>In relation to access and parking requirements these are set out in Section 7.0 of Volume 2. All planning applications should meet the required standards as set out. Where a deficiency is identified this will need to be suitably justified by the applicant and will be assessed on its own merits.</p> <p>Recommendation: No change to Draft Plan</p>
WFD -C2- 141	The submission seeks for the provision of "student accommodation" within the zoning matrix of the plan as "permitted in principle" on lands zoned for Light Industry, Enterprise and Employment.	<p>The CE notes the issues raised.</p> <p>Having regard to the location and accessibility of the lands which zoned 'Industrial, Enterprise and Employment' in the Draft Plan it is considered that</p>

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		<p>they are removed from the main urban area/ university campus, and therefore the CE does not support the inclusion of an objective to enable the provision of student accommodation on said lands.</p> <p>Recommendation No change to Draft Plan.</p> <p>The CE notes that the Zoning Matrix Table 11 of Volume 2 Development Management Standards omits the use type 'Student Accommodation' from the Table.</p> <p>Recommendation Amend Table 2 of Volume 2 Development Management Standards (Page 81-82) to include Student Accommodation.</p>
WFD -C2- 222	The submission seeks to amend the definition of nursing home/retirement village and the requirements for same.	<p>The CE notes the issues raised.</p> <p>Having regard to the location and general nature of the lands zoned 'Mixed/general 'green'/recreation/conservation' (G5) in the Draft Plan it is considered that they are not suitable to accommodate nursing home/ assisted living type development due to their biodiversity value. Therefore this use type will not be included as 'open for consideration' on lands zoned for G5 in the zoning matrix.</p> <p>Recommendation No change to Draft Plan.</p>
WFD -C2- 302	<p>The submission highlights the importance of retaining natural boundaries and discourages the use of concrete walls due to high carbon footprint.</p> <p>Alternatives to concrete block walls should be encouraged: e.g. "Hit-and-miss" fencing</p>	<p>The CE notes the issues raised.</p> <p>Policy Objective BD20 in Section 9.12 of Volume 1 and Section 9.0 of the DM Standards sets out Site Boundary and hedgerow consideration. There is a presumption against the removal of hedgerows.</p> <p>Recommendation</p>

URN	Submission Summary	Chief Executive Response & Recommendation
	NEW POLICY "The council will seek to discourage the use of concrete walls for external boundary-making where alternatives exist."	No change to Draft Plan.
WFD -C2- 307	The submission requests that the council will seek to discourage the use of concrete walls for external boundary-making where alternatives exist. Natural stone and sod ditches to be left in place as a condition of planning permissions at the planning control phase	The CE notes the issues raised. Recommendation See CE's recommendation to submission number WFD-C2-302.
WFD -C2- 375	Volume 2 WEI submission identifies that the Wind Energy Development Guidelines 2006 (and any future update thereof) are the national standards that apply to all wind energy developments in every county in Ireland. The Draft 2019 Guidance is still under review with the final publication expected Q3 2021. Appropriate noise standards and associated guidelines for wind energy development are set in the WEDGs and are being considered by the Department in the latest Draft. As such, reference to the World Health Organisation's 2018 Environmental Noise Guidelines for the European Region in policy objective UTL 14 of the draft Plan should be removed to ensure it doesn't conflict with national guidance.	The CE notes the issues raised. In the interim while we wait for the final publication of the Draft 2019 Wind Energy Guidelines the CE considers it necessary to keep reference to World Health Organisation's 2018 Environmental Noise Guidelines for the European Region in UTL 14 for human health purposes. The CE considers the Policy Objective ULT 14 could be expanded on to give specific reference to the Wind Energy Guidelines. Recommendation Amend Policy Objective ULT 14 on Page 144 as follows: Energy Developments & Human Health "Proposals for energy development should demonstrate that human health has been considered, including those relating to the topics of: > Noise (including consistency with the World Health Organisation's 2018 Environmental Noise Guidelines for the European Region, <u>developments must comply with the Wind Energy Development Guidelines (2006), or any subsequent update/ review of these</u>);..."
WFD -C2- 379	3. Signage In our towns and villages The submission asks that the local authority review planning guidelines on commercial and private signage in our towns and village areas as the proliferation of cheap neon and plastic signage is destroying our streetscapes and reducing the	The CE notes the issue raised. It is considered that the plan already supports the issue raised through Policy Objective DM 17 - 22 in Section 5.6 to 5.11 in Volume 2 Development Management Standards Page 22.

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	amenity value of the environment.	<p>Recommendation No change to Draft Plan.</p>
<p>WFD -C2- 392</p>	<p>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 to facilitate student accommodation.</p>	<p>The CE notes the issue raised.</p> <p>The Zoning Matrix Table 11 of Volume 2 Development Management Standards omits the use type 'Residential' from the Table.</p> <p>Recommendation Amend Table 2 of Volume 2 Development Management Standards (Page 81-82) to include 'Residential'.</p>
<p>WFD -C2- 397</p>	<p>The submission highlights that the draft amended development plan needs to have a considerable number of lands zoned specifically for Traveller accommodation, zoning should not be prohibitive or discriminatory towards Traveller accommodation, and the new WCCDP needs to be flexible enough to allow for changing circumstances. I.e The provision of Traveller accommodation has to be a permitted use in all other areas, zoned for residential use, and be "permitted in principle" or "open for consideration" the same as other residential dwellings.</p>	<p>The CE notes the issues raised.</p> <p>The locations, delivery and specific requirements of Traveller accommodation across Waterford are determined by and set out within the Council's 'Traveller Accommodation Programme 2019-2024' (TAP) or any superseding programmes. Policy Objective H16 in the Draft Plan provides policy support for the implementation of the TAP. In the CE's response to the OPR (see submission number WFD-C2-363) sets out the location of traveller accommodation in Waterford on a map. The Zoning Matrix Table 11 of Volume 2 Development Management Standards will be updated to provide more flexibility for Traveller Accommodation within the landuse zoning.</p> <p>Recommendation Amend the use class 'Traveller Accommodation' in Table 2 of Volume 2 Development Management Standards (Page 81-82) to provide more flexibility.</p>

3.2.12 Appendix 2: Specific Development Objectives

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WFD -C2- 12	<p>The submission seeks the increase the village population and the provision of additional facilities to support the enlarged population of permanent residents i.e. employment, public amenities, biodiversity areas, affordable/social housing, retirement village, business hub/visitor centre, town centre regeneration, active transport facilities, coastal erosion protection etc. Some issues raised are location specific and may be included in the development plan as specific development objectives in Appendix 2.</p>	<p>The CE notes the issue raised.</p> <p>It must be noted that the Perks Site is identified as Regeneration in Appendix 21. The lands are located within the development boundary of the village as defined in the Draft Plan and as such could accommodate a development which is compatible with the context of the site in terms of character, scale and density of the village and its location in line with the core strategy and settlement strategy in Chapter 2.</p> <p>It is considered that the Draft Plan needs to amended to include reference to the extension of the Cliff Walk from Ardmore to Whitting Bay.</p> <p>Recommendation: Add an additional Specific Development Objective for Ardmore 'ADDO11' on Page 4 of Appendix 2 as follows:</p> <p><u>ADDO11: ● DO11 As the opportunities arise, the Council will support and facilitate the extension of the Cliff Walk to Goat Island and Whiting Bay.</u></p>
WFD -C2- 40	<p>Submission requests the re-zoning of lands at Páirc na gCapall (Kilrush Park, Geal gCua Estate, The Paddocks, Dungarvan AFC and Westgate Business Park) from 'R4.6 Strategic Residential Reserve and 'C2.1 Industrial, Enterprise and Employment' for residential development purposes. A number of drone, aerial and ground level photographs as well as a Land Use/Vegetation analysis were submitted in conjunction with the submission.</p> <p>A summary of the Draft City and County Development Plan zoning and specific objectives pertaining to the site is detailed. The submission also notes that the development would begin</p>	<p>The CE notes the issue raised.</p> <p>Recommendation: Add an additional Specific Development Objective for Dungarvan 'DGD16' on Page 14 of Appendix 2 as follows:</p> <p><u>DGDO16: ● DO16 The development of the lands at Páirc na gCapall will be informed by a masterplan for the entire landholding to be agreed in writing with the planning authority, providing for appropriate housing phasing, mix and layout, an infrastructure and service delivery plan, enhanced access to Dungarvan town centre, augmentation of biodiversity value across the lands and incorporation of the former line of the railway and masonry bridge for</u></p>

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	<p>to redress the imbalance in residential development, in terms of housing type, tenure and location, between Abbeyside and Dungarvan and would recentre development around the town centre. The submission states that the lands are contiguous to existing developed lands and fulfil the spatially sequential approach to the location of a new development meeting a Specific Development Objective for Dungarvan and are in line with 'Compact Growth'.</p> <p>It is considered that the lands are well served by the public road system and that the Shandon Road, could provide good access to the lands in question. The submission also highlights that Road Improvements Objectives are included in the Draft Development Plan in respect of the roads that bound the subject site. It is considered that the lands also meet a key strategic objective of the Draft Development Plan as set out in Chapter 5, Transport and Mobility.</p> <p>The submission considers that the majority of the site is suitable for residential development with little or no technical, environmental or flooding constraints and the lands have already attracted a buyer with an excellent track record ready to develop the land for residential use, subject to zoning. The submission considers the area to be well served by existing and planned infrastructure, local services and facilities in line with Principle #1 Access/Connectivity/Linkages as set out in Chapter 8 Placemaking of the Draft Development Plan.</p> <p>The submission concludes by highlighting should the lands be zoned residential and developed it would serve to dilute the social housing imbalance, which would be in keeping with the goals of Part V of the Housing Supply Provisions in the Planning and Development Act 2000, and also start to restore</p>	<p><u>active transport modes across the site as part of broader amenity strategy and provision of lands for a future school campus.</u></p>

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	development around the historic core of the town.	
WFD -C2- 52	The submission highlights that a stream which runs to the back of the six houses at Woodbrook Dunmore East is causing erosion. The submission seeks that before any works to the field (to the north of Woodbrook) is completed which would cause more run off and debris to enter the stream that remedial works take place.	<p>The CE notes the issues raised.</p> <p>It is considered that Policy BD 18 applies -new development to be set back 15m from the watercourse.</p> <p>Recommendation No change to Draft Plan.</p>
WFD -C2- 89	The submission requests that the following specific Development Objective be included in the Development Plan: "WCDO XX - To support the principle of the development of a bridge between the Island Lane slipway on the mainland to the Little Island slipway to serve the Little Island, Waterford Castle and Golf Resort and allow for the decommissioning of the existing ferry service".	<p>The CE notes the issue raised.</p> <p>In relation to the specific Development Objective for a Bridge from Little Island slipway to serve the Little Island the following must be noted:</p> <ol style="list-style-type: none"> 1. The River Suir is designated a SAC on account of the presence of a range of habitats and species listed on the EU Habitats Directive and thus any proposal will require to be subject to AA Screening and most likely full AA through preparation of a Natura Impact Statement. The NIS will need to establish the potential for adverse impact on the integrity of the SAC and the conservation objectives for species and habitats within the site. 2. The ecological value of Little Island itself whilst not within the boundary of the SAC lies in its significant and long established use as a research site for Badgers and TB. The island is unique in having one of the highest densities of badger groups/area in Europe a population which also uniquely is TB free. 3. Establishment of a bridging point between Little Island and King's Channel has the potential to increase public access and use and possibly increased number of dogs which could have detrimental impacts on the badger and fox population on the island. 4. Establishment of a bridging point between Little Island and King's Channel may also introduce a corridor for the spread of invasive species such as Grey Squirrel which are known to be present in woodland in Maypark. <p>Due to potential ecological impact and other potential impacts for protected wildlife species on the island and potential for invasive species to become</p>

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		<p>established there it is considered that a Specific Development Objective for a Bridge from Little Island slipway to serve the Little Island should not be included in the Draft Plan.</p> <p>Recommendation No change to Draft Plan.</p>
<p>WFD -C2- 97</p>	<p>The submission seeks the inclusion of an Active Travel Route along the Youghal Road to New Chapel Street in Dungarvan.</p>	<p>The CE notes the issue raised.</p> <p>Recommendation Amend Map 3 of the Draft Plan to include Active Travel Route along the Youghal Road to New Chapel Street in Dungarvan.</p>
<p>WFD -C2- 130</p>	<p>The submission seeks the rewording of the development objective KLMD01 relating to the SE Construction (Kent) Ltd landholding to ensure a balanced approach to the delivery of development within the site (as set out herein) and the reconsideration of the status of Kilmeaden with the settlement hierarchy within chapter 2 of the Draft Plan.</p> <p>The submission requests that revised KLMD01 places a focus on employment, enterprise and industry at this location to a level that is not reflective of the overall area pertaining to the specific objective. It highlights a need to consider these lands in terms of the sustainable and managed growth of Kilmeaden that achieves a balanced level of residential development aligned to the development of a village centre and employment uses.</p>	<p>The CE notes the issue raised.</p> <p>It is noted that the submission seeks an to reword KLMD01 to accommodate residential uses on this strategic landbank. It must be noted the lands are located within the development boundary of the village as defined in the Draft Plan and as such could accommodate small cluster type housing in line with the core strategy and settlement strategy in Chapter 2 of the draft Plan and the existing KLMD01.</p> <p>Recommendation No change to Draft Plan.</p>
<p>WFD -C2- 158</p>	<p>The submission seeks to edit, rewording and strengthen specific development objective DGDO6.</p>	<p>The CE Notes the issue raised.</p> <p>Please see CE's response to submission number WFD-C2-280.</p> <p>Recommendation See CE's recommendation to submission number WFD-C2-280.</p>

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WFD -C2- 161	<p>The submission seeks the insertion of a Local Objective for the subject site be included in the Waterford development Plan 2022-2028 as follows:</p> <p>'Allow a maximum of four houses on the subject lands'.</p>	<p>The CE notes the issues raised.</p> <p>It must be noted that any planning application for rural housing is assessed on its own merits. It is further noted that the rural housing policy in the Draft Plan is consistent with Section 28 Ministerial Guidelines. Any applicant must comply with Policy Objective H27 and or H28 and demonstrate a genuine economic and or social need to live in a rural area.</p> <p>Recommendation No change to Draft Plan.</p>
WFD -C2- 226	<p>This submission seeks the rezoning of lands in Dunmore East.</p>	<p>The CE notes the issue raised.</p> <p>Recommendation: Add an additional Specific Development Objective for Dungarvan 'DMDO12' on Page 12 of Appendix 2 as follows:</p> <p><u>DMDO12: • DO12 Future development in the vicinity of the golf club will need to protect and enhance the visual, natural and other amenities of the area.</u></p>
WFD -C2- 244	<p>The submission seeks to advance traffic planning at a local level in Stradbally, particularly on R675 approach road at Holy Cross Church, along with enhanced road safety signage and other road safety interventions across the village.</p>	<p>The CE notes the issues raised.</p> <p>This is not considered to be a County Development Plan issue. This is an operational Traffic issue which is not within the scope of the Draft Plan.</p> <p>Recommendation No change to Draft Plan.</p>
WFD -C2- 248	<p>The submission seeks to provide emergency and general access to coastal water amenity areas such as Stradbally Cove, and Ballyvooney Cove.</p>	<p>The CE notes the issues raised.</p> <p>This is not considered to be a County Development Plan issue. This is an operational Traffic issue which is not within the scope of the Draft Plan.</p> <p>Recommendation No change to Draft Plan.</p>

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WFD -C2- 259	The submission promotes and details a new Green Ring route around Tramore that links existing and proposed sites of biodiversity or natural amenity, following paths, cycle paths and roads already in place and includes suggestions for new safe and sustainable transport routes. A new park and ride proposal is also included.	<p>The CE notes the issues raised.</p> <p>It is considered that the Draft Plan needs to be amended to include reference that the Council will support the development of the Tramore Green Route. It should be noted that this issue will be addressed in more detail through the Local Transport Plan for Tramore.</p> <p>Recommendation Add an additional Appendix 2 'Tramore' on Page 13 to include an additional Specific Development Objective 'TRDO12' to read as follows:</p> <p><u>TRDO12: ● DO12 To support the development of a Green Ring Route around Tramore that links existing and proposed sites of biodiversity or natural amenity, 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).</u></p>
WFD -C2- 261	The submission seeks the following specific development objective for lands in Ardmore: "that supports sustainable residential development is applied to the subject site".	<p>The CE notes the issues raised.</p> <p>It is noted that the submission seeks an additional specific development objective on the site to accommodate "sustainable residential development". The lands are located within the development boundary of the town as defined in the Draft Plan and as such could accommodate small cluster type housing in line with the core strategy and settlement strategy in Chapter 2 of the draft Plan.</p> <p>Recommendation No change to Draft Plan.</p>
WFD -C2- 280	Ballinroad Community Group submits that specific development objective DGD06 be reworded along the following lines so that it is strengthened and made more specific:	<p>The CE notes the issues raised.</p> <p>The provision of resources both financial and human to deliver Council projects/ services are a workforce plan and budget matter and not a Draft</p>

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	<p>DGD06A: It is an objective of the Council to provide a footpath/cycle-path, public lighting and traffic calming on the L3012 Road to connect Ballinroad Village with Garranbane National School within the first two years of the lifetime of the new plan in recognition of the longstanding need to address the legacy under-provision of infrastructure that should have accompanied the rapid and significant development of Ballinroad that was encouraged and facilitated by previous development plans.</p> <p>DGD06B: It is an objective of the Council to provide a footpath/cycle-path, public lighting and traffic calming on the L3011 linking Ballinroad with the Clonea Roundabout, Ballinroad Hall, Ballinroad Soccer Club and the Waterford Greenway within the first two years of the lifetime of the new plan in recognition of the longstanding need to address the legacy under-provision of infrastructure that should have accompanied the rapid and significant development of Ballinroad that was encouraged and facilitated by previous development plans.</p> <p>DGD06C: It is an objective of the Council to arrange for the completion of an independent road safety audit upon completion of DGD06A and DGD06B to identify any further desirable road safety improvements for Ballinroad.</p>	<p>Development Plan matter. However, linking Ballinroad Village with Garranbane National School is a priority for the Draft Plan. It is considered that DGDO06 could be further strengthened to support this.</p> <p>Recommendation Amend Specific Development Objective for Dungarvan 'DGD06' on Page 14 of Appendix 2 as follows: "DGDO6 • DO6 As the opportunities arise the Council shall provide a footpath/cycle-path, public lighting and traffic calming on the L3012 Road to connect Ballinroad Village with Garranbane National School and along the L3011 linking Ballinroad with the Waterford Greenway. <u>The connection of Ballinroad Village with Garranbane National School through Active Travel measures is a priority of the Development Plan</u>".</p>
WFD -C2- 324	<p>The submission requests the rezoning of land at Williamstown, The Ring Road, Waterford City from agricultural zoning to a new tourism category to facilitate integrated tourism recreation, leisure resort, tourist accommodation, and low density residential.</p>	<p>The CE notes the issue raised.</p> <p>It is considered necessary to place a Specific Development Objective on these lands at Williamstown, The Ring Road, Waterford City which will facilitate the sustainable development of the site.</p>

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		<p>Recommendation: Add an additional Specific Development Objective for Waterford City 'WCDO18' on Page 15 of Appendix 2 as follows:</p> <p>WCDO18: ● DO18 The development of these lands will be subject to the preparation of a more detailed masterplan for the landholding prior to any development progressing. Any such masterplan will identify how the proposal will be incorporated into the broader recreation and open space strategy referred to in policy objective W City 19.</p>
WFD -C2- 325	<p>The primary objective of this submission is to seek a designation of all of the subject lands at Coleville Road, Clonmel Environs that fall outside the designated Flood Zone A boundary to be zoned, Zoning Objective R4.6 (Strategic Residential Reserve) as opposed to the proposed Zoning Objective G3 (Conservation, amenity or buffer space)</p>	<p>The CE notes the issue raised.</p> <p>It is considered necessary to place a Specific Development Objective on these lands at f Mongarriff roundabout to lands at Kilgainy Lower, Clonmel which will facilitate the sustainable development of the site.</p> <p>Recommendation: Add an additional Specific Development Objective for Clonmel Environs 'CLEDO4' on Page 7 of Appendix 2 as follows:</p> <p><u>CLEDO4: ● DO4 To protect the line of a future river crossing linking Mongarriff roundabout to lands at Kilgainy Lower.</u></p>
WFD -C2- 341	<p>The submission relates to lands at Coleville Road, Clonmel. The primary objective of this submission is to seek a designation of part of the subject lands to be zoned, Zoning Objective R1.3 (New Residential –Medium Density) and the remainder of the site to be zoned Objective R4.6 (Strategic Residential Reserve).</p> <p>It is also proposed to retain the existing road infrastructure objective to provide for a link road between Coleville Road and Spa Road, to the south-west thereof</p>	<p>The CE notes the issue raised.</p> <p>It is considered necessary to place a Specific Development Objective on lands at Coleville Road, Clonmel, Clonmel which will facilitate the sustainable development of the site and will facilitate improved access to these lands zoned for strategic residential reserve.</p> <p>Recommendation: Add an additional Specific Development Objective for Clonmel Environs 'CLEDO5' on Page 7 of Appendix 2 as follows:</p>

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		<p><u>CLEDO5: ● DO5 The development of the strategic residential reserve lands will be informed by a masterplan for the area with particular focus on access and linkages to Clonmel town centre, permeability, servicing and amenity provision.</u></p>
<p>WFD -C2- 357</p>	<p>This submission identifies a number of additional specific development objectives for Dungarvan.</p> <ol style="list-style-type: none"> 1. -Reduce the vacancy in the town to EU averages for vacancy in both housing & commercial properties (i.e. 10% and 5%, respectively), starting in 2022. 2. -Reduce the amount of young people living at home with parents (as per CSO) by 50% by 2028 in Dungarvan and it's surrounding areas, starting in 2022 (i.e. 10% p.a. reduction for 5 years), given the housing crisis. 3. -Reduce the carbon footprint of Dungarvan's existing homes & it's surrounding catchment by 50% by 2030, with clear path to 100% carbon neutrality by 2035 (i.e. ahead of national targets), by working on leading on EU green deal implementation. 4. -Reduce the number of women looking after the home in Dungarvan and surrounding areas by 30% by 2028 through innovative ways to promote working, including WFH incentives, crèche incentives & funding models in partnership with EU and local funds. 5. -Dungarvan to rank in top 5 in all the country on number of km's of cycle lane installed by year per person, each year, so that we improve further the quality of living in Dungarvan, with specific focus on safe cycle routes to/from the schools in Dungarvan town, Abbeyside & Ballinroad. 6. -Dungarvan to measure hectares of deciduous trees planted, given national targets to 2030, and this objective published quarterly. c192 hectares have to be published by 	<p>The CE notes the issue raised.</p> <p>Please see comments below in relation to points raised in the submission.</p> <ul style="list-style-type: none"> - Point 1: It is considered that the Draft Plan includes the following strategic Policy Objectives CS 12, ECON 07, H06 and Place 01 which deal with both housing and commercial vacancy. - Point 2: It is considered that this is not a Development Plan issue. - Point 3: It is considered that the Draft Plan includes the following strategic Policy Objectives H18 and H19. - Point 4: It is considered that the Draft Plan includes the following strategic Policy Objectives Econ 02, Econ 13 - 15. - Point 5: This will be addressed through the Local Transport Plan for Dungarvan/ Ballinroad. - Point 6: It is considered that the Draft Plan includes the following strategic Policy Objectives H18, B21 - 25. <p>Recommendation No change to Draft Plan.</p>

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<p>WFD -C2- 376</p>	<p>2030 in Dungarvan to meet targets.</p> <p>Population: Increase planned population growth in Portlaw for the period 2016-2031 to at least 500 people.</p> <p>Zoning: In order for Portlaw to expand and develop, sufficient land must be zoned residential in order to cater for the expected increase in population. There has been a chronic lack of suitably zoned sites in the area for several years, particularly for local people that wish to build.</p> <p>Provision must also my made for a small hotel type development in order to cater for local events and attract tourist in to capitalise on our location to the Comeragh Uplands and Greenway. Suitable zoning must also be included to cater for a new fuel/petrol station which is required for the benefit of the local residents.</p>	<p>The CE notes the issue raised.</p> <p>It is considered necessary to place a Specific Development Objective in Portlaw which will support the footpath between the town centre and the Church/Curraghmore Estate.</p> <p>Recommendation: Add an additional Specific Development Objective for Portlaw 'PLDO9' on Page 13 of Appendix 2 as follows:</p> <p><u>PLDO9: ● DO9 To facilitate and support the provision of a new footpath to link the town centre to the St. Patricks Church and Curraghmore Estate.</u></p>
<p>WFD -C2- 405</p>	<p>The submission sets out a number of specific development objectives for Kill Village.</p> <p>1. To upgrade and refurbish the existing community centre (see photograph below) to create a modern, sustainable, multi-purpose facility at the heart of the village. The community centre built in 1979 has always been at the heart of the village but requires modernisation to encourage better use by all members of the community and potentially local enterprise.</p> <p>2. 2. To fully utilise the site on which the community centre building sits to create a hub at the heart of the village by:</p> <ul style="list-style-type: none"> o Developing a potential community playground area within 	<p>The CE notes the issues raised.</p> <p>It is considered that the plan already supports points 4-9. However, the CE notes that points 1-3 can be included in Appendix 2 of the Draft Plan.</p> <p>Recommendation: Appendix 2 to add two additional Specific Development Objective for Kill 'KLD04' & 'KLD05' on Page 7:</p> <p><u>KLDO4: ● DO4 The Council will support the upgrade and refurbishment of the existing community centre to create a modern, sustainable, multi-purpose facility at the heart of the village. It is hoped to fully utilise the site on which the community centre building sits to create a hub at the heart of the village</u></p>

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	<p>the existing landscaped area to the front of the community centre building, adjacent to Kill GAA pitch (see Area A in the plan view below).</p> <p>o Developing an outdoor multi-functioning entertainment/performance space and parkland area to the rear of the Community Centre building (see Area B in the plan view below).</p> <p>3. To utilise/develop the currently derelict site at An Dallon which is overgrown, unused and has become a site for illegal dumping and bonfires. Potential options include the development of a community garden or orchard, Multi Use Games Area or landscaped area considerate to biodiversity and sustainability.</p> <p>4. To create definition and a sense of place in Kill village. To enhance the visual appearance of the village by improving existing stonewalls and hedgerows within the village, upgrading and extending public lighting, creating continuity of paving and footpaths, landscaping, and planting within the village area.</p> <p>5. To create a unified, targeted litter prevention campaign and creative signage for all areas of Copper Coast.</p> <p>6. To reserve an area to provide for future expansion of the school playground/parking facilities. Kill National School building was extended to facilitate the increase in pupil numbers due in part to the new housing developments in the area. Due to constraints in acquiring adjacent land, the extension was built on the existing children's play area which has been significantly diminished. We would ask for the Council's support in reserving and acquiring land for a suitable size play / green /parking area. The approximate outline of the school site is shown in yellow in the plan below.</p> <p>7. To develop pedestrian walkways and cycle paths. Provision</p>	<p><u>by:</u></p> <p><u>o Developing a community playground area within the existing landscaped area to the front of the community centre building, adjacent to Kill GAA pitch.</u></p> <p><u>o Developing an outdoor multi-functioning entertainment/performance space and parkland area to the rear of the Community Centre building.</u></p> <p><u>KLDO5: ● DO5 The Council will support the development of the currently derelict site at An Dallon to the north of the village into a community garden/ orchard which will enhance biodiversity and sustainability of the village.</u></p>

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	<p>of a connection from the Greenway to Kill Village if the opportunity arises.</p> <p>8. To protect natural resources such as Ballinlough lake and Kilmurrin Cove.</p> <p>9. 9. To ensure that any future housing developments contribute positively to the village infrastructure and facilities.</p>	
<p>WFD -C2- 455</p>	<p>The submission seeks to have 3.85Ha of lands zoned for residential use to cater from local housing need in An Rinn.</p>	<p>The CE notes the issue raised.</p> <p>It is considered necessary to place a Specific Development Objective in Gaeltacht na nDéise (An Rinn) which will support the sustainable development of the settlement.</p> <p>Recommendation: Add an additional Specific Development Objective for Gaeltacht na nDéise 'GDDO8' on Page 13 of Appendix 2 as follows:</p> <p><u>GDDO8: ● DO8 New residential development shall be accompanied by developer provided public lighting, footpath and junction alignment works to link the new development the existing footpath on Church Road prior to occupation of any dwelling houses.</u></p>
<p>WFD -C2- 459</p>	<p>The submission seeks the rezoning of land off the Waterford City Ring Road between Old Tramore Road (Kilcohan) and Killure Road (John's Park). Waterford from G5 open space to R1.3 new proposed residential use.</p>	<p>The CE notes the issue raised.</p> <p>It is considered necessary to place a Specific Development Objective on lands at Waterford City Ring Road between Old Tramore Road (Kilcohan) and Killure Road (John's Park) which will support the sustainable development of the settlement.</p> <p>Recommendation: Add an additional Specific Development Objective for Waterford City 'WCDO19' on Page 15 of Appendix 2 as follows:</p> <p><u>WCDO19: ● DO19 The landscaping and provision of open space for the</u></p>

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		<p><u>development of new residential areas shall provide for the following: Incorporating the Couse Stream as a central element in public open space and ensure habitat restoration along the length of the watercourse, c. 2 ha of usable open space and habitat areas to be provided across new housing areas to include enhanced tree planting and permeable active travel routes for cyclists/pedestrians along the boundary with the outer ring road and links between the new housing and existing housing areas.</u></p>
WFD -C2-8	<p>The submissions calls for the rewording of Policy Objective SC33 with regards to the provision of a 25m community pool in Dungarvan/ West Waterford, the provision of aquatic sports needs and or a 25m swimming pool in Dungarvan/ West Waterford Area as well as creatively provide suitable and sufficient access to public swimming opportunities and/or infrastructure, both indoor and outdoor.</p>	<p>The CE notes the issues raised.</p> <p>It is considered that the plan already supports the provision of a public swimming pool in Dungarvan through Policy Objective SC 33. However, the CE notes that this could be further strengthened through a Specific Development Objective for Dungarvan in Appendix 2.</p> <p>Recommendation: Appendix 2 to add an additional Specific Development Objective for Dungarvan 'DGD015' on Page 14: <u>"To facilitate and support the development of a new sustainable 25m community swimming pool facilities in Dungarvan/West Waterford Region, to achieve maximum accessibility to the residents of Waterford, including the integration with and development of existing associated sports facilities, accompanied by appropriate infrastructure".</u></p>
WFD-C2-20 WFD-C2-22 WFD-C2-23 WFD-C2-24 WFD-C2-63 WFD-C2-64 WFD-C2-65 WFD-C2-67 WFD-C2-68 WFD-C2-70	WFD-C2-196 WFD-C2-197 WFD-C2-199 WFD-C2-200 WFD-C2-208 WFD-C2-234 WFD-C2-239 WFD-C2-240 WFD-C2-247 WFD-C2-249	<p>The CE notes the issues raised.</p> <p>Recommendation Please see CE response and recommendation to WFD-C2-8</p>

URN	Submission Summary	Chief Executive Response & Recommendation
WFD-C2-93	WFD-C2-253	
WFD-C2-98	WFD-C2-256	
WFD-C2-100	WFD-C2-258	
WFD-C2-104	WFD-C2-268	
WFD-C2-108	WFD-C2-269	
WFD-C2-114	WFD-C2-273	
WFD-C2-119	WFD-C2-278	
WFD-C2-123	WFD-C2-280	
WFD-C2-136	WFD-C2-295	
WFD-C2-137	WFD-C2-296	
WFD-C2-138	WFD-C2-298	
WFD-C2-145	WFD-C2-299	
WFD-C2-146	WFD-C2-300	
WFD-C2-147	WFD-C2-308	
WFD-C2-148	WFD-C2-315	
WFD-C2-149	WFD-C2-338	
WFD-C2-150	WFD-C2-340	
WFD-C2-151	WFD-C2-344	
WFD-C2-152	WFD-C2-349	
WFD-C2-153	WFD-C2-352	
WFD-C2-154	WFD-C2-359	
WFD-C2-155	WFD-C2-361	
WFD-C2-156	WFD-C2-364	
WFD-C2-164	WFD-C2-366	
WFD-C2-171	WFD-C2-367	
WFD-C2-173	WFD-C2-372	
WFD-C2-177	WFD-C2-378	
WFD-C2-181	WFD-C2-379	
WFD-C2-186	WFD-C2-432	
WFD-C2-192	WFD-C2-456	

URN	Submission Summary	Chief Executive Response & Recommendation
WFD -C2	<p>The submissions calls for the rewording of Policy Objective SC33 with regards to the provision of a 25m community pool in Dungarvan/ West Waterford, the provision of aquatic sports needs and or a 25m swimming pool in Dungarvan/ West Waterford Area as well as creatively provide suitable and sufficient access to public swimming opportunities and/or infrastructure, both indoor and outdoor.</p>	<p>The CE notes the issues raised.</p> <p>It is considered that the plan already supports the provision of a public swimming pool in Dungarvan through Policy Objective SC 33. However, the CE notes that this could be further strengthened through a Specific Development Objective for Dungarvan in Appendix 2.</p> <p>Recommendation: Appendix 2 to add an additional Specific Development Objective for Dungarvan 'DGD015' on Page 14: <u>"To facilitate and support the development of a new sustainable 25m community swimming pool facilities in Dungarvan/West Waterford Region, to achieve maximum accessibility to the residents of Waterford, including the integration with and development of existing associated sports facilities, accompanied by appropriate infrastructure".</u></p>

3.2.13 Appendix 3: Housing Strategy and Housing Need Demand Assessment

URN	Submission Summary	Chief Executive Response & Recommendation
<p>WFD -C2- 163</p>	<p>The submission requests the inclusion / retention of the aims and objectives to avoid social segregation of Section 8.4 of the current City Development Plan adjusted for current Government guidelines and the removal of Appendix 3 HDNA and Housing pag78 table 5.5 of the Draft Plan as the criteria for location of social housing schemes within the city.</p>	<p>The CE notes the issues raised.</p> <p>The content of the submission is noted along with that of WFD-C2-69, 139, 301 & 345 and 399. The preparation of the LAP for Neighbourhood 2 Gracedieu as set out in the draft Plan will consider the challenges and opportunities to developing a sustainable neighbourhood in this area while having regard to the original action plan for Neighbourhoods 1 & 2. This will be informed by public consultation will all communities with an interest in the development of the area. The amended HNDA and Housing Strategy has considered further the relevant housing needs and demands for Waterford city and county over the development plan period and has provided the basis for amended housing policies set out in this report as addressed in the response to OPR Submission WFD-C2-363.</p> <p>Recommendation: No Change to Draft Plan</p>
<p>WFD -C2- 392</p>	<p>The submission provides background and context to house building 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>The CE notes the issues raised.</p> <p>CE Response: 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 - See submission WFD-C2-363 & WCCC Response</p> <p>Recommendation: No Change to Draft Plan</p>

URN	Submission Summary	Chief Executive Response & Recommendation
WFD -C2- 397	<p>The submission provides a policy and legislative background with regards to the Travelling Community in Ireland.</p> <p>It submits that the draft amended plan should name and identify sufficient amounts of zoned lands close to facilities/ amenities on maps the location of all planned Traveller accommodation within the County or both the current and the next TAP. It also seeks a policy that WCCC CEO will use his emergency powers to deliver Traveller accommodation if required, where elected members block much needed Traveller accommodation via Part 8.</p>	<p>The CE notes the issues raised.</p> <p>The locations, delivery and specific requirements of Traveller accommodation across Waterford are determined by and set out within the Council's 'Traveller Accommodation Programme 2019-2024' (TAP) or any superseding programmes. Policy Objective H16 in the Draft Plan provides policy support for the implementation of the TAP. In the CE's response to the OPR (see submission number WFD-C2-363) sets out the location of traveller accommodation in Waterford on a map. The Zoning Matrix Table 11 of Volume 2 Development Management Standards will be updated to provide more flexibility for Traveller Accommodation within the land use zoning. The CE emergency powers are considered not a development plan issue.</p> <p>Recommendation: No Change to Draft Plan</p>

3.2.14 Appendix 4: Retail Strategy

URN	Submission Summary	Chief Executive Response & Recommendation
<p>WFD -C2- 419</p>	<p>The submission believes that the current Development Plan objectives to limit future retail warehousing to existing and planned Retail Parks at Butlerstown, Six Cross roads and Cork road be maintained but that the Retail strategy recognises that there is currently little if any available retail warehousing stock and therefore some new Retail warehousing will need to be developed during the life of the New Plan in order to maintain Waterford as a Regional hub for all forms of Retail.</p>	<p>The CE notes the issues raised.</p> <p>Please see comments below in relation to points raised in the submission. It should be noted that the Retail Strategy is consistent with the Regional and National Retail Policy and recognises the primacy of Waterford City Centre in terms of retail development. The Retail Strategy was informed by a survey of the quantum of comparison, convenience and retail warehousing floor space, permitted, occupied and vacant in 2020. It is recognised that the retail sector undergoes constant change over time and it is expected that this interrelationship between existing and vacant retail floor space will likely continue during the lifetime of the development plan. In this regard new retail development proposals will be required to fully assess their impacts on the retail function of the city centre by way of retail impact assessment and the sequential approach to retailing.</p> <p>The Draft Development Plan outlines in Section 3.6.8 that demand for further Retail Warehousing floor space will be limited in Waterford city or county in the short term. The Draft Retail Strategy highlights that limited future retail warehouse development to be to be directed to the planned and existing retail parks in the City, Dungarvan and Tramore in line with the retail floor space projections.</p> <p>Recommendation No change to Draft Plan</p>

3.2.15 Appendix 7: Renewable Energy Strategy

URN	Submission Summary	Chief Executive Response & Recommendation
WFD -C2- 194	<p>This submission requests that the Comeragh Mountain area be classified as a RED No Go area in the Renewable Energy Strategy.</p>	<p>The CE notes the issues raised.</p> <p>The area is designated a SAC and classed as most sensitive in the Landscape Character Assessment and a No Go area in the Wind Energy Map. A new WES has been prepared. Please see CE's response to submission number WFD-C2-363.</p> <p>Recommendation No Change to Draft Plan</p>
WFD -C2- 312	<p>This submission focuses mainly on specific opportunities in relation to wind energy, security of supply and the decarbonisation of heat and transport.</p> <p>Our recommendations can be summarised as follows: Renewable electricity</p> <ul style="list-style-type: none"> •Offshore wind presents significant opportunities for Co. Waterford. Integrated land and marine planning is essential to its development. Alignment between national, regional and local planning policies is of critical importance to all those involved in infrastructure development. •SSE recommends the inclusion of a policy in support of the development and expansion of the electricity grid and facilitate the development of landing locations for offshore generated wind energy. •The consistent implementation of the Wind Energy Development Guidelines (WEDG)—a key piece of national policy currently under review -is of crucial importance to onshore wind. We would urge the Council to consistently implement the WEDG to ensure adherence with national policy. 	<p>The CE notes the issues raised.</p> <p>It is considered that the Draft Plan supports efficiency of Local Authority social housing stock through Policy Objective SC10 and H18. With regards to the electrification of transport these will be addressed through the WMATS.</p> <p>Recommendation: In relation to Renewable electricity please see the CE Response and Recommendation to the following Submissions: WFD-C2-128; WFD-C2-354; WFD-C2-363; and WFD-C2-373. With regards to Security of Supply please see CE Response and Recommendation to the following Submissions: WFD-C2-354.</p>

URN	Submission Summary	Chief Executive Response & Recommendation
	<ul style="list-style-type: none"> •Waterford County Council should consider developing a Wind Energy Strategy (WES) to build on the landscape character assessment that has been carried out and to ensure a sufficient quantum of land is available for onshore wind development. •We recommend the SEAI Wind Atlas, or any similar general wind resource data, is not used as a constraint when identifying suitable areas for onshore wind in Waterford's WES. We also recommend that existing grid constraints are not considered hard constraints. •New consents need to allow for 30-35 years operation at a minimum so as not to unnecessarily limit the operation of developments and ensure a strong business case can be developed at the outset. <p>Security of supply</p> <ul style="list-style-type: none"> •We would encourage Waterford County Council to recognise the ongoing importance of security of supply in the CDP and the continued need for flexible, low carbon generation capacity. •We also encourage the Council to recognise the importance of ensuring the continued use, reuse or repowering of existing infrastructure where appropriate to enable Ireland to meet its energy needs. • Opportunities for shared CCS and hydrogen infrastructure to decarbonise conventional generation, industry and transport should also be supported. <p>Heat and transport</p> <ul style="list-style-type: none"> • Energy efficiency needs to be considered as an infrastructure priority. We recommend Waterford's County Development Plan reflect Action 64 in the Climate 	

URN	Submission Summary	Chief Executive Response & Recommendation
	<p>Action Plan which seeks to increase the energy efficiency of Local Authority social housing stock.</p> <ul style="list-style-type: none"> • Spatial planning at a local authority level will be critical to drive the electrification of transport. <p>Waterford's CDP should go further than the policies currently outlined to identify areas where EV charge points could be installed and competitively tender for these assets.</p>	
<p>WFD -C2- 351</p>	<p>With respect to renewable energy, Coillte believe that Coillte Forestry, Land Solutions and Renewable Energy businesses and Coillte Nature have the experience and expertise to support the Council to realise one of the Region's key principles around climate action. In this regard, the following are key asks of the Local Authority in the preparation of the final Plan with respect to renewable energy:</p> <ol style="list-style-type: none"> 1- The specific criteria of wind energy development are considered in the draft LCA and areas of higher sensitivity such as the Foothills are considered [objectively] positively for wind energy development. 2- The RES, in the form of the proposed "integrated Energy Strategy / Masterplan" is published for consultation as a matter of priority. 3- Ensure that wind speed, site specific engineering issues, and existing grid capacity issues are not considered constraints in identifying suitable lands in the updated RES and ensure a sufficient quantum of land (headroom) is designated suitable for wind to account for site level attrition through a scientific approach. 4- Remove reference to the World Health Organisation's 2018 Environmental Noise Guidelines for the European Region in policy objective UTL 14 of the draft Plan. 	<p>The CE notes the issues raised.</p> <p>In response to Points 1 - 3 please see the CE's Response and Recommendation to Submission No.WFD-C2-363 and 375.</p> <p>In relation to Point 4: World Health Organisation's 2018 Environmental Noise Guidelines for the European Region in policy objective UTL 14 of the draft Plan please see the CE's Response and Recommendation to Submission No.WFD-C2-375.</p> <p>Recommendation No change to Draft Plan.</p>
<p>WFD</p>	<p>WEI states that the Council is to be commended for its</p>	<p>The CE notes the issues raised.</p>

URN	Submission Summary	Chief Executive Response & Recommendation
-C2-375	<p>preparation of a Wind Energy Development Strategy as laid out in Appendix 7. This provides a policy framework for the wind energy industry to bring forward planning applications for developments of appropriate scales in appropriate locations and forms an integral part of the Draft CDP. In preparing a new Wind Energy Strategy (WES), the changes to various Government renewable energy policies since 2016 need to be reflected. Taking due cognisance of the opportunities and existing infrastructure across the county and Chapter 3 of the Draft Revised Wind Energy Development Guidelines, the RES needs set out more distinctly how the County will facilitate a proportionate level of the additional 4.2GW of onshore wind growth as a matter of priority and to comply with 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>WEI would also recommend the removal of Figure 8.1 and update the modification of this section of the strategy. The figure from ORDEP is out of date and will be replaced by OREDP2. WEI recommends updating the strategy with the link to the Marine Area Planning legislation, and the potential role as a coastal authority. WEI strongly suggests that the CDP and RES for Waterford must classify a sufficient quantum of land as being suitable for wind energy, to ensure national renewable energy targets can be achieved, and demonstrate how the quantum of land classified as suitable is sufficient for this purpose. A clear policy ambition in the CDP and RES for County Waterford is critical to guide the strategy and the identification of a sufficient quantum of potentially suitable land.</p>	<p>A new WES has been prepared. Please see CE's response to submission number WFD-C2-363.</p> <p>Recommendation See CE's recommendation to submission number WFD-C2-363.</p>

URN	Submission Summary	Chief Executive Response & Recommendation
	<p>When finalising the new WES for Waterford, WEI urges Waterford County Council not to consider the following potential constraints or facilitators in the process of identifying areas as being potentially suitable for wind energy developments:</p> <ol style="list-style-type: none"> 1. Grid Capacity - Grid capacity is a technical and electrical engineering constraint that is managed by the TSO/DSO and new infrastructure is often provided on the basis of there being a need to connect wind energy developments to the electricity grid, thereby further reinforcing grid infrastructure in counties where this work would not otherwise have occurred. Given the extent of grid within the County, lack of grid capacity is not seen as a major constraint. 2. Wind Speed - Wind speed should not be used as a constraint for site suitability or unsuitability at the strategy preparation stage, as wind turbine technology is quickly evolving to be able to harness lower wind speeds than was not thought possible only a few years ago. The Draft RES indeed agrees with this; however areas of 7.5m/s at 75m and above were identified, excluding otherwise potentially available lands. 3. Nature Conservation Areas - Areas designated for nature conservation should also not be automatically excluded from accommodating new or repowered wind energy projects. This is because, for example, in such constraints-led studies, Special Protection Areas (SPAs) would typically be deemed unsuitable. However, there is greater than 1GW (1,000MW) of wind energy developments currently in operation in SPAs within Ireland. 	

URN	Submission Summary	Chief Executive Response & Recommendation
WFD -C2- 440	The submission requests that the Comeragh Mountain's be designated a Special Protection Area and lists a number of townlands that the submission refers directly to. The submission suggests that the area be free of large industrial windfarms. The submission highlights that the area is popular with walkers and provides a unique and unspoilt landscape for animals and plants.	<p>The CE notes the issues raised.</p> <p>Designation of SPAs is the remit of NPWS. The area is designated a SAC and classed as most sensitive in the Landscape Character Assessment and a No Go area in the Wind Energy Map. A new WES has been prepared. Please see CE's response to submission number WFD-C2-363.</p> <p>Recommendation No Change to Draft Plan</p>

3.2.16 Appendix 8: Landscape and Seascape Character Assessment, Scenic Routes and Protected Views

URN	Submission Summary	Chief Executive Response & Recommendation
WFD-C2-113	<p>The submission encourage the Council to use the GSI's physiographic units map data (link can be found in submission), in relation to Section 4.13, 'Landscape,' of the draft SEA Report and in Section 10.0 Landscape/ Seascape of Chapter 10: Landscape, Coast/ Marine and Blue Green Infrastructure of the draft Development Plan.</p> <p>It further recommends the use of GSI's Marine and Coastal Unit datasets in the Landscape and Seascape Character Assessment.</p>	<p>The CE notes the issues raised.</p> <p>Recommendation No change to Draft Plan.</p>
WFD-C2-140	<p>The submission call for the Council to restrict development around the Whiting bay area and to make it a protected area.</p>	<p>The CE notes the issues raised.</p> <p>Whiting Bay is included in the Most Sensitive Landscape Designation within the Landscape Character Assessment Map and subject to policies L02 and C&M05 and DM Standards of the plan.</p> <p>Recommendation No change to Draft Plan.</p>
WFD-C2-262	<p>The submission seeks that the most sensitive landscape classification for the Comeragh Mountains should include the entire mountain area.</p>	<p>The CE notes the issues raised.</p> <p>The Comeragh Mountains above the 200m contour line are designated most sensitive landscape in the Landscape Character Assessment and subject to policies L02 and L03.</p> <p>Recommendation No change to Draft Plan.</p>
WFD-C2-266	<p>The submission welcomes the continued identification of the Whiting Bay area as being most sensitive and raises concerns regarding inappropriate types and quantum of development in the immediate area which has limited public services and</p>	<p>The CE notes the issues raised.</p> <p>Whiting Bay is included in the Most Sensitive Landscape Designation within the Landscape Character Assessment Map and subject to policies L02 and</p>

URN	Submission Summary	Chief Executive Response & Recommendation
	public road capacity.	<p>C&M05 and development standards of the plan.</p> <p>Recommendation No change to Draft Plan.</p>
WFD-C2-302	<p>The Landscape sensitivity Map (and all relevant zoning decisions) need to be amended to protect the beauty and maintain the popularity of the Tramore cliffs and backstrand to local people and tourists.</p>	<p>The CE notes the issues raised.</p> <p>Tramore coastal zone is included in the Most Sensitive Landscape Designation within the Landscape Character Assessment and subject to policies L02 and C7M05.</p> <p>Recommendation No change to Draft Plan.</p>
WFD-C2-375	<p>Appendix 8</p> <p>In order to deliver the 4.2GW of wind energy as set out in the Climate Action Plan 2019, it is likely there will be a need to extent areas suitable for wind energy development into more sensitive landscape areas. WEI makes the following comments in relation to the impact of Appendix 8 on the RES for County Waterford.</p> <p>1. Over Emphasis on Visibility</p> <p>According to the IEMA Guidelines for Landscape and Visual Assessment (2013), 'Landscape Impacts' and 'Visual Impacts' are to be assessed separately. Landscape impact assessment considers the landscape as a resource and is concerned with physical effects on landform and land cover and the resulting changes to landscape fabric and character arising from a specific development, while visual impacts relate to views experienced at particular locations. As the draft LCA includes scenic designations it follows that the LCA must take account of the difference between landscape character and visual amenity. WEI has observed little distinction in the case of the</p>	<p>The CE notes and agrees the issues raised.</p> <p>Revised Renewable energy Strategy and Wind Energy Map address issues raised (Please see response to the OPR Submission No. WFD-C2-363). Upland characterisation also informed by SAC designation and peatland soils and potential for carbon release.</p> <p>Recommendation No change to Draft Plan.</p>

URN	Submission Summary	Chief Executive Response & Recommendation
	<p>draft LCA for Waterford and consider there is an over emphasis on visibility as a criterion for sensitivity in a landscape.</p> <p>This is highlighted further in section 3.2 'Disproportionate Visual Impacts. Again, WEI observes that the emphasis is on the extent of visibility, which is used as the singular policy focus. Similarly, WEI observes that the 'Degrees of Sensitivity' in section 3.3 are heavily reliant on the extent of visibility of development rather than the effects on landscape character. WEI considers that it is challenging to apply this approach appropriately for certain developments such as wind energy developments.</p> <p>2. Uniformly classifies landscape types that traditionally host wind energy developments as higher sensitivities. The Landscape Character Types of the 'Uplands' and the 'Foothills' have been classified as 'Most Sensitive' and 'Increased Sensitivity' respectively. WEI recognises and supports the importance of protecting the character and visual quality of 'Most Sensitive' and 'Increased Sensitivity' areas in Waterford. However, it is important to note that wind farms are required to be developed in areas of lower populations and higher wind speeds, traditionally in landscape types like foothills and uplands. It is also important to note that wind turbines are tall structures. Modern turbines are in the region of 150 – 185m+ in height; therefore such projects are inevitably going to be visible over wider areas. Individual projects can be designed and laid out in a way that are sensitive and appropriate to a particular landscape type. Furthermore, Landscape and Visual Impact Assessments (LVIA) are an integral aspect of the EIAR process which inform</p>	

URN	Submission Summary	Chief Executive Response & Recommendation
	<p>the design of wind farm proposals and as set out in planning applications. These surveys take account of both the Visual Impact and the Landscape Character of the wind farm location.</p> <p>3. No 'Medium Sensitivity' The absence of a medium sensitivity category results in low / lower sensitivity and high / higher sensitivity classifications which leaves potential development sites bordering high / low sensitivity landscapes open to ambiguity.</p> <p>This document needs to be objectively developed such that it can be used by all stakeholders to deliver the best outcomes. Although wind energy is not mentioned specifically, the draft LCA in its current form would eliminate the majority of land in County Waterford that is normally considered appropriate for wind energy developments.</p> <p>As presented, the 'increased sensitivity' of the Foothills landscape type in the draft LCA will have a significant and detrimental impact on potential wind energy developments in the landscape type typical of such development throughout the country. WEI have reviewed some of the established and extant wind energy developments within County Waterford. This confirms that wind energy developments are consented and therefore considered appropriate within or proximate to areas within 'most sensitive' and 'increased sensitivity' as described in the draft LCA. WEI would request that the ability of wind energy developments to absorb into areas of higher sensitivity is recognised by virtue of their locational requirements in a rural setting and their unique scale and massing i.e. slender and tall structures.</p>	

3.2.17 Appendix 9: Record of Protected Structures

URN	Submission Summary	Chief Executive Response & Recommendation
WFD -C2-2	The submission calls for the removal of a property from the draft list of the Record of Protected Structure.	<p>CE notes the comments.</p> <p>The building was proposed for listing due to the thatch roof. The roof is now slated.</p> <p>Recommendation WA751011, is to be deleted from the list of proposed additions to RPS, Appendix 9 in the Draft Plan p.55</p>
WFD -C2-35	Submission queries the addition of a property to the RPS.	<p>CE notes the comments.</p> <p>Sensitive renovations of the building and outbuildings have ensured the survival of the structures. It is of sufficient quality and standard to meet the requirements for inclusion onto the RPS.</p> <p>BH 03 of Draft Development Plan states that the Planning Authority can issue a Section 57 Declaration to determine which elements/features of the interior are of interest and to clarify the type of works would be considered exempted development i.e. which would not require planning permission.</p> <p>Recommendation No change to Draft Plan</p>
WFD -C2-103	The submission requests that the extent of the Portlaw ACA and the designation of the Cotton Mill site be reviewed and amended to take account the points raised in the submission.	<p>The CE notes the submission made and notes the issues raised.</p> <p>With regard to the extent of the ACA boundary, this includes the vista and setting on the approach into Portlaw and is also consistent with the requirements with regard to ACAs under Section 3.1 of the Department of Housing, Local Government and Heritage 'Architectural Heritage Protection Guidelines for Planning Authorities' (2011)</p> <p>It is noted that with regard to the Tannery, The 20th century addition is part of the evolving industrial history of the site and its inclusion is consistent with requirements under Section 2.5.8 of the Department of Housing, Local Government and Heritage 'Architectural Heritage Protection Guidelines for</p>

URN	Submission Summary	Chief Executive Response & Recommendation
		<p>Planning Authorities' (2011)</p> <p>Recommendation No change to Draft Plan</p>
WFD -C2- 165	This submission seeks the removal of a structure from the proposed additions to the RPS	<p>CE notes the comments.</p> <p>Funding supports are noted in BH 02 and BH 24 of the Draft Development Plan. It is to be noted that there are 11 thatchers working in the Waterford area at present</p> <p>The LA obligations under Part IV of the Planning and Development Act 2000 apply. It is considered that the building meets one or more of the Categories of Special Interest as set out in Section 51(1) of the Planning and Development Act, 2000, (as amended) to warrant inclusion on the Record of Protected Structures (Architectural, Historical, Archaeological, Artistic, Cultural, Scientific, Social or Technical interest). This house is considered of architectural and social merit. It is also of one of an important cluster of thatch houses in the Ardmore area.</p> <p>Recommendation No change to Draft Plan</p>
WFD -C2- 174	The submission states that it is not in agreement with the property in question being placed on the RPS.	<p>CE notes the comments.</p> <p>Funding supports are noted in BH 02 and BH 24 of the Draft Development Plan and repair to thatch roofs are eligible works. It is to be noted that there are 11 thatches working in the Waterford area at present. It is to be noted that the permanent removal of a thatch roof regardless of protected structure status requires planning permission.</p> <p>The LA obligations under Part IV of the Planning and Development Act 2000 apply. It is considered that the building meets one or more of the Categories of Special Interest as set out in Section 51(1) of the Planning and</p>

URN	Submission Summary	Chief Executive Response & Recommendation
		<p>Development Act, 2000, (as amended) to warrant inclusion on the Record of Protected Structures (Architectural, Historical, Archaeological, Artistic, Cultural, Scientific, Social or Technical interest). This house is considered of architectural and social merit. This house is one of an important cluster of thatch houses in the Ballynacourty area.</p> <p>Recommendation No change to Draft Plan</p>
<p>WFD -C2- 190</p>	<p>This submission seeks the removal of a structure from the proposed additions to the RPS</p>	<p>CE notes the comments.</p> <p>BH 03 of Draft Development Plan states that the Planning Authority can issue a Section 57 Declaration to determine which elements/features of the interior are of interest and to clarify the type of works would be considered exempted development i.e. which would not require planning permission.</p> <p>It is to be noted that designation as a protected structure would not impinge on privacy.</p> <p>The LA obligations under Part IV of the Planning and Development Act 2000 apply. It is considered that the house is one of historical and architectural merit. The executive support the inclusion of the building onto the RPS, however, based on site visit, this should relate only to its exterior envelope of the house and outbuildings only</p> <p>Recommendation Amend description of Proposed addition WA751045, Appendix 9 , p 57 in the Draft Plan from "Country house" To: <u>"Country house (exterior envelope only)".</u></p>
<p>WFD -C2- 216</p>	<p>The submission requests that property is not place on the Record of Protected Structures.</p>	<p>CE notes the comments.</p> <p>All notifications were sent by registered post, in the event of non delivery the letters were reposted. It is considered that every effort was made to deliver</p>

URN	Submission Summary	Chief Executive Response & Recommendation
		<p>to the owners / occupiers The LA obligations under Part IV of the Planning and Development Act 2000 apply It is considered that the building meets one or more of the Categories of Special Interest as set out in Section 51(1) of the Planning and Development Act, 2000, (as amended) to warrant inclusion on the Record of Protected Structures (Architectural, Historical, Archaeological, Artistic, Cultural, Scientific, Social or Technical interest). This house is on the NIAH ref 22817055 and is considered of architectural historical and social merit This and the boathouse Protected Structure WA750865 are important element of the maritime history of Dunmore East.</p> <p>Recommendation No change to Draft Plan</p>
<p>WFD -C2- 238</p>	<p>The submission requests that a property is not included on the Record of Protected Structures.</p>	<p>CE notes the comments.</p> <p>The submission refers to alterations and extensions to the building. Most historic buildings evolve over time and have been altered or extended. It is to be noted that designation as a protected structure would not impinge on privacy. BH 3 of Draft Development Plan states that the Planning Authority can issue a Section 57 Declaration to determine which elements/features of the interior are of interest and to clarify the type of works would be considered exempted development i.e. which would not require planning permission.</p> <p>The LA obligations under Part IV of the Planning and Development Act 2000 apply. It is considered that the building to meets one or more of the Categories of Special Interest as set out in Section 51(1) of the Planning and Development Act, 2000, (as amended) to warrant inclusion on the Record of Protected Structures (Architectural, Historical, Archaeological, Artistic, Cultural, Scientific, Social or Technical interest). It is considered that the house is one of historical and architectural merit. One of the few villa style houses found in East Waterford.</p>

URN	Submission Summary	Chief Executive Response & Recommendation
		<p>Recommendation No change to Draft Plan</p>
<p>WFD -C2- 272</p>	<p>The submission seeks to not to include a property on the Record of Protected Structures</p>	<p>CE notes the comments and appreciates that the character of the house has been carefully maintained.</p> <p>It is to be noted that the designation as a protected structure would not impinge on privacy. It is to be noted that the Local Authority obligations under Part IV of the Planning and Development Act 2000 apply. It is considered that the building to meets one or more of the Categories of Special Interest as set out in Section 51(1) of the Planning and Development Act, 2000, (as amended) to warrant inclusion on the Record of Protected Structures (Architectural, Historical, Archaeological, Artistic, Cultural, Scientific, Social or Technical interest). This house is considered of architectural and social merit. It is also of one of an important cluster of 5 thatch houses in the Portally area.</p> <p>Recommendation No change to Draft Plan</p>
<p>WFD -C2- 274</p>	<p>The submission requests that a property not be placed on the Record of Protected Structures.</p>	<p>CE notes the comment and appreciated that the character of this building has been carefully maintained.</p> <p>The request that the roof only be considered for protection, but this would not be possible as the context has to be considered. Designation as a protected structure would not impinge on privacy. The LA obligations under Part IV of the Planning and Development Act 2000 apply. It is considered that the building to meets one or more of the Categories of Special Interest as set out in Section 51(1) of the Planning and Development Act, 2000, (as amended) to warrant inclusion on the Record of Protected Structures (Architectural, Historical, Archaeological, Artistic, Cultural, Scientific, Social or Technical interest).</p> <p>This house is a very fine example of a thatch house and is one of an important cluster of the remaining 5 thatch houses in the Portally area.</p>

URN	Submission Summary	Chief Executive Response & Recommendation
		<p>Recommendation No change to Draft Plan</p>
WFD -C2- 279	The submission seeks not to include a property on the Record of protected Structures.	<p>CE notes the comments.</p> <p>It is noted that there have been extensive renovations to the building. Most historic buildings evolve over time and have been altered or extended. It is considered that the building retains its architectural form and expression, Section 2.5.2 of the 'Architectural Heritage Protection Guidelines for Planning Authorities' advise that "The protection of a façade alone should generally only be considered where there is no surviving interior of any interest, for example where the building has previously been gutted and the façade is the only remaining feature of the original historic building. The LA obligations under Part IV of the Planning and Development Act 2000 apply. The architectural interest of this building relates solely to its external appearance and form. In this instance therefore, the RPS designation should be applied to the envelope only</p> <p>Recommendation Amend description of Proposed addition Glebe House WA750970, Appendix 9 in the Draft Plan from "House" To: <u>"House (exterior only)"</u>.</p>
WFD -C2- 319	This submission seeks the removal of a structure from the proposed additions to the RPS	<p>CE notes the applicants support for addition to the RPS.</p> <p>It must be noted that any planning application for rural housing is assessed on its own merits. It is further noted that the rural housing policy in the Draft Plan is consistent with Section 28 Ministerial Guidelines. All applicants must comply with Policy Objective H27 and or H28 and demonstrate a genuine economic and or social need to live in a rural area. With regard to the Protected Structure status, the policies and objectives of the Development Plan and the Planning and Development Act 2000 as amended apply. BH 03 of Draft Development Plan states that the Planning Authority can issue a Section</p>

URN	Submission Summary	Chief Executive Response & Recommendation
		<p>57 Declaration to determine which elements/features of the interior are of interest and to clarify the type of works would be considered exempted development i.e. which would not require planning permission.</p> <p>The LA obligations under Part IV of the Planning and Development Act 2000 apply. It is considered that the house and immediate curtilage is one of historical and architectural merit.</p> <p>Recommendation No change to Draft Plan</p>
<p>WFD -C2- 430</p>	<p>The submission seeks not to include a property on the Record of protected Structures.</p>	<p>CE notes the comments and appreciation of vernacular heritage.</p> <p>It must be noted that a planning application for any development is assessed on its own merits. Funding supports are noted in BH 02 and BH 24 of the Draft Development Plan. It is to be noted that there are 11 thatches working in the Waterford area at present. BH 03 of Draft Development Plan states that the Planning Authority can issue a Section 57 Declaration to determine which elements/features of the interior are of interest and to clarify the type of works would be considered exempted development i.e. which would not require planning permission.</p> <p>The LA obligations under Part IV of the Planning and Development Act 2000 apply. It is considered that the building to meets one or more of the Categories of Special Interest as set out in Section 51(1) of the Planning and Development Act, 2000, (as amended) to warrant inclusion on the Record of Protected Structures (Architectural, Historical, Archaeological, Artistic, Cultural, Scientific, Social or Technical interest). This house is considered of architectural and social merit. It is also of one of an important cluster of thatch houses in this area of the County.</p> <p>Recommendation No change to Draft Plan</p>

URN	Submission Summary	Chief Executive Response & Recommendation
WFD -C2- 431	The submission seeks not to include a property on the Record of protected Structures.	<p>CE notes the comments.</p> <p>The submission refers to alterations to the building. Most historic buildings evolve over time and have been altered or extended. It is to be noted that the permanent removal of a thatch roof regardless of protected structure status requires planning permission. Funding supports are noted in BH 02 and BH 24 of the Draft Development Plan .It is to be noted that there are 11 thatches working in the Waterford area at present.</p> <p>The LA obligations under Part IV of the Planning and Development Act 2000 apply. It is considered that the building to meets one or more of the Categories of Special Interest as set out in Section 51(1) of the Planning and Development Act, 2000, (as amended) to warrant inclusion on the Record of Protected Structures (Architectural, Historical, Archaeological, Artistic, Cultural, Scientific, Social or Technical interest). This house is considered of architectural and social merit. This house is one of an important cluster of thatch houses around the Blackwater River area.</p> <p>Recommendation No change to Draft Plan</p>
WFD -C2- 443	This submission advises that she is not the current owner of the properties which are proposed additions to the RPS	<p>CE notes the comments.</p> <p>The correct mechanism for addressing errors was indicated on the notification letters.</p> <p>Recommendation No change to Draft Plan</p>
WFD -C2- 444	This submission seeks the removal of a structure from the proposed additions to the RPS	<p>CE notes comments.</p> <p>Most historic buildings evolve over time and have been altered or extended. BH 3 of Draft Development Plan states that the Planning Authority can issue a Section 57 Declaration to determine which elements/features of the interior</p>

URN	Submission Summary	Chief Executive Response & Recommendation
		<p>are of interest and to clarify the type of works would be considered exempted development i.e. which would not require planning permission.</p> <p>The LA obligations under Part IV of the Planning and Development Act 2000 apply. It is considered that the building to meets one or more of the Categories of Special Interest as set out in Section 51(1) of the Planning and Development Act, 2000, (as amended) to warrant inclusion on the Record of Protected Structures (Architectural, Historical, Archaeological, Artistic, Cultural, Scientific, Social or Technical interest). This house is considered to be a well-composed, middle-size house, which retains most of its original form and massing and of architectural merit by NIAH ref 22817041.</p> <p>Recommendation No change to Draft Plan</p>
WFD -C2- 450	This submission seeks the removal of a structure from the proposed additions to the RPS	<p>CE notes the comments.</p> <p>Funding supports are noted in BH 02 and BH 24 of the Draft Development Plan. It is to be noted that there are 11 thatches working in the Waterford area at present. BH 03 of Draft Development Plan states that the Planning Authority can issue a Section 57 Declaration to determine which elements/features of the interior are of interest and to clarify the type of works would be considered exempted development i.e. which would not require planning permission</p> <p>The LA obligations under Part IV of the Planning and Development Act 2000 apply. Waterford has a rich and varied built heritage which covers over 100 structure types as per NIAH typologies including thatch houses. When appraising buildings for addition to the RPS they are assessed under the criteria of special architectural, archaeological, historical, cultural, artistic, scientific, technical or social interest within the rankings of National, Regional or Local importance. In most circumstances additions to the RPS will be of Regional Importance or above, however buildings of local interest may be considered for inclusion on the RPS, provided the said structure meets one or</p>

URN	Submission Summary	Chief Executive Response & Recommendation
		<p>more of the Categories of Special Interest in accordance with Section 51 (1) of the Planning & Development Act, 2000, as per Section 2.5.3 of the 'Architectural Heritage Protection Guidelines for Planning Authorities', 2011</p> <p>This house is considered to be of architectural and social merit by NIAH ref 2903603 therefore meeting the criteria to warrant inclusion on the Record of Protected Structures inclusion onto the RPS.</p> <p>This house is of importance as it is one of the 2 remaining thatch houses in An Rinn Gaeltacht.</p> <p>Recommendation No change to Draft Plan</p>

3.2.18 Appendix 11: Natural Heritage Assets

URN	Submission Summary	Chief Executive Response & Recommendation
WFD-C2-479	<p>The submission seeks Tree Protection Orders (TPOs) for the following locations:</p> <ul style="list-style-type: none"> - St. John's College woods - Trees lining the road down to The Pier - The woodland at Pickardstown previously owned by Paul Horan - The wood across The bay at Corbally 	<p>The CE notes and agrees the issues raised.</p> <p>St. John's College Woods is listed as a site under the Schedule of Amenity Trees and as a site of Green Infrastructure value but given its value for biodiversity and carbon sequestration and it is recommended to include St. John's College Woods as an addition to Appendix 11 as a site of local biodiversity interest. There is no existing biodiversity/natural heritage designation on Corbally Woods, Tree belt at Pickardstown or Trees in the Cove Tramore leading to the Pier.</p> <p>Recommendation Include St. John's College Wood as a site of Local Biodiversity Interest and trees at Corbally, Pickardstown and the Cove, Tramore as Tree Preservation Orders to Appendix 11.</p>

3.2.19 Appendix 12: Airport Masterplan

URN	Submission Summary	Chief Executive Response & Recommendation
<p>WFD -C2- 313</p>	<p>Submission relates to lands at the Airport Business Park which has been selected by the client to expand its whiskey maturation services. Observations relating to the Draft Plan are:</p> <p>1: The Draft Waterford Development Plan 2022-2028 does not identify our client's landholdings as having Seveso Status and we ask for this to be changed accordingly.</p> <p>2: The Landscape and Seascape Character Assessment, Scenic Routes and Protected Views is misleading and unclear. We request that the relevant changes suggested above are made to designate both the Airport and the Business Park as Least Sensitive while also including both sites on the Landscape Sensitivity Map.</p> <p>3: The updated Waterford Airport Masterplan is zoned for Industrial, Enterprise and Employment uses, with greater flexibility to include not only airport-dependent enterprises, but also the types of those which can offer long-term prospects for generating revenues in new technologies and knowledge-based areas. We welcome this land use zoning and the general guidance provided within the Waterford Airport & Business Park Masterplan; however, we request that existing and permitted land use of bonded warehousing be appropriately recognised within the Waterford Regional Airport and Business Park Masterplan (Appendix 12).</p>	<p>The CE notes the issues raised</p> <p>Please see comments below in relation to points raised in the submission.</p> <p>1: Section 4.9 of the Draft Plan sets out SEVESO Directive/ Major Accidents. The CE notes that the Staffords Wholesale Ltd. T/A Staffords Bonded, Lockheed Avenue, Airport Business Park is not indicated as a SEVESO Directive/ Major Accidents Site.</p> <p>Recommendation Insert the following text in Section 4.9 at the start of the first paragraph on p.99 as follows: At present there are no industries which are established Seveso Directive sites within Waterford City and county, however Staffords Wholesale Ltd. T/A Staffords Bonded, Lockheed Avenue, Airport Business Park is a Designated Lower Tier Seveso III Establishment and Waterford Trans-Stock located in Ferrybank/ Kilkenny County 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> <p>2. It is considered that the use type 'bonded warehouses' has been accepted by way of development consent therefore the use type is considered appropriate at this location.</p> <p>Recommendation No change to Draft Plan</p> <p>3. The Landscape and Seascape Character Assessment has been updated.</p>

URN	Submission Summary	Chief Executive Response & Recommendation
		<p>Please see CE's response and recommendation to submission number WFD-C2-363. It must be noted that the Airport falls in an area classified as 'Low Sensitivity'. This area type is a common character type with a potential to absorb a wide range of new developments. This is considered appropriate at this location.</p> <p>Recommendation No change to Draft Plan</p>
<p>WFD -C2- 379</p>	<p>10. Waterford Regional Airport</p> <p>The development plan should not alone recognize the importance of the development of the additional runway at Waterford regional airport but also the need for central government to provide whatever funding is required to achieve this project completion. This regional airport is a keystone in future southeast aviation development</p>	<p>The CE notes the issue raised.</p> <p>The CE is aware of the need to support the continued development and expansion Waterford Airport as key pieces of infrastructure for the region in their own right in addition to key drivers for employment and our economy. Section 4.5 of the Draft Plan sets out the Council's supports for the 'expansion' of the existing runway and the need to secure capital investment in order to advance and implement infrastructure, utility and facility improvements at Waterford Airport in order to unlock the local, regional and international economic potential of the airport. Please refer to Policy Objective Econ 09 and Trans 27.</p> <p>Recommendation No change to Draft Plan</p>

3.2.20 Appendix 16: Implementation and Monitoring

URN	Submission Summary	Chief Executive Response & Recommendation
<p>WFD -C2- 143</p>	<p>The submission highlights that the draft plan lacks specific indicators (measures) to monitor quality of life improvements that are being currently measured and will be directly comparable over the lifetime of the plan. The submission suggests that these indicators must reflect the UN sustainable development goals, in order to move away from economic measures that have proved to be problematic for sustainable development and equality.</p>	<p>The CE notes the issue raised.</p> <p>The Draft Development Plan introduces, for the first time, a framework for measuring the outcomes of Policy Objectives. The implementation and monitoring framework is set out in Appendix 16 of the Draft Plan and Policy Objectives are assessed in terms of means of implementation and also assessed against key local SDG Strategic goals to monitor/evaluate delivery of the Policy Objective.</p> <p>With regard to timeframes and identifying key priorities, many Policy Objectives are continual or may take a number of Plan cycles to be fully realised. In this context, the framework is intended to provide a first step towards assessing the progression towards the delivery of desired planning outcomes which, may continue through successive Development Plans. Furthermore, it is noted that the delivery of desired planning outcomes, may be subject to a range of external factors, most notably wider economic circumstances and availability of resources, and as such the specification of a timeframe would necessitate a firm means of ensuring implementation.</p> <p>In addition, it is highlighted that a key purpose of the implementation and monitoring framework is to function as a formal policy feedback loop with the evaluation and reporting processes intended to comprise a key input into the formulation and refinement of future planning policy. In this manner, the framework is intended to serve as an important evidence-based input and integrate with the review process of subsequent County Development Plan's on an ongoing basis.</p> <p>Recommendation No change to Draft Plan</p>

URN	Submission Summary	Chief Executive Response & Recommendation
WFD -C2- 245	The submission seeks to strengthen the monitoring of plan implementation during its lifetime by identifying measurable goals and targets which can be readily monitored on an ongoing basis.	The CE notes the issue raised. Recommendation Please see CE response to Submission No. WFD-C2-143.
WFD -C2- 339	<p>The submission requests that alongside the development plan a timeline & masterplan of 2022 to 2028 be published which outlines when key projects go-live; i.e. The University expansion unlocks FDI confidence, the North Quays, pedestrianisation of South Quays.</p> <p>The submission requests that a dedicated, full-time resourced team be put in place, which will unlock 1bn and 10,000 jobs would change the course of Waterford's history. It submits that both Cork & Limerick have shown what's possible in the past decade when such teams are put in place; Waterford now has the opportunity to replicate these models of delivery to unlock growth.</p> <p>The submission was attached a 'Covid Recovery Masterplan v5' which outlines a full Development plan for 22-28, with timelines, and it's jobs & economic impact, by year, with specific solution on housing, retail, tourism & climate.</p> <p>The submission also highlights the need for a digital dashboard to be created to facilitate reporting, monitoring and implementation and suggests a partnership with the University, CSO and Chamber be established.</p>	<p>The CE notes the issue raised.</p> <p>It is noted that the Draft Plan supports collaboration with WIT/Walton Institute for Information and Communication Systems and Science and other parties to devise and implement SMART city/transport initiatives for Waterford City and other urban centres within the functional area of the Council. A dashboard could be developed over the lift time of the plan to facilitate reporting, monitoring and implementation of policy objectives. A number of other points raised in this submission are considered not to be Development Plan issues and are more operational.</p> <p>Recommendation Please see CE response to Submission No. WFD-C2-143</p>

3.2.21 Appendix 17: Tiered Approach to Zoning

URN	Submission Summary	Chief Executive Response & Recommendation
<p>WFD -C2- 132</p>	<p>The requests that the Tiered Approach to Zoning presented in presented in Appendix 17 of the Draft Plan should not related to 'residential' zoned lands only. All zoned lands with potential for development in the life of the plan (for residential or non-residential/commercial development) should be tiered to comply with the NPF.</p>	<p>The CE notes the issues raised.</p> <p>It is considered that the approach taken in compiling Appendix 17 is consistent with Appendix 3 of the NPF and the recently published Development Plan Guidelines for Planning Authorities – Draft for Consultation (August 2021) and will therefore more readily enable the planning authority and other agencies to focus delivery of essential infrastructure, services and facilities on more precise locations where housing can be more rapidly be developed, supported by transport and amenities. Furthermore, it is noted that the OPR have not raised any issues in terms of requiring a Tiered Approach to Zoning for all zoned land within the Draft Plan.</p> <p>Recommendation No change to Draft Plan</p>

3.2.22 Appendix 13 Strategic Flood Risk Assessment (SFRA)

URN	Submission Summary	Chief Executive Response & Recommendation
WFD -C2-1	The submission call for the flood zone at Ballinakill to be modified.	<p>The CE notes the issues raised.</p> <p>The flood zones identified are the National Indicative Fluvial Mapping prepared by the OPW. These have been assessed for the purposes of Strategic Flood Risk Assessment to support the preparation of the Development Plan. The lands are located in flood zone B. The applicant has stated that the finished floor levels lie above the flood level. Section 5.6 of the SFRA (Appendix 13 of the draft Plan) identifies where development may be appropriate in floodzones.</p> <p>Recommendation No change to Draft Plan</p>
WFD -C2-54	This submission requests that the SFRA for Tallow be revised so that the remedial works undertaken by Glanbia can be taken into consideration.	<p>The CE notes the issues raised.</p> <p>The flood zones identified are the National Indicative Fluvial Mapping prepared by the OPW. These have been assessed for the purposes of Strategic Flood Risk Assessment to support the preparation of the Development Plan. Lands in Tallow have been identified for rural village uses pursuant to the amended general zoning types. Any development on the lands will be required to assess the impact of flooding on the proposal, if any in line with Section 5 of the SFRA.</p> <p>Recommendation No change to Draft Plan</p>
WFD -C2-134	The submission raises a number of concerns in relation to sea level rise with regards to Dungarvan Bay and call for the dredging and the placement of flood defences or a lock.	<p>The CE notes the issues raised.</p> <p>The flood zones identified are the National Indicative Fluvial Mapping prepared by the OPW. These have been assessed for the purposes of Strategic Flood Risk Assessment to support the preparation of the Development Plan. The funding and construction of future flood defence measures is the</p>

URN	Submission Summary	Chief Executive Response & Recommendation
		<p>responsibility of the OPW while the placing of a lock and wall in the harbour is likely to cause significant impact on siltation, flooding and will be located within the Dungarvan Harbour SPA and pNHA.</p> <p>Recommendation No change to Draft Plan</p>

3.2.23 Appendix 19 Strategic Environmental Assessment (SEA)

URN	Submission Summary	Chief Executive Response & Recommendation
<p>WFD-C2-15</p>	<p>The submission identifies the principal function of the EPA as one of the statutory environmental authorities under the SEA Regulations. Their role as an SEA environmental authority focuses on promoting the full and transparent integration of the findings of the Environmental Assessment into the Plan and advocating that the key environmental challenges for Ireland are addressed as relevant and appropriate to the plan. Specific reference is made to the document 'SEA of Local Authority Land Use Plans – EPA Recommendations and Resources' in this regard. In addition to alignment of the development plan with this document reference is made to the alignment required with national and regional plans and programs, particularly the NPF and SRSES.</p> <p>The submission refers specifically to ensuring alignment of the Development Plan and Environmental Report with the following:</p> <ul style="list-style-type: none"> • RPO 79 relating to the inclusion in the Development Plan of an objective to prepare a Strategic Integrated Framework Plan for Waterford Harbour. • Full description of the alternatives considered and how the selection and assessment of these has led to the selection of the preferred alternative. You should assess the alternatives against the 'Strategic Environmental Objectives' identified in the SEA ER. • Assess and document the full range of likely significant environmental effects of implementing the Plan, including the potential for cumulative effects in combination with other relevant Plans/ Programmes and Projects. • Where the potential for likely significant effects is identified, provide appropriate mitigation measures to avoid or minimise 	<p>The CE notes and agrees the issues raised.</p> <p>SEA Environmental Report revised and amended accordingly.</p> <p>Recommendation No change to Draft Plan.</p>

URN	Submission Summary	Chief Executive Response & Recommendation
	<p>these, ensuring that the Development Plan includes clear commitments to implement the mitigation measures.</p> <ul style="list-style-type: none"> • The Monitoring Programme should be flexible to take account of specific environmental issues and unforeseen adverse impacts should they arise. It should consider and deal with the possibility of cumulative effects. Monitoring of both positive and negative effects should be considered. The monitoring programme should set out the various data sources, monitoring frequencies and responsibilities. Where monitoring identifies adverse impacts during the implementation of the Plan, Waterford City and County Council should ensure that suitable and effective remedial action is taken. Reference is made to guidance on SEA-related monitoring available on the EPA website at https://www.epa.ie/publications/research/environmental-technologies/research-306-guidance.php. • All future amendments to the Development Plan should be screened for likely significant effects. • Once the Development Plan is adopted an SEA Statement must be prepared and forwarded to the environmental authorities. 	
WFD-C2-113	<p>The submission highlights various amendments that the GSI would like made to the draft amended plan. These include the list of Geological Heritage sites in Waterford as outlined in Appendix 11 and in Section 4.8.1 in the SEA Report.</p> <p>It submits that the Geochemistry datasets would be of benefit in Chapter 4 'Environmental Baseline', Section 4.8 'Soil' of the SEA environmental report.</p>	<p>The CE notes and agrees the issues raised.</p> <p>Recommendation: List of Geological Heritage sites in Appendix 11 and SEA Environmental Report revised and amended accordingly. 9 Ballyquin Shore(north side of Ardmore Bay) Quaternary,Devonian, Lower Carboniferous Include 2 additional GH sites in Appendix 11- Comeraghs Overview-Quaternary and Copper Coast Overview - Cambrian,Silurian, Mineralogy and Coastal Geomorphology</p>
WFD-C2-	<p>The submission considers that the SEA fails to fully identify the likely environmental impacts of the draft CDP and suggests</p>	<p>The CE notes and agrees the issues raised.</p>

URN	Submission Summary	Chief Executive Response & Recommendation
302	<p>the following Policy be included:</p> <p>NEW POLICY: The council commits itself to the goal of sustainable development, but the council explicitly recognizes that, despite the efforts made in this County Development Plan, the way of life we have in Waterford (and Ireland generally) is environmentally unsustainable at present. We need to change.</p> <p>The submission considers that neither the draft CDP nor its Environmental Reports addresses the issue of effluent discharge to the sea in Tramore or the impact that the expansion of Tramore will have on this ongoing issue. A new Policy statement is suggested.</p> <p>NEW POLICY: The council recognizes that, despite the Blue Flag status of Tramore Beach, there is an intermittent problem with the water quality in Tramore bay, especially behind the Ladies slip and at Tramore Pier (where sewage is intermittently released). With renewed urgency, the council will examine permanent solutions to this problem and will discourage developments that will exacerbate the problem.</p>	<p>Issues raised subject to environmental monitoring and regulation. Policies WQ01, WQ02, WQ03, WQ04 and WQ05 pertain.</p> <p>Recommendation No change to Draft Plan.</p>
WFD-C2-305	<p>The submission considers that the SEA is problematic as it does not fully reflect that life is environmentally unsustainable at present. A new policy statement be incorporated into the Plan.</p> <p>NEW POLICY STATEMENT: The council commits itself to the goal of sustainable development, but the council explicitly recognizes that, despite the efforts made in this County Development Plan, the way of life we have in Waterford (and Ireland generally) is environmentally unsustainable at present. We need to change.</p>	<p>The CE notes and agrees the issues raised.</p> <p>Vision goals policies and objectives of plan are robust in advocacy and commitment to Sustainable Development Goals.</p> <p>Recommendation No change to Draft Plan.</p>

PART 4 APPENDICES TO CHIEF EXECUTIVE'S REPORT

APPENDIX 1 Proposed CE Recommended Zoning Changes

Welcome to the Waterford City and County Development Plan Map Browser

Welcome to the CE Zoning Recommendation Story Maps, this is an easy to use information system displaying the detailed proposed recommended zoning changes as part of the Draft Development Plan review. The map browser incorporates proposed zoning changes and is innovative in its ability to overlay and analyse the data in a web browser environment.

The aim of the Story Maps Browser is to give the public and elected members access to large scale detailed maps of all the proposed zoning changes across the City and County. This allows you to be better informed about the policies contained in the plan and how they affect the county.

Disclaimer

Waterford City and County Draft Development Plan Information displayed on the maps is current as of 22nd November 2021. If you have any queries on the content of the maps please contact the Planning Department of Waterford City and County Council. Tel 0761 10 20 20.

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To continue and use the Story Map Browser click [here](#).

APPENDIX 2 List of Written Submissions received (in numerical order)

URN	Author
WFD-C2-1	Mark O Sullivan
WFD-C2-2	Eamonn Sweeney
WFD-C2-3	Aaron O'Doherty
WFD-C2-4	T Walsh
WFD-C2-5	T Walsh
WFD-C2-6	Damien Hennessy
WFD-C2-7	Withdrawn author
WFD-C2-8	Avice White
WFD-C2-9	Fitzwilton Hotel
WFD-C2-10	Waterford and tramore racecourse ltd
WFD-C2-11	Waterford L.E.D.C.
WFD-C2-12	Ardmore Tidy Towns Association
WFD-C2-13	Suirway Bus & Coach Services Ltd
WFD-C2-14	Heritage Group
WFD-C2-15	Environmental Protection Agency
WFD-C2-16	MICHEAL MOLONEY
WFD-C2-17	Local Link Waterford
WFD-C2-18	Land Development Agency
WFD-C2-19	Irish Green Building Council
WFD-C2-20	4th Waterford Abbeyside Scouts
WFD-C2-21	Dean Carroll
WFD-C2-22	Aisling Uí Cheallacháin
WFD-C2-23	Thelma Caples
WFD-C2-24	Joe Brennan
WFD-C2-25	Kevin McGrath
WFD-C2-26	David Keane
WFD-C2-27	Waterford LCDC
WFD-C2-28	Peter and Nellie Power
WFD-C2-29	Michael & Martina Walsh
WFD-C2-30	Laoi na Mara Residents Association
WFD-C2-31	Joan Clancy
WFD-C2-32	Mary Power
WFD-C2-33	Irish Bee Conservation Project CLG.
WFD-C2-34	Richard Finnegan
WFD-C2-35	Mildred King
WFD-C2-36	Bernard Thompson
WFD-C2-37	Laurence Curran
WFD-C2-38	Dunhill Rural Enterprises CLG

URN	Author
WFD-C2-39	David Walsh
WFD-C2-40	Karen & Donal Dempsey Dempsey
WFD-C2-41	Waterford Volunteer Centre
WFD-C2-42	Meadowcourt Homes Ltd
WFD-C2-43	Teresa LeGear Keane
WFD-C2-44	Denise Doherty
WFD-C2-45	Orla Murray
WFD-C2-46	Withdrawn author
WFD-C2-47	Richard Hanrahan
WFD-C2-48	Richard Hanrahan
WFD-C2-49	mark boyle
WFD-C2-50	Harry and Margaret Boyle
WFD-C2-51	norma Carmody
WFD-C2-52	Eithne Earle
WFD-C2-53	Pauline Lyne
WFD-C2-54	Martin Curley
WFD-C2-55	Stagemad Theatre Company
WFD-C2-56	St Johns Special School Board of Management
WFD-C2-57	mark boyle
WFD-C2-58	Copper Coast UNESCO Global Geopark
WFD-C2-59	Roadstone Ltd.
WFD-C2-60	SE Construction (Kent) Ltd
WFD-C2-61	Gary Lawlor
WFD-C2-62	Sean O Reagain
WFD-C2-63	Sarah O Donoghue
WFD-C2-64	Brian Dempsey
WFD-C2-65	Maggie UiMhurchu
WFD-C2-66	Noreen McMahon
WFD-C2-67	Elaine Hamblen
WFD-C2-68	Margaret Kelly Toft
WFD-C2-69	Gracedieu Residents Group
WFD-C2-70	Emma Hannon
WFD-C2-71	Waterford Older People's Council
WFD-C2-72	John O Donnell
WFD-C2-73	Peter Thomson Planning Solutions
WFD-C2-74	Peter Thomson Planning Solutions
WFD-C2-75	Peter Thomson Planning Solutions
WFD-C2-76	Peter Thomson Planning Solutions
WFD-C2-77	Peter Thomson Planning Solutions
WFD-C2-78	Peter Thomson Planning Solutions
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WFD-C2-88	Peter Thomson Planning Solutions
WFD-C2-89	Peter Thomson Planning Solutions
WFD-C2-90	Peter Thomson Planning Solutions
WFD-C2-91	Fewer Harrington and Partners
WFD-C2-92	Transport Infrastructure Ireland
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WFD-C2-94	Francis Dwane
WFD-C2-95	John Whelan
WFD-C2-96	Críostóir Ó Faoláin
WFD-C2-97	James Murray
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WFD-C2-102	Copper Coast UNESCO Global Geopark
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WFD-C2-104	Críostóir Ó Faoláin
WFD-C2-105	Colette O'Connell
WFD-C2-106	Kevin Kinsella
WFD-C2-107	Radley Engineering
WFD-C2-108	Water Safety Ireland Waterford
WFD-C2-109	John Harney
WFD-C2-110	Gas Networks Ireland
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WFD-C2-113	Geological Survey Ireland
WFD-C2-114	Patricia Connors
WFD-C2-115	James Comyn
WFD-C2-116	Dept of Housing, Local Government & Heritage
WFD-C2-117	Fewer Harrington and Partners
WFD-C2-118	Tom Hanrahan
WFD-C2-119	Joseph Connors
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WFD-C2-122	Breda Murphy

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WFD-C2-127	Pat Rockett
WFD-C2-128	Greensource
WFD-C2-129	S.E. Construction (Kent) Ltd.
WFD-C2-130	S.E. Construction (Kent) Ltd.
WFD-C2-131	Tesco Ireland Limited
WFD-C2-132	Gas Networks Ireland
WFD-C2-133	An Post
WFD-C2-134	Dungarvan & West Waterford Chamber
WFD-C2-135	Waterford Suir Valley Railway
WFD-C2-136	Fionnuala McGrath
WFD-C2-137	Catalina Saldarriaga
WFD-C2-138	Caroline Ryan
WFD-C2-139	Michael Duffy
WFD-C2-140	David Naylor
WFD-C2-141	Combray Ltd
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WFD-C2-146	Susan Furniss
WFD-C2-147	Jane O'Shea
WFD-C2-148	Moya Power
WFD-C2-149	Yvonne Whelan
WFD-C2-150	Eileen Heffernan
WFD-C2-151	Susan Murray
WFD-C2-152	Therese Veale
WFD-C2-153	Claire Lennon
WFD-C2-154	Valerie Dempsey
WFD-C2-155	Julianne Veale
WFD-C2-156	Laura Green
WFD-C2-157	Ursula Ryan
WFD-C2-158	Rosarie Kealy
WFD-C2-159	Richie Daly
WFD-C2-160	Ben Flynn
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WFD-C2-164	Clare Morrissey

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WFD-C2-173	Ann Marie Earley
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WFD-C2-175	Nicola Boland
WFD-C2-176	John Murphy
WFD-C2-177	Paula Veale
WFD-C2-178	Críostóir Ó Faoláin
WFD-C2-179	Clashmore and Kinsalebeg Community Council
WFD-C2-180	Bohemians FC
WFD-C2-181	Sasa Repas
WFD-C2-182	Residents of Kennel lane group
WFD-C2-183	Frank Ryan
WFD-C2-184	Richard Hanrahan
WFD-C2-185	Waterford Bicycle User Group (BUG)
WFD-C2-186	Pat Devereux
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WFD-C2-190	Ellen power
WFD-C2-191	South East on Track
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WFD-C2-193	Aoife Mooney
WFD-C2-194	Martina cullinan
WFD-C2-195	Dermot Fitzpatrick
WFD-C2-196	Sonya O Keffe
WFD-C2-197	Eilis O'toole
WFD-C2-198	Jean Mullany
WFD-C2-199	Maura Murphy
WFD-C2-200	Terri Foley
WFD-C2-201	Údarás na Gaeltachta
WFD-C2-202	Arthur and Sylvia Dagg
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WFD-C2-213	Office of Public Works
WFD-C2-214	Mary Griffin
WFD-C2-215	Claire Fanning
WFD-C2-216	John O'Sullivan
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WFD-C2-220	Noreen McMahon
WFD-C2-221	Gianni Alen Buckley
WFD-C2-222	Tramore Golf Club
WFD-C2-223	BMA Planning
WFD-C2-224	Kylie Queally
WFD-C2-225	Ballinroad Soccer Club
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WFD-C2-229	Fiachra O Ceilleachair
WFD-C2-230	Susan Duggan
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WFD-C2-232	Carmel Ann
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WFD-C2-262	Alice Sweeney
WFD-C2-263	Declan Clune
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WFD-C2-268	Danny McGrath
WFD-C2-269	Eilis O'Grady
WFD-C2-270	Fáilte Ireland
WFD-C2-271	Wayne Kingston
WFD-C2-272	Betty Dillon
WFD-C2-273	Elaine O'Grady O'Grady
WFD-C2-274	Mary Hegarty
WFD-C2-275	Michael Murphy
WFD-C2-276	Scoil Gharbháin
WFD-C2-277	Mel Morgan
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WFD-C2-279	Simon and Rosemarie Dunne
WFD-C2-280	Ballinroad Community Group Committee
WFD-C2-281	Lisa Shortall
WFD-C2-282	David Veale
WFD-C2-283	Creadan - Waterford Estuary SG
WFD-C2-284	Clair Ni Sheoige
WFD-C2-285	denis malone
WFD-C2-286	Coiste Cúram Leanai Phort Láirge
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WFD-C2-305	Jim Swift
WFD-C2-306	Thomas Kavanagh
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WFD-C2-309	Stephanie Taheny
WFD-C2-310	Fewer Harrington and Partners
WFD-C2-311	Southern Regional Assembly
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WFD-C2-320	Glenveagh Homes
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WFD-C2-322	Department of Education
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WFD-C2-338	Little Conquerors, West Waterford Autism Support
WFD-C2-339	Robert Cass
WFD-C2-340	Katie Bullen
WFD-C2-341	Declan Brassil & Co. Ltd.
WFD-C2-342	Stephanie Taheny
WFD-C2-343	Gaelcholáiste Phort Láirge
WFD-C2-344	Lisa Cunningham
WFD-C2-345	Anthony Robinson
WFD-C2-346	Fewer Harrington and Partners
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WFD-C2-348	Waterford Institute of Technology
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WFD-C2-350	Emma Tobin
WFD-C2-351	Coillte
WFD-C2-352	Therese Casey
WFD-C2-353	BirdWatch Ireland
WFD-C2-354	DP Energy
WFD-C2-355	National Transport Authority
WFD-C2-356	Michael Ryan
WFD-C2-357	Robert Cass
WFD-C2-358	Ken Healy
WFD-C2-359	April OGorman
WFD-C2-360	Ibec
WFD-C2-361	Judit McNally
WFD-C2-362	Karen & Donal Dempsey Dempsey
WFD-C2-363	Office of the Planning Regulator
WFD-C2-364	Emmett Mullally
WFD-C2-365	Co. Waterford Beekeepers' Association
WFD-C2-366	Heather O Reilly
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WFD-C2-368	annette wallace
WFD-C2-369	Gerard & Kay Boland
WFD-C2-370	Denise Radley
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WFD-C2-372	Waterford Sports Partnership
WFD-C2-373	Ocean Winds (Ireland)

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WFD-C2-375	Wind Energy Ireland
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WFD-C2-377	Native Irish Honey Bee Society
WFD-C2-378	Eibhlin Drohan
WFD-C2-379	Matt Shanahan
WFD-C2-380	Suirside to Seaside Citizens for Survival
WFD-C2-381	Anne-Marie and Richard Hayes
WFD-C2-382	Siobhan Drohan
WFD-C2-383	Justin Spratt
WFD-C2-384	Gareth Falconer
WFD-C2-385	Gareth Falconer
WFD-C2-386	Gareth Falconer
WFD-C2-387	Br. Ben Kellegher
WFD-C2-388	Breida Sinnott
WFD-C2-389	Catherine Twomey
WFD-C2-390	Claire Meaney
WFD-C2-391	Conchur O Hogain
WFD-C2-392	Construction Industry Federation
WFD-C2-393	Patrica Ward
WFD-C2-394	MDP and Partners
WFD-C2-395	Dermot Fitzpatrick
WFD-C2-396	Bilberry Goats Heritage Trust Ltd.
WFD-C2-397	Waterford Traveller Community Development Project.
WFD-C2-398	Norman Graham
WFD-C2-399	David Chapman
WFD-C2-400	Stephen and Mary Harte
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WFD-C2-404	Peter Thomson Planning Solutions
WFD-C2-405	Kill Action and Alert Group and Kill Community Centre CLG
WFD-C2-406	Francis Creen
WFD-C2-407	MDP and Partners
WFD-C2-408	Peter Thomson Planning Solutions
WFD-C2-409	Waterford Disability Network .
WFD-C2-410	Jim Walsh
WFD-C2-411	Bernie Skimer
WFD-C2-412	Anselm Hayes
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WFD-C2-423	Sam Mc Crum
WFD-C2-424	MDP and Partners
WFD-C2-425	MDP and Partners
WFD-C2-426	Peter and Nellie Power
WFD-C2-427	Barry Monaghan
WFD-C2-428	Pat Halley
WFD-C2-429	Yvonne O'Brien
WFD-C2-430	John Morrison
WFD-C2-431	Blare McCauley
WFD-C2-432	Brickey Rangers
WFD-C2-433	James Fleming
WFD-C2-434	David Gough?
WFD-C2-435	Joanna Heduvan
WFD-C2-436	Simon Cross
WFD-C2-437	Maria Fewer
WFD-C2-440	Helen Fraher
WFD-C2-441	Michael Keane
WFD-C2-442	Patricia O Sullivan
WFD-C2-443	Mary Condon
WFD-C2-444	Ruth Murphy
WFD-C2-445	Francis Smith
WFD-C2-446	John and Lenore Byrne
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WFD-C2-448	Mrs. K O'Neill
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WFD-C2-450	Mary Cahill
WFD-C2-451	john morrison
WFD-C2-452	Withdrawn author
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WFD-C2-454	Gareth Falconer
WFD-C2-455	Roisin Clancy Davies
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WFD-C2-457	Deirdre O'Neill
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WFD-C2-472	Owen Kavanagh
WFD-C2-473	Fiona Rockett
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WFD-C2-476	Heather Spain
WFD-C2-477	Noel Whittle
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WFD-C2-479	Mary Higgins
WFD-C2-480	Sean Furlong
WFD-C2-481	John and Tyrone Molly
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APPENDIX 3 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

APPENDIX4 Chief Executive's Draft Plan Errata

Chapter 4
" Existing Enterprise Centres in Dungarvan, Tallow, Lismore, Cappoquin, Dunmore East , Kilmacthomas, Dunhill" - No enterprise centre in Dunmore according to Dunmore Tidy Towns
Chapter 5
Point of correction (Chapter 5 – 5.5): the 14.6% total population travelling to work/ education using Green modes within the county is lower than the State average 16.6% not higher.
"The Council is committed to working with key stakeholders such as NTA, TII, Rural Link (this should read Local Link) and local communities in providing a real alternative to the private car".

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

Draft Waterford City and County Development Plan 2022-2028

Section 12 of the Planning and Development Acts 2000 – 2020 Notice of the Preparation of the Draft Waterford City and County Development Plan 2022 - 2028

Notice is hereby given pursuant to Section 12(1)(b) of the Planning and Development Acts, 2000-2020 that Waterford City and County Council has prepared a Draft City and County Development Plan. The Draft Plan is accompanied by a Strategic Environmental Report prepared in accordance with the Planning and Development (Strategic Environmental Assessment) Regulations 2004, an Appropriate Assessment, pursuant to Article 6(3) and Article 4 of the Habitats Directive 92/43/EEC and a Strategic Flood Risk Assessment.

The Draft City and County Development Plan, the Strategic Environmental Assessment Report, the Appropriate Assessment Report and the Strategic Flood Risk Assessment, will be on PUBLIC DISPLAY and available for public inspection from **18th June to 30th August 2021** (both dates inclusive) at the following locations during normal opening hours:

- Customer Care Desk, Waterford City & County Council, Baileys New Street, Waterford City;
- Customer Care Desk, Waterford City & County Council, Civic Offices, Dungarvan; and,
- Waterford City & County Council Branch Libraries.

Resulting from the Covid 19 public health restrictions currently in place it may not be feasible to access the Draft Development Plan content on demand at the above locations and as such engagement with a dedicated online consultation portal consult.waterfordcouncil.ie is strongly recommended.

Observations or submissions regarding the Draft Development Plan and/or Environmental Report and/or Appropriate Assessment are invited from members of the public and other interested parties. You can make an observation or submission via the following options **only**;

- Online by registering on <https://consult.waterfordcouncil.ie> where you can then make a submission on the draft chapters, topics and map sheets. You can also submit drawings of any areas relating to your submission on an interactive development plan map, **or**
- In Writing marked "Draft City and County Development Plan" to the Planning Department, Waterford City and County Council, Menapia Building, The Mall, Waterford City.

Observations or submissions must include the full name and address of the person(s) making the submission and where relevant, the body or organisation represented.

Only written submissions or observations with respect to the Draft made to the planning authority within the stated period will be taken into consideration before the making of the plan. Submissions or observations in respect of the Strategic Environmental Assessment (SEA) report, Appropriate Assessment (AA) report and Strategic Flood Risk Assessment (SFRA) may also be made to the Planning Authority within the period specified and will be taken into consideration. All submissions and observations must be received before **5pm on 30th August 2021. Late submissions will not be accepted.**

Children, or groups or associations representing the interests of children, are invited to make submissions or observations.

Please note that all submissions will be made available for public viewing on the Council's consultation website during the plan-making period. Waterford City and County Council will treat all personal data you may give as confidential. We will retain your data for no longer than is necessary for the purpose of this City and County Development Plan and in accordance with Waterford City and County Council's Retention Policy and the relevant Data Protection legislation.

Public Consultation Events:

While Waterford City & County Council wishes to ensure that the draft Development Plan will be informed by public engagement, as a result of Covid 19, new ways of communicating fully with the public and interest parties are required. To this end it is intended to hold a number of public webinars throughout the public consultation period, full details of which will be posted on the consultation portal consult.waterfordcouncil.ie and in local press in the coming weeks. Registration for these events will be required. Individuals, groups, organisations or representatives will be invited to discuss any element or issues stemming from the Waterford City and County Draft Development Plan 2022 - 2028.

In the interim members of the public are requested to engage with the consultation portal and associated online content which are specifically designed to facilitate the easy making of submissions. In the interest of public health at this time we would ask that people interact in the first instance with the online content on our consultation portal however where individuals are unable to access the content online they may contact the Planning Department via email to planning@waterfordcouncil.ie or by phone to 0761 102562 to make an appointment to view the relevant documents.

**Liam McGree,
Senior Planner,
Waterford City and County Council**

APPENDIX 7 Draft Development Plan Additional Appendices

Appendix 21

Waterford City and County

Regeneration and Opportunity Sites

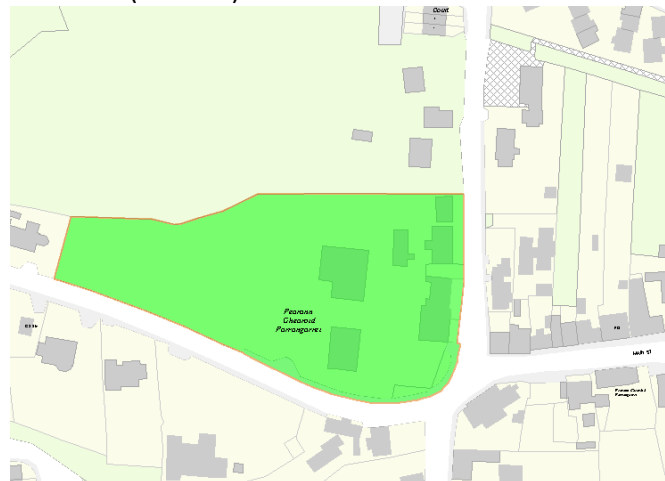
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General Objectives for Regeneration Sites

- All new development must be of an appropriate size, scale, character, have high quality public realm, incorporate excellent architectural/ urban design and place-making principles as outlined in Chapter 8 of the Development Plan, Volume 2 Development Management and Appendix 5 – Placemaking Strategy, include hard and soft landscaping, SUDs and nature based infrastructure where appropriate, along with visual improvements to the streetscape.
- Where appropriate it is an objective to protect the vistas and settings of protected structures and the streetscape by the retention of vernacular houses, rubblestone walls, water pumps, post boxes etc, as identified on the NIAH survey.
- Any development which is in an Architectural Conservation Area shall have regard to the planning guidance set out in Chapter 11 of the Development Plan.
- In addition to compliance with other national, regional and local development plan policies and development management standards, all developments on regeneration/opportunity sites will be required to demonstrate that:
 - 1) The scale of proposed development is consistent with the class/ typology of settlement as set out in the Settlement Strategy;
 - 2) The proposal is compatible with the context of the site in terms of character, scale and density;
 - 3) The proposal will contribute to the visual and general/residential amenity of the site and its built quality;
 - 4) The proposal for any site should be accompanied by a program for developing out the site in terms of access to public water/wastewater, innovative solutions to wastewater such as integrated constructed wetlands and other services along with a completion timeframe; and,
 - 5) The proposal will not prejudice the future development of land in its vicinity and the expansion of public amenities or community land uses such as schools.


Ardmore

AOS1 Perks Site (1.15 HA)

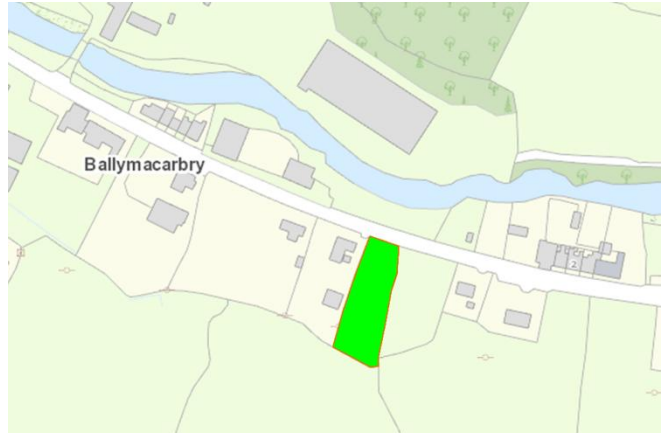


Vision
 Potential Landmark/ gateway to village.
 Desirable street edge.
 Potential mixed use.
 Incorporate natural assets.
 Potential open space.
 Green infrastructure links.
 Potential Housing Yield.

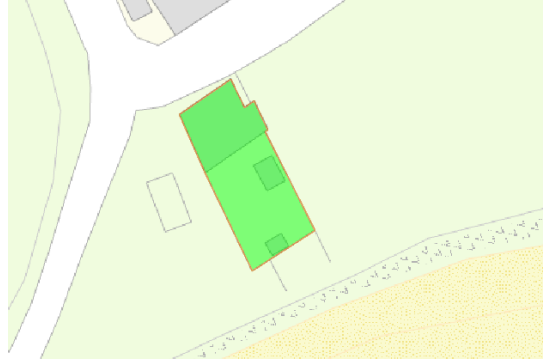
Ballyduff West (Upper)

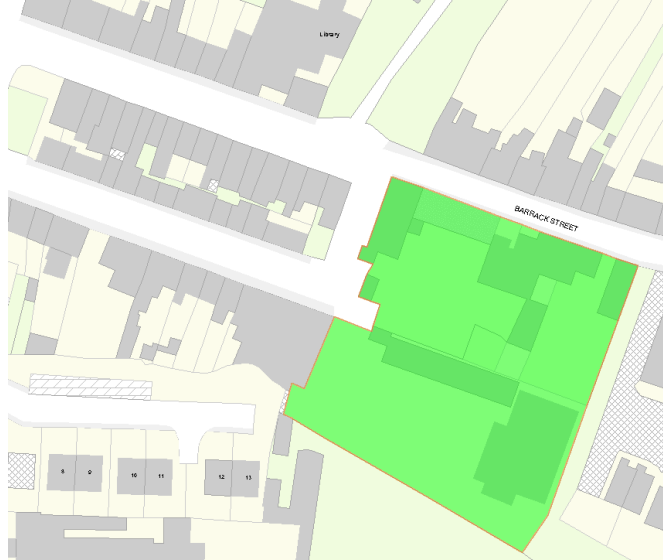
<p>BOS1</p>	<p>Former Co-Op Site (0.17 HA)</p> 	<p><i>Vision</i></p> <p>Potential Landmark/ gateway to village. Desirable street edge. Potential mixed use (employment/ community). Incorporate natural assets. Potential open space. Green infrastructure links. Potential Housing Yield</p>
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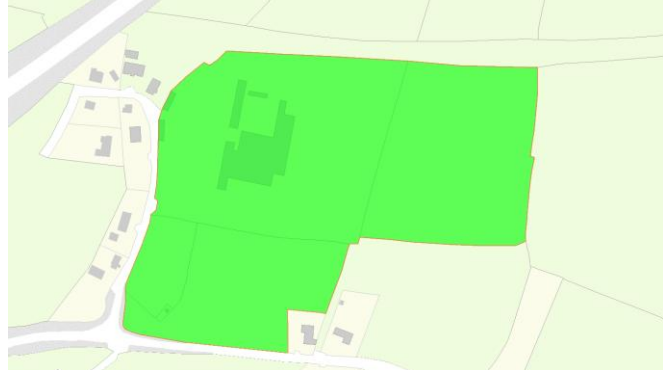

Ballymacarby

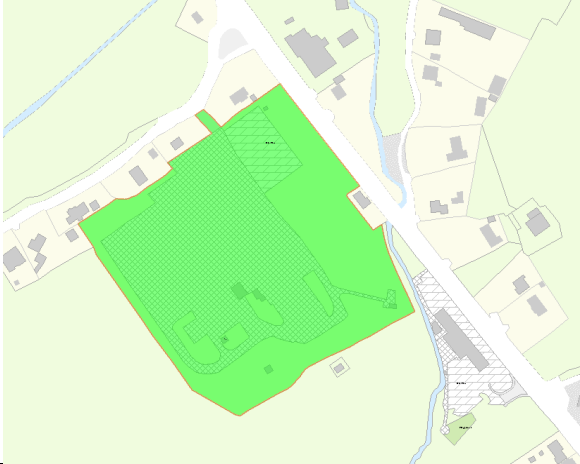
<p>BYOS1</p>	<p>Former Community Hall (0.17 HA)</p> 	<p><i>Vision</i></p> <p>Potential Landmark/ gateway to village. Desirable street edge. Potential mixed use. Incorporate natural assets. Potential open space. Green infrastructure links. Potential Housing Yield</p>
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Bunmahon

<p>BUOS1</p>	<p>Templeyvrick Site (0.064 HA)</p> 	<p><i>Vision</i></p> <p>Potential Landmark/ gateway to village. Desirable street edge. Potential mixed use (employment/ community). Incorporate natural assets. Green infrastructure links.</p>
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Cappoquin		
COS1	Glanbia Site and Murray's Coal Yard, Barracks Street (0.48 HA)	<p><i>Vision</i></p> <ul style="list-style-type: none"> Further development of existing complex. Potential Landmark/ gateway to village. Desirable street edge. Potential mixed use. Incorporate natural assets. Potential open space. Green infrastructure links. Potential Housing Yield.
		

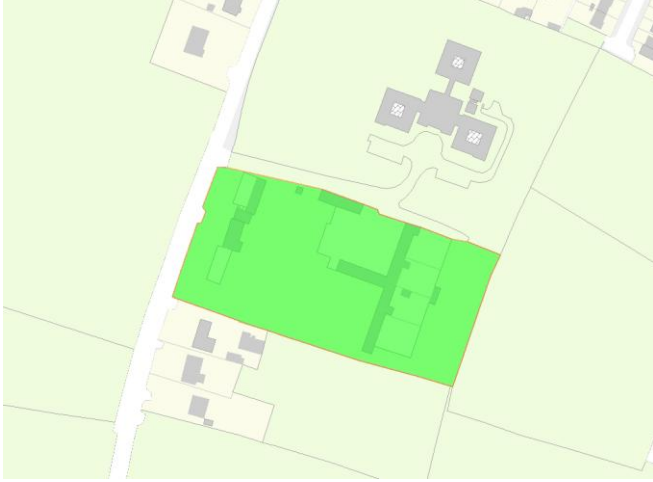
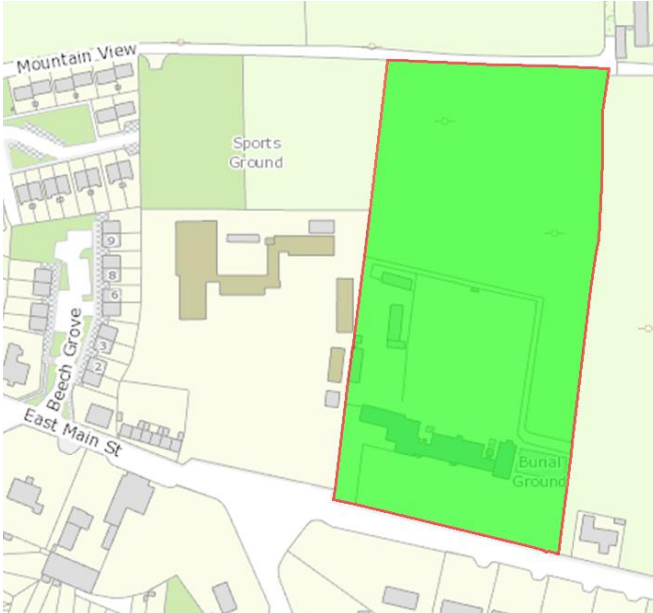

Kilmacthomas		
KMOS 1	Former Workhouse Site (8.45 HA)	<p><i>Vision</i></p> <ul style="list-style-type: none"> Further development of existing complex. Potential Landmark/ gateway to village. Potential mixed use. Incorporate natural assets. Potential open space. Green infrastructure links. Greenway link. Potential Tourism Development. Please see specific development objective KMD05 in Appendix 2 of the Development Plan.
		
KMOS 2	Former mill and back lands at Keighery's Bar and Restaurant, Main Street (0.58HA)	<p><i>Vision</i></p> <ul style="list-style-type: none"> Potential Landmark/ gateway to village. Potential mixed use. Incorporate natural assets. Green infrastructure links to river. Greenway link. Potential Tourism/ Employment Development. Back lands / infill. Potential Housing Yield.
		

Kilmeaden		
KOS1	Former Glanbia Site (4.39 HA) 	<p><i>Vision</i></p> <p>Further development of existing complex. Potential Landmark/ gateway to village. Desirable street edge. Potential mixed use. Incorporate natural assets. Potential open space. Green infrastructure links. Potential Housing Yield. Please see specific development objective KLMD01 in Appendix 2 of the Development Plan.</p>

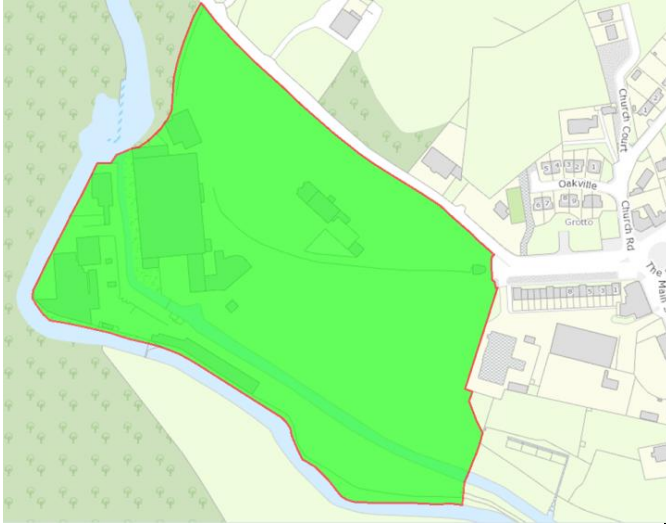
Passage East		
POS1	Passage East Crooke Development Association (0.05 HA) 	<p><i>Vision</i></p> <p>Further development of existing complex. Potential Landmark/ gateway to village and Waterford Estuary. Potential mixed use. Incorporate natural assets. Potential open space. Green infrastructure link to river. Potential Tourism Development.</p>

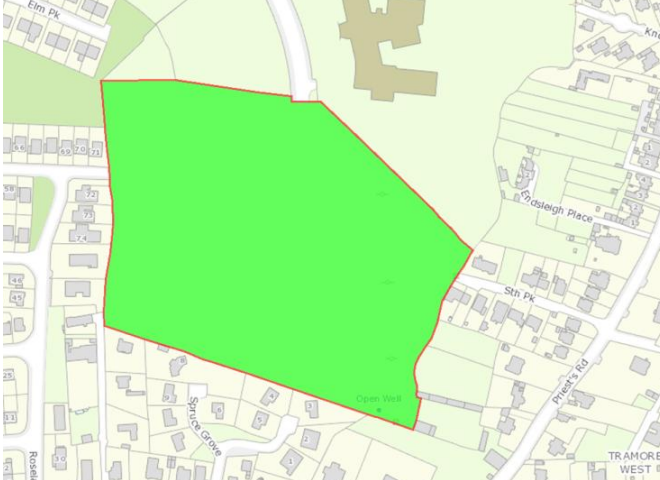


Rathcormack		
ROS1	Former Co-Op Site (0.14 HA) 	<p><i>Vision</i></p> <p>Potential Landmark/ gateway to village. Desirable street edge. Potential mixed use (employment/ community) Incorporate natural assets. Potential open space. Green infrastructure links.</p>

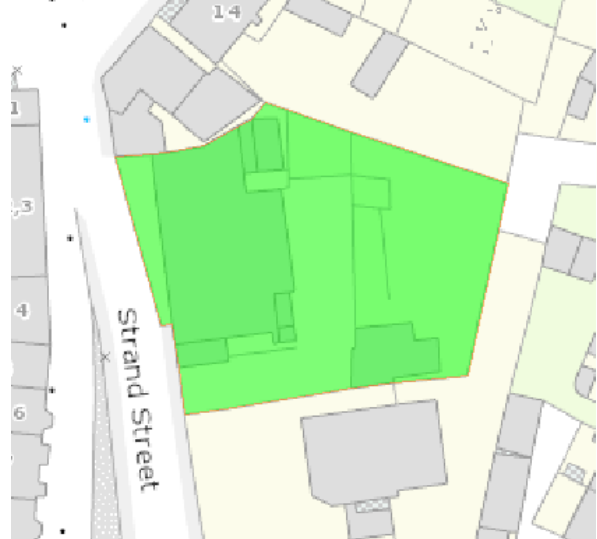


Tallow		
TOS1	Car Park, Former Mill Site, Barracks Street (0.21 HA)	<p><i>Vision</i></p> <ul style="list-style-type: none"> Further development of existing complex. Potential Landmark to village. Desirable street edge. Potential mixed use. Incorporate natural assets. Potential Housing Yield. Please see specific development objective TWD01 in Appendix 2 of the Development Plan.
TOS2	Former Corn Store, Barracks Street (0.14HA)	<p><i>Vision</i></p> <ul style="list-style-type: none"> Potential Landmark/ gateway to village. Desirable street edge. Potential mixed use. Incorporate natural assets (Protected Structure) into any development. Potential open space. Green infrastructure links to proposed river walkway to the east of the site (TWD09). Potential Housing Yield. Please see specific development objective TWD02 in Appendix 2 of the Development Plan.

Lismore Town		
LOPSO 1	<p>Workhouse Site (1.4 HA)</p> 	<p><i>Vision</i></p> <p>Any development on this site must facilitate the redevelopment of the workhouse in an orderly and sustainable manner whilst retaining the architectural and historical character of the workhouse.</p> <p>Any development proposal shall have due regard to the designation of the workhouse and its curtilage as a Protected Structure and as such will be subject to Best Conservation Principles;</p> <p>Any proposals on this should consist of a mixed use developments that compliment the zoning objective;</p> <p>Development on this site could also facilitate start-up/enterprise type development;</p> <p>Potential Housing Yield.</p>
LOPSO 2	<p>The Convent Site (2.42HA)</p> 	<p><i>Vision</i></p> <p>Any proposals on this site should be developed in a manner where the proposed uses/structures are compatible with both onsite and adjacent land uses and are appropriate to their location within the curtilage of this protected structure.</p> <p>The redevelopment of the site shall adhere to best conservation principles;</p> <p>Potential Housing Yield.</p>
LOPSO 3	<p>The Train Station Site (1.80HA)</p> 	<p><i>Vision</i></p> <p>Potential mixed use (employment/ community).</p> <p>Incorporate natural assets (potential for Greenway extension through the site should be retained);</p> <p>Potential open space.</p> <p>Green infrastructure links.</p> <p>Potential Housing Yield</p>

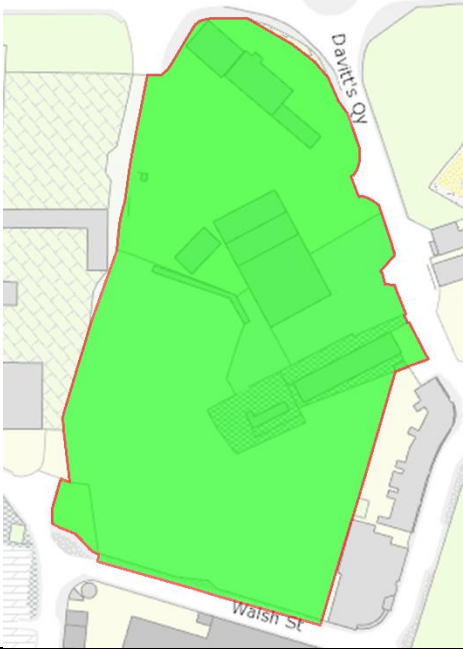


Portlaw Town		
PTOSO 1	Former Tannery Complex and Mayfield House site (8.10 HA)	<p><i>Vision</i></p> <p>Any development on this site must facilitate the assessment, remediation and redevelopment of the former Tannery.</p> <p>This site can accommodate a high quality mixed use development and shall be subject to the approval of an Environmental Management Plan for the site;</p> <p>Any development on this site should maximise its river location and facilitate the development of the greenway/ walkway along the riverside.</p> <p>Potential Landmark to village.</p> <p>Potential mixed use.</p> <p>Incorporate natural assets open space and links to the river while avoiding development within the floodzone.</p> <p>Potential Housing Yield.</p> <p>Please see specific development objective PLD07 and PLD08 in Appendix 2 of the Development Plan.</p>



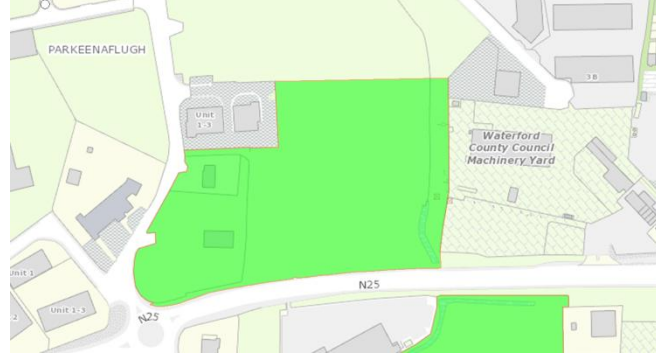





Tramore Town		
<p>TROSO 1</p>	<p>Ballycarnane (5.63 HA)</p> 	<p><i>Vision</i> Development on this key town centre infill site should provide strong architectural design; Create a mixed use sustainable and compact urban quarter through a mixed use high-density development with an emphasis on employment, retail, apartments and residential living; Any development proposal shall facilitate sustainable transport links across the site from the Summerhill Centre to Priest's Road and adjoining developments to enhance permeability and reduce car usage; Potential Housing Yield.</p>
<p>TROSO 2</p>	<p>Former Stella Maris (2 HA)</p> 	<p><i>Vision</i> Development on this site should provide for a mixed use medium-density development with an emphasis on apartments and residential living; Any development should address the extensive street frontage along the Pond Road and the Old Waterford Road and be designed to an exceptional standard; Adjoining private amenity spaces of neighbouring residential properties should be protected through the design and layout of any proposal; Potential Housing Yield.</p>
<p>TROSO 3</p>	<p>Strand Street/ Turkey Road/ Old Lane (0.06HA)</p> 	<p><i>Vision</i> Development on this town centre site should provide strong architectural design and a mix of uses; The development should address Turkey Road and Lower Strand St and be designed to an exceptional standard with a desirable street edge. Passive surveillance should be provided onto Old lane; Adjoining private amenity spaces of neighbouring residential properties should be protected through the design and layout of any proposal; Potential Housing Yield.</p>



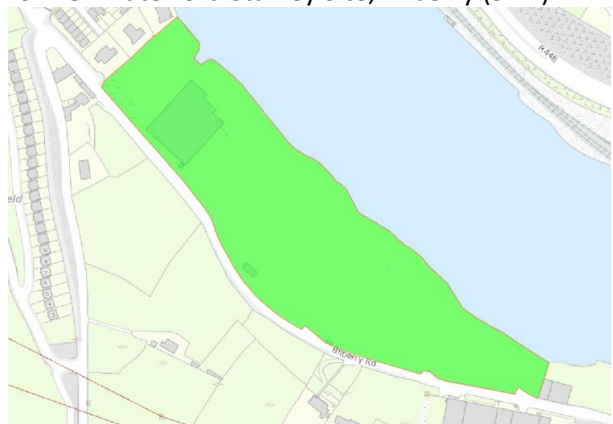
<p>TROSO 4</p>	<p>The Former Tramore Hotel Site, Strand Street (0.14HA)</p> 	<p><i>Vision</i> Development on this strategic brownfield site should provide strong architectural design as a key landmark/gateway to Tramore Town; Development on this site should be mixed use high density with emphasis on tourism, commercial, retail and residential uses; Development should maximise its central location; Potential Housing Yield.</p>
<p>TROSO 5</p>	<p>The Former Grand Hotel, The Square (0.14HA)</p> 	<p><i>Vision</i> Development on the site of the former hotel should provide for its redevelopment as a hotel or other tourism uses; Development should maximise the potential for enhancement of the vitality and vibrancy of street frontage onto The Square and Little Market Street.</p>
<p>TROSO 6</p>	<p>Vacant Site, SuperValu Car Park, Priest's Road (0.22HA)</p> 	<p><i>Vision</i> Development on this infill site should provide strong architectural design; Development on this site should be mixed use high density with emphasis on, commercial, and retail uses; Development should maximise its central location; Potential Housing Yield.</p>

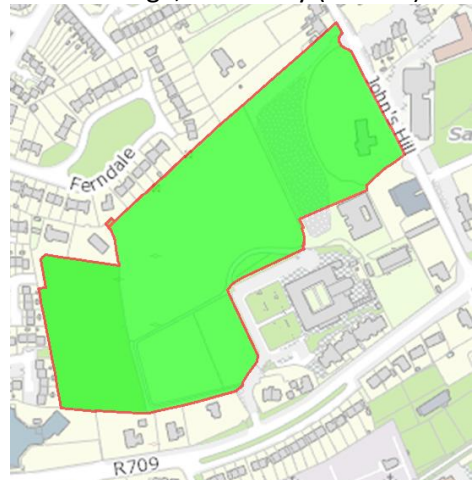


<p>TROS0 7</p>	<p>Sisters Of Charity Convent, Old Waterford Road (0.6HA)</p>  A map showing a large green-shaded area representing the Sisters Of Charity Convent site. The site is bounded by Old Waterford Road to the south and east, and Convent Hill to the north. The map also shows surrounding residential areas and other roads.	<p><i>Vision</i> Development on this institutional site should cater for medium-density residential development; Any development proposal shall have due regard to the Open Space on the site; Potential Housing Yield.</p>
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Dungarvan Town		
DTOSO 1	<p>Glanbia Site and adjacent lands, Davitt's Quay (3.21 HA)</p> 	<p><i>Vision</i></p> <p>Development on this key strategic underutilised site should provide strong architectural design as a key landmark or gateway to Dungarvan Town;</p> <p>Future developments shall comprise a high quality design, fine grained active frontage blocks providing a strong built edge;</p> <p>Any development should be mixed use high density with emphasis on employment, tourism, apartments and town centre uses;</p> <p>Any development should address the extensive street frontage along the Davitt's Quay and Walsh Street and be designed to an exceptional standard;</p> <p>Any development proposal shall facilitate active linkages through the site from the Shandon Roundabout to Walsh Street (L2060);</p> <p>Changes to car parking capacity on the site should be informed by the Local Transport Plan (LTP) for Dungarvan;</p> <p>Potential for multi storey car parking;</p> <p>Potential Housing Yield.</p>
DTOSO 2	<p>SuperValu Car Park, Davitt's Quay (0.29HA)</p> 	<p><i>Vision</i></p> <p>Development on this site should have an emphasis on a mix of town centre commercial and residential uses;</p> <p>Provide a strong architectural response for the site addressing both Crossbridge St and Davitts Quay;</p> <p>Any development on this site must be designed to an exceptional standard with a desirable street edge and maximise its sites riverside location;</p> <p>Potential Housing Yield;</p> <p>Changes to car parking capacity on the site should be informed by the Local Transport Plan (LTP) for Dungarvan.</p>
DTOSO 3	<p>Car Park, St. Augustine Street (0.56HA)</p> 	<p><i>Vision</i></p> <p>Development on this key town centre infill site should provide strong architectural design;</p> <p>Create a sustainable and compact urban quarter through a mixed use high-density development with an emphasis on employment, retail, apartments & residential;</p> <p>It will be vital that pedestrian/ cycle links from Main Street and St. Augustine St. are incorporated into the design of any proposed development;</p> <p>Adjoining private amenity spaces of neighbouring residential properties should be protected through the design and layout of any proposal;</p> <p>Changes to car parking capacity on the site should be informed by the Local Transport Plan (LTP) for Dungarvan;</p> <p>Potential Housing Yield.</p>


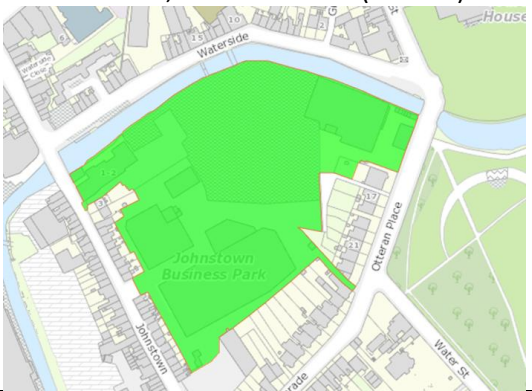

<p>DTOSO 4</p>	<p>Car Park, O'Connell Street (0.27HA)</p> 	<p><i>Vision</i></p> <p>Development on this key town centre infill site should provide strong architectural design; Create a sustainable and compact urban quarter through a mixed use high-density development with an emphasis on employment, retail, apartments & residential; Any development should address the street frontage along O'Connell Street and Western Terrace and be designed to an high standard; Adjoining private amenity spaces of neighbouring residential properties should be protected through the design and layout of any proposal; Changes to car parking capacity on the site should be informed by the Local Transport Plan (LTP) for Dungarvan; Potential Housing Yield.</p>
<p>DTOSO 5</p>	<p>John Treacy Street, Shandon Site (2.6HA)</p> 	<p><i>Vision</i></p> <p>Development on this strategic brownfield site should provide strong architectural design as a key landmark/gateway to Dungarvan Town; Development on this site should be mixed use high density with emphasis on tourism (hotel), commercial, retail and residential uses; Any development should address the street frontage along N25 and John Treacy Street and be designed to an high standard; Any development on the site should provide for the enhanced pedestrian and cycle links across the site to link Sean Treacy Street and the town centre to Shandon north of the N25.</p>
<p>DTOSO 5</p>	<p>Firestation Road, Shandon Site(3HA)</p> 	<p><i>Vision</i></p> <p>Development on this strategic brownfield site should provide strong architectural design as a key landmark/gateway to Dungarvan Town; Development on this site should be mixed use high density with emphasis on tourism (hotel), commercial, retail and residential uses; Potential to enhance the biodiversity value of the site; Any development should address the street frontage along N25 and Firestation Road and be designed to an high standard; Any development on the site should provide for the provision of new and improved access to Shandon, pedestrian and sustainable mode link across the N25 and biodiversity on the site north of the N25.</p>

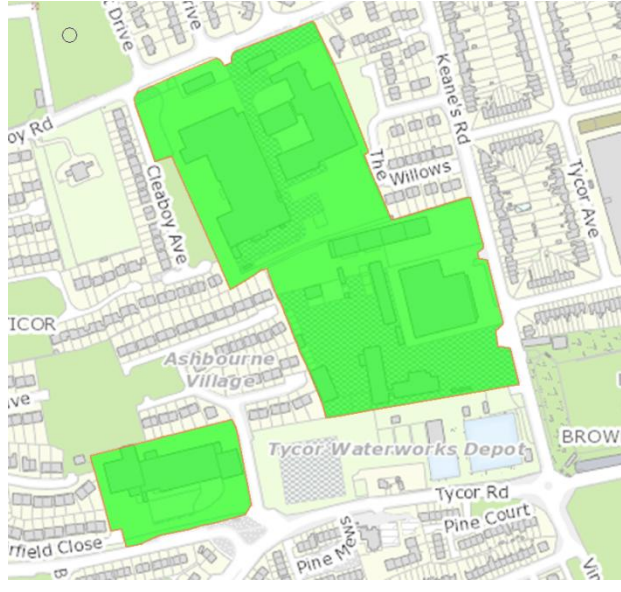


Waterford City		Overview
OPS01	<p>Saint Joseph's House, Manor Hill (2.45HA)</p> 	<p><i>Vision</i></p> <p>Development on this institutional site should cater for medium-density residential development;</p> <p>Any development proposal shall have due regard to the Open Space on the site and the Protected Structures and as such will be subject to Best Conservation Principles;</p> <p>Any development on the site must include pocket parks and active/ green infrastructure links between John's Hill and Lower Grange Road;</p> <p>Potential Housing Yield 50 Units.</p>
OPS02	<p>Exchange Street Site (0.17HA)</p> 	<p><i>Vision</i></p> <p>Development on this city centre infill site should provide strong architectural design within the City Conservation Area;</p> <p>Create a sustainable and compact urban quarter through a mixed use high-density development with an emphasis on employment, retail, apartments and residential city living;</p> <p>The development should be a landmark building and address Exchange Street and High Street and be designed to an exceptional standard with a desirable street edge;</p> <p>Potential Housing Yield 30 Units.</p>
OPS03	<p>Thomas Hill (0.20HA)</p> 	<p><i>Vision</i></p> <p>Development on this city centre infill site should provide strong architectural design within the City Conservation Area;</p> <p>Create a sustainable and compact urban quarter through a mixed use high-density development with an emphasis on employment, retail, apartments and residential city living;</p> <p>The development should address Thomas Hill street frontage and be designed to an exceptional standard with a desirable street edge;</p> <p>Adjoining private amenity spaces of neighbouring residential properties should be protected through the design and layout of any proposal;</p> <p>The site has potential to accommodate taller building(s).</p>

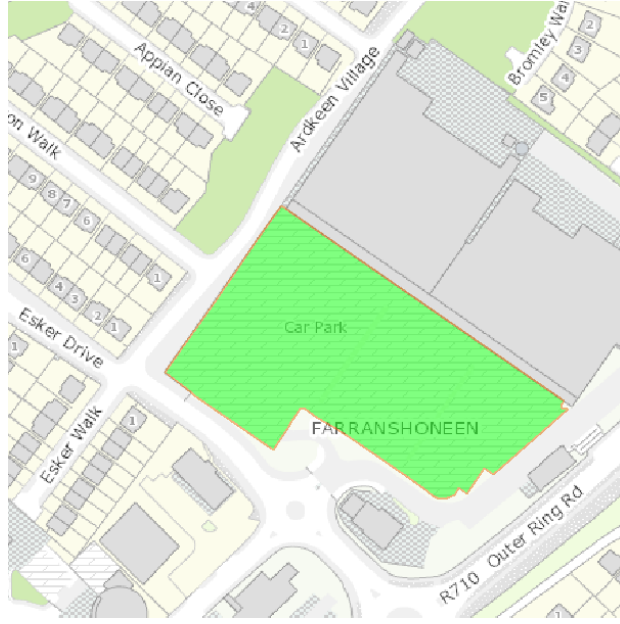

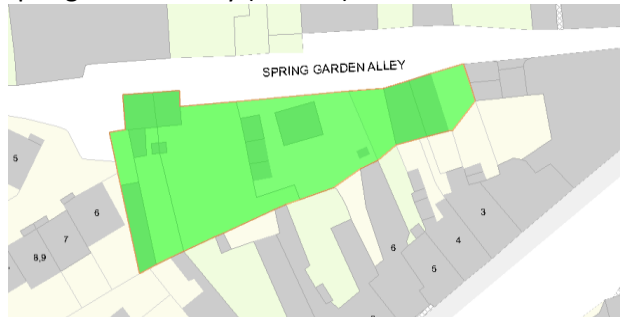
<p>OPS04</p>	<p>Jenkins Lane Site (0.47HA)</p> 	<p><i>Vision</i></p> <p>Development on this key city centre infill site should provide strong architectural design within the City Conservation Area;</p> <p>Create a sustainable and compact urban quarter through a mixed use high-density development with an emphasis on employment, retail, apartments and residential city living;</p> <p>It will be vital that pedestrian and cycle links from Great George's to Patrick Street are incorporated into the design of any proposed development;</p> <p>Adjoining private amenity spaces of neighbouring residential properties should be protected through the design and layout of any proposal;</p> <p>Any development should incorporate natural assets (city walls etc.) include potential open space and provide green infrastructure links;</p> <p>Potential Housing Yield 10 Units</p>
<p>OPS05</p>	<p>North Quays SDZ (c. 11.68HA)</p> 	<p><i>Vision</i></p> <p>Development on this key strategic brownfield city centre site should provide strong architectural design as a key landmark/ gateway to Waterford City;</p> <p>Any development on the site must adhere to the North Quays STZ Planning Scheme as applicable at the time;</p> <p>Development should maximise the sites river location and facilitate the development of the greenway/walkway along the riverside;</p> <p>Any development should incorporate natural assets (river side location etc.) include potential open space and provide green infrastructure links.</p> <p>The site has potential to accommodate taller building(s) and has a potential yield of c. 300 units.</p>
<p>OPS06</p>	<p>Former Waterford Stanley Site, Bilberry (5HA)</p> 	<p><i>Vision</i></p> <p>Development on this key strategic brownfield site should provide strong architectural design as a key landmark or gateway to Waterford City;</p> <p>Any development on this site should maximise its river location and facilitate the development of the greenway/ walkway along the riverside;</p> <p>Future developments shall comprise a high quality design, fine grained active frontage blocks providing a strong built edge;</p> <p>Any development should be mixed use high density with emphasis on residential uses with ancillary commercial and tourism uses;</p> <p>Any development should incorporate natural assets (river side location etc.) include potential open space and provide green infrastructure links.</p> <p>The site has potential to accommodate taller building(s) and has a potential yield of c. 300 units.</p>



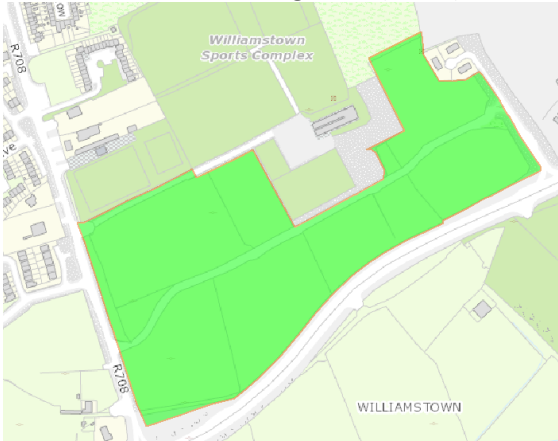
<p>OPS07</p>	<p>John's College, The Folley (5.19HA)</p> 	<p><i>Vision</i> Development on this institutional site should cater for medium-density residential development; Any development proposal shall have due regard to the trees in the grounds of St. John's College as well as the designation of the Arlington Lodge and St. John's College and their curtilage as Protected Structures and as such will be subject to Best Conservation Principles; Any development on the site must include pocket parks and green infrastructure links across the site and between John's Hill and Lower Grange Road; The site has potential to accommodate taller building(s) and has a potential yield of c. 20 units.</p>
<p>OPS08</p>	<p>St. Otteran's, John's Hill (13.35HA)</p> 	<p><i>Vision</i> Development on this institutional site should cater for medium/high-density residential development; Any development proposal shall have due regard to the trees and open space in the grounds of St. Otteran's Hospital as well as the designation of the Hospital and its curtilage as Protected Structures and as such will be subject to Best Conservation Principles; Any development on this site must include pocket parks and green infrastructure and active travel links across the site and between Upper Grange Road and Lower Grange/ St. John's Park Road; The site has potential to accommodate taller building(s) and has a potential yield of c. 150 units.</p>
<p>OPS09</p>	<p>Brooks Site, Newtown Road (1.5HA)</p> 	<p><i>Vision</i> Development on this brownfield site should create a mixed use high-density mixed use development with an emphasis on residential, tourism and commercial development; Provide a strong architectural response for the site addressing both the People's Park and the River Suir as well as providing pedestrian and green infrastructure links to and along the river; Any development on this site must be designed to an exceptional standard with a desirable street edge while maximising the riverside location; The site has potential to accommodate taller building(s) and has a potential yield of c. 50 units</p>


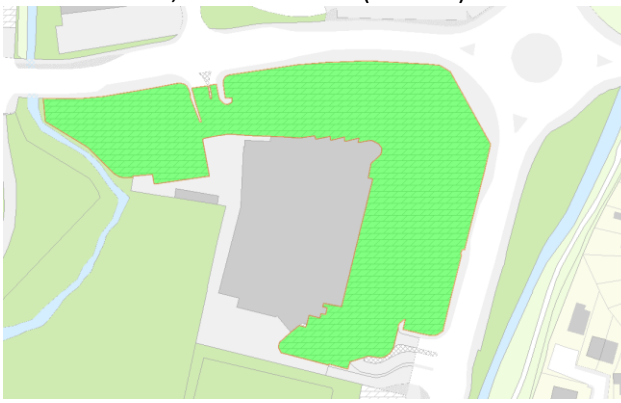

<p>OPS10</p>	<p>The Glenville Centre (Former Power Seeds), Dunmore Road (0.88HA)</p> 	<p><i>Vision</i></p> <p>The underutilised site is a key regeneration site in the east of the Waterford City should provide for a mixed use medium-density development with an emphasis on employment, apartments and residential city living;</p> <p>The development should address the extensive street frontage along the Dunmore Road and be designed to an exceptional standard;</p> <p>A high quality public realm will be required in any development including pocket park;</p> <p>Adjoining private amenity spaces of neighbouring residential properties should be protected through the design and layout of any proposal;</p> <p>Potential Housing Yield.</p>
<p>OPS11</p>	<p>Yellow House, Kilbarry (8.27HA)</p> 	<p><i>Vision</i></p> <p>Development on this infill site should provide strong architectural design as a key landmark/ gateway to Waterford City;</p> <p>Create a mixed use medium/ high-density development on the site with an emphasis on apartments and residential city living;</p> <p>Any development on the site must adhere to the specific objectives highlighted in the Appendix 6 City South West Design Framework;</p> <p>Any development on this site must provide for adequate open space and facilitate the development of a walkway/ cycle route and green infrastructure links connecting the TUSE with Kilbarry Nature Park.</p> <p>Provide a strong architectural response and be designed to an exceptional standard with a desirable street edge addressing the Cork Road, Nature Park and the Kilbarry/Lacken;</p> <p>The site has potential to accommodate taller building(s) and has a potential yield of c. 170 units.</p>

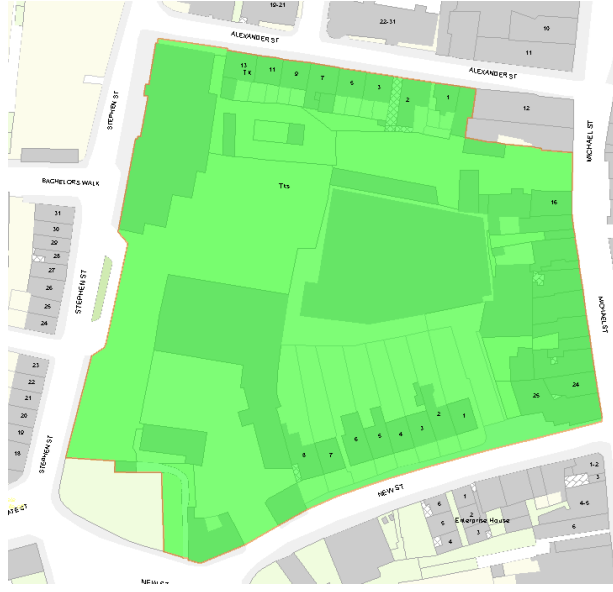

<p>OPS12</p>	<p>Former Waterford Crystal Site, Cork Road (14.9 HA)</p> 	<p><i>Vision</i></p> <p>Development on this regional key strategic brownfield site should provide strong architectural design as a key landmark or gateway to Waterford City and of the TUSE Quarter and be designed to an exceptional standard with a desirable street edge along all streets;</p> <p>Future developments shall comprise a high quality design, fine grained active frontage blocks providing a strong built edge;</p> <p>Any development should facilitate the development of the TUSE;</p> <p>Any development on the site must adhere to the specific objectives highlighted in the Appendix 6 City South West Design Framework;</p> <p>Any development proposal shall facilitate active and green infrastructure linkages to the TUSE and Kilbarry Nature Park;</p> <p>The site has potential to accommodate taller building(s) and has a potential to accommodate c. 1000 Students.</p>
<p>OPS13</p>	<p>Gasworks Site, The Waterside (2.88HA)</p> 	<p><i>Vision</i></p> <p>Create a mixed use high-density development on the site with an emphasis on commercial and residential city living;</p> <p>Create an attractive waterside mixed use development;</p> <p>Future developments shall comprise a high quality design, fine grained active frontage blocks providing a strong built edge;</p> <p>The site has potential to accommodate taller building(s) and has a potential yield of c. 136 units.</p>
<p>OPS14</p>	<p>Dock Road (c.1.84HA)</p> 	<p><i>Vision</i></p> <p>Development on this strategic brownfield site should provide strong architectural design as a key landmark/gateway to Waterford City;</p> <p>Future developments shall comprise a high quality design, fine grained active frontage blocks providing a strong built edge and complement the North Quay planning scheme;</p> <p>Development on this site should be mixed use high density with emphasis on employment, apartments and city living;</p> <p>Any development proposal shall facilitate active linkages through the site from Ross Road to the North Quays SDZ and the River Suir;</p> <p>The site has potential to accommodate taller building(s) and has a potential yield of c. 300 units.</p>

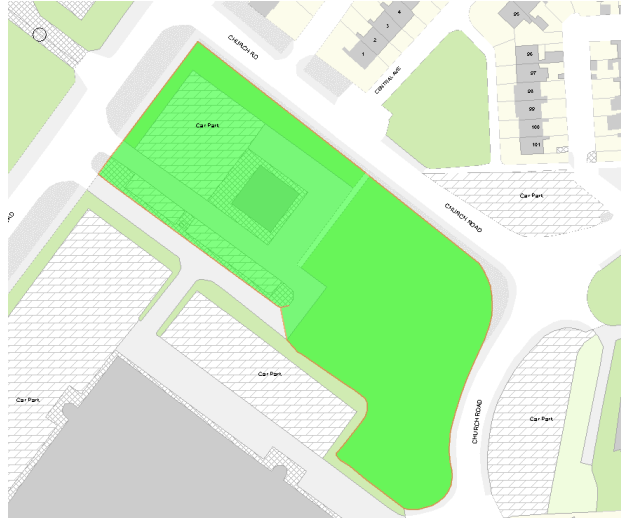

<p>OPS15</p>	<p>Cleaboy/ Keane's/ Tycor Road Site (8.12HA)</p> 	<p><i>Vision</i></p> <p>Development on this underutilised city centre site should provide for mixed used developments with an emphasis on employment, apartments and residential city living which is compliant with the zoning objective (Potential Housing Yield);</p> <p>The development should address the extensive street frontage along Cleaboy Road, Keane's Road and Tycor Road Future and shall comprise a high quality design, fine grained active frontage blocks providing a strong built edge;</p> <p>A high quality public realm will be required in any development including pocket parks;</p> <p>Pedestrian and cycle links between Cleaboy and Tycor Road should be included in the overall design of this site;</p> <p>Adjoining private amenity spaces of neighbouring residential properties should be protected through the design and layout of any proposal;</p>
<p>OPS16</p>	<p>Tycor Industrial Complex, Morrison's Ave (1.62HA)</p> 	<p><i>Vision</i></p> <p>Development on this underutilised city centre site should provide for mixed used developments with an emphasis on employment and residential uses which is compliant with the zoning objective;</p> <p>The development should address the extensive street frontage along and maximise natural assets (Old Factory Site);</p> <p>A high quality public realm will be required in any development including pocket parks;</p> <p>Pedestrian and cycle links through the site should be included in the overall design;</p> <p>Adjoining private amenity spaces of neighbouring residential properties should be protected through the design and layout of any proposal;</p> <p>Potential Housing Yield.</p>
<p>OPS17</p>	<p>The Former Ard Ri Site, Dock Road (7.71HA)</p> 	<p><i>Vision</i></p> <p>Development on this strategic brownfield site should provide strong architectural design as a key landmark/ gateway to Waterford City;</p> <p>Future developments shall comprise a high quality design complementing the North Quay planning scheme;</p> <p>Development on this site should be mixed use high density with emphasis on tourism, apartments and city living;</p> <p>Development should maximise the sites elevated location and views across the city;</p> <p>The site has potential to accommodate taller building(s).</p>

<p>OPS18</p>	<p>Tesco Ardkeen, Outer Ring Road (1.27HA)</p> 	<p><i>Vision</i></p> <p>The site which is located in Ardkeen District Centre is a key regeneration site in the east of the Waterford City and should provide for a mixed use higher-density development with an emphasis on employment and residential uses while retaining the capacity of the car park to service the development in the area;</p> <p>The development should address the street frontage of Esker Drive/ Ardkeen Village and be designed to an exceptional standard;</p> <p>A high quality public realm will be required in any development including pocket park;</p> <p>Adjoining private amenity spaces of neighbouring residential properties should be protected through the design and layout of any proposal;</p> <p>Any development on this site must provide for adequate open space and facilitate the development of a walkway/ cycle route and green infrastructure links from Tesco to Ardkeen Village.</p>
<p>OPS19</p>	<p>The South Quays (2.61HA)</p> 	<p><i>Vision</i></p> <p>Development on this key strategic city centre site should provide strong architectural design as a key landmark/ gateway to Waterford City;</p> <p>Development should maximise the sites river location and facilitate the development of the greenway/walkway along the riverside;</p> <p>Any development should incorporate natural assets (river side location etc.) include extensive open space and provide green infrastructure links along the quay;</p> <p>Development will be carried out in compliance with the design framework for the South Quays as per W City 29.</p>
<p>OPS20</p>	<p>Spring Garden Alley (0.09HA)</p> 	<p><i>Vision</i></p> <p>Potential mixed use;</p> <p>Green infrastructure/ active travel link from Mall to Apple Market;</p> <p>Potential to sympathetically regenerate are area in the immediate cartilage of sections of the Medieval City Wall;</p> <p>Potential for significant improvement to the public realm along Spring Garden;</p> <p>Muse type development to enhance the stock of quality residential units in the city centre.</p>

<p>OPS21</p>	<p>Car Park Bolton Street (0.71HA)</p> 	<p><i>Vision</i> 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).</p>
<p>OPS22</p>	<p>Waterford Crystal Sports Complex, Cork Road (9.8HA)</p> 	<p><i>Vision</i> Development on this strategic site should provide strong architectural design as a key landmark/ gateway to Waterford City; Future developments shall comprise a high quality design; Development on this site should be mixed use high density with emphasis on employment/ residential uses; Any development proposal shall facilitate active linkages through the site from Cork Road to Clonard Park and Ballybeg Link Road; The site has potential to accommodate taller building(s).</p>
<p>OPS23</p>	<p>Williamstown, Outer Ring Road (13HA)</p> 	<p><i>Vision</i> Development on this strategic site should provide strong architectural design as a key landmark/ gateway to Waterford City; Development on this site should be mixed use high density with emphasis on neighbourhood scale retail/services, employment and residential uses; Any development proposal shall facilitate active and green infrastructure/active travel linkages through the site from Killure Road/ Outer Rind Road to St Otterans; Provide a strong architectural response for the site addressing both the Killure Road/ Outer Rind Road; The site has potential to accommodate taller building(s).</p>

<p>OPS24</p>	<p>Neighbourhood Centre, Carrickpherish (7.23HA)</p> 	<p><i>Vision</i></p> <p>Development on this infill site should provide strong architectural design as a key landmark development for Carrickpheirsh Neighbourhood.</p> <p>Create a mixed use medium/ high-density development on both sites with an emphasis on community, neighbourhood scale retail uses, apartments and residential city living;</p> <p>Any development on this site must provide for adequate open space and facilitate the development of a walkway/ cycle route and green infrastructure links connecting the Carrickpherish Road with the IDA Industrial Estate to the south and surrounding residential developments.</p> <p>Provide a strong architectural response and be designed to an exceptional standard with a desirable street edge addressing the Carrickpherish Road;</p> <p>The site has potential to accommodate taller building(s).</p>
<p>OPS25</p>	<p>District Centre, Tramore Road (1.31HA)</p> 	<p><i>Vision</i></p> <p>The site which is located in the Tramore Road/ Kilbarry District Centre is a key regeneration site in the South West of the Waterford City and should provide for a mixed use high density development with an emphasis on employment, apartments and residential city living while retaining sufficient car parking to accommodate existing and proposed uses on the lands;</p> <p>The development should address the street frontage of The Inner Ring Road (R709) and the Tramore Road (675) and be designed to an exceptional standard;</p> <p>A high quality public realm will be required in any development;</p> <p>The site has potential to accommodate taller building(s).</p>
<p>OPS26</p>	<p>O'Bryne Garage Site, The Glen (0.09HA)</p> 	<p><i>Vision</i></p> <p>Potential mixed.</p> <p>The development should address the street frontage of The Glen/ Glasshouse Land and be designed to an exceptional standard;</p> <p>The site has potential to accommodate taller building(s).</p>

<p>OPS27</p>	<p>Michael Street Site (1.43HA)</p> 	<p><i>Vision</i></p> <p>Development on this key city centre site should provide strong architectural design within the City Conservation Area;</p> <p>Create a sustainable and compact urban quarter through a mixed use high-density development with an emphasis on tourism, employment, retail, apartments and residential city living;</p> <p>It will be vital that pedestrian and cycle links through the site are incorporated into the design of any proposed development;</p> <p>Adjoining private amenity spaces of neighbouring residential properties should be protected through the design and layout of any proposal;</p> <p>Any development should incorporate natural assets and include potential open space and provide green infrastructure links to Wyse Park;</p> <p>The development should address the extensive street frontage of the site and be designed to an exceptional standard;</p> <p>The site has potential to accommodate taller building(s)</p>
<p>OPS28</p>	<p>Ballybricken (0.73HA)</p> 	<p><i>Vision</i></p> <p>Development on this key city centre site should provide strong architectural design;</p> <p>Create a sustainable and compact urban quarter through a mixed use high-density development with an emphasis on tourism, employment, retail, apartments and residential city living;</p> <p>It will be vital that pedestrian and cycle links from Yellow Road to Morgan St are incorporated into the design of any proposed development;</p> <p>Adjoining private amenity spaces of neighbouring residential properties should be protected through the design and layout of any proposal;</p> <p>The development should address the extensive street frontage along Morgan St. and be designed to an exceptional standard;</p> <p>The site has potential to accommodate taller building(s).</p>

<p>OPS29</p>	<p>Lisduggan Shopping Centre (0.76HA)</p> 	<p><i>Vision</i></p> <p>The site which is located in the Lisduggan District Centre is a key regeneration site in the West of the Waterford City and should provide for a mixed use medium-density mixed use development with an emphasis on employment, apartments and residential city living;</p> <p>The development should address the street frontage of Paddy Browne's Road and be designed to an exceptional standard;</p> <p>A high quality public realm will be required in any development;</p> <p>The site has potential to accommodate taller building(s).</p>
<p>OPS30</p>	<p>The Glen (0.19 HA)</p> 	<p><i>Vision</i></p> <p>Potential mixed.</p> <p>The development should address the street frontage of The Glen/ Penrose Land/ Thomas Street and be designed to an exceptional standard.</p> <p>The site has potential to accommodate taller building(s) at its western end nearest to the multi-storey car park.</p>

Appendix 22

Archaeology

The [Sites and Monuments Record \(SMR\)](#) contains details of all monuments and places (sites) where it is believed there is a monument known to the ASI pre-dating AD 1700 and also includes a selection of monuments from the post-AD 1700 period. The records, which are maintained by the National Monuments Service, Department of Housing Local Government and Heritage, are subject to revision and the data is updated daily. The SMR database can be viewed on-line on the Historic Environment Viewer on <https://maps.archaeology.ie>

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA009-007----	ABBEYLANDS	Weir - fish
WA009-008----	ABBEYLANDS	Religious house - Augustinian, of Arrouaise nuns
WA009-008001-	ABBEYLANDS	Graveyard
WA031-040029-	ABBEYSIDE	Graveslab
WA031-040005-	ABBEYSIDE	Religious house - Augustinian friars
WA031-040006-	ABBEYSIDE	Castle - tower house
WA031-040030-	ABBEYSIDE	Armorial plaque
WA031-040008-	ABBEYSIDE	Architectural fragment
WA031-040015-	ABBEYSIDE	Ritual site - holy well
WA031-040027-	ABBEYSIDE	Excavation - miscellaneous
WA031-040031-	ABBEYSIDE	Stone head
WA031-040032-	ABBEYSIDE	Graveyard
WA031-040----	ABBEYSIDE,DUNGARVAN	Historic town
WA016-036----	ADAMSTOWN (Middlethird By., Kilmeadan Par.)	Castle - unclassified
WA016-037----	ADAMSTOWN (Middlethird By., Kilmeadan Par.)	Church
WA016-035----	ADAMSTOWN (Middlethird By., Kilmeadan Par.)	Ritual site - holy well
WA016-122----	ADAMSTOWN (Middlethird By., Kilmeadan Par.)	Boundary stone
WA017-123003-	ADAMSTOWN (Middlethird By., Kilmeadan Par.)	Hut site
WA017-123004-	ADAMSTOWN (Middlethird By., Kilmeadan Par.)	Kiln
WA017-123007-	ADAMSTOWN (Middlethird By., Kilmeadan Par.)	Furnace
WA017-123009-	ADAMSTOWN (Middlethird By., Kilmeadan Par.)	Kiln
WA017-123005-	ADAMSTOWN (Middlethird By., Kilmeadan Par.)	Enclosure

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA017-123001-	ADAMSTOWN (Middlethird By., Kilmeadan Par.)	Hut site
WA017-123002-	ADAMSTOWN (Middlethird By., Kilmeadan Par.)	Hut site
WA017-123006-	ADAMSTOWN (Middlethird By., Kilmeadan Par.)	Hut site
WA017-123008-	ADAMSTOWN (Middlethird By., Kilmeadan Par.)	Excavation - miscellaneous
WA029-051----	AFFANE	Metalworking site
WA021-040----	AFFANE HUNTER	House - 17th century
WA029-013001-	AFFANE HUNTER	Church
WA029-013002-	AFFANE HUNTER	Graveyard
WA021-030----	AFFANE HUNTER,CRINNAGHTAUN WEST,SLUGGARA,SUNLAWN	Battlefield
WA028-007----	AGLISH (Coshmore and Coshbride By.)	Moated site
WA028-006002-	AGLISH (Coshmore and Coshbride By.)	Burial ground
WA034-003002-	AGLISH (Decies within Drum By.)	Graveyard
WA034-003003-	AGLISH (Decies within Drum By.)	Cross
WA034-003005-	AGLISH (Decies within Drum By.)	Headstone
WA034-003004-	AGLISH (Decies within Drum By.)	Headstone
WA034-003006-	AGLISH (Decies within Drum By.)	Headstone
WA034-003001-	AGLISH (Decies within Drum By.)	Church
WA034-003007-	AGLISH (Decies within Drum By.)	Cross - Wayside cross
WA034-075----	AGLISH (Decies within Drum By.)	Excavation - miscellaneous
WA034-003008-	AGLISH (Decies within Drum By.)	Graveslab
WA015-048001-	AHANAGLOGH	Fulacht fia
WA015-106002-	AHANAGLOGH	Fulacht fia
WA015-106001-	AHANAGLOGH	Habitation site
WA015-048006-	AHANAGLOGH	Hearth
WA015-106004-	AHANAGLOGH	Kiln
WA015-048009-	AHANAGLOGH	Excavation - miscellaneous
WA015-106006-	AHANAGLOGH	Charcoal-making site
WA015-106005-	AHANAGLOGH	Metalworking site
WA015-108----	AHANAGLOGH	Metalworking site

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA015-106003-	AHANAGLOGH	Metalworking site
WA015-048008-	AHANAGLOGH	Metalworking site
WA015-106007-	AHANAGLOGH	Habitation site
WA015-106008-	AHANAGLOGH	Field boundary
WA015-091----	AHANAGLOGH	Fulacht fia
WA015-048002-	AHANAGLOGH	Hut site
WA015-048003-	AHANAGLOGH	Habitation site
WA015-092----	AHANAGLOGH	Fulacht fia
WA020-005----	AHAUN (Coshmore and Coshbride By.)	Designed landscape - tree-ring
WA035-012----	AHAUN (Decies within Drum By.)	Standing stone
WA038-061----	AHAUN (Decies within Drum By.)	Standing stone
WA036-028----	AN CARRAIGÁIN (Par. Rinn Ó gCuanach)	Ringfort - rath
WA024-010----	AN FHAICHE (Bar. Na Déise lasmuigh den Drom)	Ringfort - rath
WA024-012----	AN FHAICHE (Bar. Na Déise lasmuigh den Drom)	Ringfort - unclassified
WA024-007----	AN FHAICHE (Bar. Na Déise lasmuigh den Drom)	Ringfort - unclassified
WA024-008----	AN FHAICHE (Bar. Na Déise lasmuigh den Drom)	Ringfort - unclassified
WA024-009----	AN FHAICHE (Bar. Na Déise lasmuigh den Drom)	Earthwork
WA024-011----	AN FHAICHE (Bar. Na Déise lasmuigh den Drom)	Ringfort - rath
WA024-013----	AN FHAICHE (Bar. Na Déise lasmuigh den Drom)	Ringfort - rath
WA024-015----	AN FHAICHE (Bar. Na Déise lasmuigh den Drom)	Ringfort - rath
WA024-014001-	AN FHAICHE (Bar. Na Déise lasmuigh den Drom)	Ringfort - rath
WA024-014002-	AN FHAICHE (Bar. Na Déise lasmuigh den Drom)	Souterrain
WA036-007----	AN MÓTA	Ritual site - holy well
WA036-006----	AN MÓTA	Mound
WA035-016001-	AN tSEANCHILL (Par. Dún Garbhán)	Church
WA035-016002-	AN tSEANCHILL (Par. Dún Garbhán)	Bullaun stone
WA035-016003-	AN tSEANCHILL (Par. Rinn Ó gCuanach)	Cross-inscribed stone
WA025-062----	ANNESTOWN	Monumental structure
WA025-070----	ANNESTOWN	Promontory fort - coastal

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA016-026004-	ARDEENLOUN EAST	Font
WA016-026003-	ARDEENLOUN EAST	Tomb - chest tomb
WA016-027----	ARDEENLOUN EAST	Field boundary
WA016-026002-	ARDEENLOUN EAST	Graveyard
WA016-026001-	ARDEENLOUN EAST	Church
WA016-024----	ARDEENLOUN EAST	Ringfort - unclassified
WA016-025----	ARDEENLOUN EAST	Castle - unclassified
WA016-020----	ARDEENLOUN EAST	Ringfort - unclassified
WA016-074----	ARDEENLOUN EAST	Standing stone
WA016-145----	ARDEENLOUN WEST	Enclosure
WA025-032002-	ARDNAHOW	Enclosure
WA025-034----	ARDNAHOW	Ringfort - rath
WA025-035----	ARDNAHOW	Standing stone
WA025-030----	ARDNAHOW	Ringfort - rath
WA025-032001-	ARDNAHOW	Ringfort - unclassified
WA025-092----	ARDNAHOW	Church
WA025-120----	ARDNAHOW	Burnt mound
WA025-033----	ARDNAHOW,BALLYGARRAN (Middlethird By., Islandikane Par.)	Earthwork
WA040-008016-	ARDOCHEASTY	Graveslab
WA040-008015-	ARDOCHEASTY	Graveslab
WA040-008013-	ARDOCHEASTY	Graveslab
WA040-008014-	ARDOCHEASTY	Graveslab
WA040-008017-	ARDOCHEASTY	Graveslab
WA040-008002-	ARDOCHEASTY	Cathedral
WA040-008006-	ARDOCHEASTY	Ogham stone
WA040-008009-	ARDOCHEASTY	Bullaun stone
WA040-008005-	ARDOCHEASTY	Ogham stone
WA040-008007-	ARDOCHEASTY	Ogham stone
WA040-008011-	ARDOCHEASTY	Graveslab

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA040-008001-	ARDOCHEASTY	Church
WA040-008008-	ARDOCHEASTY	Graveyard
WA040-008004-	ARDOCHEASTY	Church
WA040-008022-	ARDOCHEASTY	Stone sculpture
WA040-008012-	ARDOCHEASTY	Graveslab
WA040-008010-	ARDOCHEASTY	Cross-inscribed stone
WA040-008019-	ARDOCHEASTY	Font
WA040-008003-	ARDOCHEASTY	Round tower
WA040-008018-	ARDOCHEASTY	Architectural fragment
WA040-008024-	ARDOCHEASTY	Graveslab
WA040-008025-	ARDOCHEASTY	Ogham stone (present location)
WA040-008026-	ARDOCHEASTY	Cross-slab
WA040-004001-	ARDOGINNA	Ringfort - rath
WA040-006----	ARDOGINNA	Ringfort - unclassified
WA040-003----	ARDOGINNA	Enclosure
WA040-004002-	ARDOGINNA	Souterrain
WA040-005----	ARDOGINNA	House - 18th/19th century
WA040-027----	ARDOGINNA	Promontory fort - coastal
WA040-028----	ARDOGINNA	Promontory fort - coastal
WA005-044----	ARDPADDIN	House - 17th century
WA005-042----	ARDPADDIN	Weir - fish
WA037-024----	ARDSALLAGH	Ritual site - holy well
WA015-017----	ASHTOWN	Enclosure
WA015-019----	ASHTOWN	Enclosure
WA015-018----	ASHTOWN	Ringfort - rath
WA015-065----	ASHTOWN	Standing stone
WA015-077----	ASHTOWN	Standing stone
WA015-005----	ASHTOWN	Earthwork
WA015-004----	ASHTOWN	Ringfort - rath

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA015-020----	ASHTOWN,KEALFOUN	Ringfort - rath
WA003-038----	AUGHMORE	Earthwork
WA003-018003-	AUGHMORE	Enclosure
WA003-018001-	AUGHMORE,KILBALLYQUILTY	Ecclesiastical enclosure
WA003-018002-	AUGHMORE,KILBALLYQUILTY	Enclosure
WA039-010001-	BAILE AN tSLÉIBHE THEAS	Church
WA039-010002-	BAILE AN tSLÉIBHE THEAS	Graveyard
WA039-030----	BAILE MHAC AIRT ÁRACHTARACH	Enclosure
WA039-032----	BAILE MHAC AIRT ÁRACHTARACH	Standing stone
WA039-034----	BAILE MHAC AIRT ÁRACHTARACH	Fulacht fia
WA039-035001-	BAILE MHAC AIRT ÁRACHTARACH	Field system
WA039-031002-	BAILE MHAC AIRT ÁRACHTARACH	Standing stone
WA039-035002-	BAILE MHAC AIRT ÁRACHTARACH	House - indeterminate date
WA039-031001-	BAILE MHAC AIRT ÁRACHTARACH	Standing stone
WA039-003----	BAILE MHAC AIRT UACHTARACH	Enclosure
WA039-033----	BAILE MHAC AIRT UACHTARACH	Standing stone
WA039-036----	BAILE MHAC AIRT UACHTARACH	Standing stone
WA039-009----	BAILE MHAC AIRT UACHTARACH	Mound
WA039-007----	BAILE NA MÓNA ÁRACHTARACH	Megalithic tomb - court tomb
WA039-012----	BAILE NA MÓNA ÁRACHTARACH	Enclosure
WA039-013----	BAILE NA MÓNA ÁRACHTARACH	Promontory fort - coastal
WA039-005----	BAILE NA MÓNA UACHTARACH	Ringfort - rath
WA039-027----	BAILE NA MÓNA UACHTARACH	Standing stone
WA039-028----	BAILE NA MÓNA UACHTARACH	Standing stone
WA036-010001-	BAILE NA nGALL MÓR	Ringfort - unclassified
WA036-010002-	BAILE NA nGALL MÓR	Souterrain
WA036-025----	BAILE NA nGALL MÓR	Souterrain
WA039-029----	BAILE THROSNÁIN	Souterrain
WA039-021----	BAILE THROSNÁIN	Ritual site - holy well

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA039-006----	BAILE UÁ[?] CHURRAOIN THEAS	Ringfort - unclassified
WA039-026002-	BAILE UÁ[?] CHURRAOIN THEAS	House - indeterminate date
WA039-026001-	BAILE UÁ[?] CHURRAOIN THEAS	Ringfort - rath
WA036-011----	BAILE UÁ[?] RAGHALLAIGH	Ringfort - unclassified
WA031-012----	BALLEIGHTERAGH EAST	Ringfort - unclassified
WA017-040----	BALLINAMONA	Structure
WA017-039----	BALLINAMONA	Castle - unclassified
WA017-111----	BALLINAMONA	Deer park
WA028-020----	BALLINANCHOR	Castle - unclassified
WA029-001----	BALLINASPICK NORTH	Ritual site - holy well
WA029-001001-	BALLINASPICK NORTH	Penitential station
WA026-019----	BALLINATTIN	Ringfort - unclassified
WA026-018----	BALLINATTIN	Enclosure
WA035-010001-	BALLINDRUMMA	Ringfort - rath
WA035-010002-	BALLINDRUMMA	Souterrain
WA017-110----	BALLINDUD	Standing stone
WA017-081----	BALLINDUD	Children's burial ground
WA017-016----	BALLINDUD	Megalithic tomb - portal tomb
WA003-013----	BALLINDYSERT	Ringfort - unclassified
WA003-022----	BALLINDYSERT	Earthwork
WA003-011----	BALLINDYSERT	Enclosure
WA003-019----	BALLINDYSERT	Standing stone - pair
WA003-062----	BALLINDYSERT	Church
WA003-099----	BALLINDYSERT	Enclosure
WA003-012----	BALLINDYSERT,CORRAGINA	Enclosure
WA003-006----	BALLINGARRA	Enclosure
WA003-017----	BALLINGARRA	Enclosure
WA003-016----	BALLINGARRA	Enclosure
WA025-042----	BALLINGARRY	Enclosure

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA025-043----	BALLINGARRY	Enclosure
WA025-039----	BALLINGARRY	Ringfort - unclassified
WA025-113----	BALLINGARRY	Standing stone
WA024-044001-	BALLINGOWAN	Ringfort - rath
WA024-044002-	BALLINGOWAN	Bullaun stone
WA024-110----	BALLINGOWAN	Bullaun stone
WA029-067001-	BALLINGOWAN EAST,BALLINGOWAN WEST	Enclosure
WA029-067----	BALLINGOWAN EAST,BALLINGOWAN WEST	Church
WA018-017001-	BALLINKINA	Fulacht fia
WA018-075----	BALLINKINA	Enclosure
WA018-017002-	BALLINKINA	Fulacht fia
WA018-076----	BALLINKINA	Enclosure
WA018-017003-	BALLINKINA	Fulacht fia
WA039-004----	BALLINROAD (Decies within Drum By.)	Ringfort - rath
WA031-052----	BALLINROAD (Decies without Drum By.)	Settlement cluster
WA030-073----	BALLINTAYLOR LOWER,BALLINTAYLOR UPPER	House - 17th century
WA023-017----	BALLINTLEA	Ringfort - rath
WA023-037----	BALLINTLEA	Linear earthwork
WA023-028----	BALLINTOOR	Ringfort - rath
WA027-073----	BALLINVELLA (Gaultiere By.)	Windmill
WA029-047001-	BALLINWILLIN	Church
WA029-047002-	BALLINWILLIN	Graveyard
WA017-127----	BALLYBEG	Excavation - miscellaneous
WA015-037----	BALLYBOY	Ringfort - rath
WA015-080----	BALLYBOY	Standing stone
WA015-068----	BALLYBOY	Bullaun stone
WA015-081----	BALLYBOY	Standing stone
WA034-082----	BALLYBRACK (Coshmore and Coshbride By.)	House - 17th century
WA034-028----	BALLYBRACK (Coshmore and Coshbride By.),BALLYROE	Enclosure

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA015-083----	BALLYBRACK (Decies without Drum By.)	Standing stone
WA016-016----	BALLYBRACK (Decies without Drum By.)	Ringfort - unclassified
WA016-017----	BALLYBRACK (Decies without Drum By.)	Ringfort - unclassified
WA016-124----	BALLYBRACK (Decies without Drum By.)	Enclosure
WA016-015----	BALLYBRACK (Decies without Drum By.)	Ringfort - rath
WA016-082----	BALLYBREGIN	Settlement cluster
WA016-088----	BALLYBRENOCK	Mill - unclassified
WA016-089----	BALLYBRENOCK	Settlement cluster
WA016-061----	BALLYBRENOCK	Ringfort - unclassified
WA016-060----	BALLYBRENOCK	Ringfort - unclassified
WA025-011----	BALLYBRENOCK	Ringfort - unclassified
WA025-012----	BALLYBRENOCK	Cairn - unclassified
WA025-013----	BALLYBRENOCK	Ringfort - unclassified
WA025-010----	BALLYBRENOCK	Enclosure
WA038-027----	BALLYBRUSA WEST	Ringfort - unclassified
WA038-028----	BALLYBRUSA WEST	Ringfort - rath
WA038-053----	BALLYBRUSA WEST, BALLYNAMERTINAGH, BAWNAGARRANE, MILL AND CHURCHQUARTER	Road - road/trackway
WA008-025----	BALLYCAHANE	House - 17th century
WA008-009----	BALLYCAHANE	Enclosure
WA010-009----	BALLYCANVAN BIG	Castle - tower house
WA010-016002-	BALLYCANVAN BIG	House - 17th century
WA018-001----	BALLYCANVAN BIG	Tide mill - unclassified
WA026-029----	BALLYCARNANE	Ringfort - rath
WA017-077----	BALLYCASHIN	Castle - unclassified
WA028-039002-	BALLYCLEMENT	Barn
WA028-039001-	BALLYCLEMENT	House - 17th century
WA028-052002-	BALLYCLEMENT, TIRCULLEN LOWER, TIRCULLEN UPPER	Weir - fish
WA028-052001-	BALLYCLEMENT, TIRCULLEN LOWER, TIRCULLEN UPPER	House - 17th century

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA002-010002-	BALLYCLOHY	Bawn
WA002-010001-	BALLYCLOHY	Castle - tower house
WA037-010----	BALLYCONDON	Enclosure
WA030-060----	BALLYCONNERY LOWER,INCHINDRISLA WOOD	Enclosure
WA016-054----	BALLYCRADDOCK	Enclosure
WA016-055----	BALLYCRADDOCK	Enclosure
WA016-120----	BALLYCRADDOCK	Standing stone
WA029-045----	BALLYCULLANE (Decies within Drum By.),BALLYNAMULTINA,CURRAHEEN (Decies within Drum By.),GRALLAGH LOWER,WOODHOUSE OR TINAKILLY,AUGHNACURRAVEEL,BALLINDRUMMA,BALLY ADAM,BALLYNAPARKA (Decies within Drum By., Kilmolash Par.),BRIDGEQUARTER (Decies without Drum By.),CLOGH,CRAGGS,CUSH OF GRANGE,GRAIGUE (Decies within Drum By.),KEERREEN LOWER,KEERREEN UPPER,KNOCKANEARIS,KNOCKANISKA (Decies within Drum By.),KNOCKNASKAGH UPPER,LACKAMORE (Decies within Drum By., Clashmore Par.),MILL AND CHURCHQUARTER,MONAGALLY WEST,DRUMGULLANE EAST,BALLYGAMBON UPPER,BALLYCURRANE NORTH,BALLYCURRANE SOUTH,BALLINURE (Decies within Drum By.)	Road - road/trackway
WA034-004----	BALLYCULLANE (Decies within Drum By.),CURRAHEEN (Decies within Drum By.)	Religious house - Franciscan friars
WA006-040----	BALLYCULLANE (Upperthird By.)	House - 17th century
WA006-005----	BALLYCULLANE (Upperthird By.)	Ringfort - unclassified
WA006-004----	BALLYCULLANE (Upperthird By.)	Mound
WA035-002----	BALLYCULLANE MORE	Enclosure
WA035-011----	BALLYCURRANE NORTH	Ringfort - unclassified
WA037-020----	BALLYDASOON	Ringfort - unclassified
WA018-021----	BALLYDAVID	Ringfort - unclassified

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA018-073----	BALLYDAVID	Enclosure
WA018-074----	BALLYDAVID	Enclosure
WA025-015----	BALLYDERMODY	Church
WA025-031001-	BALLYDERMODY	Ringfort - rath
WA025-031002-	BALLYDERMODY	Ringfort - rath
WA025-091----	BALLYDERMODY	Church
WA025-123----	BALLYDERMODY	Enclosure
WA025-016----	BALLYDERMODY	Ringfort - rath
WA005-002----	BALLYDONAGH	Burial ground
WA005-001----	BALLYDONAGH	Ringfort - unclassified
WA005-033----	BALLYDONAGH	Settlement cluster
WA005-002001-	BALLYDONAGH	Enclosure - large enclosure
WA032-043----	BALLYDOWANE EAST	Promontory fort - coastal
WA032-044----	BALLYDOWANE EAST	Promontory fort - coastal
WA032-043001-	BALLYDOWANE EAST	Hut site
WA024-067----	BALLYDOWANE WEST	Water mill - horizontal-wheeled
WA024-114----	BALLYDOWANE WEST	Burnt mound
WA032-045----	BALLYDOWANE WEST	Promontory fort - coastal
WA017-058----	BALLYDRISLANE	Ringfort - unclassified
WA026-016----	BALLYDRISLANE	Earthwork
WA030-067----	BALLYDUFF (Decies without Drum By.)	Enclosure
WA030-028----	BALLYDUFF (Decies without Drum By.)	Ringfort - rath
WA030-066----	BALLYDUFF (Decies without Drum By.)	Enclosure
WA030-027----	BALLYDUFF (Decies without Drum By.),BALLYDUFF MORE	Enclosure
WA030-089----	BALLYDUFF BEG,BALLYMACMAGUE EAST	Enclosure
WA016-116002-	BALLYDUFF EAST	Bullaun stone
WA016-127----	BALLYDUFF EAST	Excavation - miscellaneous
WA016-126----	BALLYDUFF EAST	Excavation - miscellaneous
WA016-130002-	BALLYDUFF EAST	Fulacht fia

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA016-129----	BALLYDUFF EAST	Excavation - miscellaneous
WA016-130001-	BALLYDUFF EAST	Fulacht fia
WA016-137----	BALLYDUFF EAST	Standing stone
WA016-116001-	BALLYDUFF EAST,BALLYDUFF WEST	Church
WA020-011----	BALLYDUFF LOWER	House - 17th century
WA030-049----	BALLYDUFF MORE	Ringfort - unclassified
WA007-045----	BALLYDURN	Ringfort - rath
WA007-044----	BALLYDURN	Enclosure
WA007-078----	BALLYDURN	Bullaun stone
WA007-089----	BALLYDURN	Standing stone
WA007-092----	BALLYDURN	Bullaun stone (present location)
WA015-105----	BALLYDURN	Standing stone
WA021-021----	BALLYEA WEST	Road - road/trackway
WA021-022----	BALLYEA WEST	Castle - motte and bailey
WA016-128----	BALLYEA WEST	Bullaun stone (present location)
WA021-047----	BALLYEA WEST	Road - road/trackway
WA038-032----	BALLYEELINAN	Ringfort - unclassified
WA030-050----	BALLYGAGIN (Garde)	Enclosure
WA020-013----	BALLYGALLY	House - 17th century
WA020-018----	BALLYGALLY EAST	Earthwork
WA030-012002-	BALLYGAMBON LOWER	Cave
WA030-038001-	BALLYGAMBON UPPER	Fulacht fia
WA030-038002-	BALLYGAMBON UPPER	Fulacht fia
WA030-035----	BALLYGAMBON UPPER	Fulacht fia
WA030-037----	BALLYGAMBON UPPER	Fulacht fia
WA030-078----	BALLYGAMBON UPPER	Burnt mound
WA030-036----	BALLYGAMBON UPPER	Fulacht fia
WA024-092----	BALLYGARRAN (Decies without Drum By.)	House - 17th century
WA024-091----	BALLYGARRAN (Decies without Drum By.)	House - 17th century

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA024-065----	BALLYGARRAN (Decies without Drum By.)	Enclosure
WA024-066----	BALLYGARRAN (Decies without Drum By.)	Ringfort - rath
WA025-127----	BALLYGARRAN (Decies without Drum By.)	Metalworking site
WA018-064----	BALLYGARRAN (Gaultiere By.)	Burnt mound
WA018-051----	BALLYGARRAN (Gaultiere By.)	Settlement cluster
WA027-003005-	BALLYGARRAN (Gaultiere By.)	Structure
WA027-003----	BALLYGARRAN (Gaultiere By.)	Church
WA027-003006-	BALLYGARRAN (Gaultiere By.)	Cross-slab
WA027-003001-	BALLYGARRAN (Gaultiere By.)	Burial ground
WA027-003002-	BALLYGARRAN (Gaultiere By.)	Enclosure
WA027-003003-	BALLYGARRAN (Gaultiere By.)	Cross-inscribed stone
WA027-003007-	BALLYGARRAN (Gaultiere By.)	Metalworking site
WA027-003008-	BALLYGARRAN (Gaultiere By.)	Well
WA027-003009-	BALLYGARRAN (Gaultiere By.)	Bullaun stone
WA027-003010-	BALLYGARRAN (Gaultiere By.)	Ecclesiastical enclosure
WA025-048----	BALLYGARRAN (Middlethird By., Islandikane Par.)	Enclosure
WA025-050----	BALLYGARRAN (Middlethird By., Islandikane Par.)	Ringfort - unclassified
WA025-049----	BALLYGARRAN (Middlethird By., Islandikane Par.)	Ringfort - unclassified
WA016-028001-	BALLYGARRAN (Middlethird By., Newcastle Par.)	Ringfort - rath
WA016-028002-	BALLYGARRAN (Middlethird By., Newcastle Par.)	Souterrain
WA016-047----	BALLYGARRAN (Middlethird By., Newcastle Par.)	Ringfort - rath
WA016-140----	BALLYGARRAN (Middlethird By., Newcastle Par.)	Enclosure
WA003-083----	BALLYGARRET	House - 17th century
WA018-012----	BALLYGUNNERCASTLE	House - 16th/17th century
WA018-014----	BALLYGUNNERCASTLE	Enclosure
WA018-085----	BALLYGUNNERCASTLE	Enclosure
WA018-013002-	BALLYGUNNERMORE	Souterrain
WA018-013001-	BALLYGUNNERMORE	Enclosure
WA018-043----	BALLYGUNNERMORE	Church

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA018-015001-	BALLYGUNNERTEMPLE	Church
WA018-015002-	BALLYGUNNERTEMPLE	Graveyard
WA018-032----	BALLYGUNNERTEMPLE	Water mill - unclassified
WA018-004----	BALLYGUNNERTEMPLE	Megalithic structure
WA018-004001-	BALLYGUNNERTEMPLE	Mound
WA018-034----	BALLYGUNNERTEMPLE	House - 17th century
WA028-048----	BALLYHAMLET	House - 17th century
WA028-017----	BALLYHAMLET	Enclosure
WA036-017001-	BALLYHARRAHAN	Burial ground
WA036-003----	BALLYHARRAHAN	Ritual site - holy well
WA025-059----	BALLYHEADON	Earthwork
WA025-058----	BALLYHEADON	Ringfort - unclassified
WA037-018----	BALLYHEENY (Decies within Drum By., Kinsalebeg Par.)	Castle - tower house
WA017-013----	BALLYHOO	Ringfort - unclassified
WA015-035----	BALLYHUSSA	Ringfort - unclassified
WA015-084----	BALLYHUSSA	Enclosure
WA015-066----	BALLYHUSSA	Settlement cluster
WA015-078----	BALLYHUSSA	Standing stone
WA015-088----	BALLYHUSSA	Ring-ditch
WA016-001----	BALLYHUSSA	Enclosure
WA016-101----	BALLYHUSSA	Standing stone
WA016-143----	BALLYHUSSA	Enclosure
WA020-009----	BALLYIN UPPER	Enclosure
WA030-017003-	BALLYKENNEDY	Architectural fragment
WA030-017004-	BALLYKENNEDY	Graveslab
WA030-017001-	BALLYKENNEDY	Church
WA030-017002-	BALLYKENNEDY	Graveyard
WA022-028----	BALLYKERIN LOWER	Ringfort - unclassified
WA022-029----	BALLYKERIN MIDDLE	Ringfort - unclassified

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA022-064----	BALLYKERIN UPPER	Fulacht fia
WA022-065----	BALLYKERIN UPPER	Burnt mound
WA031-022----	BALLYKEROGE BIG	Ringfort - rath
WA031-024----	BALLYKEROGE BIG	Ringfort - rath
WA031-023----	BALLYKEROGE BIG	Ringfort - unclassified
WA023-053----	BALLYKEROGE BIG,BALLYKEROGE LITTLE	Graveyard
WA023-052----	BALLYKEROGE BIG,BALLYKEROGE LITTLE	Ritual site - holy well
WA023-051----	BALLYKEROGE BIG,BALLYKEROGE LITTLE	Church
WA023-034----	BALLYKEROGE LITTLE	Ringfort - rath
WA039-023001-	BALLYKILMURRY (Decies within Drum By., Ardmore Par.)	Promontory fort - coastal
WA039-024----	BALLYKILMURRY (Decies within Drum By., Ardmore Par.)	Enclosure
WA039-023002-	BALLYKILMURRY (Decies within Drum By., Ardmore Par.)	Hut site
WA014-024005-	BALLYKILMURRY (Decies without Drum By.)	Cairn - clearance cairn
WA014-023----	BALLYKILMURRY (Decies without Drum By.)	Ringfort - unclassified
WA014-024002-	BALLYKILMURRY (Decies without Drum By.)	Souterrain
WA014-024004-	BALLYKILMURRY (Decies without Drum By.)	Cairn - clearance cairn
WA014-029----	BALLYKILMURRY (Decies without Drum By.)	Standing stone
WA014-024003-	BALLYKILMURRY (Decies without Drum By.)	Cairn - clearance cairn
WA014-024001-	BALLYKILMURRY (Decies without Drum By.),CUTTEEN SOUTH	Ringfort - rath
WA014-024006-	BALLYKILMURRY (Decies without Drum By.),CUTTEEN SOUTH	Hut site
WA014-024007-	BALLYKILMURRY (Decies without Drum By.),CUTTEEN SOUTH	Hut site
WA014-026----	BALLYKILMURRY (Decies without Drum By.),CUTTEEN SOUTH	Ringfort - rath
WA017-059----	BALLYKINSELLA	Coffin-resting stone
WA017-143001-	BALLYKINSELLA	Enclosure

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA017-143002-	BALLYKINSELLA	Field boundary
WA037-023----	BALLYKNOCK (Coshmore and Coshbride By.)	Souterrain
WA031-003002-	BALLYKNOCK LOWER	Souterrain
WA031-005----	BALLYKNOCK LOWER	Ringfort - rath
WA031-002----	BALLYKNOCK LOWER	Ringfort - unclassified
WA031-003001-	BALLYKNOCK LOWER	Ringfort - rath
WA031-007----	BALLYKNOCK LOWER, CARROWNCASHLANE (Decies without Drum By., Kilgobnet Par.)	Enclosure
WA023-026----	BALLYKNOCK UPPER	Ringfort - unclassified
WA031-004003-	BALLYKNOCK UPPER	Souterrain
WA031-004001-	BALLYKNOCK UPPER	Ringfort - rath
WA031-004002-	BALLYKNOCK UPPER	Ringfort - rath
WA038-035----	BALLYLANE	Ritual site - holy well
WA024-037002-	BALLYLANEEN	Graveyard
WA024-037001-	BALLYLANEEN	Church
WA024-037003-	BALLYLANEEN	Font
WA024-025002-	BALLYLANEEN	Burial ground
WA024-105----	BALLYLANEEN	Ritual site - holy well
WA024-074----	BALLYLANEEN	House - 17th century
WA024-025003-	BALLYLANEEN	Font (present location)
WA016-081----	BALLYLEEN	Church
WA025-005----	BALLYLEEN	Enclosure
WA025-129----	BALLYLEEN	Mass-rock
WA016-062----	BALLYLEGAT	Enclosure
WA016-063----	BALLYLEGAT	Ringfort - unclassified
WA016-084----	BALLYLENANE	Settlement cluster
WA016-083----	BALLYLENANE	Church
WA016-085----	BALLYLENANE	Standing stone
WA018-028----	BALLYLOUGHBEG	Enclosure

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA018-055002-	BALLYLOUGHMORE	House - 17th century
WA018-055001-	BALLYLOUGHMORE	House - 17th century
WA027-040----	BALLYMACAW	Ritual site - holy well
WA027-064----	BALLYMACAW	Standing stone
WA027-062----	BALLYMACAW, GRAIGUE (Gaultiere By.)	Church
WA018-002002-	BALLYMACLODE	House - 17th century
WA018-003----	BALLYMACLODE	Fulacht fia
WA018-002001-	BALLYMACLODE	Castle - tower house
WA018-083----	BALLYMACLODE	Fulacht fia
WA005-037----	BALLYMAKEE	House - 17th century
WA017-041----	BALLYMOAT	Ringfort - rath
WA017-042----	BALLYMOAT	Barrow - mound barrow
WA017-043----	BALLYMOAT	Standing stone
WA028-049----	BALLYMOAT LOWER	House - 17th century
WA028-050----	BALLYMOAT LOWER	Kiln - lime
WA028-051----	BALLYMOAT UPPER	House - 17th century
WA021-019----	BALLYMOODRANAGH, BALLYNELLIGAN GLEBE, BALLYSGART BEG (East), CASTLELANDS, LISMORE (Coshmore and Coshbride By.)	Historic town
WA029-061----	BALLYMUDDY	House - 17th century
WA029-040----	BALLYMUDDY	Ringfort - unclassified
WA029-068----	BALLYMUDDY, SNUGBOROUGH	Ritual site - holy well
WA030-055----	BALLYMULALLA EAST, BALLYMULALLA WEST	Ringfort - rath
WA025-004----	BALLYMURRIN	Ringfort - rath
WA025-079001-	BALLYMURRIN, KILBEG (Decies without Drum By., Kilbarrymedan Par.)	House - 17th century
WA015-090----	BALLYNABANOGE NORTH	Standing stone
WA015-051----	BALLYNABANOGE NORTH, BALLYOGARTY, COOLTUBBRID WEST	Ringfort - rath

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA024-022----	BALLYNABANOGE SOUTH	Ringfort - unclassified
WA024-021----	BALLYNABANOGE SOUTH	Enclosure
WA024-024----	BALLYNABANOGE SOUTH	Ringfort - unclassified
WA024-109----	BALLYNABANOGE SOUTH	Enclosure
WA018-060001-	BALLYNABOLA	Burnt mound
WA018-060002-	BALLYNABOLA	Burnt mound
WA018-087----	BALLYNABOLA	Standing stone
WA034-035----	BALLYNACLASH,CLASHMORE	Enclosure
WA017-094----	BALLYNACLOGH NORTH,BALLYNACLOGH SOUTH	House - 17th century
WA026-009----	BALLYNACLOGH SOUTH	Enclosure
WA026-069----	BALLYNACLOGH SOUTH	Standing stone
WA017-047----	BALLYNACLOGH SOUTH,CARRICKAVARAHANE	Enclosure
WA026-006----	BALLYNACLOGH SOUTH,CARRICKAVARAHANE	Enclosure
WA031-055002-	BALLYNACOURTY (Decies without Drum By., Dungarvan Par.)	House - 17th century
WA031-055001-	BALLYNACOURTY (Decies without Drum By., Dungarvan Par.)	House - 17th century
WA030-085----	BALLYNACOURTY (Decies without Drum By., Whitechurch Par.)	Cave
WA030-023----	BALLYNACOURTY (Decies without Drum By., Whitechurch Par.)	House - 18th/19th century
WA030-024----	BALLYNACOURTY (Decies without Drum By., Whitechurch Par.)	Enclosure
WA030-022----	BALLYNACOURTY (Decies without Drum By., Whitechurch Par.)	Burnt mound
WA030-087----	BALLYNACOURTY (Decies without Drum By., Whitechurch Par.)	Cave
WA003-046001-	BALLYNACURRA	Enclosure
WA003-046002-	BALLYNACURRA	Souterrain
WA003-081----	BALLYNACURRA,FEDDANS	Cairn - unclassified
WA003-075----	BALLYNAFINA	Church

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA003-075001-	BALLYNAFINA	Well
WA003-102----	BALLYNAFINA	Standing stone
WA003-075002-	BALLYNAFINA	Enclosure
WA033-023----	BALLYNAFINESHOGHE	House - 17th century
WA033-024----	BALLYNAFINESHOGHE	Standing stone
WA025-007----	BALLYNAGEERAGH	Megalithic tomb - portal tomb
WA025-090----	BALLYNAGEERAGH	Glass works
WA025-051----	BALLYNAGIGLA	Ringfort - unclassified
WA025-036005-	BALLYNAGIGLA	Building
WA025-036001-	BALLYNAGIGLA	Church
WA025-124----	BALLYNAGIGLA	Enclosure
WA025-128001-	BALLYNAGIGLA	Ogham stone (present location)
WA025-128002-	BALLYNAGIGLA	Ogham stone (present location)
WA025-036002-	BALLYNAGIGLA,BALLYRISTEEN	Graveyard
WA038-029----	BALLYNAGLERAGH (Decies within Drum By.)	Ringfort - rath
WA038-064----	BALLYNAGLERAGH (Decies within Drum By.)	Inscribed stone
WA022-005----	BALLYNAGLERAGH (Decies without Drum By.)	Enclosure
WA013-023001-	BALLYNAGUILKEE LOWER	Church
WA013-025----	BALLYNAGUILKEE LOWER	Ringfort - unclassified
WA013-023002-	BALLYNAGUILKEE LOWER	Cross - High cross
WA013-023003-	BALLYNAGUILKEE LOWER	Ecclesiastical enclosure
WA013-024----	BALLYNAGUILKEE LOWER	Ringfort - rath
WA013-044----	BALLYNAGUILKEE LOWER	Enclosure
WA022-004----	BALLYNAGUILKEE LOWER	Ringfort - unclassified
WA013-020002-	BALLYNAGUILKEE UPPER	Standing stone
WA013-020001-	BALLYNAGUILKEE UPPER	Hut site
WA013-043----	BALLYNAGUILKEE UPPER	Enclosure
WA039-014----	BALLYNAHARDA	Promontory fort - coastal
WA030-059----	BALLYNAHEMERY	Standing stone

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA024-103----	BALLYNAHILA	Burnt mound
WA024-104----	BALLYNAHILA	Burnt mound
WA024-085----	BALLYNAHILA	Settlement cluster
WA010-006003-	BALLYNAKILL (Gaultiere By.)	House - indeterminate date
WA010-007001-	BALLYNAKILL (Gaultiere By.)	Church
WA010-006002-	BALLYNAKILL (Gaultiere By.)	House - 17th century
WA010-015----	BALLYNAKILL (Gaultiere By.)	Mill - unclassified
WA010-006001-	BALLYNAKILL (Gaultiere By.)	Castle - tower house
WA010-007002-	BALLYNAKILL (Gaultiere By.)	Graveyard
WA010-006004-	BALLYNAKILL (Gaultiere By.)	Bawn
WA031-053002-	BALLYNALAHESSERY NORTH,BALLYNALAHESSERY SOUTH,CLONCOSKORAN,KILMINNIN LOWER,KILMINNIN NORTH,KILMINNIN SOUTH,KILMINNIN UPPER	House - 17th century
WA031-053003-	BALLYNALAHESSERY NORTH,CLONCOSKORAN,KILMINNIN LOWER,KILMINNIN NORTH,KILMINNIN SOUTH,KILMINNIN UPPER	Mill - unclassified
WA030-016----	BALLYNAMEELAGH	Cave
WA030-088----	BALLYNAMEELAGH	Cave
WA038-038----	BALLYNAMERTINAGH	Ringfort - rath
WA030-013----	BALLYNAMINTRA LOWER	Cave
WA030-015001-	BALLYNAMINTRA MIDDLE	Enclosure
WA030-015003-	BALLYNAMINTRA MIDDLE	Cave
WA030-015002-	BALLYNAMINTRA MIDDLE	Midden
WA030-019----	BALLYNAMINTRA UPPER	Fulacht fia
WA040-023----	BALLYNAMONA (Decies within Drum By.)	Enclosure
WA027-049----	BALLYNAMOYNTRAGH	Settlement cluster
WA027-076----	BALLYNAMOYNTRAGH	Enclosure
WA031-051001-	BALLYNAMUCK EAST,BALLYNAMUCK MIDDLE,BALLYNAMUCK WEST,MAPESTOWN,SHANDON	House - 17th century

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA031-051----	BALLYNAMUCK MIDDLE,BALLYNAMUCK WEST,SHANDON,BALLYNAMUCK EAST	Mill - unclassified
WA013-050001-	BALLYNAMULT	Urn burial
WA013-050002-	BALLYNAMULT	Barrow - unclassified
WA029-043----	BALLYNAPARKA (Decies within Drum By., Kilmolash Par.)	Ringfort - rath
WA029-018----	BALLYNARAHA	Ringfort - unclassified
WA029-028----	BALLYNARAHA	Castle - unclassified
WA024-068----	BALLYNARRID	Promontory fort - coastal
WA032-016002-	BALLYNARRID	Mine
WA032-016004-	BALLYNARRID	Hut site
WA032-017002-	BALLYNARRID	Building
WA032-016003-	BALLYNARRID	Hut site
WA032-016005-	BALLYNARRID	Hut site
WA032-015----	BALLYNARRID	Promontory fort - coastal
WA032-017001-	BALLYNARRID	Church
WA032-016001-	BALLYNARRID	Promontory fort - coastal
WA032-048----	BALLYNARRID	Promontory fort - coastal
WA024-087002-	BALLYNASISSALA	House - 17th century
WA025-038----	BALLYNASISSALA	Enclosure
WA025-052----	BALLYNASISSALA	Church
WA025-037----	BALLYNASISSALA	Ringfort - unclassified
WA024-087001-	BALLYNASISSALA	Mill - unclassified
WA024-087003-	BALLYNASISSALA	Church
WA037-032----	BALLYNATRAY COMMONS	House - 17th century
WA037-001----	BALLYNATRAY DEMESNE	Burnt mound
WA037-003----	BALLYNATRAY DEMESNE	Enclosure
WA037-004----	BALLYNATRAY DEMESNE	Mill - unclassified
WA037-011002-	BALLYNATRAY DEMESNE	Tomb - effigial
WA037-011001-	BALLYNATRAY DEMESNE	Religious house - Augustinian canons

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA037-002----	BALLYNATRAY DEMESNE	Ringfort - rath
WA037-005----	BALLYNATRAY DEMESNE	House - 17th century
WA037-041----	BALLYNATRAY DEMESNE	House - 17th century
WA037-033----	BALLYNATRAY DEMESNE	House - 17th century
WA037-034----	BALLYNATRAY DEMESNE	Water mill - unclassified
WA037-011004-	BALLYNATRAY DEMESNE	Graveslab
WA037-011003-	BALLYNATRAY DEMESNE	Gateway
WA037-059----	BALLYNATRAY DEMESNE	House - 17th century
WA034-038----	BALLYNEETY (Coshmore and Coshbride By.)	House - 17th century
WA031-026----	BALLYNEETY (Decies without Drum By.)	Burial ground
WA031-056----	BALLYNEETY (Decies without Drum By.),KILGOBNET,KILLADANGAN	Mill - unclassified
WA003-051002-	BALLYNEVIN	Ritual site - holy well
WA003-076----	BALLYNEVIN	House - 17th century
WA003-051001-	BALLYNEVIN	Church
WA003-051003-	BALLYNEVIN	Earthwork
WA003-051004-	BALLYNEVIN	Architectural fragment
WA003-104----	BALLYNEVIN	Enclosure
WA023-065----	BALLYNEVOGA	Burnt mound
WA023-032----	BALLYNEVOGA	Ringfort - unclassified
WA023-045----	BALLYNEVOGA	Church
WA023-046----	BALLYNEVOGA	Ogham stone
WA025-017----	BALLYPHILIP	Ringfort - unclassified
WA025-089----	BALLYPHILIP	Mill - unclassified
WA025-088001-	BALLYPHILIP	Graveyard
WA034-050----	BALLYPHILIP EAST	House - 17th century
WA034-008----	BALLYPHILIP WEST	Enclosure
WA034-049----	BALLYPHILIP WEST	House - 17th century
WA034-066----	BALLYPHILIP WEST,BALLYPHILIP EAST	Ritual site - holy well

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA038-031----	BALLYQUIN (Decies within Drum By.)	Ringfort - rath
WA003-032----	BALLYQUIN (Upperthird By.)	Ogham stone
WA003-079----	BALLYQUIN (Upperthird By.)	Stone circle
WA003-078001-	BALLYQUIN (Upperthird By.)	House - 17th century
WA003-049----	BALLYQUIN (Upperthird By.)	Megalithic tomb - portal tomb
WA003-077----	BALLYQUIN (Upperthird By.)	Souterrain
WA003-078002-	BALLYQUIN (Upperthird By.)	House - 17th century
WA003-050----	BALLYQUIN (Upperthird By.)	Megalithic structure
WA003-054----	BALLYQUIN (Upperthird By.)	Souterrain
WA003-052----	BALLYQUIN (Upperthird By.)	Ringfort - unclassified
WA003-053----	BALLYQUIN (Upperthird By.)	Ringfort - unclassified
WA003-109----	BALLYQUIN (Upperthird By.)	Standing stone
WA021-032----	BALLYRAFTER	Settlement cluster
WA025-125----	BALLYRISTEEN	Ritual site - holy well
WA037-009----	BALLYRUSSEL	Earthwork
WA021-019009-	BALLYSAGGART BEG (East)	Mound
WA021-038----	BALLYSAGGART BEG (West),BALLYSAGGART BEG GLEBE	House - 17th century
WA029-016----	BALLYSAGGARTBEGHILL	Enclosure
WA020-007----	BALLYSAGGARTMORE	Enclosure
WA020-006----	BALLYSAGGARTMORE	Standing stone
WA020-029----	BALLYSAGGARTMORE	Souterrain
WA040-001002-	BALLYSALLAGH	Souterrain
WA040-001001-	BALLYSALLAGH	Ringfort - rath
WA026-025----	BALLYSCANLAN	Ringfort - unclassified
WA026-024001-	BALLYSCANLAN	Ringfort - rath
WA026-023001-	BALLYSCANLAN	Ringfort - rath
WA026-024002-	BALLYSCANLAN	Souterrain
WA026-026----	BALLYSCANLAN	Ringfort - unclassified
WA026-027----	BALLYSCANLAN	Enclosure

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA026-055----	BALLYSCANLAN	House - 17th century
WA026-072----	BALLYSCANLAN	Burnt mound
WA026-023002-	BALLYSCANLAN	Souterrain
WA027-048----	BALLYSHONEEN	House - 17th century
WA027-079----	BALLYSHONEEN	Enclosure
WA016-006----	BALLYSHONOCK	Enclosure
WA016-012----	BALLYSHONOCK	Ringfort - unclassified
WA016-013----	BALLYSHONOCK	Burnt mound
WA016-014----	BALLYSHONOCK	Burnt mound
WA016-014001-	BALLYSHONOCK	Burnt mound
WA016-065----	BALLYSHONOCK	Enclosure
WA016-135----	BALLYSHONOCK	Burnt mound
WA016-144----	BALLYSHONOCK	Enclosure
WA016-005----	BALLYSHONOCK,HACKETSTOWN (Decies within Drum By.),ROSS (Decies without Drum By.)	Burnt mound
WA016-093----	BALLYSHONOCK,HACKETSTOWN (Middlethird By.)	Enclosure
WA003-069001-	BALLYSLOUGH	House - 17th century
WA003-069002-	BALLYSLOUGH	House - 17th century
WA007-005----	BALLYTHOMAS	Ringfort - rath
WA007-003----	BALLYTHOMAS	Ringfort - rath
WA009-036----	BALLYTRUCKLE	Windmill
WA016-002----	BALLYVADD	Ringfort - rath
WA024-029----	BALLYVADDEN	Ringfort - unclassified
WA024-027----	BALLYVADDEN	Ringfort - rath
WA025-002----	BALLYVADDEN	Ringfort - rath
WA025-001----	BALLYVADDEN	Ringfort - rath
WA025-019----	BALLYVADDEN	Ringfort - rath
WA025-018----	BALLYVADDEN	Enclosure
WA025-020----	BALLYVADDEN	Earthwork

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA025-126----	BALLYVADDEN	Burnt spread
WA024-120----	BALLYVADDEN	Burnt spread
WA024-118----	BALLYVADDEN	Burnt mound
WA024-119----	BALLYVADDEN	Burnt mound
WA020-025----	BALLYVECANE LOWER	Ritual site - holy well
WA026-002002-	BALLYVELLON	Enclosure
WA026-002001-	BALLYVELLON	Ogham stone
WA026-001----	BALLYVELLON	Standing stone
WA024-062002-	BALLYVOONY	Field boundary
WA024-064----	BALLYVOONY	Ringfort - rath
WA024-062001-	BALLYVOONY	Church
WA024-063----	BALLYVOONY	Ringfort - rath
WA032-014----	BALLYVOONY	Promontory fort - coastal
WA024-062003-	BALLYVOONY	House - indeterminate date
WA018-016----	BALLYVOREEN	Ringfort - unclassified
WA018-071----	BALLYVOREEN	Enclosure
WA032-002----	BALLYVOYLE	Ringfort - rath
WA032-003----	BALLYVOYLE	Ringfort - rath
WA032-004----	BALLYVOYLE	Ringfort - rath
WA032-006----	BALLYVOYLE	Barrow - mound barrow
WA032-022001-	BALLYVOYLE	Cairn - unclassified
WA032-025----	BALLYVOYLE	Ringfort - unclassified
WA032-007----	BALLYVOYLE	Standing stone
WA032-019----	BALLYVOYLE	Burial
WA032-022002-	BALLYVOYLE	Prehistoric site - lithic scatter
WA032-023----	BALLYVOYLE	Cairn - unclassified
WA032-024----	BALLYVOYLE	Ringfort - unclassified
WA032-026----	BALLYVOYLE	Ringfort - unclassified
WA032-027----	BALLYVOYLE	Ringfort - rath

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA032-001----	BALLYVOYLE	Earthwork
WA032-005----	BALLYVOYLE	Standing stone
WA029-007----	BALLYWELLIGAN	Standing stone
WA023-011002-	BARNANKILE	Bawn
WA023-040----	BARNANKILE	Burial
WA023-038----	BARNANKILE	Linear earthwork
WA023-039----	BARNANKILE	Linear earthwork
WA023-011003-	BARNANKILE	House - 17th century
WA023-011001-	BARNANKILE	House - 17th century
WA014-054----	BARRACREEMOUNTAIN LOWER	House - indeterminate date
WA014-058003-	BARRACREEMOUNTAIN LOWER	Hut site
WA014-058001-	BARRACREEMOUNTAIN LOWER	Enclosure
WA014-058004-	BARRACREEMOUNTAIN LOWER	Hut site
WA014-058002-	BARRACREEMOUNTAIN LOWER	Hut site
WA014-061----	BARRACREEMOUNTAIN LOWER	Enclosure
WA014-059----	BARRACREEMOUNTAIN LOWER	Sheepfold
WA014-060----	BARRACREEMOUNTAIN LOWER	Standing stone
WA014-055----	BARRACREEMOUNTAIN UPPER	Cairn - unclassified
WA030-074----	BARRANASTOOK LOWER	Enclosure
WA018-020----	BARRISTOWN	Ringfort - unclassified
WA018-018----	BARRISTOWN	Ringfort - unclassified
WA018-019----	BARRISTOWN	Ringfort - unclassified
WA018-079----	BARRISTOWN	Enclosure
WA038-034----	BAWNAGARRANE	Ringfort - unclassified
WA038-054----	BAWNAGARRANE	Ritual site - holy well
WA038-044----	BAWNAGARRANE	Castle - unclassified
WA009-034002-	BAWNDAW	Excavation - miscellaneous
WA009-034003-	BAWNDAW	Excavation - miscellaneous
WA009-034001-	BAWNDAW	Excavation - miscellaneous

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA009-014----	BAWNDAW,GRACEDIEU EAST,GRACEDIEU WEST	Bastioned fort
WA017-130----	BAWNFUNE (Gaultiere By., Lisnackill Par.)	Kiln - corn-drying
WA017-132----	BAWNFUNE (Gaultiere By., Lisnackill Par.)	Fulacht fia
WA017-133----	BAWNFUNE (Gaultiere By., Lisnackill Par.)	Burnt mound
WA017-129----	BAWNFUNE (Gaultiere By., Lisnackill Par.)	Hut site
WA017-131001-	BAWNFUNE (Gaultiere By., Lisnackill Par.)	Excavation - miscellaneous
WA017-131002-	BAWNFUNE (Gaultiere By., Lisnackill Par.)	Burnt mound
WA001-043----	BAWNFUNE (Glenahiry By.)	Souterrain
WA005-004----	BAWNFUNE (Glenahiry By.)	Well
WA005-003001-	BAWNFUNE (Glenahiry By.)	Church
WA005-003002-	BAWNFUNE (Glenahiry By.)	Enclosure
WA005-043----	BAWNFUNE (Glenahiry By.)	House - 17th century
WA005-048----	BAWNFUNE (Glenahiry By.)	Cairn - unclassified
WA034-043----	BAWNLAUR,KILLEENAGH NORTH	Standing stone
WA008-024001-	BEALLOUGH	House - 17th century
WA008-024002-	BEALLOUGH	House - 17th century
WA008-008----	BEALLOUGH	Enclosure
WA025-130----	BENVOY	Promontory fort - coastal
WA029-026001-	BEWLEY	Ringfort - rath
WA029-026002-	BEWLEY	Midden
WA029-073----	BEWLEY	Burial
WA029-024003-	BEWLEY	Graveyard
WA029-024004-	BEWLEY	Walled garden
WA029-024006-	BEWLEY	Inscribed stone
WA029-024005-	BEWLEY	Bullaun stone
WA029-024001-	BEWLEY	Church
WA029-024002-	BEWLEY	Building
WA029-015----	BEWLEY,CLASHNADARRIV,CURRAGHMOREEN,KNOCKAL AHARA,QUARTER,SPRINGFIELD (Decies without Drum By.)	Road - road/trackway

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA018-039----	BISHOPSCOURT	Castle - unclassified
WA018-040001-	BISHOPSCOURT	House - 17th century
WA018-040002-	BISHOPSCOURT	House - 17th century
WA018-088----	BISHOPSCOURT	Fulacht fia
WA003-084----	BISHOPSTOWN	Church
WA007-009----	BISHOPSTOWN	Cist
WA016-033----	BLACKKNOCK	Ringfort - unclassified
WA016-034----	BLACKKNOCK	Ringfort - unclassified
WA013-019----	BLEANTASOUR	Ringfort - rath
WA013-018----	BLEANTASOUR	Ringfort - rath
WA013-040----	BLEANTASOUR	Children's burial ground
WA013-039----	BLEANTASOUR	Ringfort - rath
WA013-017----	BLEANTASOUR	Ringfort - rath
WA014-047----	BLEANTASOUR MOUNTAIN	Booley hut
WA014-046----	BLEANTASOUR MOUNTAIN	Standing stone
WA023-050----	BOHADOON MOUNTAIN	Standing stone
WA023-012----	BOHADOON SOUTH	Ringfort - rath
WA034-084----	BOOLA (Coshmore and Coshbride By., Templemichael Par.)	House - 17th century
WA007-016----	BOOLABEG	Ringfort - unclassified
WA007-017----	BOOLABEG	Enclosure
WA007-082----	BOOLABEG	Fulacht fia
WA007-094----	BOOLABEG	Fulacht fia
WA005-006----	BOOLABRIEN UPPER	Enclosure
WA023-005----	BOOLATTIN	Ringfort - rath
WA023-006001-	BOOLATTIN	Church
WA023-006002-	BOOLATTIN	Graveyard
WA023-061----	BOOLATTIN,CURRAUN	Cairn - boundary cairn
WA024-053----	BRENAN	Earthwork
WA024-082----	BRENAN	Standing stone

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA024-083----	BRENAN	Settlement cluster
WA024-084----	BRENAN	Enclosure
WA024-081001-	BRENAN	Standing stone
WA024-081002-	BRENAN	Standing stone
WA029-069----	BRIDANE LOWER,BRIDANE UPPER	Fulacht fia
WA030-012001-	BRIDGEQUARTER (Decies without Drum By.)	Cave
WA030-014----	BRIDGEQUARTER (Decies without Drum By.)	Enclosure
WA030-011----	BRIDGEQUARTER (Decies without Drum By.)	Road - road/trackway
WA015-046----	BRISKA LOWER	Ringfort - unclassified
WA024-001----	BRISKA LOWER	Church
WA013-021----	BROEMOUNTAIN (Decies without Drum By., Lickoran Par.)	Standing stone
WA013-052----	BROEMOUNTAIN (Decies without Drum By., Lickoran Par.)	Enclosure
WA004-016----	BROWNSWOOD	Burnt mound
WA004-017----	BROWNSWOOD	Burnt mound
WA004-006----	BROWNSWOOD	Settlement cluster
WA017-114----	BUTLERSTOWN NORTH	Cist
WA017-136----	BUTLERSTOWN NORTH	Excavation - miscellaneous
WA017-137----	BUTLERSTOWN NORTH	Excavation - miscellaneous
WA017-074----	BUTLERSTOWN SOUTH	House - 17th century
WA017-009001-	BUTLERSTOWN SOUTH	Architectural fragment
WA017-008----	BUTLERSTOWN SOUTH	Castle - tower house
WA017-009002-	BUTLERSTOWN SOUTH	Architectural feature
WA017-074001-	BUTLERSTOWN SOUTH	House - 17th century
WA026-037----	CAHER	Enclosure
WA001-019001-	CAHERBAUN	Ringfort - rath
WA001-020----	CAHERBAUN	Ringfort - rath
WA001-019002-	CAHERBAUN	Souterrain
WA013-015----	CAHERBRACK	Ringfort - rath

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA019-005----	CAHERGAL	Enclosure
WA013-010----	CAHERNALEAGUE	Barracks
WA013-011----	CAHERNALEAGUE	Ringfort - unclassified
WA016-049----	CAHERUANE	Ringfort - rath
WA029-033----	CAMPHIRE	Castle - tower house
WA029-032----	CAMPHIRE HILL	Ritual site - holy well
WA030-021----	CANTY	Ringfort - rath
WA030-086----	CANTY	Burial
WA030-006002-	CAPPAGH (Decies without Drum By.)	Bawn
WA030-005----	CAPPAGH (Decies without Drum By.)	Fulacht fia
WA030-007----	CAPPAGH (Decies without Drum By.)	Crannog
WA030-006003-	CAPPAGH (Decies without Drum By.)	Cross-inscribed stone (present location)
WA030-006001-	CAPPAGH (Decies without Drum By.)	Castle - tower house
WA030-077----	CAPPAGH (Decies without Drum By.)	House - 17th century
WA030-080----	CAPPAGH (Decies without Drum By.)	Barrow - mound barrow
WA021-037001-	CAPPOQUIN	Ritual site - holy/saint's stone
WA021-037002-	CAPPOQUIN	Ritual site - holy/saint's stone
WA021-034----	CAPPOQUIN	Mill - unclassified
WA021-036----	CAPPOQUIN	Mine
WA021-014001-	CAPPOQUIN	Bridge
WA021-015----	CAPPOQUIN DEMESNE	Ritual site - holy well
WA021-035----	CAPPOQUIN DEMESNE	Castle - unclassified
WA021-016----	CAPPOQUIN DEMESNE	Burial ground
WA021-014002-	CAPPOQUIN,KILBREE EAST	Road - road/trackway
WA034-057----	CARNGLOSS	Cairn - unclassified
WA034-056----	CARNGLOSS	Cairn - unclassified
WA016-109----	CARRICKADUSTARA	Souterrain
WA024-049----	CARRICKAHILLA	Castle - unclassified
WA024-050----	CARRICKAHILLA	Earthwork

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA024-057----	CARRICKAHILLA	Ringfort - rath
WA024-059----	CARRICKAHILLA	Ringfort - unclassified
WA016-029----	CARRICKANURE	Ringfort - rath
WA016-008----	CARRICKANURE	Megalithic structure
WA016-102----	CARRICKANURE	Standing stone
WA016-103----	CARRICKANURE	Standing stone
WA016-141----	CARRICKANURE	Enclosure
WA016-146----	CARRICKANURE	Enclosure
WA024-041----	CARRICKAREADY	Enclosure
WA024-106----	CARRICKAREADY	Enclosure
WA024-115----	CARRICKAREADY	Fulacht fia
WA024-116----	CARRICKAREADY	Burnt mound
WA024-117----	CARRICKAREADY	Burnt mound
WA017-093----	CARRICKAVARAHANE	Cairn - unclassified
WA026-007----	CARRICKAVARAHANE	Enclosure
WA026-081----	CARRICKAVARAHANE	Standing stone
WA026-028----	CARRICKAVRANTRY	Megalithic tomb - wedge tomb
WA026-070----	CARRICKAVRANTRY NORTH,CARRICKAVRANTRY SOUTH	Road - unclassified togher
WA003-087----	CARRICKBEG	Standing stone
WA003-072----	CARRICKBEG	Standing stone
WA003-092----	CARRICKBEG	Boundary stone
WA009-030----	CARRICKPHIERISH	Excavation - miscellaneous
WA016-050----	CARRICKPHILIP	Ringfort - rath
WA016-080----	CARRICKPHILIP	Cairn - unclassified
WA016-079----	CARRICKPHILIP	Standing stone
WA016-078----	CARRICKPHILIP	House - 17th century
WA017-115----	CARRIGANARD	Enclosure
WA017-079----	CARRIGANARD	Settlement cluster
WA017-120----	CARRIGANARD	Fulacht fia

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA022-024----	CARRIGAUN (Hely)	Ringfort - rath
WA022-006----	CARRIGAUN (Mansfield)	Ringfort - unclassified
WA017-017----	CARRIGAVOE	Ringfort - rath
WA017-126----	CARRIGAVOE	Kiln
WA014-053----	CARRIGBRACK	House - indeterminate date
WA014-030001-	CARRIGBRACK	Fulacht fia
WA014-030003-	CARRIGBRACK	Field boundary
WA014-030002-	CARRIGBRACK	Cairnfield
WA024-038----	CARRIGCASTLE	Castle - unclassified
WA024-039----	CARRIGCASTLE	Souterrain
WA024-079----	CARRIGCASTLE	House - 17th century
WA024-078001-	CARRIGCASTLE	Ritual site - holy well
WA024-075----	CARRIGCASTLE	Enclosure
WA024-077----	CARRIGCASTLE	House - 17th century
WA024-076----	CARRIGCASTLE	Enclosure
WA034-060----	CARRIGEEN (Coshmore and Coshbride By.)	House - 17th century
WA034-027----	CARRIGEEN (Coshmore and Coshbride By.)	Ringfort - unclassified
WA034-083----	CARRIGEEN (Coshmore and Coshbride By.)	House - 17th century
WA015-060----	CARRIGEEN (Decies without Drum By., Rossduff Par.)	Ringfort - rath
WA015-012----	CARRIGEEN (Decies without Drum By., Rossduff Par.)	Ringfort - rath
WA006-033----	CARRIGEEN (Upperthird By.)	Standing stone
WA006-037----	CARRIGEEN (Upperthird By.)	Sheepfold
WA006-032----	CARRIGEEN (Upperthird By.)	Fulacht fia
WA006-067----	CARRIGEEN (Upperthird By.),GRAIGAVALLA	Road - road/trackway
WA023-018----	CARRIGEENNAGERAGH BIG	Enclosure
WA023-030001-	CARRIGEENNAGERAGH BIG,SHANBALLY (Decies without Drum By.)	Enclosure
WA024-101----	CARRIGEENNAHAHA	Standing stone
WA030-044001-	CARRIGLEA (Decies without Drum By.)	Settlement deserted - medieval

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA030-045----	CARRIGLEA (Decies without Drum By.)	Ringfort - unclassified
WA030-047----	CARRIGLEA (Decies without Drum By.)	Ringfort - unclassified
WA030-048----	CARRIGLEA (Decies without Drum By.)	Earthwork
WA030-046----	CARRIGLEA (Decies without Drum By.)	Burial ground
WA030-044002-	CARRIGLEA (Decies without Drum By.)	Burial
WA017-054----	CARRIGLONG	Enclosure
WA017-057----	CARRIGLONG	Megalithic tomb - passage tomb
WA017-056----	CARRIGLONG	Enclosure
WA017-113----	CARRIGLONG	Burnt mound
WA023-019----	CARRIGMOORNA	Cliff-edge fort
WA023-019001-	CARRIGMOORNA	Standing stone
WA021-005----	CARRIGNAGOWER EAST	Enclosure
WA021-004----	CARRIGNAGOWER WEST	Ritual site - holy well
WA015-099----	CARRIGNANONSHAGH	Burnt mound
WA033-005001-	CARRIGROE (Coshmore and Coshbride By.)	Penitential station
WA030-065----	CARRIGROE (Decies without Drum By.)	Standing stone
WA017-070----	CARRIGROE (Gaultiere By.)	Settlement cluster
WA035-008----	CARRONADAVDERG	Cairn - unclassified
WA035-029----	CARRONAHYLA	Standing stone
WA002-021----	CARROWCLOUGH (Upperthird By., Dysert Par.)	Ringfort - rath
WA002-058----	CARROWCLOUGH (Upperthird By., Dysert Par.)	House - 17th century
WA022-044----	CARROWGARRIFF MORE	Enclosure
WA003-041----	CARROWLEIGH	Enclosure
WA003-096----	CARROWLEIGH	Burnt mound
WA003-042----	CARROWLEIGH	Ringfort - unclassified
WA003-040002-	CARROWLEIGH,RATHGORMUCK	Graveyard
WA031-006----	CARROWNCASHLANE (Decies without Drum By., Kilgobnet Par.)	Castle - tower house
WA024-100----	CARROWNTASSONA	Standing stone

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA025-024----	CASTLECRADDOCK	Ringfort - unclassified
WA025-110----	CASTLECRADDOCK	Castle - unclassified
WA025-025----	CASTLECRADDOCK	Enclosure
WA025-023----	CASTLECRADDOCK	Ritual site - holy well
WA020-016----	CASTLELANDS,GLENMORRISHMEEN,TOORTANE,TOWNP ARKS WEST (Coshmore and Coshbride By., Lismore Par.)	Road - road/trackway
WA037-021001-	CASTLEMILES	Moated site
WA037-022----	CASTLEMILES	Ringfort - rath
WA037-021002-	CASTLEMILES	Castle - unclassified
WA023-035001-	CASTLEQUARTER (Decies without Drum By., Kilrossanty Par.)	Castle - tower house
WA023-035002-	CASTLEQUARTER (Decies without Drum By., Kilrossanty Par.)	Bawn
WA023-035003-	CASTLEQUARTER (Decies without Drum By., Kilrossanty Par.)	Dovecote
WA023-035004-	CASTLEQUARTER (Decies without Drum By., Kilrossanty Par.)	House - 17th century
WA022-015----	CASTLEQUARTER (Decies without Drum By., Modelligo Par.)	Castle - tower house
WA005-008----	CASTLEQUARTER (Glenahiry By.)	Castle - tower house
WA005-009----	CASTLEQUARTER (Glenahiry By.),KILCREGGANE,KILGREANY (Glenahiry By.),WHITEHOUSEQUARTER	Bridge
WA005-038001-	CASTLEQUARTER (Glenahiry By.),SMALLQUARTER	House - 17th century
WA005-027001-	CASTLEREAGH	Castle - unclassified
WA005-027002-	CASTLEREAGH	House - 17th century
WA005-054----	CASTLEREAGH	Standing stone
WA005-032----	CASTLEREAGH	Enclosure - large enclosure
WA013-005----	CASTLEREAGH	Barrow - ring-barrow
WA013-006----	CASTLEREAGH	Barrow - ring-barrow
WA017-060002-	CASTLETOWN	Standing stone

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA017-062----	CASTLETOWN	Enclosure
WA017-061----	CASTLETOWN	Enclosure
WA017-107002-	CASTLETOWN	Standing stone
WA017-060001-	CASTLETOWN	Embanked enclosure
WA017-063----	CASTLETOWN	House - 17th century
WA017-107001-	CASTLETOWN	Standing stone
WA033-018----	CHURCHQUARTER (Coshmore and Coshbride By.)	House - 17th century
WA033-005----	CHURCHQUARTER (Coshmore and Coshbride By.)	Ritual site - holy well
WA033-006----	CHURCHQUARTER (Coshmore and Coshbride By.)	Mill - unclassified
WA033-004001-	CHURCHQUARTER (Decies without Drum By.),KILWATERMOY	Ecclesiastical enclosure
WA003-003----	CHURCHTOWN	Enclosure
WA003-001006-	CHURCHTOWN	Armorial plaque
WA003-001007-	CHURCHTOWN	Font
WA003-001001-	CHURCHTOWN	Church
WA003-001002-	CHURCHTOWN	Graveyard
WA003-001004-	CHURCHTOWN	Graveslab
WA003-001003-	CHURCHTOWN	Graveslab
WA003-001008-	CHURCHTOWN	Armorial plaque
WA003-056001-	CHURCHTOWN	House - 17th century
WA003-056002-	CHURCHTOWN	House - 17th century
WA003-098----	CHURCHTOWNHILL	Church
WA036-009----	CILL AN FHUARTHAINN	Enclosure
WA037-007----	CLASHMORE	Ritual site - holy well
WA037-008003-	CLASHMORE	Graveyard
WA037-008004-	CLASHMORE	Cross-inscribed stone
WA037-008001-	CLASHMORE	Church
WA037-008002-	CLASHMORE	Church
WA037-008006-	CLASHMORE	Cross
WA037-008005-	CLASHMORE	Bullaun stone

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA004-009----	CLASHROE	Standing stone
WA030-052----	CLOGH	Moated site
WA004-024----	CLONAGAM	Stone head
WA004-028----	CLONAGAM	Architectural fragment
WA005-039----	CLONANAV	Enclosure
WA005-016----	CLONANAV	Enclosure
WA031-018----	CLONCOSKORAN	Enclosure
WA031-031----	CLONCOSKORAN	Castle - tower house
WA031-053001-	CLONCOSKORAN	House - 17th century
WA031-019002-	CLONCOSKORAN,GARRANBAUN	Ringfort - rath
WA031-019001-	CLONCOSKORAN,GARRANBAUN	Hilltop enclosure
WA002-037----	CLONDONNELL	Ringfort - rath
WA002-042----	CLONDONNELL	Enclosure
WA002-041----	CLONDONNELL	Enclosure
WA007-021002-	CLONEA	Bawn
WA007-021003-	CLONEA	House - indeterminate date
WA007-021001-	CLONEA	Castle - tower house
WA031-037001-	CLONEA LOWER	Church
WA031-037002-	CLONEA LOWER	Graveyard
WA031-038----	CLONEA LOWER	Castle - unclassified
WA031-039----	CLONEA LOWER	Structure
WA031-066----	CLONEA LOWER	Burnt mound
WA031-021----	CLONEA UPPER	Enclosure
WA007-070----	CLONEA,MONMINANE	House - 17th century
WA026-076----	CLONFADDA,KILCARTON	Cairn - unclassified
WA030-034----	CLONKERDIN	Burnt mound
WA030-032----	CLONKERDIN	Castle - unclassified
WA030-033----	CLONKERDIN	Fulacht fia

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA030-092----	CLONKARDIN,KEEREEN LOWER,KNOCKNASKAGH UPPER,KEEREEN UPPER	Road - road/trackway
WA007-061----	CLONMOYLE	Mill - unclassified
WA013-027----	CLOONCOGAILE	Enclosure
WA013-026----	CLOONCOGAILE,KILCLOONEY	Ringfort - unclassified
WA021-008001-	CLUTTAHINA	Concentric enclosure
WA021-031001-	CLUTTAHINA	Hut site
WA021-008002-	CLUTTAHINA	Souterrain
WA021-031002-	CLUTTAHINA	Midden
WA012-006----	CLUTTAHINA,COOLNACREENA,Unknown	Road - road/trackway
WA022-036----	CNOCÁIN AN PHAORAIGH ÁOCHTARACH (Bar. Na Déise lasmuigh den Drom)	Ringfort - unclassified
WA022-037----	CNOCÁIN AN PHAORAIGH ÁOCHTARACH (Bar. Na Déise lasmuigh den Drom)	Ringfort - unclassified
WA022-061----	CNOCÁIN AN PHAORAIGH UACHTARACH (Bar. Na Déise lasmuigh den Drom)	Water mill - horizontal-wheeled
WA022-021----	CNOCÁIN AN PHAORAIGH UACHTARACH (Bar. Na Déise lasmuigh den Drom)	Enclosure
WA022-046001-	COLLIGAN BEG	Church
WA022-046002-	COLLIGAN BEG	Graveyard
WA022-046003-	COLLIGAN BEG	Bullaun stone
WA022-045----	COLLIGAN BEG	Church
WA022-056----	COLLIGAN MORE	Children's burial ground
WA014-003----	COMERAGH	Ringfort - rath
WA014-014----	COMERAGH	Ringfort - rath
WA014-056001-	COMERAGH	Hut site
WA015-045----	COMERAGHHOUSE	Enclosure
WA014-019----	COMERAGHHOUSE	Enclosure
WA014-035001-	COMERAGHMOUNTAIN	Fulacht fia
WA014-036----	COMERAGHMOUNTAIN	Fulacht fia

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA014-002----	COMERAGHMOUNTAIN	Sheepfold
WA014-056----	COMERAGHMOUNTAIN	Cairnfield
WA014-066----	COMERAGHMOUNTAIN	Burial
WA006-062----	COMMONS (Upperthird By.),ROSS (Upperthird By.),BOOLACLOGHAGH	Cairn - unclassified
WA020-004002-	COOL (Coshmore and Coshbride By.)	Children's burial ground
WA020-004001-	COOL (Coshmore and Coshbride By.)	Enclosure
WA020-022----	COOL (Coshmore and Coshbride By.)	Standing stone
WA020-031----	COOL (Coshmore and Coshbride By.)	Standing stone (present location)
WA030-039----	COOL (Decies without Drum By.)	Burnt mound
WA021-041----	COOLADALANE LOWER,COOLADALANE UPPER	Standing stone
WA034-025----	COOLBAGH	Ringfort - rath
WA034-036----	COOLBAGH,KILMORE	Enclosure
WA034-017----	COOLBEGGAN EAST	Ringfort - unclassified
WA034-068----	COOLBEGGAN EAST,COOLBEGGAN WEST	Standing stone
WA010-003001-	COOLBUNNIA	Church
WA010-011----	COOLBUNNIA	Enclosure
WA010-001002-	COOLBUNNIA	Enclosure
WA010-003002-	COOLBUNNIA	Graveyard
WA010-005----	COOLBUNNIA	Castle - tower house
WA010-020----	COOLBUNNIA	Settlement cluster
WA010-001001-	COOLBUNNIA	Enclosure
WA010-004----	COOLBUNNIA	Castle - motte
WA010-003003-	COOLBUNNIA	Font
WA010-003004-	COOLBUNNIA	Bullaun stone
WA010-003005-	COOLBUNNIA	Bullaun stone
WA008-010001-	COOLFINN	Church
WA008-010005-	COOLFINN	Armorial plaque
WA008-010003-	COOLFINN	Tomb - effigial

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA008-010004-	COOLFINN	Tomb - chest tomb
WA008-010007-	COOLFINN	Bullaun stone
WA008-010008-	COOLFINN	Graveslab
WA008-010002-	COOLFINN	Graveyard
WA008-023001-	COOLFINN	House - 17th century
WA008-023002-	COOLFINN	House - 17th century
WA008-010012-	COOLFINN	Bullaun stone
WA002-012----	COOLISHAL (Upperthird By.)	Ringfort - rath
WA002-057001-	COOLISHAL (Upperthird By.),GURTEEN LOWER,GURTEEN UPPER	House - 17th century
WA002-057002-	COOLISHAL (Upperthird By.),GURTEEN LOWER,GURTEEN UPPER	House - 17th century
WA026-058----	COOLNAGOPPOGE	House - 17th century
WA026-039----	COOLNAGOPPOGE	Ringfort - unclassified
WA026-040----	COOLNAGOPPOGE	Ringfort - rath
WA026-074----	COOLNAGOPPOGE	Burnt mound
WA007-069----	COOLNAHORNA	Church
WA007-069001-	COOLNAHORNA	Graveyard
WA007-026----	COOLNALINGADY	Ringfort - rath
WA007-025----	COOLNALINGADY	Enclosure
WA007-068----	COOLNALINGADY	Linear earthwork
WA003-005----	COOLNAMUCK DEMESNE	Ritual site - holy well
WA003-008002-	COOLNAMUCK DEMESNE	Bawn
WA003-009----	COOLNAMUCK DEMESNE	Well
WA003-008005-	COOLNAMUCK DEMESNE	Inscribed stone
WA003-008001-	COOLNAMUCK DEMESNE	Castle - tower house
WA003-061----	COOLNAMUCK DEMESNE	Urn burial
WA003-060001-	COOLNAMUCK DEMESNE	Mill - unclassified
WA003-060002-	COOLNAMUCK DEMESNE	House - 17th century
WA003-090----	COOLNAMUCK DEMESNE	Burnt mound

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA003-091----	COOLNAMUCK DEMESNE	Burnt mound
WA003-089----	COOLNAMUCK DEMESNE	Burnt mound
WA003-058----	COOLNAMUCK DEMESNE	Weir - fish
WA003-004----	COOLNAMUCK DEMESNE	Inscribed stone (present location)
WA030-020----	COOLNANAV	Water mill - horizontal-wheeled
WA030-084----	COOLNANAV	Cave
WA022-053----	COOLNASMEAR LOWER	Standing stone
WA023-020----	COOLNASMEAR LOWER	Kiln - lime
WA023-013----	COOLNASMEAR LOWER	Earthwork
WA022-052----	COOLNASMEAR LOWER,COOLNASMEAR UPPER	Graveyard
WA023-021----	COOLNASMEAR UPPER	Ringfort - unclassified
WA023-014----	COOLNASMEAR UPPER	Ringfort - rath
WA023-015----	COOLNASMEAR UPPER	Enclosure
WA023-022----	COOLNASMEAR UPPER	Ringfort - unclassified
WA023-055----	COOLNASMEARMOUNTAIN,GLENDALLIGAN	Cairn - boundary cairn
WA023-036----	COOLNASMEARMOUNTAIN,KILNAFREHANMOUNTAIN, MONARUDMOUNTAIN	Cairn - unclassified
WA008-021----	COOLROE (Upperthird By., Clonagam Par.),GUILCAGH	Weir - fish
WA003-026----	COOLROE (Upperthird By., Mothel Par.)	Ringfort - unclassified
WA003-048----	COOLROE (Upperthird By., Mothel Par.)	Ringfort - unclassified
WA018-046----	COOLTEGIN	Souterrain
WA027-066----	COOLUM (Gaultiere By., Corbally Par.)	Rock art
WA027-037----	COOLUM (Gaultiere By., Corbally Par.)	Promontory fort - coastal
WA027-067----	COOLUM (Gaultiere By., Corbally Par.)	Settlement deserted - medieval
WA027-074----	COOLUM (Gaultiere By., Rathmoylan Par.)	Settlement cluster
WA028-003----	COOLYDOODY NORTH	Ringfort - rath
WA028-004----	COOLYDOODY NORTH	Enclosure
WA027-030001-	CORBALLY BEG	Cist
WA027-030002-	CORBALLY BEG	Standing stone

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA027-077----	CORBALLY BEG	Enclosure
WA027-030004-	CORBALLY BEG	Pit-burial
WA027-058----	CORBALLY BEG	House - 17th century
WA027-084----	CORBALLY BEG	Enclosure
WA027-057----	CORBALLY BEG	Burial
WA027-070----	CORBALLY BEG,CORBALLY MORE	Settlement cluster
WA027-025001-	CORBALLY MORE	Burnt spread
WA026-068001-	CORBALLY MORE	Tide mill - unclassified
WA026-068002-	CORBALLY MORE	Weir - fish
WA027-061----	CORBALLY MORE	House - 17th century
WA027-075----	CORBALLY MORE	Standing stone
WA027-029----	CORBALLY MORE	Ringfort - unclassified
WA027-027----	CORBALLY MORE	Enclosure
WA027-085----	CORBALLY MORE	Standing stone
WA013-042----	CORRADOON	Pit-burial
WA023-066003-	COUMARAGLINMOUNTAIN	Fulacht fia
WA014-033004-	COUMARAGLINMOUNTAIN	Barrow - ring-barrow
WA014-033005-	COUMARAGLINMOUNTAIN	Fulacht fia
WA014-033010-	COUMARAGLINMOUNTAIN	Standing stone - pair
WA014-033011-	COUMARAGLINMOUNTAIN	Cairn - burial cairn
WA014-033012-	COUMARAGLINMOUNTAIN	Cairn - burial cairn
WA014-033013-	COUMARAGLINMOUNTAIN	Cairn - ring-cairn
WA014-033014-	COUMARAGLINMOUNTAIN	Cairn - cairn circle
WA014-033020-	COUMARAGLINMOUNTAIN	Booley hut
WA014-033021-	COUMARAGLINMOUNTAIN	Booley hut
WA014-033022-	COUMARAGLINMOUNTAIN	Booley hut
WA014-033027-	COUMARAGLINMOUNTAIN	Booley hut
WA014-033028-	COUMARAGLINMOUNTAIN	Booley hut
WA014-033015-	COUMARAGLINMOUNTAIN	Cairn - cairn circle

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA014-033023-	COUMARAGLINMOUNTAIN	Booley hut
WA014-033024-	COUMARAGLINMOUNTAIN	Booley hut
WA014-033025-	COUMARAGLINMOUNTAIN	Booley hut
WA014-033026-	COUMARAGLINMOUNTAIN	Booley hut
WA014-033006-	COUMARAGLINMOUNTAIN	Fulacht fia
WA014-033007-	COUMARAGLINMOUNTAIN	Kerb circle
WA014-033008-	COUMARAGLINMOUNTAIN	Kerb circle
WA014-033009-	COUMARAGLINMOUNTAIN	Kerb circle
WA014-033016-	COUMARAGLINMOUNTAIN	Cairn - cairn circle
WA014-033017-	COUMARAGLINMOUNTAIN	Cairn - cairn circle
WA014-033018-	COUMARAGLINMOUNTAIN	Kerb circle
WA014-033019-	COUMARAGLINMOUNTAIN	Kerb circle
WA014-033002-	COUMARAGLINMOUNTAIN	Stone row
WA014-033003-	COUMARAGLINMOUNTAIN	Cairn - cairn circle
WA023-066012-	COUMARAGLINMOUNTAIN	Kerb circle
WA023-066018-	COUMARAGLINMOUNTAIN	Kerb circle
WA023-066019-	COUMARAGLINMOUNTAIN	Cairn - cairn circle
WA023-066025-	COUMARAGLINMOUNTAIN	Hut site
WA023-066011-	COUMARAGLINMOUNTAIN	Enclosure
WA023-066020-	COUMARAGLINMOUNTAIN	Barrow - pond barrow
WA023-066026-	COUMARAGLINMOUNTAIN	Field system
WA023-066027-	COUMARAGLINMOUNTAIN	Standing stone
WA023-066028-	COUMARAGLINMOUNTAIN	Cairn - unclassified
WA023-066029-	COUMARAGLINMOUNTAIN	Cairn - unclassified
WA023-066033-	COUMARAGLINMOUNTAIN	Hut site
WA023-066034-	COUMARAGLINMOUNTAIN	Hut site
WA023-066030-	COUMARAGLINMOUNTAIN	Cairn - ring-cairn
WA023-066036-	COUMARAGLINMOUNTAIN	Hut site
WA023-066035-	COUMARAGLINMOUNTAIN	Hut site

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA023-066046-	COUMARAGLINMOUNTAIN	Hut site
WA023-066016-	COUMARAGLINMOUNTAIN	Cairnfield
WA023-066017-	COUMARAGLINMOUNTAIN	Standing stone
WA023-066064-	COUMARAGLINMOUNTAIN	Standing stone
WA023-066047-	COUMARAGLINMOUNTAIN	Hut site
WA023-066048-	COUMARAGLINMOUNTAIN	Hut site
WA023-066050-	COUMARAGLINMOUNTAIN	Standing stone
WA023-066044-	COUMARAGLINMOUNTAIN	Cairn - unclassified
WA023-066045-	COUMARAGLINMOUNTAIN	Fulacht fia
WA023-066055-	COUMARAGLINMOUNTAIN	Hut site
WA023-066060-	COUMARAGLINMOUNTAIN	Hut site
WA023-066063-	COUMARAGLINMOUNTAIN	Fulacht fia
WA023-066021-	COUMARAGLINMOUNTAIN	Hut site
WA023-066022-	COUMARAGLINMOUNTAIN	Hut site
WA023-066023-	COUMARAGLINMOUNTAIN	Enclosure
WA023-066024-	COUMARAGLINMOUNTAIN	Hut site
WA023-066039-	COUMARAGLINMOUNTAIN	Fulacht fia
WA023-066041-	COUMARAGLINMOUNTAIN	Cairn - unclassified
WA023-066042-	COUMARAGLINMOUNTAIN	Cairn - unclassified
WA023-066043-	COUMARAGLINMOUNTAIN	Cairn - unclassified
WA023-066051-	COUMARAGLINMOUNTAIN	Cairnfield
WA023-066052-	COUMARAGLINMOUNTAIN	Enclosure
WA023-066053-	COUMARAGLINMOUNTAIN	Hut site
WA023-066054-	COUMARAGLINMOUNTAIN	Hut site
WA023-066056-	COUMARAGLINMOUNTAIN	Cairnfield
WA023-066057-	COUMARAGLINMOUNTAIN	Hut site
WA023-066058-	COUMARAGLINMOUNTAIN	Hut site
WA023-066059-	COUMARAGLINMOUNTAIN	Hut site
WA023-066013-	COUMARAGLINMOUNTAIN	Cairn - unclassified

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA023-066014-	COUMARAGLINMOUNTAIN	Kerb circle
WA023-066015-	COUMARAGLINMOUNTAIN	Standing stone
WA023-066031-	COUMARAGLINMOUNTAIN	Cairn - unclassified
WA023-066032-	COUMARAGLINMOUNTAIN	Field system
WA023-066037-	COUMARAGLINMOUNTAIN	Cairn - unclassified
WA023-066038-	COUMARAGLINMOUNTAIN	Standing stone
WA023-066049-	COUMARAGLINMOUNTAIN	Field system
WA023-066061-	COUMARAGLINMOUNTAIN	Hut site
WA023-066062-	COUMARAGLINMOUNTAIN	Fulacht fia
WA023-066067-	COUMARAGLINMOUNTAIN	Cairn - ring-cairn
WA023-066068-	COUMARAGLINMOUNTAIN	Cairn - unclassified
WA023-073----	COUMARAGLINMOUNTAIN	House - indeterminate date
WA023-066001-	COUMARAGLINMOUNTAIN	Cairn - cairn circle
WA023-066066-	COUMARAGLINMOUNTAIN	Cairn - unclassified
WA023-066070-	COUMARAGLINMOUNTAIN	Standing stone
WA023-066073-	COUMARAGLINMOUNTAIN	Hut site
WA023-066007-	COUMARAGLINMOUNTAIN	Standing stone
WA023-066008-	COUMARAGLINMOUNTAIN	Hut site
WA023-066009-	COUMARAGLINMOUNTAIN	Enclosure
WA023-066069-	COUMARAGLINMOUNTAIN	Standing stone
WA023-066071-	COUMARAGLINMOUNTAIN	Standing stone
WA023-066065-	COUMARAGLINMOUNTAIN	Kerb circle
WA023-066075-	COUMARAGLINMOUNTAIN	House - indeterminate date
WA023-066081-	COUMARAGLINMOUNTAIN	Burnt mound
WA023-066082-	COUMARAGLINMOUNTAIN	Cairn - ring-cairn
WA023-066072-	COUMARAGLINMOUNTAIN	Hut site
WA023-066077-	COUMARAGLINMOUNTAIN	House - indeterminate date
WA023-066078-	COUMARAGLINMOUNTAIN	Booley hut
WA023-066006-	COUMARAGLINMOUNTAIN	Fulacht fia

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA023-066079-	COUMARAGLINMOUNTAIN	Booley hut
WA023-066002-	COUMARAGLINMOUNTAIN	Fulacht fia
WA023-066004-	COUMARAGLINMOUNTAIN	Standing stone
WA023-066005-	COUMARAGLINMOUNTAIN	Fulacht fia
WA023-066010-	COUMARAGLINMOUNTAIN	Hut site
WA023-066080-	COUMARAGLINMOUNTAIN	Standing stone
WA014-033029-	COUMARAGLINMOUNTAIN	Kiln - lime
WA023-066084-	COUMARAGLINMOUNTAIN	Hut site
WA023-066085-	COUMARAGLINMOUNTAIN	Hut site
WA023-076----	COUMARAGLINMOUNTAIN	Megalithic tomb - unclassified
WA023-066040-	COUMARAGLINMOUNTAIN	Fulacht fia
WA023-066083-	COUMARAGLINMOUNTAIN	Enclosure
WA014-033030-	COUMARAGLINMOUNTAIN	Cist
WA014-033032-	COUMARAGLINMOUNTAIN	Cist
WA014-033031-	COUMARAGLINMOUNTAIN	Cist
WA014-033033-	COUMARAGLINMOUNTAIN	Cist
WA014-033034-	COUMARAGLINMOUNTAIN	Standing stone
WA014-033035-	COUMARAGLINMOUNTAIN	Cairn - unclassified
WA014-001----	COUMARAGLINMOUNTAIN,CUTTEEN NORTH	Cairn - unclassified
WA014-011001-	COUMARAGLINMOUNTAIN,CUTTEEN SOUTH	Standing stone
WA014-011004-	COUMARAGLINMOUNTAIN,CUTTEEN SOUTH	Enclosure
WA014-011002-	COUMARAGLINMOUNTAIN,CUTTEEN SOUTH	Standing stone
WA023-010----	COUMARAGLINMOUNTAIN,GLENDALLIGAN,TREENEARLA COMMONS	Standing stone
WA023-059----	COUMARAGLINMOUNTAIN,TREENEARLA COMMONS	Cairn - boundary cairn
WA010-021----	COVE	Fulacht fia
WA034-022001-	CRAGGS	Ringfort - rath
WA034-022002-	CRAGGS	Souterrain
WA034-024001-	CRAGGS,KNOCKANEARIS	Ecclesiastical enclosure

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA035-031----	Craggs,Knockanearis,Monagally West,Ballindrumma,Ballinure (Decies within Drum By.)	Road - road/trackway
WA027-024----	CREADAN	Habitation site
WA027-015----	CREADAN	Ring-ditch
WA027-052----	CREADAN	House - 17th century
WA027-016----	CREADAN	Field boundary
WA027-094----	CREADAN	Fulacht fia
WA027-095----	CREADAN	Midden
WA027-096----	CREADAN	Prehistoric site - lithic scatter
WA003-028----	CREHANAGH SOUTH	Ringfort - rath
WA003-030----	CREHANAGH SOUTH	Ogham stone
WA003-027----	CREHANAGH SOUTH	Enclosure
WA003-093----	CREHANAGH SOUTH	Fulacht fia
WA003-105----	CREHANAGH SOUTH	Font (present location)
WA026-060----	CROBALLY LOWER (Middlethird By.)	Mill - unclassified
WA026-084----	CROBALLY LOWER (Middlethird By.)	Excavation - miscellaneous
WA026-095----	CROBALLY UPPER (Decies-within-Drum By.)	Pit-burial
WA026-083----	CROBALLY UPPER (Middlethird By.)	Excavation - miscellaneous
WA026-059----	CROBALLY UPPER (Middlethird By.)	House - 17th century
WA026-094----	CROBALLY UPPER (Middlethird By.)	Enclosure
WA026-096----	CROBALLY UPPER (Middlethird By.)	Pit-burial
WA018-023001-	CROOKE	Religious house - Knights Hospitallers
WA018-023002-	CROOKE	Castle - tower house
WA018-023006-	CROOKE	Field system
WA018-023007-	CROOKE	Burnt mound
WA018-023003-	CROOKE	Graveyard
WA018-010----	CROOKE	Windmill
WA018-023004-	CROOKE	Ritual site - holy well
WA018-067001-	CROSS (Gaultiere By., Kill St. Nicholas Par.)	Burnt mound

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA018-005----	CROSS (Gaultiere By., Kill St. Nicholas Par.)	Moated site
WA018-067002-	CROSS (Gaultiere By., Kill St. Nicholas Par.)	Burnt mound
WA034-020001-	CROSSERY	Ringfort - rath
WA034-055----	CROSSERY	House - 17th century
WA034-072----	CROSSERY	Fulacht fia
WA034-020002-	CROSSERY	Souterrain
WA034-069----	CROSSERY	Standing stone
WA034-070----	CROSSERY	Enclosure
WA034-071----	CROSSERY	Burnt mound
WA014-018001-	CROUGH (Decies without Drum By.)	Ecclesiastical enclosure
WA014-018007-	CROUGH (Decies without Drum By.)	Church
WA014-018002-	CROUGH (Decies without Drum By.)	Bullaun stone
WA014-018003-	CROUGH (Decies without Drum By.)	Bullaun stone
WA014-018004-	CROUGH (Decies without Drum By.)	Bullaun stone
WA014-018006-	CROUGH (Decies without Drum By.)	Bullaun stone
WA014-018005-	CROUGH (Decies without Drum By.)	Bullaun stone
WA025-114----	CROUGH (Middlethird By.)	Standing stone - pair
WA038-067----	CRUABHAILE ÁRÓCHTARACH (Bar. Na Déise laistigh den Drom)	Promontory fort - coastal
WA038-050----	CRUABHAILE ÁRÓCHTARACH (Bar. Na Déise laistigh den Drom), CRUABHAILE UACHTARACH (Bar. Na Déise laistigh den Drom)	Church
WA038-022002-	CRUABHAILE UACHTARACH (Bar. Na Déise laistigh den Drom)	Souterrain
WA039-008----	CRUABHAILE UACHTARACH (Bar. Na Déise laistigh den Drom)	Ringfort - unclassified
WA038-021----	CRUABHAILE UACHTARACH (Bar. Na Déise laistigh den Drom)	Ringfort - unclassified
WA038-022001-	CRUABHAILE UACHTARACH (Bar. Na Déise laistigh den Drom)	Ringfort - rath
WA038-045----	CRUSHEA	House - 17th century

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA016-069----	CULLENAGH	House - 17th century
WA008-053----	CULLENAGH	Kiln - corn-drying
WA008-054----	CULLENAGH	Excavation - miscellaneous
WA016-138----	CULLENAGH	Enclosure
WA016-139----	CULLENAGH	Enclosure
WA017-049----	CULLENCASTLE	Castle - tower house
WA026-012----	CULLENCASTLE	Enclosure
WA015-059001-	CUMMEEN	Moated site
WA015-059002-	CUMMEEN	House - indeterminate date
WA015-059003-	CUMMEEN	Hut site
WA015-006----	CUMMEEN	Ringfort - rath
WA015-008----	CUMMEEN	Enclosure
WA015-010----	CUMMEEN	Enclosure
WA015-009----	CUMMEEN	Ringfort - rath
WA015-007----	CUMMEEN	Enclosure
WA023-025----	CURRABAHA	Ringfort - rath
WA023-023----	CURRABAHA	Ringfort - unclassified
WA023-024----	CURRABAHA	Ringfort - rath
WA015-047----	CURRABAHA EAST	Castle - unclassified
WA034-015----	CURRADARRA	Ringfort - rath
WA034-016----	CURRADARRA	Ringfort - unclassified
WA035-007----	CURRADARRA	Ringfort - unclassified
WA035-007001-	CURRADARRA	Souterrain
WA038-046----	CURRAGH (Decies within Drum By.)	Cairn - unclassified
WA038-040001-	CURRAGH (Decies within Drum By.)	Ringfort - rath
WA038-040002-	CURRAGH (Decies within Drum By.)	Souterrain
WA038-039----	CURRAGH (Decies within Drum By.)	Ringfort - rath
WA038-036----	CURRAGH (Decies within Drum By.),DUFFCARRICK,BALLYNAMERTINAGH,MONEA	Road - road/trackway

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA007-030----	CURRAGHATAGGART	Enclosure
WA008-011----	CURRAGHATAGGART	Ringfort - rath
WA007-086----	CURRAGHATAGGART	Fulacht fia
WA007-046----	CURRAGHATAGGART	Ringfort - unclassified
WA005-030----	CURRAGHATESKIN	Ringfort - rath
WA005-031----	CURRAGHATESKIN	Ringfort - rath
WA003-047----	CURRAGHDUFF (Upperthird By., Mothel Par.)	Ringfort - rath
WA006-060002-	CURRAGHDUFF (Upperthird By., Rathgormuck Par.)	Booley hut
WA006-060001-	CURRAGHDUFF (Upperthird By., Rathgormuck Par.)	Field boundary
WA006-053----	CURRAGHDUFF (Upperthird By., Rathgormuck Par.)	Hut site
WA006-052----	CURRAGHDUFF (Upperthird By., Rathgormuck Par.)	Standing stone
WA006-034002-	CURRAGHDUFF (Upperthird By., Rathgormuck Par.)	Booley hut
WA006-034004-	CURRAGHDUFF (Upperthird By., Rathgormuck Par.)	Field system
WA006-034001-	CURRAGHDUFF (Upperthird By., Rathgormuck Par.)	Hut site
WA006-034003-	CURRAGHDUFF (Upperthird By., Rathgormuck Par.)	Booley hut
WA006-060003-	CURRAGHDUFF (Upperthird By., Rathgormuck Par.)	Cairn - unclassified
WA006-034006-	CURRAGHDUFF (Upperthird By., Rathgormuck Par.)	Cairn - unclassified
WA006-034005-	CURRAGHDUFF (Upperthird By., Rathgormuck Par.)	Hut site
WA006-060004-	CURRAGHDUFF (Upperthird By., Rathgormuck Par.)	Hut site
WA002-036----	CURRAGHKIELY	Ringfort - rath
WA002-034----	CURRAGHKIELY	Ringfort - rath
WA002-038----	CURRAGHKIELY	Ringfort - rath
WA002-035----	CURRAGHKIELY	Ringfort - rath
WA002-064----	CURRAGHKIELY	House - 17th century
WA002-015----	CURRAGHKIELY	Ringfort - rath
WA002-014----	CURRAGHKIELY	Ringfort - rath
WA008-002002-	CURRAGHMORE	Graveyard
WA008-002001-	CURRAGHMORE	Church
WA008-020001-	CURRAGHMORE	House - 17th century

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA008-020002-	CURRAGHMORE	House - 17th century
WA008-047----	CURRAGHMORE	Stone sculpture - iconic
WA008-005003-	CURRAGHMORE	House - 17th century
WA008-001----	CURRAGHMORE	Enclosure
WA008-005001-	CURRAGHMORE	Castle - tower house
WA008-003----	CURRAGHMORE	Ringfort - rath
WA008-007----	CURRAGHMORE	Bridge
WA008-046----	CURRAGHMORE	Enclosure
WA008-055----	CURRAGHMORE	Designed landscape - tree-ring
WA008-057----	CURRAGHMORE	Designed landscape - tree-ring
WA008-002003-	CURRAGHMORE	Wall monument (present location)
WA007-095----	CURRAGHMORE	Designed landscape - tree-ring
WA003-034001-	CURRAGHNAGARRAHA	Church
WA003-034004-	CURRAGHNAGARRAHA	Ogham stone
WA003-029----	CURRAGHNAGARRAHA	Ringfort - rath
WA003-034002-	CURRAGHNAGARRAHA	Graveyard
WA003-094----	CURRAGHNAGARRAHA	Fulacht fia
WA003-034005-	CURRAGHNAGARRAHA	Headstone
WA003-094001-	CURRAGHNAGARRAHA	Fulacht fia
WA022-034----	CURRAGHNAMADDREE	Enclosure
WA022-035----	CURRAGHNAMADDREE	Enclosure
WA007-072----	CURRAGHPHILIPEN	House - 17th century
WA028-010----	CURRAGHREIGH NORTH	Ritual site - holy well
WA029-025----	CURRAGHROCHE	Ringfort - unclassified
WA029-055----	CURRAGHROCHE	House - 17th century
WA029-023003-	CURRAGHROCHE	Bullaun stone
WA029-023001-	CURRAGHROCHE	Ritual site - holy well
WA029-023002-	CURRAGHROCHE	Architectural fragment
WA029-031----	CURRAGRAIG	Enclosure

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA029-072----	CURRAGRAIG,KILLAHALY EAST	Fulacht fia
WA023-042001-	CURRAHEEN (Decies without Drum By., Kilrossanty Par.)	Enclosure
WA023-042----	CURRAHEEN (Decies without Drum By., Kilrossanty Par.)	Church
WA006-061----	CURRAHEEN (Upperthird By.)	Standing stone
WA006-002----	CURRAHEEN (Upperthird By.)	Earthwork
WA006-003----	CURRAHEEN (Upperthird By.)	Ringfort - rath
WA006-001----	CURRAHEEN (Upperthird By.)	Enclosure
WA028-032----	CURRAHEEN SOUTH	Settlement cluster
WA005-005----	CURRAHEENAVOHER	Enclosure
WA023-004----	CURRAUN	Cairn - unclassified
WA023-079----	CURRAUN	Standing stone
WA023-080----	CURRAUN	Standing stone
WA023-060----	CURRAUN,CUTTEEN SOUTH	Cairn - boundary cairn
WA005-020----	CURTISWOOD	House - 17th century
WA005-063----	CURTISWOOD	House - 17th century
WA038-014001-	CUSH OF GRANGE	Ringfort - rath
WA038-014002-	CUSH OF GRANGE	Souterrain
WA038-066----	CUSH OF GRANGE,DRUMGULLANE EAST,AUGHNACURRAVEEL	Road - road/trackway
WA014-040----	CUTTEEN NORTH	Field system
WA014-040002-	CUTTEEN NORTH	Fulacht fia
WA014-040001-	CUTTEEN NORTH	Enclosure
WA014-040004-	CUTTEEN NORTH	Fulacht fia
WA014-040005-	CUTTEEN NORTH	Fulacht fia
WA014-012----	CUTTEEN NORTH	Ringfort - rath
WA014-013----	CUTTEEN NORTH	Enclosure
WA014-040003-	CUTTEEN NORTH	Fulacht fia
WA014-051----	CUTTEEN NORTH	Hut site
WA014-052----	CUTTEEN NORTH	Cairn - unclassified
WA014-035002-	CUTTEEN NORTH	Fulacht fia

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA014-011005-	CUTTEEN SOUTH	Cist
WA014-021----	CUTTEEN SOUTH	Ringfort - rath
WA014-025----	CUTTEEN SOUTH	Enclosure
WA014-022----	CUTTEEN SOUTH	Enclosure
WA014-048----	CUTTEEN SOUTH	Cairn - unclassified
WA014-011003-	CUTTEEN SOUTH,COUMARAGLINMOUNTAIN	Standing stone
WA008-026----	DARRIGAL	Church
WA008-029----	DARRIGAL	Weir - fish
WA008-027----	DARRIGAL	Settlement cluster
WA008-028----	DARRIGAL	Burnt mound
WA023-029----	DEELISHMOUNTAIN	Cairn - unclassified
WA005-015----	DEERPARK (Glenahiry By.)	Ringfort - rath
WA029-002----	DEERPARK EAST	Ringfort - rath
WA029-004----	DEERPARK EAST	Ringfort - rath
WA029-002001-	DEERPARK EAST	Souterrain
WA029-075----	DEERPARK EAST,DEERPARK NORTH,DEERPARKHILL	Deer park
WA021-042----	DEERPARK NORTH	Ritual site - holy well
WA021-043----	DEERPARK NORTH	Fulacht fia
WA021-023----	DEERPARK NORTH	Mound
WA021-024----	DEERPARK NORTH	Ringfort - rath
WA029-003----	DEERPARK NORTH	Ringfort - unclassified
WA021-048----	DEERPARK NORTH	Road - road/trackway
WA029-006----	DEERPARKHILL	Mine
WA029-019001-	DEERPARKHILL	Enclosure
WA029-019002-	DEERPARKHILL	Enclosure
WA029-005----	DEERPARKHILL,DEERPARK EAST	Road - road/trackway
WA002-054002-	DERRINLAUR LOWER	House - 17th century
WA002-054001-	DERRINLAUR LOWER	House - 17th century
WA002-003002-	DERRINLAUR LOWER	House - 17th century

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA002-003001-	DERRINLAUR LOWER	Castle - tower house
WA022-012001-	DERRY UPPER	Church
WA022-012002-	DERRY UPPER	Graveyard
WA037-038----	D'LOUGHTANE	Church
WA037-039----	D'LOUGHTANE	Weir - fish
WA037-015----	D'LOUGHTANE	House - 18th/19th century
WA037-016----	D'LOUGHTANE	Ringfort - unclassified
WA037-017----	D'LOUGHTANE	Ringfort - unclassified
WA013-009----	DOON	Ringfort - unclassified
WA013-008----	DOON	Standing stone
WA017-116----	DOONEEN (Middlethird By., Kilmeadan Par.)	Ringfort - rath
WA017-066----	DOONEEN (Middlethird By., Lisnackill Par.),MOUNTCONGREVE (Middlethird By., Lisnackill Par.)	Mill - unclassified
WA029-021003-	DROMANA (Decies without Drum By.)	Bawn
WA029-022----	DROMANA (Decies without Drum By.)	Well
WA029-021001-	DROMANA (Decies without Drum By.)	Castle - tower house
WA029-021002-	DROMANA (Decies without Drum By.)	House - 17th century
WA029-053001-	DROMANA (Decies without Drum By.)	Weir - fish
WA029-053002-	DROMANA (Decies without Drum By.)	Weir - fish
WA018-077----	DROMINA	Enclosure
WA018-078----	DROMINA	Enclosure
WA018-070----	DROMINA	Enclosure
WA018-047----	DROMINA	Burial
WA018-027----	DROMINA,RAHEEN (Gaultiere By.)	Mound
WA029-042003-	DROMORE	Ogham stone
WA029-042010-	DROMORE	Ogham stone
WA029-042004-	DROMORE	Enclosure
WA029-042007-	DROMORE	Enclosure
WA029-042008-	DROMORE	Excavation - miscellaneous

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA029-042002-	DROMORE	Burial ground
WA029-042011-	DROMORE	Ogham stone
WA029-042006-	DROMORE	Ogham stone
WA026-017001-	DRUMCANNON	Church
WA026-017002-	DRUMCANNON	Graveyard
WA026-051----	DRUMCANNON	Cairn - unclassified
WA017-101----	DRUMCANNON,QUILLIA	House - 17th century
WA013-002----	DRUMGOREY	Ringfort - rath
WA038-013----	DRUMGULLANE EAST	Ringfort - unclassified
WA038-012----	DRUMGULLANE EAST	Ringfort - rath
WA038-051----	DRUMGULLANE EAST,DRUMGULLANE WEST	Standing stone - pair
WA038-069----	DRUMGULLANE WEST	Standing stone
WA024-033001-	DRUMLOHAN	Church
WA024-033003-	DRUMLOHAN	Ecclesiastical enclosure
WA024-033004-	DRUMLOHAN	Souterrain
WA024-033010-	DRUMLOHAN	Ogham stone
WA024-033012-	DRUMLOHAN	Ogham stone
WA024-033013-	DRUMLOHAN	Ogham stone
WA024-033019-	DRUMLOHAN	Cairn - unclassified
WA024-033020-	DRUMLOHAN	Field boundary
WA024-033006-	DRUMLOHAN	Ogham stone
WA024-033007-	DRUMLOHAN	Ogham stone
WA024-033008-	DRUMLOHAN	Ogham stone
WA024-033009-	DRUMLOHAN	Ogham stone
WA024-033017-	DRUMLOHAN	Ogham stone
WA024-033014-	DRUMLOHAN	Ogham stone
WA024-033015-	DRUMLOHAN	Ogham stone
WA024-033005-	DRUMLOHAN	Bullaun stone
WA024-033011-	DRUMLOHAN	Ogham stone

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA024-111002-	DRUMLOHAN	Souterrain
WA024-111001-	DRUMLOHAN	Ringfort - rath
WA024-033002-	DRUMLOHAN	Graveyard
WA024-124----	DRUMLOHAN	Ringfort - rath
WA021-025002-	DRUMROE UPPER	Graveyard
WA021-025003-	DRUMROE UPPER	Children's burial ground
WA021-025001-	DRUMROE UPPER	Church
WA021-027----	DRUMROE UPPER	Ringfort - unclassified
WA018-072----	DRUMRUSK	Enclosure
WA035-009----	DRUMSLIG,LYRE (Decies within Drum By.)	Mine
WA017-012001-	DUAGH	Bastioned fort
WA017-038----	DUAGH	Ringfort - unclassified
WA017-089----	DUAGH	House - 17th century
WA017-090----	DUAGH	Road - road/trackway
WA040-009002-	DUFFCARRICK	Hut site
WA040-008020-	DUFFCARRICK	Font (present location)
WA040-019001-	DUFFCARRICK	Ritual site - holy well
WA040-019002-	DUFFCARRICK	Ritual site - holy well
WA040-019003-	DUFFCARRICK	Ritual site - holy well
WA040-009001-	DUFFCARRICK	Crannog
WA040-010----	DUFFCARRICK	Ritual site - holy/saint's stone
WA025-069005-	DUNABRATTIN	Hut site
WA025-102----	DUNABRATTIN	Rock scribing - folk art
WA025-069006-	DUNABRATTIN	Hut site
WA025-069001-	DUNABRATTIN	Promontory fort - coastal
WA025-069002-	DUNABRATTIN	Promontory fort - coastal
WA025-069003-	DUNABRATTIN	Enclosure
WA025-068----	DUNABRATTIN	Enclosure
WA025-069004-	DUNABRATTIN	Hut site

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA025-069009-	DUNABRATTIN	Enclosure
WA031-040003-	DUNGARVAN	House - medieval
WA031-040013-	DUNGARVAN	Memorial stone
WA031-040004-	DUNGARVAN	Church
WA031-040009-	DUNGARVAN	Market-house
WA031-040001-	DUNGARVAN	Castle - Anglo-Norman masonry castle
WA031-040002-	DUNGARVAN	House - medieval
WA031-040010-	DUNGARVAN	Town defences
WA031-040014-	DUNGARVAN	Souterrain
WA031-040017-	DUNGARVAN	Building
WA031-040018-	DUNGARVAN	Building
WA031-040023-	DUNGARVAN	Burnt mound
WA031-040026-	DUNGARVAN	Excavation - miscellaneous
WA031-040007-	DUNGARVAN	Graveslab
WA031-040016-	DUNGARVAN	Building
WA031-040021-	DUNGARVAN	Building
WA031-040025-	DUNGARVAN	Structure
WA031-040019-	DUNGARVAN	Excavation - miscellaneous
WA031-040024-	DUNGARVAN	Excavation - miscellaneous
WA031-040028-	DUNGARVAN	Architectural fragment
WA031-040033-	DUNGARVAN	Graveyard
WA025-044003-	DUNHILL	Font
WA025-044004-	DUNHILL	Architectural fragment
WA025-045001-	DUNHILL	Castle - tower house
WA025-044001-	DUNHILL	Church
WA025-044002-	DUNHILL	Graveyard
WA025-026----	DUNHILL	Ringfort - unclassified
WA025-028----	DUNHILL	Earthwork
WA025-029----	DUNHILL	Megalithic tomb - portal tomb

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA025-116----	DUNHILL	Font (present location)
WA025-111----	DUNHILL	Cist
WA025-027----	DUNHILL	Ringfort - unclassified
WA025-045002-	DUNHILL	Bawn
WA025-046----	DUNHILL,DUNHILL LODGE	Bridge
WA033-019----	DUNMOON	House - 17th century
WA034-085----	DUNMOON NORTH	Enclosure
WA033-034----	DUNMOON SOUTH,DUNMOON NORTH	Standing stone
WA027-023002-	DUNMORE	Graveyard
WA027-034----	DUNMORE	Castle - Anglo-Norman masonry castle
WA027-035001-	DUNMORE	Promontory fort - coastal
WA027-023001-	DUNMORE	Church
WA027-035002-	DUNMORE	Hut site
WA027-035003-	DUNMORE	Enclosure
WA024-045----	DURROW	Boundary stone
WA012-008----	DYRICK LOWER	Cairn - unclassified
WA012-002----	DYRICK UPPER	Boundary stone
WA040-011001-	DYSERT	Church
WA040-011003-	DYSERT	Cross
WA040-011005-	DYSERT	Cross
WA040-016----	DYSERT	Mine
WA040-011002-	DYSERT	Ritual site - holy well
WA040-011004-	DYSERT	Cross
WA040-015001-	DYSERT	Castle - unclassified
WA040-024----	DYSERT	Signal tower
WA040-011006-	DYSERT	Cross
WA040-026----	DYSERT	Excavation - miscellaneous
WA040-029----	DYSERT	Promontory fort - coastal
WA023-078----	ENGLISHTOWN	Bullaun stone (present location)

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA023-047002-	ENGLISHTOWN	Bullaun stone
WA023-033001-	ENGLISHTOWN	Ringfort - rath
WA023-033002-	ENGLISHTOWN	Souterrain
WA031-049----	ENGLISHTOWN	Church
WA021-013----	FADDUAGA	Ringfort - rath
WA024-017----	FAHAFEELAGH	Ringfort - rath
WA024-016----	FAHAFEELAGH	Ringfort - rath
WA031-071----	FAIRLANE (Decies without Drum By., Dungarvan Par.)	Ritual site - holy well
WA010-013005-	FAITHLEGG	Weir - fish
WA010-013006-	FAITHLEGG	Weir - fish
WA010-013007-	FAITHLEGG	Weir - fish
WA010-013003-	FAITHLEGG	Weir - fish
WA010-014----	FAITHLEGG	Ritual site - holy well
WA010-010----	FAITHLEGG	Mill - unclassified
WA010-013001-	FAITHLEGG	Weir - fish
WA010-013004-	FAITHLEGG	Weir - fish
WA010-013008-	FAITHLEGG	Weir - fish
WA010-002----	FAITHLEGG	Ritual site - holy well
WA010-013002-	FAITHLEGG	Weir - fish
WA007-043----	FALLAGH	Ringfort - rath
WA007-091----	FALLAGH	Standing stone
WA022-014003-	FARNANE LOWER	Road - road/trackway
WA022-014004-	FARNANE LOWER	Bullaun stone
WA022-014002-	FARNANE LOWER	Graveyard
WA022-014005-	FARNANE LOWER	Children's burial ground
WA022-014006-	FARNANE LOWER	Ritual site - holy well
WA022-014001-	FARNANE LOWER	Church
WA022-013----	FARNANE UPPER	Ringfort - unclassified
WA025-108----	FARRANALAHESERY	Settlement cluster

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA025-074----	FARRANALAHESERY	Memorial stone
WA040-013----	FARRANGARRET	Cross
WA040-008023-	FARRANGARRET	Ecclesiastical enclosure
WA040-008021-	FARRANGARRET	Building
WA040-025001-	FARRANGARRET	Enclosure
WA040-025002-	FARRANGARRET	Mound
WA003-080----	FEDDANS	Cairn - unclassified
WA007-006001-	FEDDANS	Castle - motte and bailey
WA007-007----	FEDDANS	Castle - tower house
WA026-022----	FENNOR NORTH	Ringfort - unclassified
WA026-021----	FENNOR NORTH	Earthwork
WA026-031----	FENNOR SOUTH	Ringfort - rath
WA020-010001-	FLOWERHILL	Enclosure
WA020-010----	FLOWERHILL	Burial ground
WA027-012----	FORNAGHT	Habitation site
WA027-080001-	FORNAGHT	Enclosure
WA027-080002-	FORNAGHT	Field system
WA029-038001-	FOUNTAIN	Church
WA029-038002-	FOUNTAIN	Graveyard
WA029-036----	FOUNTAIN	Earthwork
WA029-039----	FOUNTAIN	Ringfort - rath
WA024-031----	FOX'S CASTLE	Ringfort - rath
WA024-042----	FOX'S CASTLE	Water mill - horizontal-wheeled
WA024-098----	FOX'S CASTLE	Road - road/trackway
WA024-043----	FOX'S CASTLE	Castle - unclassified
WA024-046----	FOX'S CASTLE	Ringfort - rath
WA024-080001-	FOX'S CASTLE	Souterrain
WA024-080002-	FOX'S CASTLE	Ogham stone
WA015-036----	FURRALEIGH	Castle - unclassified

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA031-067----	GALLOWSHILL (Decies without Drum By., Kilrush Par.)	Castle - motte
WA025-003----	GARDENMORRIS	House - 17th century
WA025-109----	GARDENMORRIS	Church
WA025-003001-	GARDENMORRIS	Armorial plaque (present location)
WA024-004----	GARRAHLISH	Ringfort - rath
WA024-005----	GARRAHLISH	Ringfort - rath
WA031-016001-	GARRANBAUN	Burnt mound
WA031-016002-	GARRANBAUN	Burnt mound
WA031-020----	GARRANBAUN	Ringfort - unclassified
WA031-035----	GARRANBAUN	Ringfort - rath
WA031-015----	GARRANBAUN, KILLINEEN WEST	Earthwork
WA024-003----	GARRANMILLON LOWER	Ringfort - rath
WA024-006001-	GARRANMILLON LOWER	Ecclesiastical enclosure
WA024-006002-	GARRANMILLON LOWER	Church
WA024-006003-	GARRANMILLON LOWER	Ogham stone
WA024-006004-	GARRANMILLON LOWER	Ogham stone
WA024-002001-	GARRANMILLON UPPER	Ringfort - rath
WA024-102----	GARRANMILLON UPPER	Standing stone
WA024-002002-	GARRANMILLON UPPER	Bullaun stone
WA024-125----	GARRANMILLON UPPER	Enclosure
WA024-020----	GARRANTURTON	Ringfort - unclassified
WA024-018----	GARRANTURTON	Designed landscape - tree-ring
WA024-019----	GARRANTURTON	Designed landscape - tree-ring
WA024-035----	GARRANTURTON	Enclosure
WA024-034----	GARRANTURTON	Ringfort - unclassified
WA024-036----	GARRANTURTON	Ringfort - rath
WA024-107----	GARRANTURTON	Standing stone
WA024-108----	GARRANTURTON	Standing stone
WA024-113----	GARRANTURTON	Standing stone

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA024-073001-	GARRANTURTON	Enclosure
WA024-073006-	GARRANTURTON	Bullaun stone
WA024-072----	GARRANTURTON	Settlement cluster
WA024-073003-	GARRANTURTON	Standing stone
WA024-073002-	GARRANTURTON	Standing stone
WA026-065----	GARRARUS	Enclosure
WA026-038----	GARRARUS	Promontory fort - coastal
WA026-088----	GARRARUS	Promontory fort - coastal
WA026-089----	GARRARUS	Promontory fort - coastal
WA030-026----	GARRAUNFADDA	Ringfort - unclassified
WA003-100----	GARRAVOONE	Souterrain
WA020-008002-	GARRISON	Burial ground
WA020-008001-	GARRISON	Enclosure
WA028-009----	GARRYBRITTAS	Enclosure
WA037-019001-	GARRYDUFF (Coshmore and Coshbride By.)	Mound
WA037-019002-	GARRYDUFF (Coshmore and Coshbride By.)	Castle - unclassified
WA022-030----	GARRYDUFF (Decies without Drum By.)	Burnt mound
WA022-031----	GARRYDUFF (Decies without Drum By.)	Burnt mound
WA022-032----	GARRYDUFF (Decies without Drum By.)	Burnt mound
WA022-033----	GARRYDUFF (Decies without Drum By.)	Enclosure
WA022-043----	GARRYDUFF (Decies without Drum By.)	Ringfort - unclassified
WA031-033----	GARRYNAGERAGH EAST	Enclosure
WA031-032----	GARRYNAGERAGH EAST	Ringfort - unclassified
WA031-034----	GARRYNAGERAGH EAST	Fulacht fia
WA017-026----	GAULSTOWN	Cist
WA017-028----	GAULSTOWN	Ringfort - rath
WA017-025----	GAULSTOWN	Concentric enclosure
WA017-027----	GAULSTOWN	Megalithic tomb - portal tomb
WA009-015----	GIBBETHILL	Standing stone

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA009-037----	GIBBETHILL	Excavation - miscellaneous
WA009-013----	GIBBETHILL,GRACEDIEU WEST	Castle - unclassified
WA005-007----	GLASHA	Enclosure
WA031-043001-	GLEBE (Decies without Drum By.)	Church
WA031-043003-	GLEBE (Decies without Drum By.)	Sarcophagus
WA001-024002-	GLEBE (Glenahiry By.)	Graveyard
WA001-024003-	GLEBE (Glenahiry By.)	Ritual site - holy well
WA001-024001-	GLEBE (Glenahiry By.)	Church
WA032-018002-	GLEN	Graveyard
WA032-018001-	GLEN	Church
WA020-017----	GLEN BEG (Decies without Drum By.)	Enclosure
WA020-027----	GLEN BEG (Decies without Drum By.)	Enclosure
WA020-012----	GLEN BEG (Decies without Drum By.)	House - 17th century
WA035-015----	GLEN BEG (Decies without Drum By.)	Cross-inscribed stone (present location)
WA002-056----	GLEN LOWER (Upperthird By.)	House - 17th century
WA002-007002-	GLEN LOWER (Upperthird By.)	Inscribed stone
WA002-007001-	GLEN LOWER (Upperthird By.)	Castle - tower house
WA022-041----	GLEN UPPER (Decies without Drum By.)	Enclosure
WA002-009----	GLEN UPPER (Upperthird By.)	Ringfort - unclassified
WA002-006----	GLEN UPPER (Upperthird By.)	Ringfort - rath
WA038-009----	GLEN WILLIAM	Enclosure
WA038-062----	GLEN WILLIAM	Standing stone
WA001-037----	GLENABBEY	House - 18th/19th century
WA028-043----	GLENABOY	House - 17th century
WA001-044----	GLENARY	Cairn - unclassified
WA001-045----	GLENARY	Fulacht fia
WA022-054----	GLENAVADDRA	Kiln - corn-drying
WA020-020----	GLENCAIRN	Ringfort - unclassified
WA020-014----	GLENCAIRN	Castle - unclassified

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA020-019----	GLENCAIRN	Enclosure
WA023-016----	GLENDALLIGAN	Ringfort - rath
WA023-069----	GLENDALLIGAN	Standing stone
WA023-062----	GLENDALLIGAN,DEELISHMOUNTAIN	Cairn - boundary cairn
WA001-042----	GLENDALOUGH	Cairn - unclassified
WA002-028----	GLENDALOUGH	Cairn - unclassified
WA006-039----	GLENDALOUGH	Standing stone
WA005-047----	GLENDALOUGH	Burnt mound
WA005-059----	GLENDALOUGH	Turf stand
WA034-079----	GLENGOAGH	House - 17th century
WA020-015----	GLENMORRISHMEEN	Castle - unclassified
WA012-003002-	GLENNAFALLIA	Cist
WA012-003001-	GLENNAFALLIA	Cairn - radial-stone cairn
WA033-035----	GLENNAGLOGH	Burial ground
WA033-011----	GLENNAGLOGH	Linear earthwork
WA033-016----	GLENNAGLOGH,KILCALFMOUNTAIN	Ford
WA006-016----	GLENNANORE	Enclosure
WA007-029----	GLENNAPHUCA	Ringfort - unclassified
WA007-028----	GLENNAPHUCA	Ringfort - unclassified
WA007-083----	GLENNAPHUCA	Standing stone
WA002-031002-	GLENPATRICK	House - indeterminate date
WA002-032001-	GLENPATRICK	Church
WA002-075----	GLENPATRICK	House - indeterminate date
WA002-031001-	GLENPATRICK	Ringfort - rath
WA002-080----	GLENPATRICK	Cairn - unclassified
WA002-082----	GLENPATRICK	House - indeterminate date
WA002-030----	GLENPATRICK	Ringfort - rath
WA002-032002-	GLENPATRICK	Burial ground
WA002-062----	GLENPATRICK	House - 17th century

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA002-029----	GLENPATRICK	Ringfort - rath
WA002-011----	GLENPATRICK	Enclosure
WA021-006----	GLENTAUN EAST	Earthwork
WA011-009----	GLENTAUNATINAGH	Pill-box
WA011-007----	GLENTAUNATINAGH,KNOCKAUNABULLOGA,KNOCKNAL OUGHA,GLENTAUNEMON,KNOCKAUNARAST,MONARD, MONATAGGART,KNOCKACOMORTISH,KNOCKADAV,KN OCKANNANAGH,KNOCKAVEELISH,KNOCKMEALDOWN,K NOCKNAFALLIA,BALLYIN UPPER,BARRANAMANOG,BOGGAGHBAUN,DYRICK LOWER,DYRICK UPPER,MONATARRIV WEST,SHANAVOOLA,FEAGARRID,GLENAVEHA,GLENDEIS H WEST	Linear earthwork
WA011-008----	GLENTAUNEMON	Structure
WA038-070----	GLISTINANE	Bullaun stone
WA036-021----	GORT NA DUIMHCHE ÁOCHTARACH,GORT NA DUIMHCHE UACHTARACH	Settlement cluster
WA036-020----	GORT NA DUIMHCHE UACHTARACH,GORT NA DUIMHCHE ÁOCHTARACH	Church
WA008-035----	GORTACLADE	Bullaun stone
WA008-036----	GORTACLADE	Souterrain
WA008-037----	GORTACLADE	Cairn - unclassified
WA008-041----	GORTACLADE	Mill - unclassified
WA027-038----	GORTAHILLY	Ringfort - rath
WA023-044----	GORTAVICARY	Castle - unclassified
WA031-014----	GORTEEN (Decies without Drum By.)	Ritual site - holy well
WA031-014002-	GORTEEN (Decies without Drum By.)	Ritual site - holy tree/bush
WA031-014001-	GORTEEN (Decies without Drum By.)	Penitential station
WA014-027----	GORTNALAGHT	Ringfort - rath
WA023-009001-	GORTNALAGHT	Ringfort - rath
WA023-009002-	GORTNALAGHT	Bullaun stone

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA023-008----	GORTNALAGHT	Ringfort - rath
WA023-064----	GORTNALAGHT	Burnt mound
WA023-077----	GORTNALAGHT	Bullaun stone (present location)
WA035-013----	GOWLAUN	Enclosure
WA039-002----	GOWLAUN	Ringfort - unclassified
WA039-001----	GOWLAUN	Ringfort - rath
WA009-012----	GRACEDIEU EAST,GRACEDIEU WEST	Habitation site
WA009-033003-	GRACEDIEU WEST	Excavation - miscellaneous
WA009-033001-	GRACEDIEU WEST	Excavation - miscellaneous
WA009-033004-	GRACEDIEU WEST	Structure
WA009-033002-	GRACEDIEU WEST	Excavation - miscellaneous
WA027-032----	GRAIGARIDY	Enclosure
WA027-033----	GRAIGARIDY	Enclosure
WA027-078----	GRAIGARIDY	Enclosure
WA006-011----	GRAIGAVALLA	Ringfort - rath
WA006-014001-	GRAIGAVALLA	Cairnfield
WA006-014002-	GRAIGAVALLA	Cairn - ring-cairn
WA006-007----	GRAIGAVALLA	Enclosure
WA006-008----	GRAIGAVALLA	Ringfort - unclassified
WA006-014003-	GRAIGAVALLA	Booley hut
WA006-015001-	GRAIGAVALLA	Enclosure
WA006-015002-	GRAIGAVALLA	Ringfort - rath
WA006-049----	GRAIGAVALLA	Standing stone
WA006-041----	GRAIGAVALLA	Settlement cluster
WA006-048----	GRAIGAVALLA	Standing stone
WA006-007001-	GRAIGAVALLA	Standing stone
WA006-013----	GRAIGAVALLA	Ringfort - rath
WA006-012----	GRAIGAVALLA	Ringfort - unclassified
WA006-009----	GRAIGAVALLA	Enclosure

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA006-010----	GRAIGAVALLA	Enclosure
WA006-006----	GRAIGAVALLA	Ringfort - unclassified
WA006-071----	GRAIGAVALLA	Standing stone
WA005-025----	GRAIGNAGOWER	Ringfort - rath
WA005-024----	GRAIGNAGOWER	Ringfort - unclassified
WA005-026001-	GRAIGNAGOWER	Church
WA005-026002-	GRAIGNAGOWER	Graveyard
WA005-056----	GRAIGNAGOWER	Bullaun stone
WA005-055----	GRAIGNAGOWER	Standing stone
WA005-021004-	GRAIGNAGOWER	Cairn - clearance cairn
WA005-021001-	GRAIGNAGOWER	Field system
WA005-021002-	GRAIGNAGOWER	Enclosure
WA005-061----	GRAIGNAGOWER	Enclosure
WA005-060----	GRAIGNAGOWER	Enclosure
WA022-023----	GRAIGUE BEG	Ringfort - rath
WA015-117----	GRAIGUEARUSH	Burnt mound
WA015-118----	GRAIGUEARUSH	Burnt mound
WA015-116----	GRAIGUEARUSH	Burnt mound
WA015-115----	GRAIGUEARUSH	Burnt mound
WA015-119----	GRAIGUEARUSH	Burnt mound
WA015-049----	GRAIGUESHONEEN	Ringfort - unclassified
WA015-050----	GRAIGUESHONEEN	Ringfort - unclassified
WA015-107001-	GRAIGUESHONEEN	Pit-burial
WA015-048005-	GRAIGUESHONEEN	Hut site
WA015-107002-	GRAIGUESHONEEN	Fulacht fia
WA015-048007-	GRAIGUESHONEEN	Excavation - miscellaneous
WA015-089----	GRAIGUESHONEEN	Enclosure
WA015-086----	GRAIGUESHONEEN	Burnt mound
WA015-048004-	GRAIGUESHONEEN	Excavation - miscellaneous

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA015-093----	GRAIGUESHONEEN	Fulacht fia
WA015-094002-	GRAIGUESHONEEN	House - Bronze Age
WA015-094001-	GRAIGUESHONEEN	Habitation site
WA015-094003-	GRAIGUESHONEEN	Metalworking site
WA015-098----	GRAIGUESHONEEN	Hearth
WA015-111----	GRAIGUESHONEEN	Enclosure
WA015-121----	GRAIGUESHONEEN	Enclosure
WA015-074----	GRAIGUESHONEEN,KILMACTHOMAS	Courthouse
WA038-003----	GRALLAGH LOWER	Souterrain
WA038-004----	GRALLAGH LOWER	Ringfort - rath
WA038-060001-	GRALLAGH LOWER	Fulacht fia
WA038-060002-	GRALLAGH LOWER	Fulacht fia
WA038-003001-	GRALLAGH LOWER	Ringfort - rath
WA038-049----	GRALLAGH LOWER,GRALLAGH UPPER	Mine
WA038-005001-	GRALLAGH UPPER	Burial ground
WA038-006----	GRALLAGH UPPER	Ringfort - rath
WA038-068----	GRANGE	Enclosure - large enclosure
WA018-031001-	GRANTSTOWN	House - 17th century
WA018-031002-	GRANTSTOWN	House - 17th century
WA016-042001-	GREENAN (Decies without Drum By.)	Ringfort - unclassified
WA016-042002-	GREENAN (Decies without Drum By.)	Souterrain
WA016-043001-	GREENAN (Decies without Drum By.)	Ringfort - rath
WA016-018001-	GREENAN (Decies without Drum By.)	Enclosure
WA016-018002-	GREENAN (Decies without Drum By.)	Souterrain
WA016-043002-	GREENAN (Decies without Drum By.)	Souterrain
WA016-019----	GREENAN (Decies without Drum By.)	Ringfort - rath
WA016-117----	GREENAN (Decies without Drum By.)	Standing stone
WA016-134----	GREENAN (Decies without Drum By.)	Fulacht fia
WA001-012002-	GREENAN (Glenahiry By.)	Graveyard

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA001-010----	GREENAN (Glenahiry By.)	Enclosure
WA001-012001-	GREENAN (Glenahiry By.)	Church
WA001-011----	GREENAN (Glenahiry By.)	House - fortified house
WA001-047----	GREENAN (Glenahiry By.),KILMACOMMA	Weir - fish
WA022-058----	GREENANE	Enclosure
WA008-022001-	GUILCAGH	House - 17th century
WA008-022002-	GUILCAGH	House - 17th century
WA008-059----	GUILCAGH	Enclosure
WA002-083----	GURTEEN LOWER	Standing stone
WA002-005----	GURTEEN LOWER	Megalithic tomb - portal tomb
WA002-008----	GURTEEN UPPER	Standing stone
WA039-018----	HACKETSTOWN (Decies within Drum By.)	Church
WA039-019----	HACKETSTOWN (Decies within Drum By.)	House - 17th century
WA039-011----	HACKETSTOWN (Decies within Drum By.)	Castle - unclassified
WA039-039----	HACKETSTOWN (Decies within Drum By.)	Promontory fort - coastal
WA008-032----	HACKETSTOWN (Middlethird By.)	House - 17th century
WA008-033----	HACKETSTOWN (Middlethird By.)	Castle - unclassified
WA027-007----	HARRISTOWN	Megalithic tomb - passage tomb
WA027-008----	HARRISTOWN	Ritual site - holy tree/bush
WA027-010----	HARRISTOWN	Settlement deserted - medieval
WA027-007002-	HARRISTOWN	Urn burial
WA027-007001-	HARRISTOWN	Pit-burial
WA027-007003-	HARRISTOWN	Cist
WA027-007004-	HARRISTOWN	Urn burial
WA027-007007-	HARRISTOWN	Cremated remains
WA027-007005-	HARRISTOWN	Urn burial
WA027-007006-	HARRISTOWN	Cremation pit
WA034-081----	HARROWHILL	House - 17th century
WA034-080----	HARROWHILL	House - 17th century

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA029-063----	HEADBOROUGH	House - 17th century
WA029-062----	HEADBOROUGH	House - 17th century
WA029-064----	HEADBOROUGH	Settlement cluster
WA034-001----	HEADBOROUGH	Designed landscape - tree-ring
WA034-002----	HEADBOROUGH	Ringfort - rath
WA029-041----	HEADBOROUGH	House - 17th century
WA034-073----	HEADBOROUGH	Souterrain
WA034-074----	HEADBOROUGH	Ringfort - rath
WA036-029----	HEILBHC	Promontory fort - coastal
WA028-046----	HUNTHILL	House - 17th century
WA030-061001-	INCHINDRISLA	Church
WA030-061003-	INCHINDRISLA	Ritual site - holy well
WA030-061002-	INCHINDRISLA	Cross
WA019-008----	INCHINLEAMA EAST,INCHINLEAMA WEST	Castle - unclassified
WA032-029001-	ISLAND	Ecclesiastical enclosure
WA032-009----	ISLAND	Ringfort - rath
WA032-029002-	ISLAND	Ogham stone
WA032-029004-	ISLAND	Cross-inscribed stone
WA032-028004-	ISLANDHUBBOCK	Inscribed stone
WA032-028002-	ISLANDHUBBOCK	Souterrain
WA032-028003-	ISLANDHUBBOCK	Hut site
WA032-028001-	ISLANDHUBBOCK	Promontory fort - coastal
WA032-047----	ISLANDHUBBOCK	Promontory fort - coastal
WA032-046----	ISLANDHUBBOCK	Promontory fort - coastal
WA026-071----	ISLANDIKANE EAST	Standing stone
WA026-090----	ISLANDIKANE EAST	Promontory fort - coastal
WA026-036003-	ISLANDIKANE EAST,ISLANDIKANE SOUTH	Hut site
WA026-036001-	ISLANDIKANE EAST,ISLANDIKANE SOUTH	Promontory fort - coastal
WA026-036002-	ISLANDIKANE EAST,ISLANDIKANE SOUTH	Hut site

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA026-062----	ISLANDIKANE NORTH	Building
WA026-075----	ISLANDIKANE NORTH	Standing stone
WA026-033001-	ISLANDIKANE SOUTH	Church
WA026-033002-	ISLANDIKANE SOUTH	Graveyard
WA026-034----	ISLANDIKANE SOUTH	Earthwork
WA026-057----	ISLANDTARSNEY NORTH,ISLANDTARSNEY SOUTH	Settlement cluster
WA026-032----	ISLANDTARSNEY SOUTH	Ringfort - rath
WA028-035001-	JANEVILLE	Kiln - lime
WA028-035002-	JANEVILLE	House - 17th century
WA028-038----	JANEVILLE	House - 17th century
WA028-035003-	JANEVILLE	House - 17th century
WA003-025001-	JOANSTOWN	Ringfort - unclassified
WA003-025002-	JOANSTOWN	Enclosure
WA003-068----	JOANSTOWN	Church
WA016-104001-	JOHNSTOWN	Burnt mound
WA016-105----	JOHNSTOWN	Burnt mound
WA016-107----	JOHNSTOWN	Burnt mound
WA016-106001-	JOHNSTOWN	Burnt mound
WA016-106002-	JOHNSTOWN	Burnt mound
WA016-104002-	JOHNSTOWN	Burnt mound
WA015-021----	KEALFOUN	Earthwork
WA015-079----	KEALFOUN	Standing stone
WA015-120----	KEALFOUN	Standing stone (present location)
WA030-063----	KEEREEN LOWER	Church
WA030-054----	KEEREEN UPPER	Ringfort - unclassified
WA018-066001-	KEILOGE	Enclosure
WA018-050----	KEILOGE	House - 17th century
WA018-066002-	KEILOGE	Enclosure
WA003-066----	KILBALLYQUILTY	House - 17th century

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA003-095----	KILBALLYQUILTY	Standing stone
WA017-003003-	KILBARRY	Building
WA017-003001-	KILBARRY	Religious house - Knights Hospitallers
WA017-003004-	KILBARRY	Building
WA017-003007-	KILBARRY	Architectural fragment
WA017-003002-	KILBARRY	Graveyard
WA017-004----	KILBARRY	Burnt mound
WA017-003005-	KILBARRY	Graveslab
WA017-003009-	KILBARRY	Building
WA017-003008-	KILBARRY	Road - hollow-way
WA017-140----	KILBARRY	Excavation - miscellaneous
WA017-003011-	KILBARRY	Building
WA017-003012-	KILBARRY	Flat cemetery
WA017-003010-	KILBARRY	Building
WA025-040001-	KILBARRYMEADEN	Church
WA025-047----	KILBARRYMEADEN	Burnt mound
WA025-041----	KILBARRYMEADEN	Ritual site - holy well
WA025-040003-	KILBARRYMEADEN	Field system
WA025-040005-	KILBARRYMEADEN	Graveslab
WA025-040004-	KILBARRYMEADEN	Bullaun stone
WA025-021----	KILBARRYMEADEN	Burnt mound
WA025-076----	KILBARRYMEADEN	Standing stone
WA025-075----	KILBARRYMEADEN	Standing stone
WA025-077001-	KILBARRYMEADEN	Mill - unclassified
WA025-077002-	KILBARRYMEADEN	House - 17th century
WA025-040002-	KILBARRYMEADEN	Graveyard
WA025-040006-	KILBARRYMEADEN	Road - hollow-way
WA025-041001-	KILBARRYMEADEN	Ritual site - holy tree/bush
WA031-036----	KILBEG (Decies without Drum By., Clonea Par.)	Well

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA025-078----	KILBEG (Decies without Drum By., Kilbarrymeadan Par.)	Ogham stone
WA025-079002-	KILBEG (Decies without Drum By., Kilbarrymeadan Par.)	House - 17th century
WA033-030----	KILBEG UPPER	House - 17th century
WA033-031----	KILBEG UPPER	House - 17th century
WA033-022----	KILBEG UPPER	House - 17th century
WA033-003----	KILBEG UPPER	Standing stone - pair
WA033-027----	KILBEG UPPER,KILBEG LOWER	House - 17th century
WA033-002----	KILBEG UPPER,KILCALF EAST	Boundary stone
WA002-043----	KILBRACK	Enclosure
WA002-047----	KILBRACK	Enclosure
WA002-048005-	KILBRACK	Bullaun stone
WA002-079----	KILBRACK	Burnt mound
WA002-048004-	KILBRACK	Bullaun stone
WA002-048002-	KILBRACK	Graveyard
WA002-048003-	KILBRACK	Ecclesiastical enclosure
WA002-048001-	KILBRACK	Church
WA002-049----	KILBRACK	Enclosure
WA003-044----	KILBRACK	Earthwork
WA007-001----	KILBRACK	Water mill - horizontal-wheeled
WA002-048006-	KILBRACK	Bullaun stone
WA002-048007-	KILBRACK	Bullaun stone
WA006-069----	KILBRACK	Standing stone
WA006-068----	KILBRACK	Standing stone
WA021-026002-	KILBREE EAST	Church
WA021-026001-	KILBREE EAST	House - 17th century
WA017-050001-	KILBRIDE NORTH	Church
WA017-050004-	KILBRIDE NORTH	Settlement deserted - medieval
WA017-050005-	KILBRIDE NORTH	Road - road/trackway
WA017-051----	KILBRIDE NORTH	House - 18th/19th century

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA017-050002-	KILBRIDE NORTH	Graveyard
WA017-053----	KILBRIDE NORTH	Ringfort - unclassified
WA017-050003-	KILBRIDE NORTH	Ritual site - holy well
WA017-052----	KILBRIDE NORTH	Ringfort - unclassified
WA017-117----	KILBRIDE NORTH	Enclosure
WA017-050006-	KILBRIDE NORTH	Ecclesiastical enclosure
WA017-050007-	KILBRIDE NORTH	Enclosure
WA017-104----	KILBRIDE NORTH,KILBRIDE SOUTH	Cist
WA026-011----	KILBRIDE SOUTH	Ringfort - unclassified
WA026-085----	KILBRIDE SOUTH	Standing stone
WA013-041001-	KILBRYAN LOWER	Burial ground
WA014-020----	KILBRYAN LOWER	Ringfort - rath
WA014-038001-	KILBRYAN UPPER	Fulacht fia
WA014-041----	KILBRYAN UPPER	Field system
WA014-041001-	KILBRYAN UPPER	Settlement cluster
WA014-041002-	KILBRYAN UPPER	Fulacht fia
WA014-032----	KILBRYAN UPPER	Fulacht fia
WA014-031----	KILBRYAN UPPER	Standing stone - pair
WA014-041012-	KILBRYAN UPPER	Enclosure
WA014-041013-	KILBRYAN UPPER	Cairn - clearance cairn
WA014-057----	KILBRYAN UPPER	Standing stone
WA014-038002-	KILBRYAN UPPER	Fulacht fia
WA014-041008-	KILBRYAN UPPER	House - indeterminate date
WA014-041009-	KILBRYAN UPPER	House - indeterminate date
WA014-041010-	KILBRYAN UPPER	House - indeterminate date
WA014-041011-	KILBRYAN UPPER	House - indeterminate date
WA014-041003-	KILBRYAN UPPER	House - indeterminate date
WA014-041005-	KILBRYAN UPPER	House - indeterminate date
WA014-041006-	KILBRYAN UPPER	House - indeterminate date

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA014-041007-	KILBRYAN UPPER	House - indeterminate date
WA014-041004-	KILBRYAN UPPER	House - indeterminate date
WA033-021----	KILCALF EAST	House - 17th century
WA033-026----	KILCALF WEST	House - 17th century
WA033-033----	KILCALF WEST	House - 17th century
WA033-020----	KILCALF WEST	House - 17th century
WA033-008----	KILCALFMOUNTAIN	Standing stone - pair
WA015-061001-	KILCANAVEE	Ecclesiastical enclosure
WA015-062----	KILCANAVEE	Architectural fragment
WA015-061----	KILCANAVEE	Church
WA007-077001-	KILCANAVEE	House - 17th century
WA007-077002-	KILCANAVEE	House - 17th century
WA007-087----	KILCANAVEE,KNOCKATURNORY	Cairn - unclassified
WA025-060----	KILCANNON	Ringfort - unclassified
WA025-061----	KILCANNON	Enclosure
WA025-097----	KILCANNON	Church
WA025-098----	KILCANNON	Settlement cluster
WA030-003002-	KILCANNON (Hely),KILCANNON (Osborne)	Ecclesiastical enclosure
WA030-003001-	KILCANNON (Osborne)	Church
WA030-003003-	KILCANNON (Osborne)	Graveyard
WA018-011002-	KILCARAGH	Graveyard
WA018-011001-	KILCARAGH	Church
WA018-041002-	KILCARAGH	House - 17th century
WA018-041001-	KILCARAGH	House - 17th century
WA026-005002-	KILCARTON	House - indeterminate date
WA026-046----	KILCARTON	Settlement cluster
WA026-047----	KILCARTON	Church
WA026-005001-	KILCARTON,REISK	Ringfort - rath
WA030-058002-	KILCLOHER	Enclosure

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA030-058001-	KILCLOHER	Church
WA006-046----	KILCLOONEY	Water mill - horizontal-wheeled
WA007-073----	KILCLOONEY	Church
WA007-033----	KILCLOONEY	Ringfort - rath
WA007-034----	KILCLOONEY	House - indeterminate date
WA007-036----	KILCLOONEY	Enclosure
WA007-032----	KILCLOONEY	Field boundary
WA007-085----	KILCLOONEY	Standing stone
WA007-081----	KILCLOONEY	Enclosure
WA014-039----	KILCLOONEY	Enclosure
WA014-049----	KILCLOONEY	Cairn - unclassified
WA015-002----	KILCLOONEY	Ringfort - rath
WA015-001----	KILCLOONEY	Ringfort - rath
WA015-003----	KILCLOONEY	Ringfort - unclassified
WA007-031001-	KILCLOONEY	Field boundary
WA014-064----	KILCLOONEY	Hut site
WA014-063----	KILCLOONEY	Hut site
WA034-018----	KILCOCKAN	Ringfort - rath
WA034-019001-	KILCOCKAN	Church
WA034-019004-	KILCOCKAN	Graveyard
WA034-054----	KILCOCKAN	House - 17th century
WA017-071----	KILCOHAN	House - 17th century
WA017-080----	KILCOHAN	Church
WA017-142----	KILCOHAN	Hearth
WA038-020004-	KILCOLMAN	Graveyard
WA038-020003-	KILCOLMAN	Ritual site - holy well
WA038-019----	KILCOLMAN	Enclosure
WA038-020001-	KILCOLMAN	Enclosure
WA038-020002-	KILCOLMAN	Church

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA038-020005-	KILCOLMAN	Ritual site - holy tree/bush
WA015-044002-	KILCOMERAGH	Souterrain
WA015-044001-	KILCOMERAGH	Children's burial ground
WA015-042----	KILCOMERAGH	Ogham stone (present location)
WA015-043----	KILCOMERAGH	Castle - unclassified
WA013-028002-	KILCOONEY	Graveyard
WA013-030----	KILCOONEY	Enclosure
WA013-028001-	KILCOONEY	Church
WA013-029----	KILCOONEY	Ringfort - rath
WA022-008----	KILCOONEY	Ringfort - rath
WA018-044002-	KILCOP LOWER,KILCOP UPPER	House - 17th century
WA018-044001-	KILCOP LOWER,KILCOP UPPER	House - 17th century
WA018-025001-	KILCOP UPPER	Church
WA018-025002-	KILCOP UPPER	Enclosure
WA018-025003-	KILCOP UPPER	Graveyard
WA005-010----	KILCREGGANE	Ringfort - unclassified
WA005-011001-	KILCREGGANE	Burial ground
WA005-011002-	KILCREGGANE	Cross
WA010-019----	KILCULLEN LOWER,KILCULLEN UPPER	Church
WA016-068003-	KILDERMODY	Bullaun stone
WA016-068001-	KILDERMODY	Ecclesiastical enclosure
WA016-068002-	KILDERMODY	Church
WA016-068004-	KILDERMODY	Bullaun stone
WA003-057----	KILDROUGHTAUN	Church
WA025-100----	KILDUANE	Church
WA025-073----	KILFARRASY	Promontory fort - coastal
WA025-104----	KILFARRASY	Church
WA025-106----	KILFARRASY	Mill - unclassified
WA025-105----	KILFARRASY	Fulacht fia

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA037-040----	KILGABRIEL	House - 17th century
WA038-001----	KILGABRIEL	Church
WA001-031----	KILGAINY LOWER	Weir - fish
WA001-032003-	KILGAINY LOWER,KILGAINY UPPER	House - 17th century
WA001-032001-	KILGAINY LOWER,KILGAINY UPPER	House - 17th century
WA001-033----	KILGAINY UPPER	Church
WA001-014----	KILGAINY UPPER	Castle - tower house
WA001-032002-	KILGAINY UPPER,KILGAINY LOWER	House - 17th century
WA031-001001-	KILGOBNET	Church
WA031-001003-	KILGOBNET	Ritual site - holy well
WA031-001002-	KILGOBNET	Graveyard
WA031-001004-	KILGOBNET	Font
WA030-062----	KILGREANY (Decies without Drum By.)	Church
WA030-018----	KILGREANY (Decies without Drum By.)	Cave
WA030-018001-	KILGREANY (Decies without Drum By.)	Burial
WA031-045001-	KILGROVAN	Ecclesiastical enclosure
WA031-045----	KILGROVAN	Church
WA031-045002-	KILGROVAN	Ogham stone
WA031-045004-	KILGROVAN	Ogham stone
WA031-045003-	KILGROVAN	Ogham stone
WA031-045005-	KILGROVAN	Ogham stone
WA031-045009-	KILGROVAN	Children's burial ground
WA031-045008-	KILGROVAN	Ogham stone
WA031-045006-	KILGROVAN	Ogham stone
WA031-045010-	KILGROVAN	Kiln
WA031-045011-	KILGROVAN	Kiln
WA031-045012-	KILGROVAN	Kiln
WA031-045013-	KILGROVAN	Kiln
WA031-045014-	KILGROVAN	Kiln

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA031-045015-	KILGROVAN	Ogham stone
WA005-028----	KILKEANY	Enclosure
WA005-040001-	KILKEANY	Enclosure
WA005-040002-	KILKEANY	Graveyard
WA005-040003-	KILKEANY	Church
WA038-018002-	KILKNOCKAN	Church
WA038-018001-	KILKNOCKAN	Enclosure
WA017-082----	KILL ST. LAWRENCE	Ritual site - holy well
WA017-005003-	KILL ST. LAWRENCE	Headstone
WA017-108----	KILL ST. LAWRENCE	Standing stone
WA017-005001-	KILL ST. LAWRENCE	Church
WA017-005004-	KILL ST. LAWRENCE	Ecclesiastical enclosure
WA017-005002-	KILL ST. LAWRENCE	Graveyard
WA017-005005-	KILL ST. LAWRENCE	Hut site
WA017-005006-	KILL ST. LAWRENCE	Hut site
WA018-037001-	KILL ST. NICHOLAS	House - 17th century
WA018-007005-	KILL ST. NICHOLAS	Burnt mound
WA018-007003-	KILL ST. NICHOLAS	Ritual site - holy well
WA018-007004-	KILL ST. NICHOLAS	Bullaun stone
WA018-007001-	KILL ST. NICHOLAS	Church
WA018-007002-	KILL ST. NICHOLAS	Graveyard
WA018-037002-	KILL ST. NICHOLAS	House - 17th century
WA018-080----	KILL ST. NICHOLAS	Enclosure
WA031-025----	KILLADANGAN	Ringfort - unclassified
WA030-029002-	KILLADANGAN	Enclosure
WA030-029001-	KILLADANGAN	Burial ground
WA029-071----	KILLAHALY EAST	Linear earthwork
WA029-019003-	KILLAHALY WEST	Enclosure
WA029-037----	KILLANTHONY	Church

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA035-001----	KILLATOOR	Ringfort - rath
WA027-056001-	KILLAWLAN	Mill - unclassified
WA027-055----	KILLAWLAN	Dovecote
WA037-051----	KILLEA (Coshmore and Coshbride By.)	Burnt mound
WA037-043----	KILLEA (Coshmore and Coshbride By.)	Church
WA022-027----	KILLEAGH	Burial ground
WA034-041002-	KILLEENAGH NORTH	Bullaun stone
WA034-041001-	KILLEENAGH NORTH	Church
WA034-040----	KILLEENAGH NORTH	House - 17th century
WA034-042----	KILLEENAGH NORTH	House - 17th century
WA034-077----	KILLEENAGH SOUTH	House - 17th century
WA034-078----	KILLEENAGH SOUTH	House - 17th century
WA034-076----	KILLEENAGH SOUTH	House - 17th century
WA034-048----	KILLEENAGHMOUNTAIN	Cairn - unclassified
WA034-007002-	KILLEENAGHMOUNTAIN	Pit-burial
WA034-007001-	KILLEENAGHMOUNTAIN	Pit-burial
WA024-090----	KILLELTON	Church
WA024-090001-	KILLELTON	Enclosure
WA007-040----	KILLERGUILE	Ringfort - rath
WA007-042002-	KILLERGUILE	Bullaun stone
WA007-042001-	KILLERGUILE	Enclosure
WA007-041----	KILLERGUILE	Ringfort - rath
WA016-087----	KILLONE	Burnt mound
WA025-009001-	KILLONE	Ecclesiastical enclosure
WA025-009002-	KILLONE	Church
WA035-017----	KILLONGFORD	Settlement cluster
WA030-076----	KILLOSSERAGH	Castle - unclassified
WA017-001001-	KILLOTARAN	Church
WA017-001003-	KILLOTARAN	Graveslab

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA017-001004-	KILLOTARAN	Graveslab
WA017-001002-	KILLOTARAN	Graveyard
WA017-118----	KILLOTARAN	Burnt mound
WA017-124----	KILLOTARAN	Fulacht fia
WA017-119----	KILLOTARAN	Water mill - vertical-wheeled
WA017-128----	KILLOTARAN	Excavation - miscellaneous
WA017-125----	KILLOTARAN	Excavation - miscellaneous
WA017-141001-	KILLOTARAN	Fulacht fia
WA017-141002-	KILLOTARAN	Road - class 3 togher
WA017-102----	KILLOWEN (Middlethird By.)	Mill - unclassified
WA017-064----	KILLOWEN (Middlethird By.)	Graveyard
WA017-109----	KILLOWEN (Middlethird By.)	Fulacht fia
WA017-065----	KILLOWEN (Middlethird By.)	Ringfort - rath
WA004-010----	KILLOWEN (Upperthird By.)	Church
WA017-083----	KILLURE	Settlement cluster
WA017-018001-	KILLURE	Church
WA017-018002-	KILLURE	Structure
WA017-138003-	KILLURE	Fulacht fia
WA017-138004-	KILLURE	Fulacht fia
WA017-138001-	KILLURE	Fulacht fia
WA017-138002-	KILLURE	Fulacht fia
WA027-021----	KILMACLEAGUE EAST	Ringfort - rath
WA027-022----	KILMACLEAGUE EAST	Ringfort - unclassified
WA027-020----	KILMACLEAGUE EAST	Ringfort - unclassified
WA027-019003-	KILMACLEAGUE WEST	Bullaun stone
WA027-019002-	KILMACLEAGUE WEST	Graveyard
WA027-019007-	KILMACLEAGUE WEST	House - 17th century
WA027-019005-	KILMACLEAGUE WEST	Field boundary
WA027-019006-	KILMACLEAGUE WEST	Road - road/trackway

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA027-019001-	KILMACLEAGUE WEST	Church
WA027-091----	KILMACLEAGUE WEST	Midden
WA027-090----	KILMACLEAGUE WEST	Midden
WA027-092----	KILMACLEAGUE WEST	Midden
WA027-093----	KILMACLEAGUE WEST	Midden
WA027-050----	KILMACOMB	House - 17th century
WA027-005----	KILMACOMB	Stone circle
WA027-006002-	KILMACOMB	Graveyard
WA027-086----	KILMACOMB	Enclosure
WA027-006005-	KILMACOMB	Earthwork
WA027-006001-	KILMACOMB	Church
WA027-006003-	KILMACOMB	Bullaun stone
WA027-006004-	KILMACOMB	Ritual site - holy well
WA027-087----	KILMACOMB	Enclosure
WA001-007----	KILMACOMMA	Ringfort - rath
WA001-018----	KILMACOMMA	Ringfort - rath
WA001-007001-	KILMACOMMA	Souterrain
WA001-008----	KILMACOMMA	Ringfort - rath
WA001-009----	KILMACOMMA	Ringfort - rath
WA001-029----	KILMACOMMA	Sheela-na-gig
WA015-052----	KILMACTHOMAS	Well
WA015-040001-	KILMACTHOMAS	Church
WA015-040002-	KILMACTHOMAS	Graveyard
WA015-041----	KILMACTHOMAS	Ritual site - holy well
WA015-039----	KILMACTHOMAS	Castle - unclassified
WA015-069----	KILMACTHOMAS	Mill - unclassified
WA015-071----	KILMACTHOMAS	House - 17th century
WA015-070----	KILMACTHOMAS	Mill - unclassified
WA015-095----	KILMACTHOMAS	Fulacht fia

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA015-097----	KILMACTHOMAS	Metalworking site
WA015-096----	KILMACTHOMAS	Fulacht fia
WA015-100----	KILMACTHOMAS	Excavation - miscellaneous
WA015-101----	KILMACTHOMAS	Excavation - miscellaneous
WA015-112----	KILMACTHOMAS	Burnt mound
WA037-027----	KILMALOO EAST	Church
WA037-050----	KILMALOO EAST	Burnt mound
WA037-027001-	KILMALOO EAST	Enclosure
WA037-047----	KILMALOO EAST,KILMALOO OR CLASHGANNY,KILMALOO WEST	Leacht
WA001-034001-	KILMANAHAN	House - 17th century
WA001-038001-	KILMANAHAN	Weir - fish
WA001-034002-	KILMANAHAN	House - 17th century
WA001-038002-	KILMANAHAN	Weir - fish
WA001-017----	KILMANAHAN	Ringfort - rath
WA001-016----	KILMANAHAN	Castle - tower house
WA001-015002-	KILMANAHAN	Graveyard
WA001-015001-	KILMANAHAN	Church
WA001-049----	KILMANAHAN	Enclosure
WA001-050----	KILMANAHAN	Enclosure
WA001-022----	KILMANAHAN,WHITESFORT	Enclosure
WA034-037002-	KILMANICHOLAS	Graveyard
WA034-044----	KILMANICHOLAS	House - 17th century
WA034-037001-	KILMANICHOLAS	Church
WA027-031001-	KILMAQUAGUE	Ringfort - unclassified
WA027-031002-	KILMAQUAGUE	Souterrain
WA027-065----	KILMAQUAGUE	Church
WA027-065001-	KILMAQUAGUE	Enclosure
WA008-018----	KILMEADAN	Settlement deserted - medieval
WA008-049----	KILMEADAN	House - 17th century

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA008-042----	KILMEADAN	Cist
WA008-018001-	KILMEADAN	Church
WA008-018003-	KILMEADAN	Mill - unclassified
WA008-018002-	KILMEADAN	Graveyard
WA038-023----	KILMEEDY EAST	Ringfort - unclassified
WA038-052----	KILMEEDY EAST,KILMEEDY WEST	Church
WA024-055----	KILMINNIN LOWER	Ringfort - unclassified
WA024-122002-	KILMINNIN LOWER	Bullaun stone
WA024-122001-	KILMINNIN LOWER	Mass-rock
WA031-044002-	KILMINNIN NORTH	Burial ground
WA031-044001-	KILMINNIN NORTH	Church
WA031-044003-	KILMINNIN NORTH	Excavation - miscellaneous
WA024-048----	KILMINNIN UPPER	Ringfort - rath
WA029-027008-	KILMOLASH	Graveslab
WA029-027003-	KILMOLASH	Inscribed stone
WA029-027006-	KILMOLASH	Ogham stone
WA029-027005-	KILMOLASH	Ritual site - holy well
WA029-027011-	KILMOLASH	Decorated stone
WA029-027001-	KILMOLASH	Church
WA029-027002-	KILMOLASH	Graveyard
WA029-027010-	KILMOLASH	Font
WA029-027007-	KILMOLASH	Graveslab
WA029-027012-	KILMOLASH	Cross-inscribed stone
WA028-028----	KILMORE EAST	Church
WA028-047----	KILMORE EAST	House - 17th century
WA028-045----	KILMORE EAST	House - 17th century
WA028-042----	KILMORE WEST,TOWNPARKS EAST (Coshmore and Coshbride By., Tallow Par.)	House - 17th century
WA008-012----	KILMOVEE	Ringfort - unclassified

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA008-014----	KILMOVEE	Ringfort - unclassified
WA008-015----	KILMOVEE	Enclosure
WA008-013----	KILMOVEE	Ringfort - unclassified
WA008-030001-	KILMOVEE	Church
WA008-048----	KILMOVEE	Standing stone
WA008-051001-	KILMOVEE	Standing stone
WA008-050----	KILMOVEE	Standing stone
WA008-051002-	KILMOVEE	Enclosure
WA008-052----	KILMOVEE	Kiln
WA008-030003-	KILMOVEE	Bullaun stone
WA008-030004-	KILMOVEE	Bullaun stone
WA008-030007-	KILMOVEE	Souterrain
WA008-030002-	KILMOVEE	Ecclesiastical enclosure
WA008-030005-	KILMOVEE	Ritual site - holy well
WA008-030006-	KILMOVEE	Mound
WA016-009001-	KILMOYEMOGE EAST	Church
WA016-009002-	KILMOYEMOGE EAST	Graveyard
WA016-010----	KILMOYEMOGE EAST	Barrow - mound barrow
WA016-007----	KILMOYEMOGE EAST	Ritual site - holy well
WA016-009003-	KILMOYEMOGE EAST	Bullaun stone
WA016-125----	KILMOYEMOGE EAST	Standing stone
WA016-136----	KILMOYEMOGE EAST	Enclosure
WA016-142----	KILMOYEMOGE EAST	Enclosure
WA015-056----	KILMOYLIN	Ringfort - unclassified
WA015-072----	KILMOYLIN	Church
WA025-056----	KILMURRIN	Earthwork
WA025-101001-	KILMURRIN	Church
WA025-101002-	KILMURRIN	Graveyard
WA030-072----	KILMURRY	Ritual site - holy well

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA030-071----	KILMURRY	Church
WA023-048----	KILNAFREHAN EAST	Church
WA031-010----	KILNAFREHAN EAST	Ringfort - rath
WA031-011----	KILNAFREHAN EAST	Ringfort - rath
WA023-070----	KILNAFREHAN EAST	Souterrain
WA031-009----	KILNAFREHAN MIDDLE	Ringfort - rath
WA023-027----	KILNAFREHAN WEST	Enclosure
WA031-008----	KILNAFREHAN WEST	Ringfort - unclassified
WA023-063----	KILNAFREHANMOUNTAIN,MONARUDMOUNTAIN	Cairn - boundary cairn
WA015-038001-	KILNAGRANGE	Church
WA015-038002-	KILNAGRANGE	Ecclesiastical enclosure
WA015-033----	KILNAGRANGE	Earthwork
WA015-026----	KILNAGRANGE	Ritual site - holy well
WA015-028----	KILNAGRANGE	Ringfort - rath
WA015-022001-	KILNAGRANGE	Church
WA015-022002-	KILNAGRANGE	Graveyard
WA015-024----	KILNAGRANGE	Ringfort - unclassified
WA015-027----	KILNAGRANGE	Earthwork
WA015-082----	KILNAGRANGE	Fulacht fia
WA015-030----	KILNAGRANGE	Designed landscape - tree-ring
WA015-032----	KILNAGRANGE	Ringfort - unclassified
WA015-023----	KILNAGRANGE	Earthwork
WA015-025----	KILNAGRANGE	Earthwork
WA015-029----	KILNAGRANGE	Ringfort - unclassified
WA015-085001-	KILNAGRANGE	Burnt mound
WA015-085002-	KILNAGRANGE	Burnt mound
WA015-113----	KILNAGRANGE	Standing stone
WA015-114----	KILNAGRANGE	Standing stone
WA001-005----	KILNAMACK EAST	Hilltop enclosure

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA001-041001-	KILNAMACK EAST	Weir - fish
WA001-002----	KILNAMACK EAST	Ringfort - rath
WA001-003----	KILNAMACK EAST	Ringfort - unclassified
WA001-006----	KILNAMACK EAST	Ringfort - rath
WA001-004----	KILNAMACK EAST	Ringfort - rath
WA001-041002-	KILNAMACK EAST	Weir - fish
WA001-040----	KILNAMACK EAST	House - 17th century
WA001-001001-	KILNAMACK WEST	Church
WA001-001002-	KILNAMACK WEST	Graveyard
WA017-075----	KILRONAN	Settlement cluster
WA017-010002-	KILRONAN	Graveyard
WA017-076----	KILRONAN	Ritual site - holy well
WA017-010001-	KILRONAN	Church
WA017-011----	KILRONAN,BALLYCASHIN,KNOCKEEN	Ringfort - rath
WA017-030----	KILRONAN,SPORHOUSE	Enclosure
WA023-007004-	KILROSSANTY	Ritual site - holy well
WA023-007002-	KILROSSANTY	Graveyard
WA023-007001-	KILROSSANTY	Church
WA023-007003-	KILROSSANTY	Ritual site - holy well
WA023-007005-	KILROSSANTY	Ritual site - holy well
WA023-007006-	KILROSSANTY	Graveslab
WA023-007007-	KILROSSANTY	Road - hollow-way
WA023-007008-	KILROSSANTY	Ecclesiastical enclosure
WA031-043005-	KILRUSH (Power)	Bullaun stone
WA031-043002-	KILRUSH (Power),GLEBE (Decies without Drum By.)	Graveyard
WA025-094----	KILSTEAGUE	Settlement cluster
WA025-096----	KILSTEAGUE	Castle - unclassified
WA025-095001-	KILSTEAGUE	Graveyard
WA025-095002-	KILSTEAGUE	Standing stone

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA033-004002-	KILWATERMOY	Graveyard
WA033-004003-	KILWATERMOY	Church
WA033-004004-	KILWATERMOY	Souterrain
WA033-029----	KILWATERMOYMOUNTAIN	Cist
WA033-009----	KILWATERMOYMOUNTAIN	Standing stone
WA028-033----	KILWINNY	House - 17th century
WA028-034----	KILWINNY	Church
WA022-051----	KNOCKACAHARNA	Cairn - unclassified
WA022-050----	KNOCKACAHARNA	Fulacht fia
WA022-020----	KNOCKACAHARNA	Enclosure
WA022-018----	KNOCKACAHARNA	Ringfort - rath
WA016-031001-	KNOCKADERRY LOWER	Burnt mound
WA016-030----	KNOCKADERRY LOWER	Burnt mound
WA016-032----	KNOCKADERRY LOWER	Burnt mound
WA016-032001-	KNOCKADERRY LOWER	Burnt mound
WA016-030001-	KNOCKADERRY LOWER	Burnt mound
WA016-031002-	KNOCKADERRY LOWER	Burnt mound
WA016-053001-	KNOCKADERRY LOWER	Burnt mound
WA016-051001-	KNOCKADERRY LOWER	Burnt mound
WA016-052----	KNOCKADERRY LOWER	Burnt mound
WA016-053002-	KNOCKADERRY LOWER	Burnt mound
WA016-051002-	KNOCKADERRY LOWER	Burnt mound
WA016-031003-	KNOCKADERRY LOWER	Burnt mound
WA016-095----	KNOCKADERRY LOWER,KNOCKADERRY UPPER	Cairn - unclassified
WA016-094----	KNOCKADERRY LOWER,KNOCKADERRY UPPER	Cist
WA011-005----	KNOCKADULLAUN EAST,KNOCKADULLAUN WEST	Standing stone
WA002-061----	KNOCKALAFALLA	House - 17th century
WA003-015----	KNOCKALAFALLA	Enclosure
WA003-014----	KNOCKALAFALLA	Enclosure

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA003-082----	KNOCKALAFALLA,RATHGORMUCK	Ogham stone
WA029-014----	KNOCKALAHARA,AFFANE (Part of),BEWLEY,COOLANHEEN,DRUMROE,QUARTER,SHESKIN (Decies without Drum By., Affane Par.),KILCLOHER,SPRINGFIELD (Decies without Drum By.)	Road - road/trackway
WA005-035----	KNOCKALISHEEN (Glenahiry By.)	Enclosure
WA005-049----	KNOCKALISHEEN (Glenahiry By.)	Enclosure
WA005-019----	KNOCKALISHEEN (Glenahiry By.)	Ringfort - rath
WA005-064----	KNOCKALISHEEN (Upperthird By.)	Standing stone
WA014-016----	KNOCKANACULLIN	Ringfort - unclassified
WA014-017----	KNOCKANACULLIN	Cairn - clearance cairn
WA014-015----	KNOCKANACULLIN	Enclosure
WA006-017001-	KNOCKANAFFRIN	Earthwork
WA006-018----	KNOCKANAFFRIN	Enclosure
WA006-054----	KNOCKANAFFRIN	Stone row
WA006-055001-	KNOCKANAFFRIN	Stone row
WA006-063----	KNOCKANAFFRIN	Standing stone
WA006-055002-	KNOCKANAFFRIN	Enclosure
WA006-055003-	KNOCKANAFFRIN	Enclosure
WA006-031----	KNOCKANAFFRIN	Hut site
WA006-055004-	KNOCKANAFFRIN	Field system
WA006-017003-	KNOCKANAFFRIN	Children's burial ground
WA006-017002-	KNOCKANAFFRIN	Church
WA006-064----	KNOCKANAFFRIN	Fulacht fia
WA006-070----	KNOCKANAFFRIN	Standing stone
WA016-011----	KNOCKANAGH (Middlethird By., Kilmeadan Par.),ADAMSTOWN (Middlethird By., Kilmeadan Par.)	Designed landscape - tree-ring
WA025-093001-	KNOCKANE (Decies without Drum By.)	House - 17th century
WA025-093002-	KNOCKANE (Decies without Drum By.)	House - 17th century

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA025-057----	KNOCKANE (Middlethird By.)	Enclosure
WA034-021----	KNOCKANEARIS	Ringfort - rath
WA034-023----	KNOCKANEARIS	Ringfort - rath
WA034-026----	KNOCKANEARIS	Enclosure
WA034-024002-	KNOCKANEARIS	Bullaun stone
WA012-001----	KNOCKANNANAGH,KNOCKAUNGARRIFF,POULFADDA,R EANABARNA	Road - road/trackway
WA013-004----	KNOCKARAHA	Ringfort - rath
WA031-028----	KNOCKATEEMORE	Ringfort - unclassified
WA031-027----	KNOCKATEEMORE	Ringfort - unclassified
WA005-052----	KNOCKATRELLANE	Hilltop enclosure
WA005-050----	KNOCKATRELLANE	Standing stone
WA005-053----	KNOCKATRELLANE	Fulacht fia
WA005-058----	KNOCKATRELLANE	Mine
WA007-074004-	KNOCKATURNORY	Bullaun stone
WA007-074003-	KNOCKATURNORY	Bullaun stone
WA007-038----	KNOCKATURNORY	Ringfort - rath
WA007-074002-	KNOCKATURNORY	Ecclesiastical enclosure
WA007-037----	KNOCKATURNORY	Ringfort - rath
WA007-074001-	KNOCKATURNORY	Church
WA007-090----	KNOCKATURNORY	Stone row
WA007-084----	KNOCKATURNORY	Fulacht fia
WA007-088----	KNOCKATURNORY	Mine
WA007-093----	KNOCKATURNORY	Fulacht fia
WA007-084001-	KNOCKATURNORY	Fulacht fia
WA030-025----	KNOCKAUN (Decies without Drum By.)	Ringfort - unclassified
WA033-028----	KNOCKAUN NORTH	House - 17th century
WA033-013001-	KNOCKAUN SOUTH	Linear earthwork
WA033-013----	KNOCKAUN SOUTH,LYRENACARRIGA	Boundary stone

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA023-043----	KNOCKAUNAGLOON	Bullaun stone
WA023-075----	KNOCKAUNAGLOON	Ringfort - cashel
WA012-011----	KNOCKAUNGARRIFF	Road - road/trackway
WA022-019----	KNOCKAUNNAGLOKEE	Ringfort - rath
WA022-049----	KNOCKAUNNAGLOKEE	Cairn - unclassified
WA038-063----	KNOCKAUNNAGOUN	Inscribed stone
WA006-056----	KNOCKAVANNIA	Fulacht fia
WA005-046----	KNOCKAVANNIA	Burnt mound
WA006-021----	KNOCKAVANNIA	Ringfort - unclassified
WA005-041----	KNOCKAVANNIA	Standing stone
WA005-022----	KNOCKAVANNIA	Ringfort - unclassified
WA027-051----	KNOCKAVELISH	House - 17th century
WA027-011----	KNOCKAVELISH	Ringfort - rath
WA027-013----	KNOCKAVELISH	Habitation site
WA027-083----	KNOCKAVELISH	Enclosure
WA027-082----	KNOCKAVELISH	Enclosure
WA019A001----	KNOCKBAUN	Metalworking site
WA013-034001-	KNOCKBOY (Decies without Drum By., Seskinan Par.)	Church
WA013-034004-	KNOCKBOY (Decies without Drum By., Seskinan Par.)	Church
WA013-034005-	KNOCKBOY (Decies without Drum By., Seskinan Par.)	Ogham stone
WA013-037----	KNOCKBOY (Decies without Drum By., Seskinan Par.)	Enclosure
WA013-038001-	KNOCKBOY (Decies without Drum By., Seskinan Par.)	Enclosure
WA013-032001-	KNOCKBOY (Decies without Drum By., Seskinan Par.)	Ritual site - holy well
WA013-034006-	KNOCKBOY (Decies without Drum By., Seskinan Par.)	Ogham stone
WA013-034009-	KNOCKBOY (Decies without Drum By., Seskinan Par.)	Ogham stone
WA013-034010-	KNOCKBOY (Decies without Drum By., Seskinan Par.)	Ogham stone
WA013-034011-	KNOCKBOY (Decies without Drum By., Seskinan Par.)	Ecclesiastical enclosure
WA013-034014-	KNOCKBOY (Decies without Drum By., Seskinan Par.)	Ogham stone
WA013-034016-	KNOCKBOY (Decies without Drum By., Seskinan Par.)	Headstone

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA013-031----	KNOCKBOY (Decies without Drum By., Seskinan Par.)	Enclosure
WA013-034007-	KNOCKBOY (Decies without Drum By., Seskinan Par.)	Ogham stone
WA013-034017-	KNOCKBOY (Decies without Drum By., Seskinan Par.)	Cross-inscribed stone
WA013-038002-	KNOCKBOY (Decies without Drum By., Seskinan Par.)	Stone row
WA013-046----	KNOCKBOY (Decies without Drum By., Seskinan Par.)	Cairn - unclassified
WA013-032002-	KNOCKBOY (Decies without Drum By., Seskinan Par.)	Burnt mound
WA013-016----	KNOCKBOY (Decies without Drum By., Seskinan Par.)	Ringfort - rath
WA013-033----	KNOCKBOY (Decies without Drum By., Seskinan Par.)	Enclosure
WA013-034002-	KNOCKBOY (Decies without Drum By., Seskinan Par.)	Graveyard
WA013-034003-	KNOCKBOY (Decies without Drum By., Seskinan Par.)	Font
WA013-034008-	KNOCKBOY (Decies without Drum By., Seskinan Par.)	Ogham stone
WA013-034015-	KNOCKBOY (Decies without Drum By., Seskinan Par.)	Ogham stone
WA020-001----	KNOCKCORRAGH	Standing stone
WA017-033002-	KNOCKEEN	Graveyard
WA017-034----	KNOCKEEN	Megalithic tomb - portal tomb
WA017-032001-	KNOCKEEN	Ringfort - rath
WA017-032002-	KNOCKEEN	Field system
WA017-033001-	KNOCKEEN	Church
WA017-086----	KNOCKEEN	House - 17th century
WA017-097001-	KNOCKEEN	Enclosure
WA017-097002-	KNOCKEEN	Souterrain
WA022-039----	KNOCKGARRAUN (Sergeant)	Ritual site - holy well
WA022-038----	KNOCKGARRAUN (Sergeant)	Ringfort - unclassified
WA008-016----	KNOCKHOUSE (Upperthird By.)	Ringfort - unclassified
WA016-003----	KNOCKHOUSE (Upperthird By.)	Ringfort - unclassified
WA016-004----	KNOCKHOUSE (Upperthird By.)	Ringfort - rath
WA009-003001-	KNOCKHOUSE LOWER	Ringfort - rath
WA009-003002-	KNOCKHOUSE LOWER	Field system
WA009-026----	KNOCKHOUSE LOWER	Excavation - miscellaneous

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA009-031----	KNOCKHOUSE LOWER	Enclosure
WA009-027----	KNOCKHOUSE LOWER	Habitation site
WA009-025----	KNOCKHOUSE LOWER	Fulacht fia
WA009-029----	KNOCKHOUSE LOWER	Excavation - miscellaneous
WA009-028----	KNOCKHOUSE LOWER	Hut site
WA009-003008-	KNOCKHOUSE LOWER	Excavation - miscellaneous
WA009-045----	KNOCKHOUSE LOWER	Burnt mound
WA009-047----	KNOCKHOUSE LOWER	Kiln
WA009-003005-	KNOCKHOUSE LOWER	Souterrain
WA009-046----	KNOCKHOUSE LOWER	Burnt mound
WA009-003003-	KNOCKHOUSE LOWER	Structure
WA009-003004-	KNOCKHOUSE LOWER	Structure
WA009-003006-	KNOCKHOUSE LOWER	Souterrain
WA009-003007-	KNOCKHOUSE LOWER	Structure
WA009-021----	KNOCKHOUSE UPPER	Fulacht fia
WA009-022----	KNOCKHOUSE UPPER	Excavation - miscellaneous
WA009-032001-	KNOCKHOUSE UPPER	Fulacht fia
WA009-032002-	KNOCKHOUSE UPPER	Fulacht fia
WA009-044----	KNOCKHOUSE UPPER	Hearth
WA001-013001-	KNOCKLUCAS	Ritual site - holy tree/bush
WA001-013----	KNOCKLUCAS	Ritual site - holy well
WA001-048----	KNOCKLUCAS	Standing stone
WA025-065----	KNOCKMAHON	Promontory fort - coastal
WA025-065001-	KNOCKMAHON	Ogham stone
WA025-065002-	KNOCKMAHON	Ogham stone
WA030-041001-	KNOCKMAON	Castle - tower house
WA030-042001-	KNOCKMAON	Church
WA030-041002-	KNOCKMAON	Bawn
WA030-042003-	KNOCKMAON	Cross-inscribed stone

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA030-042002-	KNOCKMAON	Graveyard
WA012-010----	KNOCKMEALDOWN	Burial
WA038-024----	KNOCKMEELMORE	Barrow - unclassified
WA003-043----	KNOCKNACREHA	Enclosure
WA003-097----	KNOCKNACREHA	Bullaun stone
WA003-045002-	KNOCKNACREHA	Enclosure
WA003-045001-	KNOCKNACREHA	Boundary stone
WA003-107----	KNOCKNACREHA	Boundary stone (present location)
WA003-106----	KNOCKNACREHA	Bullaun stone (present location)
WA030-004----	KNOCKNACROOHA UPPER	Fulacht fia
WA030-008----	KNOCKNACROOHA UPPER	Burnt mound
WA030-009----	KNOCKNACROOHA UPPER	Ringfort - unclassified
WA030-079----	KNOCKNACROOHA UPPER	Fulacht fia
WA031-030----	KNOCKNAGRANAGH	Ringfort - unclassified
WA035-006----	KNOCKNAHOOLA	Ritual site - holy well
WA022-062----	KNOCKNAMAULEE	Standing stone
WA022-063----	KNOCKNAMAULEE	Standing stone
WA030-068----	KNOCKNAMONA	Standing stone
WA012-009----	KNOCKNANASK	Barracks
WA029-058----	KNOCKNARAHA	Enclosure
WA029-035----	KNOCKNARAHA	Standing stone
WA018-009004-	KNOCKROE (Gaultiere By.)	Ritual site - holy well
WA018-009003-	KNOCKROE (Gaultiere By.)	Church
WA018-009006-	KNOCKROE (Gaultiere By.),PASSAGE EAST,PASSAGE WEST	Weir - fish
WA018-009----	KNOCKROE (Gaultiere By.),PASSAGE EAST,PASSAGE WEST	Settlement cluster
WA033-007----	KNOCKROUR	Ringfort - unclassified
WA023-041----	KNOCKYELAN	Church
WA023-082----	KNOCKYELAN	Enclosure

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA032-021001-	KNOCKYOOLAHAN EAST	Standing stone
WA031-059----	KNOCKYOOLAHAN EAST,KNOCKYOOLAHAN WEST	Standing stone
WA031-063----	KNOCKYOOLAHAN EAST,KNOCKYOOLAHAN WEST	Settlement cluster
WA032-020----	KNOCKYOOLAHAN WEST	Burial
WA019-004----	LABBANACALLEE	Megalithic tomb - unclassified
WA013-035----	LACKANDARRA UPPER	Ringfort - rath
WA013-036----	LACKANDARRA UPPER	Ringfort - rath
WA031-013----	LACKEN (Decies without Drum By., Dungarvan Par.)	Ringfort - rath
WA017-015----	LACKEN (Gaultiere By.)	Bridge
WA017-014----	LACKEN (Gaultiere By.)	Ringfort - unclassified
WA035-019----	LACKENAGREANY	Standing stone
WA031-054----	LACKENFUNE	Enclosure
WA034-011----	LACKENSILLAGH	Enclosure
WA008-034----	LAHARDAN	Enclosure
WA002-055----	LANDSCAPE	Megalithic tomb - unclassified
WA030-064----	LAURAGH	Earthwork
WA027-054----	LECKAUN	Bullaun stone
WA027-053----	LECKAUN	House - 17th century
WA027-009----	LEPERSTOWN	Ringfort - unclassified
WA027-081----	LEPERSTOWN	Enclosure
WA028-023----	LIMEKILNCLOSE	House - 17th century
WA017-037----	LISDUGGAN (Tramore ED)	Ringfort - unclassified
WA028-013----	LISFINNY	Castle - tower house
WA028-021----	LISFINNY	Metalworking site
WA028-013001-	LISFINNY	Bawn
WA002-004----	LISHEEN	Ringfort - rath
WA038-008----	LISKEELTY (Decies within Drum By., Ballymacart Par.)	Ringfort - rath
WA013-022----	LISLEAGH	Ringfort - rath
WA022-003001-	LISLEAGH	Ringfort - rath

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA022-003002-	LISLEAGH	Hut site
WA021-019019-	LISMORE (Coshmore and Coshbride By.)	Architectural feature
WA021-019018-	LISMORE (Coshmore and Coshbride By.)	Walled garden
WA021-019020-	LISMORE (Coshmore and Coshbride By.)	Armorial plaque
WA021-019001-	LISMORE (Coshmore and Coshbride By.)	Castle - Anglo-Norman masonry castle
WA021-019003-	LISMORE (Coshmore and Coshbride By.)	Cathedral
WA021-019002-	LISMORE (Coshmore and Coshbride By.)	Ecclesiastical enclosure
WA021-019004-	LISMORE (Coshmore and Coshbride By.)	Graveyard
WA021-019008-	LISMORE (Coshmore and Coshbride By.)	Ritual site - holy well
WA021-019021-	LISMORE (Coshmore and Coshbride By.)	Gatehouse
WA021-019007-	LISMORE (Coshmore and Coshbride By.)	Ritual site - holy well
WA021-019005-	LISMORE (Coshmore and Coshbride By.)	Cross-slab
WA021-019006-	LISMORE (Coshmore and Coshbride By.)	Architectural fragment
WA021-019010-	LISMORE (Coshmore and Coshbride By.)	Sheela-na-gig (present location)
WA021-019013-	LISMORE (Coshmore and Coshbride By.)	Cross-slab
WA021-019011-	LISMORE (Coshmore and Coshbride By.)	Cross-slab
WA021-019012-	LISMORE (Coshmore and Coshbride By.)	Cross-slab
WA021-019015-	LISMORE (Coshmore and Coshbride By.)	Stone sculpture
WA021-019017-	LISMORE (Coshmore and Coshbride By.)	Tomb - chest tomb
WA021-019014-	LISMORE (Coshmore and Coshbride By.)	Cross-slab
WA021-019016-	LISMORE (Coshmore and Coshbride By.)	Graveslab
WA021-019022-	LISMORE (Coshmore and Coshbride By.)	Church
WA021-019023-	LISMORE (Coshmore and Coshbride By.)	Ogham stone (present location)
WA021-019024-	LISMORE (Coshmore and Coshbride By.)	Sundial
WA009-016----	LISMORE (Middlethird By.)	Enclosure
WA024-112----	LISNAGERAGH	Enclosure
WA024-086----	LISNAGERAGH	House - 17th century
WA017-023003-	LISNAKILL	Enclosure
WA017-023004-	LISNAKILL	Architectural fragment

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA017-023002-	LISNAKILL	Graveyard
WA017-106----	LISNAKILL	Urn burial
WA017-023001-	LISNAKILL	Church
WA017-122----	LISNAKILL	Cist
WA022-042----	LISROE	Ringfort - unclassified
WA016-046----	LISSAHANE	Earthwork
WA016-077001-	LISSAHANE	House - 17th century
WA016-077002-	LISSAHANE	House - 17th century
WA016-045----	LISSAHANE	Ringfort - rath
WA016-044----	LISSAHANE	Standing stone - pair
WA016-048----	LISSAHANE	Ringfort - rath
WA038-025----	LISSANISKA	Ringfort - rath
WA038-055----	LISSAROW (Decies within Drum By., Ardmore Par.),LISSAROW (Decies within Drum By., Ballymacart Par.),TONTEHEIGE	Enclosure
WA038-030----	LISSAROW (Decies within Drum By., Ballymacart Par.)	Souterrain
WA025-119----	LISSAVIRON	Enclosure
WA027-025008-	LISSELY	Burnt spread
WA027-025002-	LISSELY	Burnt mound
WA027-036----	LISSELY	Ringfort - unclassified
WA027-025005-	LISSELY	Burnt spread
WA027-025006-	LISSELY	Burnt mound
WA027-025007-	LISSELY	Burnt spread
WA027-025003-	LISSELY	Midden
WA027-025004-	LISSELY	Burnt mound
WA010-008----	LITTLE ISLAND	Castle - unclassified
WA036-013----	LOG NA GIÚISÍ	Standing stone
WA036-023----	LOISCREÁIN	House - 17th century
WA039-015001-	LOISCREÁIN	Church
WA039-016----	LOISCREÁIN	Standing stone

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA039-015002-	LOISCREÁIN	Cross
WA016-115----	LOUGHDEHEEN	Burnt mound
WA016-111----	LOUGHDEHEEN	Burnt mound
WA016-059004-	LOUGHDEHEEN	Ritual site - holy well
WA016-110----	LOUGHDEHEEN	Burnt mound
WA016-059002-	LOUGHDEHEEN	Ecclesiastical enclosure
WA016-059003-	LOUGHDEHEEN	Bullaun stone
WA017-019001-	LOUGHDEHEEN	Bawn
WA016-121----	LOUGHDEHEEN	Standing stone
WA016-059001-	LOUGHDEHEEN	Church
WA017-073----	LOUGHDEHEEN	Mill - unclassified
WA017-020001-	LOUGHDEHEEN	Enclosure
WA017-021----	LOUGHDEHEEN	Ringfort - rath
WA017-019----	LOUGHDEHEEN	Gatehouse
WA028-026002-	LOUGHNASOLLIS LOWER	House - 17th century
WA028-026003-	LOUGHNASOLLIS LOWER	House - 17th century
WA028-027----	LOUGHNASOLLIS LOWER	House - 17th century
WA028-026001-	LOUGHNASOLLIS LOWER	House - 17th century
WA028-029----	LOUGHNASOLLIS UPPER	House - 17th century
WA033-032----	LOUGHNATOUSE	House - 17th century
WA033-001001-	LOUGHNATOUSE	Enclosure
WA031-042----	LUSKANARGID	Ringfort - rath
WA022-002----	LYRATTIN	Ringfort - unclassified
WA022-001----	LYRATTIN	Enclosure
WA021-007----	LYRE EAST (Coshmore and Coshbride By.)	Ringfort - unclassified
WA006-028001-	LYRE EAST (Decies without Drum By.)	Enclosure
WA006-028002-	LYRE EAST (Decies without Drum By.)	Burial ground
WA006-057----	LYRE WEST (Decies without Drum By.)	Fulacht fia
WA006-059----	LYREMOUNTAIN	Standing stone

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA006-058001-	LYREMOUNTAIN	Fulacht fia
WA014-045----	LYREMOUNTAIN	Hut site
WA006-058002-	LYREMOUNTAIN	Fulacht fia
WA033-012----	LYRENACARRIGA	Standing stone
WA033-010----	LYRENACARRIGA	Cairn - unclassified
WA033-036----	LYRENACARRIGA	House - 17th century
WA033-014----	LYRENACARRIGA,BALLYNATRAY COMMONS	Boundary stone
WA022-022----	MAGAHA	Enclosure
WA036-024----	MAOIL AN CHOIRNIGH (Par. Áird Mhóir),MAOIL AN CHOIRNIGH (Par. Rinn Ó gCuanach)	Cairn - unclassified
WA030-051----	MAPESTOWN	Enclosure
WA031-069----	MAPESTOWN	Standing stone
WA026-003----	MATTHEWSTOWN	Megalithic tomb - passage tomb
WA026-004----	MATTHEWSTOWN	Earthwork
WA026-020----	MATTHEWSTOWN	Enclosure
WA026-087----	MATTHEWSTOWN	Burnt mound
WA004-012----	MAYFIELD OR ROCKETSCASTLE	House - 17th century
WA008-004----	MAYFIELD OR ROCKETSCASTLE	Castle - tower house
WA008-045----	MAYFIELD OR ROCKETSCASTLE	Burnt mound
WA008-044001-	MAYFIELD OR ROCKETSCASTLE	Cist
WA008-044002-	MAYFIELD OR ROCKETSCASTLE	Excavation - miscellaneous
WA036-002----	MIDDLEQUARTER	Enclosure
WA036-001001-	MIDDLEQUARTER	Church
WA031-046001-	MIDDLEQUARTER	Ringfort - rath
WA036-001002-	MIDDLEQUARTER	Graveyard
WA031-046002-	MIDDLEQUARTER	Castle - unclassified
WA036-032----	MIDDLEQUARTER	Bullaun stone
WA036-033----	MIDDLEQUARTER	Stone sculpture
WA031-046003-	MIDDLEQUARTER	Earthwork

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA038-026005-	MILL AND CHURCHQUARTER	Headstone
WA038-026002-	MILL AND CHURCHQUARTER	Church
WA038-026003-	MILL AND CHURCHQUARTER	Ogham stone
WA038-026004-	MILL AND CHURCHQUARTER	Headstone
WA038-026001-	MILL AND CHURCHQUARTER	Graveyard
WA024-047----	MILLERSTOWN	Ringfort - rath
WA024-089----	MILLERSTOWN	Souterrain
WA028-041----	MOANFUNE	Gallows
WA028-053001-	MOANFUNE	Mill - unclassified
WA028-053002-	MOANFUNE	Mill - unclassified
WA019-002001-	MOCOLLOP	Church
WA020-024----	MOCOLLOP	Mill - unclassified
WA019-006----	MOCOLLOP	Mill - unclassified
WA019-002002-	MOCOLLOP	Graveyard
WA019-007----	MOCOLLOP	Mine
WA019-002003-	MOCOLLOP	Headstone
WA019-003----	MOCOLLOP	Castle - Anglo-Norman masonry castle
WA002-046----	MONADIHA	Ringfort - rath
WA002-065----	MONADIHA	Standing stone
WA002-044----	MONADIHA	Enclosure
WA002-045----	MONADIHA	Enclosure
WA002-066----	MONADIHA	Cairn - unclassified
WA003-035----	MONADIHA,RATHGORMUCK	Ringfort - rath
WA035-003----	MONAGALLY WEST	Ringfort - rath
WA035-027----	MONAGALLY WEST	Burnt mound
WA035-030----	MONAGALLY WEST	Ringfort - rath
WA039-020----	MONAGOUSH	Mine
WA024-052----	MONAKIRKA	Ringfort - rath

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA021-002----	MONALOUR LOWER,COOLADALANE UPPER,GLENTAUN WEST,RATH UPPER	Road - road/trackway
WA035-018001-	MONALUMMERY	Cairn - unclassified
WA035-018002-	MONALUMMERY	Standing stone
WA035-028----	MONALUMMERY	Ritual site - holy well
WA035-022----	MONAMEEAN	Metalworking site
WA025-064----	MONAMELAGH	Enclosure
WA017-092----	MONAMINTRA	House - 17th century
WA018-084----	MONAMINTRA	Barrow - ditch barrow
WA017-139----	MONAMINTRA	Fulacht fia
WA018-084001-	MONAMINTRA	Pit-burial
WA018-084002-	MONAMINTRA	Pit-burial
WA018-084003-	MONAMINTRA	Pit-burial
WA034-012----	MONANG (Coshmore and Coshbride By.)	Well
WA034-053----	MONANG (Coshmore and Coshbride By.)	House - 17th century
WA040-002----	MONATRAY EAST	Ritual site - holy well
WA040-012002-	MONATRAY EAST	House - 17th century
WA040-018----	MONATRAY EAST	Castle - unclassified
WA040-012001-	MONATRAY EAST	House - 17th century
WA040A002----	MONATRAY MIDDLE	Enclosure
WA028-040----	MONATRIM LOWER	Weir - fish
WA029-077----	MONATRIM UPPER	Ring-ditch
WA029-017----	MONATRIM UPPER	Ringfort - unclassified
WA038-037----	MONEA	Ringfort - rath
WA040-017----	MONEA	Cross (present location)
WA038-065001-	MONEA	Fulacht fia
WA038-065002-	MONEA	Kiln
WA026-082----	MONLOUM	Burnt spread
WA007-039----	MONMINANE	Enclosure

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA026-013----	MONVOY	Standing stone
WA026-014----	MONVOY	Ringfort - rath
WA026-078----	MONVOY	Mine
WA029-054002-	MONYVROE	Enclosure
WA029-054001-	MONYVROE	Burial ground
WA037-031----	MOORD	Ritual site - holy well
WA007-010012-	MOTHEL	Cross-slab
WA007-010005-	MOTHEL	Graveslab
WA007-052----	MOTHEL	Castle - unclassified
WA007-011----	MOTHEL	Cross-inscribed pillar
WA007-010010-	MOTHEL	Cross
WA007-010002-	MOTHEL	Graveyard
WA007-010003-	MOTHEL	Tomb - chest tomb
WA007-053002-	MOTHEL	House - 17th century
WA007-054----	MOTHEL	Rock art
WA007-010001-	MOTHEL	Religious house - Augustinian canons
WA007-010004-	MOTHEL	Graveslab
WA007-010006-	MOTHEL	Graveslab
WA007-053001-	MOTHEL	Mill - unclassified
WA007-010013-	MOTHEL	Tomb - chest tomb
WA022-016----	MOUNTAINCASTLE SOUTH	Ringfort - unclassified
WA004-001----	MOUNTBOLTON	Well
WA004-021----	MOUNTBOLTON	Hearth
WA004-026----	MOUNTBOLTON	Burnt mound
WA004-019----	MOUNTBOLTON	Burnt mound
WA004-027----	MOUNTBOLTON	Burnt mound
WA004-020----	MOUNTBOLTON	Burnt mound
WA004-025----	MOUNTBOLTON	Burnt mound
WA021-003001-	MOUNTMELLERAY	Ogham stone (present location)

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA021-003003-	MOUNTMELLERAY	Ogham stone (present location)
WA021-003005-	MOUNTMELLERAY	Ogham stone (present location)
WA021-003002-	MOUNTMELLERAY	Ogham stone (present location)
WA021-003004-	MOUNTMELLERAY	Ogham stone (present location)
WA009-017001-	MOUNTMISERY	Standing stone
WA009-017003-	MOUNTMISERY	Mound
WA009-017002-	MOUNTMISERY	Standing stone
WA030-070----	MOUNTODELL	Cairn - unclassified
WA030-056----	MOUNTODELL	House - 17th century
WA030-083----	MOUNTODELL	Burnt mound
WA030-081----	MOUNTODELL	Souterrain
WA030-082----	MOUNTODELL	Burnt mound
WA029-076----	MOUNTRIVERS	Castle - unclassified
WA029-013----	MOUNTRIVERS,AFFANE HUNTER	Settlement deserted - medieval
WA017-112002-	MUNMAHOGE (Middlethird By., Kilbride Par.)	Enclosure
WA017-112001-	MUNMAHOGE (Middlethird By., Kilbride Par.)	Enclosure
WA017-144----	MUNMAHOGE (Middlethird By., Kilbride Par.)	Enclosure
WA017-096----	MUNMAHOGE (Middlethird By., Kilbride Par.),MUNMAHOGE (Middlethird By., Kilburne Par.)	House - 17th century
WA017-035----	MUNMAHOGE (Middlethird By., Kilburne Par.)	Megalithic tomb - wedge tomb
WA007-063----	MUNSBURROW	House - 17th century
WA007-027001-	MUNSBURROW	Enclosure
WA007-020----	MUNSBURROW	Earthwork
WA007-062----	MUNSBURROW	Ecclesiastical residence
WA007-027003-	MUNSBURROW	Enclosure
WA007-019----	MUNSBURROW	Enclosure
WA007-027002-	MUNSBURROW	Enclosure
WA007-064----	MUNSBURROW	House - 17th century
WA034-033----	NEWPORT EAST	Ritual site - holy well

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA037-037001-	NEWPORT EAST	House - 17th century
WA037-006----	NEWPORT EAST	Prehistoric site - lithic scatter
WA037-037002-	NEWPORT EAST	House - 17th century
WA037-036001-	NEWPORT EAST	House - 17th century
WA037-036002-	NEWPORT EAST	Barn
WA034-029----	NEWPORT WEST	Earthwork
WA034-030----	NEWPORT WEST	Ringfort - rath
WA034-031----	NEWPORT WEST	Ringfort - rath
WA034-032----	NEWPORT WEST	Enclosure
WA037-035----	NEWPORT WEST	House - 17th century
WA038-059----	NEWTOWN (Decies within Drum By., Ardmore Par.)	Standing stone
WA036-031----	NEWTOWN (Decies without Drum By., Dungarvan Par.)	Standing stone (present location)
WA036-030----	NEWTOWN (Decies without Drum By., Dungarvan Par.)	Standing stone
WA022-011----	NEWTOWN (Decies without Drum By., Modelligo Par.)	Ringfort - unclassified
WA015-067----	NEWTOWN (Decies without Drum By., Rossduff Par.), PARKEENNAGLOGH	Settlement cluster
WA018-024----	NEWTOWN (Gaultiere By., Croke Par.)	Barracks
WA026-042----	NEWTOWN (Middlethird By., Drumcannon Par.)	Enclosure
WA026-061----	NEWTOWN (Middlethird By., Drumcannon Par.)	House - 17th century
WA026-080----	NEWTOWN (Middlethird By., Drumcannon Par.)	Stone sculpture
WA025-063----	NEWTOWN (Middlethird By., Islandikane Par.)	Ringfort - unclassified
WA029-011----	NORRISLAND	House - 17th century
WA027-060----	NYMPHHALL	House - 17th century
WA027-088----	NYMPHHALL	Promontory fort - coastal
WA029-029----	OKYLE	Burial ground
WA029-030----	OKYLE	Church
WA007-057----	OLDGRANGE	Megalithic structure
WA018-065----	ORCHARDSTOWN (Gaultiere By.)	Burnt mound
WA018-063----	ORCHARDSTOWN (Gaultiere By.)	Enclosure

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA018-053----	ORCHARDSTOWN (Gaultiere By.)	Burial ground
WA017-007----	ORCHARDSTOWN (Middlethird By.)	Ringfort - unclassified
WA028-037001-	PADDOCK	House - 17th century
WA028-037002-	PADDOCK	House - 17th century
WA024-056----	PARK (Decies without Drum By.)	Enclosure
WA002-040001-	PARK (Upperthird By.)	Church
WA002-040002-	PARK (Upperthird By.)	Graveyard
WA002-040003-	PARK (Upperthird By.)	Ecclesiastical enclosure
WA002-040004-	PARK (Upperthird By.)	Ritual site - holy well
WA002-040006-	PARK (Upperthird By.)	Megalithic structure
WA002-059----	PARK (Upperthird By.)	House - 17th century
WA002-039----	PARK (Upperthird By.)	Enclosure
WA002-040005-	PARK (Upperthird By.)	Bullaun stone
WA002-040007-	PARK (Upperthird By.)	Cairn - clearance cairn
WA002-040008-	PARK (Upperthird By.)	Megalithic structure
WA002-076----	PARK (Upperthird By.)	Standing stone
WA002-077----	PARK (Upperthird By.)	Water mill - horizontal-wheeled
WA002-020001-	PARK (Upperthird By.)	Enclosure
WA002-022----	PARK (Upperthird By.)	Enclosure
WA002-023001-	PARK (Upperthird By.)	Enclosure
WA002-023002-	PARK (Upperthird By.)	Souterrain
WA002-024----	PARK (Upperthird By.)	Enclosure
WA002-019----	PARK (Upperthird By.)	Enclosure
WA002-020002-	PARK (Upperthird By.)	Bullaun stone
WA002-060----	PARKBEG	House - 17th century
WA002-078----	PARKBEG	Standing stone
WA002-026----	PARKBEG	Enclosure
WA002-025----	PARKBEG	Ringfort - rath
WA002-027001-	PARKBEG	Ringfort - rath

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA002-027002-	PARKBEG	Standing stone
WA028-030002-	PARKDOTIA	House - 17th century
WA028-030001-	PARKDOTIA	Kiln - lime
WA015-034----	PARKEENNAGLOGH	Ritual site - holy well
WA010-018----	PARKSWOOD LOWER	Weir - fish
WA010-017----	PARKSWOOD UPPER	Weir - fish
WA018-009005-	PASSAGE EAST	House - 16th century
WA018-009001-	PASSAGE EAST	Bastioned fort
WA018-009009-	PASSAGE EAST	Armorial plaque
WA018-009010-	PASSAGE EAST	Excavation - miscellaneous
WA018-009002-	PASSAGE WEST	House - 16th century
WA018-009008-	PASSAGE WEST,KNOCKROE (Gaultiere By.),PASSAGE EAST	Mill - unclassified
WA018-009007-	PASSAGE WEST,KNOCKROE (Gaultiere By.),PASSAGE EAST	Mill - unclassified
WA017-024----	PEMBROKESTOWN	Castle - motte
WA017-085----	PEMBROKESTOWN	House - 17th century
WA017-022----	PEMBROKESTOWN	Enclosure
WA026-077----	PICKARDSTOWN	Standing stone
WA037-029001-	PILLTOWN	Castle - unclassified
WA037-028----	PILLTOWN	Ringfort - rath
WA037-030002-	PILLTOWN	Graveyard
WA037-030001-	PILLTOWN	Church
WA037-029002-	PILLTOWN	Mill - unclassified
WA037-029----	PILLTOWN	Settlement cluster
WA037-055----	PILLTOWN	Excavation - miscellaneous
WA037-054----	PILLTOWN	Excavation - miscellaneous
WA037-058----	PILLTOWN	Habitation site
WA027-044----	PORTALLY	Mound
WA027-089----	PORTALLY	Promontory fort - coastal

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA004-015----	PORTNABOE	Burnt mound
WA004-004----	PORTNABOE, TINHALLA	Water mill - unclassified
WA002-033----	POULAVONE	Ringfort - unclassified
WA002-063----	POULAVONE	House - 17th century
WA021-046----	POULFADDA	Road - road/trackway
WA016-039----	POWERSKNOCK	Ringfort - rath
WA016-040----	POWERSKNOCK	Ringfort - unclassified
WA016-038----	POWERSKNOCK	Standing stone
WA016-108----	POWERSKNOCK	Burnt mound
WA040A001002-	PROSPECTHALL	Graveyard
WA040A001001-	PROSPECTHALL	Church
WA040A001003-	PROSPECTHALL	Graveslab
WA036-012----	PULLA	Burial ground
WA036-026----	RÁTH NA mBINÁNEACH (Par. Rinn Ó gCuanach)	Standing stone
WA036-027----	RÁTH NA mBINÁNEACH (Par. Rinn Ó gCuanach)	Standing stone
WA033-017----	RACECOURSE	House - 17th century
WA018-049----	RAHEEN (Gaultiere By.)	Settlement cluster
WA001-046----	RAHEEN (Upperthird By.)	Cist
WA016-041----	RAHEENS	Enclosure
WA016-112----	RAHEENS	Standing stone
WA016-113----	RAHEENS	Standing stone
WA016-119----	RAHEENS	Fulacht fia
WA016-114----	RAHEENS	Souterrain
WA016-118----	RAHEENS	Standing stone
WA020-026001-	RALPH	Burial ground
WA003-031----	RATH (Upperthird By.)	Megalithic structure
WA003-101----	RATH (Upperthird By.)	Enclosure
WA021-010002-	RATH LOWER	Enclosure
WA021-010001-	RATH LOWER	Burial ground

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA016-057----	RATHANNY	Enclosure
WA016-123----	RATHANNY	Standing stone
WA009-004----	RATHFADDAN	Mound
WA003-039003-	RATHGORMUCK	Bawn
WA003-040001-	RATHGORMUCK	Church
WA003-036----	RATHGORMUCK	Earthwork
WA003-085----	RATHGORMUCK	Enclosure
WA003-039002-	RATHGORMUCK	Castle - unclassified
WA003-039001-	RATHGORMUCK	Castle - tower house
WA003-040003-	RATHGORMUCK	Bullaun stone
WA015-031----	RATHMAIDEN	Earthwork
WA015-087----	RATHMAIDEN	Stone row
WA015-011----	RATHMAIDEN	Ringfort - rath
WA027-041001-	RATHMOYLAN	Church
WA027-041002-	RATHMOYLAN	Graveyard
WA027-042----	RATHMOYLAN	Ringfort - rath
WA027-039003-	RATHMOYLAN	Metalworking site
WA027-043----	RATHMOYLAN	Promontory fort - coastal
WA027-039----	RATHMOYLAN	Field system
WA027-039002-	RATHMOYLAN	Midden
WA027-039001-	RATHMOYLAN	Enclosure
WA024-051----	RATHNASKILLOGE	Cist
WA025-053----	RATHQUAGE	Ringfort - rath
WA025-055----	RATHQUAGE	Ringfort - rath
WA025-054----	RATHQUAGE	Ringfort - rath
WA005-057----	REANADAMPAUN COMMONS (Decies without Drum By.)	Standing stone
WA013-007----	REANADAMPAUN COMMONS (Glenahiry By.),REANADAMPAUN COMMONS (Decies without Drum By.)	Stone row

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA003-033----	REATAGH	Burnt mound
WA004-023----	REATAGH	Bullaun stone
WA017-046001-	REISK	Church
WA017-046002-	REISK	Graveyard
WA017-046003-	REISK	Font
WA037-046----	RINCREW	Souterrain
WA037-045----	RINCREW	Souterrain
WA037-025----	RINCREW	Religious house - Knights Templars
WA031-050----	RINGAPHUCA	Burial ground
WA029-012----	RIVER BLACKWATER	Ford
WA037-012----	RIVER BLACKWATER	Weir - fish
WA007-079----	ROBERTSTOWN (Decies without Drum By., Rossduff Par.)	Settlement cluster
WA015-014----	ROBERTSTOWN (Decies without Drum By., Rossduff Par.)	Enclosure
WA015-015----	ROBERTSTOWN (Decies without Drum By., Rossduff Par.)	Enclosure
WA015-016----	ROBERTSTOWN (Decies without Drum By., Rossduff Par.)	Ringfort - unclassified
WA038-033001-	RODEEN	Ringfort - unclassified
WA038-033002-	RODEEN	Burial ground
WA016-021----	ROSS (Middlethird By.)	Castle - unclassified
WA016-022----	ROSS (Middlethird By.)	Standing stone
WA006-043----	ROSS (Upperthird By.)	Settlement cluster
WA006-044001-	ROSS (Upperthird By.)	Cairn - unclassified
WA006-044002-	ROSS (Upperthird By.)	Standing stone
WA007-058----	ROSS (Upperthird By.)	Burial ground
WA007-018----	ROSS (Upperthird By.)	Enclosure
WA001-021----	RUSSELLSTOWN	Ringfort - unclassified
WA001-035----	RUSSELLSTOWN	Castle - unclassified

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA021-012----	SALTERBRIDGE	House - 18th/19th century
WA021-033----	SALTERBRIDGE	Mine
WA029-074----	SAPPERTON NORTH	House - 17th century
WA025-006----	SAVAGETOWN	Standing stone
WA025-022----	SAVAGETOWN	Megalithic tomb - portal tomb
WA034-058----	SCART (Coshmore and Coshbride By., Kilcockan Par.)	House - 17th century
WA022-026003-	SCART (Sergeant)	Graveslab
WA022-026002-	SCART (Sergeant)	Graveyard
WA022-025----	SCART (Sergeant)	Ringfort - unclassified
WA022-026001-	SCART (Sergeant)	Church
WA002-074----	SCARTLEA	Burnt mound
WA002-018----	SCARTLEA	Enclosure
WA002-017003-	SCARTLEA	Souterrain
WA002-017001-	SCARTLEA	Enclosure
WA002-016----	SCARTLEA	Enclosure
WA002-017002-	SCARTLEA	Ringfort - rath
WA014-009002-	SCARTNADRINYMOUNTAIN	Kerb circle
WA014-006----	SCARTNADRINYMOUNTAIN	Ringfort - rath
WA014-008----	SCARTNADRINYMOUNTAIN	Field boundary
WA014-009004-	SCARTNADRINYMOUNTAIN	Field boundary
WA014-034----	SCARTNADRINYMOUNTAIN	Hut site
WA014-009001-	SCARTNADRINYMOUNTAIN	Cairn - ring-cairn
WA014-033001-	SCARTNADRINYMOUNTAIN	Barrow - ring-barrow
WA014-007001-	SCARTNADRINYMOUNTAIN	Ringfort - rath
WA014-005----	SCARTNADRINYMOUNTAIN	Ringfort - rath
WA014-007002-	SCARTNADRINYMOUNTAIN	Souterrain
WA014-009003-	SCARTNADRINYMOUNTAIN	Cairn - unclassified
WA014-062----	SCARTNADRINYMOUNTAIN	Standing stone
WA014-009005-	SCARTNADRINYMOUNTAIN	Cist

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA015-103----	SCRAHAN	Fulacht fia
WA024-040----	SEAFIELD	Ringfort - rath
WA024-054----	SEAFIELD	Ringfort - rath
WA024-121----	SEAFIELD	Fulacht fia
WA036-008003-	SEANCHLUAIN	Headstone
WA036-008001-	SEANCHLUAIN	Church
WA036-008002-	SEANCHLUAIN	Graveyard
WA011-003002-	SEEMOCHUDA	Ogham stone
WA011-003001-	SEEMOCHUDA	Ogham stone
WA011-003005-	SEEMOCHUDA	Cross
WA011-003003-	SEEMOCHUDA	Ogham stone
WA011-003004-	SEEMOCHUDA	Leacht
WA016-086----	SHANACLONE	Standing stone
WA025-008----	SHANACLONE	Enclosure
WA025-115002-	SHANACLONE	Burnt mound
WA025-115001-	SHANACLONE	Burnt mound
WA025-118----	SHANACLONE	Kerb circle
WA037-052----	SHANACOOLE	Standing stone
WA037-057----	SHANACOOLE	Burnt mound
WA037-053----	SHANACOOLE	Kiln
WA037-056----	SHANACOOLE	Burnt mound
WA034-009----	SHANAKILL (Decies within Drum By., Aglish Par.)	Hilltop enclosure
WA034-052----	SHANAKILL (Decies within Drum By., Aglish Par.)	House - 17th century
WA034-051----	SHANAKILL (Decies within Drum By., Aglish Par.)	Church
WA015-058----	SHANAKILL (Decies without Drum By., Rossduff Par.)	Ringfort - rath
WA024-026----	SHANAKILL (Decies without Drum By., Rossduff Par.)	Ringfort - unclassified
WA024-028----	SHANAKILL (Decies without Drum By., Rossduff Par.)	Ritual site - holy well
WA015-110----	SHANAKILL (Decies without Drum By., Rossduff Par.)	Burnt mound
WA015-109----	SHANAKILL (Decies without Drum By., Rossduff Par.)	Burnt mound

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA007-002----	SHANAKILL (Upperthird By., Rathgormuck Par.)	Enclosure
WA007-004----	SHANAKILL (Upperthird By., Rathgormuck Par.)	Ringfort - unclassified
WA007-015----	SHANAKILL (Upperthird By., Rathgormuck Par.)	Ringfort - rath
WA023-030002-	SHANBALLY (Decies without Drum By.)	Bullaun stone
WA023-031----	SHANBALLY (Decies without Drum By.)	Church
WA023-030003-	SHANBALLY (Decies without Drum By.)	Church
WA023-031001-	SHANBALLY (Decies without Drum By.)	Bullaun stone
WA031-041----	SHANDON	Church
WA031-070----	SHANDON	Burial ground
WA031-072----	SHANDON	Enclosure
WA031-073----	SHANDON	Metalworking site
WA028-005----	SHEAN MORE	Ringfort - rath
WA028-001----	SHEAN MORE	Castle - tower house
WA028-001001-	SHEAN MORE	Bawn
WA032-008----	SHESKIN (Decies without Drum By., Stradbally Par.)	Standing stone
WA003-023----	SHESKIN (Upperthird By.)	Megalithic tomb - portal tomb
WA003-067----	SHESKIN (Upperthird By.)	House - 17th century
WA003-086001-	SHESKIN (Upperthird By.)	Standing stone - pair
WA003-086003-	SHESKIN (Upperthird By.)	Field boundary
WA003-088001-	SHESKIN (Upperthird By.)	Enclosure
WA003-088003-	SHESKIN (Upperthird By.)	Field boundary
WA003-088002-	SHESKIN (Upperthird By.)	Standing stone
WA003-103----	SHESKIN (Upperthird By.)	Megalithic tomb - unclassified
WA005-034----	SILLAHEENS	House - 17th century
WA005-045----	SILLAHEENS	Burnt mound
WA009-020----	SKIBBEREEN	Excavation - miscellaneous
WA022-017----	SLEADYCASTLE	House - 17th century
WA025-117----	SLEVEEN (Decies without Drum By.)	Church
WA016-096----	SMOOR BEG,SMOOR MORE	Church

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA029-060----	SNUGBOROUGH	House - 17th century
WA029-059----	SNUGBOROUGH	House - 17th century
WA001-030----	SPA	Spa works/bath
WA017-029----	SPORHOUSE	Enclosure
WA017-031----	SPORHOUSE	Enclosure
WA031-074----	SPRING (Duke)	Rock scribing - folk art
WA031-076----	SPRING (Duke)	Standing stone (present location)
WA031-075----	SPRING (Duke)	Standing stone
WA028-044----	SPRINGFIELD (Coshmore and Coshbride By.)	House - 17th century
WA008-040----	STONEHOUSE	Weir - fish
WA008-038----	STONEHOUSE	Castle - unclassified
WA008-039----	STONEHOUSE	House - 17th century
WA024-058----	STRADBALLY MORE	Standing stone
WA024-061001-	STRADBALLY MORE	Ritual site - holy well
WA032-012----	STRADBALLY MORE	Settlement cluster
WA024-061002-	STRADBALLY MORE	Ogham stone
WA024-061003-	STRADBALLY MORE	Ogham stone
WA032-011----	STRADBALLY MORE	Ringfort - unclassified
WA032-012001-	STRADBALLY MORE	Church
WA032-013----	STRADBALLY MORE	Promontory fort - coastal
WA032-012002-	STRADBALLY MORE	Graveyard
WA032-012003-	STRADBALLY MORE	Graveslab
WA032-012004-	STRADBALLY MORE	Kiln
WA032-038----	STRADBALLY MORE, WOODHOUSE (Decies without Drum By., Stradbally Par.)	Inscribed stone
WA034-063----	STRANCALLY	Weir - fish
WA034-064----	STRANCALLY	House - 17th century
WA034-061----	STRANCALLY	House - 17th century
WA034-034001-	STRANCALLY	Castle - hall-house

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA034-034----	STRANCALLY	Castle - tower house
WA034-034002-	STRANCALLY	Bawn
WA034-045----	STRANCALLY DEMESNE	House - 17th century
WA027-026----	SUMMERVILLE	House - 17th century
WA028-015002-	TALLOW	Graveslab
WA028-015003-	TALLOW	Forge
WA028-015005-	TALLOW	Sheela-na-gig
WA028-015001-	TALLOW	Church
WA028-015004-	TALLOW	Market-house
WA028-015006-	TALLOW	Inscribed stone
WA028-015007-	TALLOW	Graveyard
WA028-015----	TALLOW, TOWNPARKS EAST (Coshmore and Coshbride By., Tallow Par.), TOWNPARKS WEST (Coshmore and Coshbride By., Tallow Par.)	Historic town
WA028-022----	TALLOWBRIDGE LANDS	Metalworking site
WA025-131----	TANKARDSTOWN	Promontory fort - coastal
WA025-133----	TANKARDSTOWN	Enclosure
WA025-132----	TANKARDSTOWN	Promontory fort - coastal
WA037-013004-	TEMPLEMICHAEL	Building
WA037-014002-	TEMPLEMICHAEL	Bawn
WA037-013002-	TEMPLEMICHAEL	Graveyard
WA037-014001-	TEMPLEMICHAEL	Castle - tower house
WA037-013003-	TEMPLEMICHAEL	Ritual site - holy well
WA037-013001-	TEMPLEMICHAEL	Church
WA024-093----	TEMPLEYVRICK	House - 17th century
WA024-069----	TEMPLEYVRICK	Burial ground
WA024-070----	TEMPLEYVRICK	Church
WA024-123----	TEMPLEYVRICK	Promontory fort - coastal
WA024-093001-	TEMPLEYVRICK	Settlement deserted - medieval

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA008-017----	TIGROE	Ringfort - rath
WA008-017001-	TIGROE	Souterrain
WA002-052----	TIKINCOR LOWER	Weir - fish
WA002-051002-	TIKINCOR LOWER	House - 17th century
WA002-081----	TIKINCOR LOWER	Enclosure
WA002-002----	TIKINCOR LOWER	House - 17th century
WA002-001----	TIKINCOR LOWER	Bridge
WA002-053----	TIKINCOR UPPER	Enclosure
WA022-007----	TINALIRA	Ringfort - unclassified
WA022-010----	TINALIRA	Ringfort - unclassified
WA022-009----	TINALIRA	Ringfort - unclassified
WA004-005001-	TINHALLA	Font
WA004-013----	TINHALLA	Burnt mound
WA004-014----	TINHALLA	Burnt mound
WA004-022----	TINHALLA	Burnt mound
WA004-005----	TINHALLA	Church
WA003-063----	TINHALLA	House - 17th century
WA037-026----	TINNABINNA	Ringfort - rath
WA037-026002-	TINNABINNA	Enclosure
WA038-017----	TINNALYRA	Ritual site - holy well
WA038-016----	TINNALYRA	Ringfort - rath
WA038-015----	TINNALYRA	Ringfort - rath
WA034-059----	TINNASCART	Church
WA034-010----	TINNASCART	Enclosure
WA034-013----	TINNASCART	Ringfort - rath
WA034-014----	TINNASCART	Enclosure
WA028-016----	TIRCULLEN UPPER	Earthwork
WA028-002001-	TOBER	Ringfort - rath
WA028-002002-	TOBER	Altar

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA028-002003-	TOBER	Ritual site - holy well
WA028-002004-	TOBER	Children's burial ground
WA019-001----	TOBERNAHULLA	Ritual site - holy well
WA002-071----	TOOR (Upperthird By.)	Burnt mound
WA002-072----	TOOR (Upperthird By.)	Burnt mound
WA002-073----	TOOR (Upperthird By.)	Burnt mound
WA002-013----	TOOR (Upperthird By.)	Ringfort - rath
WA035-005----	TOOR NORTH	Enclosure
WA005-012----	TOORACURRAGH	Ogham stone (present location)
WA005-014002-	TOORACURRAGH	Ecclesiastical enclosure
WA005-013----	TOORACURRAGH	Enclosure
WA005-014001-	TOORACURRAGH	Church
WA005-014003-	TOORACURRAGH	Ogham stone
WA005-018----	TOORALA	Ringfort - rath
WA012-005----	TOORANARAHEEN	Linear earthwork
WA013-051----	TOORANEENA	Standing stone
WA013-048001-	TOORANEENA	Enclosure
WA013-048002-	TOORANEENA	Standing stone
WA013-012001-	TOORANEENA	Ringfort - rath
WA013-012002-	TOORANEENA	Souterrain
WA013-013----	TOORANEENA	Ringfort - rath
WA006-022002-	TOOREEN EAST	Stone row
WA006-050----	TOOREEN EAST	Fulacht fia
WA006-051----	TOOREEN EAST	Fulacht fia
WA006-022003-	TOOREEN EAST	Standing stone
WA006-026----	TOOREEN EAST	Enclosure
WA006-027----	TOOREEN EAST	Barrow - ring-barrow
WA006-022001-	TOOREEN EAST	Barrow - ring-barrow
WA006-024001-	TOOREEN EAST	Kerb circle

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA006-025----	TOOREEN EAST	Fulacht fia
WA006-022004-	TOOREEN EAST	Cist
WA006-022005-	TOOREEN EAST	Standing stone
WA006-022006-	TOOREEN EAST	Standing stone
WA006-023001-	TOOREEN WEST	Stone row
WA014-043----	TOOREENMOUNTAIN	Cairn - unclassified
WA005-029----	TOORREAGH	Ringfort - rath
WA013-047----	TOORREAGH	Burnt mound
WA013-001----	TOORREAGH	Ringfort - unclassified
WA029-078----	TOURIN DEMESNE	Enclosure
WA029-070----	TOURIN DEMESNE	Weir - fish
WA029-010----	TOURIN DEMESNE	Castle - tower house
WA017-055----	TOWERGARE	Ringfort - unclassified
WA017-099----	TOWERGARE	House - 17th century
WA017-087----	TOWERGARE	Settlement cluster
WA028-014----	TOWNPARKS EAST (Coshmore and Coshbride By., Tallow Par.),TALLOWBRIDGE LANDS	Bridge
WA028-011----	TOWNPARKS WEST (Coshmore and Coshbride By., Lismore Par.)	Ringfort - unclassified
WA028-024----	TOWNPARKS WEST (Coshmore and Coshbride By., Tallow Par.)	Mill - unclassified
WA028-025----	TOWNPARKS WEST (Coshmore and Coshbride By., Tallow Par.)	Forge
WA026-030----	TRAMORE BURROW	Burial ground
WA026-066----	TRAMORE BURROW	Midden
WA026-086----	TRAMORE BURROW	Midden
WA026-092----	TRAMORE BURROW	Midden
WA026-093----	TRAMORE BURROW	Midden
WA026-079----	TRAMORE WEST	Standing stone
WA023-074----	TREENEARLA COMMONS	House - indeterminate date

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA023-071----	TREENEARLA COMMONS	House - indeterminate date
WA023-072----	TREENEARLA COMMONS	Cairn - unclassified
WA023-067----	TREENEARLA COMMONS	Cairn - unclassified
WA021-017----	TURBEHA	Enclosure
WA021-018----	TURBEHA	Burial ground
WA015-075----	Unknown	Fulacht fia
WA036-019002-	Unknown	Hearth
WA036-019001-	Unknown	Urn burial
WA040-020----	Unknown	Fulacht fia
WA009-005038-	WATERFORD CITY	House - 17th century
WA009-005042-	WATERFORD CITY	House - medieval
WA009-005043-	WATERFORD CITY	House - medieval
WA009-005051-	WATERFORD CITY	House - medieval
WA009-005052-	WATERFORD CITY	House - medieval
WA009-005039-	WATERFORD CITY	House - 16th/17th century
WA009-005041-	WATERFORD CITY	House - 16th century
WA009-005040-	WATERFORD CITY	Ecclesiastical residence
WA009-005047-	WATERFORD CITY	House - medieval
WA009-005050-	WATERFORD CITY	Bastioned fort
WA009-005045-	WATERFORD CITY	House - medieval
WA009-005048-	WATERFORD CITY	Bastioned fort
WA009-005049-	WATERFORD CITY	Blockhouse
WA009-005044-	WATERFORD CITY	Habitation site
WA009-005046-	WATERFORD CITY	House - medieval
WA009-005029-	WATERFORD CITY	Religious house - Augustinian canons
WA009-005026-	WATERFORD CITY	Church
WA009-005027-	WATERFORD CITY	Church
WA009-005035-	WATERFORD CITY	Leper hospital
WA009-005025-	WATERFORD CITY	Church

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA009-005028-	WATERFORD CITY	Church
WA009-005036-	WATERFORD CITY	Hospital
WA009-005031-	WATERFORD CITY	Religious house - Dominican friars
WA009-005032-	WATERFORD CITY	Religious house - Franciscan friars
WA009-005023-	WATERFORD CITY	Church
WA009-005024-	WATERFORD CITY	Church
WA009-005030-	WATERFORD CITY	Religious house - Benedictine monks
WA009-005037-	WATERFORD CITY	House - 16th/17th century
WA009-005033-	WATERFORD CITY	Hospital
WA009-005034-	WATERFORD CITY	Hospital
WA009-005055-	WATERFORD CITY	House - medieval
WA009-005058-	WATERFORD CITY	House - medieval
WA009-005059-	WATERFORD CITY	House - medieval
WA009-005061-	WATERFORD CITY	Habitation site
WA009-005053-	WATERFORD CITY	House - medieval
WA009-005054-	WATERFORD CITY	House - medieval
WA009-005056-	WATERFORD CITY	House - medieval
WA009-005057-	WATERFORD CITY	House - medieval
WA009-005060-	WATERFORD CITY	Excavation - miscellaneous
WA009-005002-	WATERFORD CITY	Town defences
WA009-005021-	WATERFORD CITY	Church
WA009-005022-	WATERFORD CITY	Church
WA009-005017-	WATERFORD CITY	Bridge
WA009-005020-	WATERFORD CITY	Cathedral
WA009-005001-	WATERFORD CITY	Castle - Anglo-Norman masonry castle
WA009-005078-	WATERFORD CITY	Graveslab
WA009-005085-	WATERFORD CITY	Graveslab
WA009-005088-	WATERFORD CITY	Graveslab
WA009-005089-	WATERFORD CITY	Graveslab

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA009-005093-	WATERFORD CITY	Graveslab
WA009-005094-	WATERFORD CITY	Graveslab
WA009-005103-	WATERFORD CITY	Tomb - effigial
WA009-005104-	WATERFORD CITY	Tomb - effigial
WA009-005108-	WATERFORD CITY	Armorial plaque
WA009-005109-	WATERFORD CITY	Graveslab
WA009-005115-	WATERFORD CITY	Graveslab
WA009-018----	WATERFORD CITY	Standing stone
WA009-005068-	WATERFORD CITY	Excavation - miscellaneous
WA009-005081-	WATERFORD CITY	Graveslab
WA009-005083-	WATERFORD CITY	Graveslab
WA009-005069-	WATERFORD CITY	Tannery
WA009-005084-	WATERFORD CITY	Graveslab
WA009-005086-	WATERFORD CITY	Graveslab
WA009-005090-	WATERFORD CITY	Graveslab
WA009-005097-	WATERFORD CITY	Graveslab
WA009-005107-	WATERFORD CITY	Tomb - effigial
WA009-005110-	WATERFORD CITY	Graveslab
WA009-005111-	WATERFORD CITY	Graveslab
WA009-005112-	WATERFORD CITY	Stone sculpture
WA009-005116-	WATERFORD CITY	Tomb - effigial
WA009-005070-	WATERFORD CITY	Building
WA009-005079-	WATERFORD CITY	Graveslab
WA009-005080-	WATERFORD CITY	Graveslab
WA009-005091-	WATERFORD CITY	Graveslab
WA009-005092-	WATERFORD CITY	Graveslab
WA009-005095-	WATERFORD CITY	Graveslab
WA009-005096-	WATERFORD CITY	Graveslab
WA009-005100-	WATERFORD CITY	Graveyard

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA009-005101-	WATERFORD CITY	Tomb - effigial
WA009-005102-	WATERFORD CITY	Tomb - effigial
WA009-005105-	WATERFORD CITY	Tomb - chest tomb
WA009-005114-	WATERFORD CITY	Graveslab
WA009-005123-	WATERFORD CITY	Burial ground
WA009-005065-	WATERFORD CITY	Linear earthwork
WA009-005066-	WATERFORD CITY	House - medieval
WA009-005077-	WATERFORD CITY	Graveslab
WA009-005082-	WATERFORD CITY	Graveslab
WA009-005087-	WATERFORD CITY	Graveslab
WA009-005099-	WATERFORD CITY	Armorial plaque
WA009-005063-	WATERFORD CITY	Tannery
WA009-005064-	WATERFORD CITY	House - medieval
WA009-005071-	WATERFORD CITY	Graveyard
WA009-005072-	WATERFORD CITY	Graveyard
WA009-005076-	WATERFORD CITY	Graveslab
WA009-005067-	WATERFORD CITY	House - medieval
WA009-005126-	WATERFORD CITY	Kiln
WA009-005113-	WATERFORD CITY	Graveslab
WA009-005124-	WATERFORD CITY	House - medieval
WA009-005106-	WATERFORD CITY	Tomb - effigial
WA009-005117-	WATERFORD CITY	Graveslab (present location)
WA009-005120-	WATERFORD CITY	Burial
WA009-005118-	WATERFORD CITY	Graveyard
WA009-005119-	WATERFORD CITY	Graveyard
WA009-005073-	WATERFORD CITY	Ritual site - holy well
WA009-005074-	WATERFORD CITY	Cross
WA009-005127-	WATERFORD CITY	Armorial plaque (present location)
WA009-005128-	WATERFORD CITY	Armorial plaque (present location)

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA009-005129-	WATERFORD CITY	Armorial plaque (present location)
WA009-005130-	WATERFORD CITY	Excavation - miscellaneous
WA009-005125-	WATERFORD CITY	Building
WA009-005075-	WATERFORD CITY	Graveyard
WA009-005132-	WATERFORD CITY	Burial
WA009-005131-	WATERFORD CITY	House - 17th century
WA009-005133-	WATERFORD CITY	Battlefield
WA009-005134-	WATERFORD CITY	Stone sculpture
WA009-005136-	WATERFORD CITY	House - medieval
WA009-005----	WATERFORD CITY,TRINITY WITHOUT	Historic town
WA026-041001-	WEST-TOWN	Promontory fort - coastal
WA026-041002-	WEST-TOWN	House - indeterminate date
WA026-091----	WEST-TOWN	Promontory fort - coastal
WA025-103----	WHITEFIELD	Settlement cluster
WA001-023----	WHITESFORT	Enclosure
WA001-039----	WHITESFORT	Settlement cluster
WA015-053----	WHITESTOWN	Earthwork
WA015-054----	WHITESTOWN	Ringfort - unclassified
WA015-055----	WHITESTOWN	Enclosure
WA016-132----	WHITESTOWN	Burnt mound
WA016-133----	WHITESTOWN	Burnt mound
WA016-131----	WHITESTOWN	Burnt mound
WA007-024----	WHITESTOWN EAST	Megalithic tomb - portal tomb
WA008-056----	WHITESTOWN EAST	Ring-ditch
WA007-022----	WHITESTOWN WEST	Architectural fragment
WA007-067----	WHITESTOWN WEST	House - 17th century
WA015-057----	WHITESTOWN,KILMOYLIN	Enclosure
WA017-006----	WHITFIELD NORTH	Standing stone
WA017-067----	WHITFIELD NORTH	Castle - unclassified

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA017-103----	WHITFIELD NORTH,WHITFIELD SOUTH	Souterrain
WA017-121----	WILLIAMSTOWN (Gaultiere By.)	Ringfort - rath
WA017-121001-	WILLIAMSTOWN (Gaultiere By.)	Excavation - miscellaneous
WA017-145----	WILLIAMSTOWN (Gaultiere By.)	Burnt pit
WA003-007001-	WINDGAP OR ARDMORE	Ringfort - rath
WA003-007005-	WINDGAP OR ARDMORE	Souterrain
WA003-007002-	WINDGAP OR ARDMORE	Church
WA003-007003-	WINDGAP OR ARDMORE	Ogham stone
WA003-007004-	WINDGAP OR ARDMORE	Ogham stone
WA032-030----	WOODHOUSE (Decies without Drum By., Stradbally Par.)	Mill - unclassified
WA032-039----	WOODHOUSE (Decies without Drum By., Stradbally Par.)	Souterrain
WA032-010----	WOODHOUSE (Decies without Drum By., Stradbally Par.)	House - 16th/17th century
WA032-040----	WOODHOUSE (Decies without Drum By., Stradbally Par.)	Enclosure
WA032-042----	WOODHOUSE (Decies without Drum By., Stradbally Par.)	Bridge
WA030-053----	WOODHOUSE OR TINAKILLY	Ritual site - holy well
WA029-034----	WOODSTOCK	Ringfort - rath
WA025-072----	WOODSTOWN (Middlethird By., Islandikane Par.)	Promontory fort - coastal
WA025-122----	WOODSTOWN (Middlethird By., Islandikane Par.)	Fulacht fia
WA025-071----	WOODSTOWN (Middlethird By., Islandikane Par.)	Standing stone
WA025-121----	WOODSTOWN (Middlethird By., Islandikane Par.)	Standing stone
WA009-009----	WOODSTOWN (Middlethird By., Killoteran Par.)	Mound
WA009-006----	WOODSTOWN (Middlethird By., Killoteran Par.)	Enclosure
WA009-023----	WOODSTOWN (Middlethird By., Killoteran Par.)	Fulacht fia
WA009-019----	WOODSTOWN (Middlethird By., Killoteran Par.)	Enclosure
WA009-024----	WOODSTOWN (Middlethird By., Killoteran Par.)	Hearth
WA009-038----	WOODSTOWN (Middlethird By., Killoteran Par.)	Excavation - miscellaneous

SMR NUMBER	TOWNLAND NAME	CLASSIFICATION
WA009-040----	WOODSTOWN (Middlethird By., Killoteran Par.)	Excavation - miscellaneous
WA009-019001-	WOODSTOWN (Middlethird By., Killoteran Par.)	Burial
WA009-019002-	WOODSTOWN (Middlethird By., Killoteran Par.)	Kiln
WA009-043----	WOODSTOWN (Middlethird By., Killoteran Par.)	Excavation - miscellaneous
WA009-035----	WOODSTOWN (Middlethird By., Killoteran Par.)	Fulacht fia
WA009-006003-	WOODSTOWN (Middlethird By., Killoteran Par.)	Enclosure
WA009-041----	WOODSTOWN (Middlethird By., Killoteran Par.)	Excavation - miscellaneous
WA009-042----	WOODSTOWN (Middlethird By., Killoteran Par.)	Excavation - miscellaneous
WA009-019003-	WOODSTOWN (Middlethird By., Killoteran Par.)	Structure
WA017-134----	WOODSTOWN (Middlethird By., Killoteran Par.)	Pit-burial
WA009-039----	WOODSTOWN (Middlethird By., Killoteran Par.)	Excavation - miscellaneous
WA018-056002-	WOODSTOWN LOWER,WOODSTOWN UPPER	House - 17th century
WA018-029001-	WOODSTOWN UPPER	Enclosure
WA018-030----	WOODSTOWN UPPER	Enclosure
WA018-056001-	WOODSTOWN UPPER,WOODSTOWN LOWER	Church

The following appendices are appended to this report via PDF document.

Appendix 3 Draft Housing Need and Demand Assessment (HNDA) and Housing Strategy

Appendix 13 Strategic Flood Risk Assessment



Housing Strategy and Housing Need Demand Assessment Waterford City & County Council

November 2021

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1.0 Introduction

1.0 Introduction

Part V, Section 94 of the Planning and Development Act, 2000 (as amended) requires planning authorities to include in its development plan a Housing Strategy for the purpose of ensuring that the proper planning and sustainable development of the area provides for the housing of the existing and future population of the area. This Housing Strategy has been prepared on behalf of Waterford City & County Council to meet the statutory requirements set out under the Act. The Housing Strategy also addresses relevant provisions contained within the Housing (Miscellaneous Provision) Act, 2009 and the Urban Regeneration and Housing Act 2015.

The Housing Strategy is a critical component of the County Development Plan (CDP) and assists in translating national housing policies and housing supply responses to the local level. The Housing Strategy informs the policies and objectives of the CDP, and provides details in relation to housing requirements including types, sizes and tenures.

Waterford City & County Council was established following the amalgamation of Waterford City Council and Waterford County Council on the 1st June 2014. The three existing development plans within the amalgamated Council area, Waterford City Development Plan 2013 – 2019, Waterford County Development Plan 2011 – 2017, & the Dungarvan Town Development Plan 2012 – 2018, are replaced by this new City and County Development Plan.

The Housing Strategy has taken cognisance of significant recent changes in national and regional planning policy, notably the publication of the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES) for the Southern Regional Assembly area.

This Housing Strategy includes the determination of housing requirements in County Waterford over the period of the development plan 2022-2028. Demographic, economic and social inputs have been examined and utilised to estimate projected population, households and associated housing needs in County Waterford.

The NPF has introduced the requirement for a Housing Need Demand Assessment (HNDA) under National Policy Objective 37 in order *'to correlate and accurately align future housing requirements'*. The HNDA contained herein has been prepared with regard to guidance within the NPF and population and housing demand data provided in the NPF Implementation Roadmap, Ministerial Circulars and Section 28 guidelines. The NPF notes the HDNA should *'primarily inform housing policies, housing strategies and associated land use zoning policies as well as assisting in determining where new policy areas or investment programmes are to be developed'*. In addition, Circular Letter Housing 14/2021 was issued on the 14th of April 2021 and accompanies a suite of documents providing updated guidance on Housing Need Demand Assessment.

The HDNA provides the evidence base to inform decision-making around the current and future housing supply within the county, examining trends in population, house prices and rental prices and calculating affordability for different housing tenures including private market purchase and private rental. The HDNA also arrives at a projected social housing need based on the consideration of affordability outlined above.

1.1 Methodology

The NPF indicates the purpose of the HNDA tool is to:

- *‘Assist local authorities to develop long-term strategic views of housing need across all tenures.*
- *Provide a robust evidence base to support decisions about new housing supply, wider investment and housing related services that inform an overall national housing profile.*
- *Inform policies about the proportion of social and affordable housing required, including the need for different types and sizes of provision.*
- *Provide evidence to inform policies related to the provision of specialist housing and housing related services’.*

The NPF further defines the HDNA as a database which allows local authorities to run a number of different scenarios to inform key decisions on housing need and supply, and are designed to give broad, long run estimates of what future housing need might be, rather than precision estimates.

The NPF lists the following key evidence inputs that will inform and drive the HDNA model, based around:

1. *Demographic trends, affordability trends and wider economic trends.*
2. *Housing Stock Profile Pressures, existing need and management issues*
3. *Estimate future housing need and demand.*

The HNDA is structured through a number of stages which project and determine the future housing requirements to cover the plan period. The components considered include projected demographic and household data to understand future housing need in the county over the plan period.

The next component undertakes an assessment of housing affordability, considering house price data and the ability of households to access private market ownership or private market rental. This assessment leads to the identification of social and affordable housing needs in Waterford during the plan period.

1.2 Structure

Section 1 introduces the Housing Strategy and the HNDA process, outlining the policy framework and key objectives and purposes. It also discusses the HDNA methodology used to project future housing requirements over the plan period.

Section 2 analyses the legislative and policy framework relevant to Housing Strategies and Housing Need Demand Assessment.

Section 3 provides an overview of the existing housing context utilising demographic and housing data from the CSO, Daft, the Residential Tenancies Board and the Property Price Register. It also reviews data from Waterford City and County Council on unfinished housing estates and planning permissions to further interrogate the local context in Waterford.

Section 4 analyses housing requirements in County Waterford building upon Section 3 which provided the local housing context to be considered. This section projects and determines the housing need

and supply over the 2022-2028 development plan period through a number of sequential stages outlined in greater detail in Section 4.

Section 5 summarises the overall housing requirements for the county having regard to the supply and demand analysis outputs determined in the preceding sections.

Section 6 concludes with the findings of the Housing Strategy and HNDA.

2.0 Planning Policy and Legislative Framework

2.0 Planning Policy and Legislative Framework

A comprehensive review of all relevant national, regional and local housing and associated planning legislation, policies and plans has been carried out and discussed herein as they relate to the Housing Strategy. This includes the following:

National Legislation and Policy

- The Planning and Development Act, 2000 (as amended)
- Planning and Development (Amendment) (No. 2) Regulations 2018
- National Planning Framework (NPF) (Project Ireland 2040)
- Implementation Roadmap for the National Planning Framework (NPF)
- Housing Supply Target Methodology for Development Planning - Guidelines for Planning Authorities (2020)
- Circular Letter Housing 14/2021 - Re: Housing Need and Demand Assessment (HNDA)
- Guidance on the Preparation of a Housing Need and Demand Assessment
- National Development Plan 2018-2027 (NDP) (Project Ireland 2040)
- Rebuilding Ireland – Action Plan for Housing and Homelessness (2016)
- Housing For All (2021) / Programme for Government: Our Shared Future (2020)
- National Vacant Housing Reuse Strategy 2018-2021
- Social Housing Strategy 2020
- Urban Regeneration and Housing Act 2015
- National Housing Strategy for People with a Disability (2011-2016)
- Design Standards for New Apartments - Guidelines for Planning Authorities (2020)

Regional Policy

- Regional Spatial and Economic Strategy for the Southern Region

Local Policy

- Waterford County Council - Traveller Accommodation Programme 2019-2024
- Waterford Age Friendly Alliance Strategy 2017-2022

2.1 National Legislation and Policy

Planning and Development Act, 2000

Section 94 of Part V of the Planning & Development Act 2000 as amended (the Act) requires the inclusion in a development plan of a housing strategy for the purposes of ensuring that the proper planning and sustainable development of the area of the development plan provides for the housing of the existing and future population of the area.

Part V, Section 94 of the Planning and Development Act, 2000 (as amended) requires planning authorities to include in its development plan a Housing Strategy for the purpose of ensuring that the proper planning and sustainable development of the area provides for the housing of the existing and future population of the area.

Section 94 (3) states that a housing strategy shall take into account:

- a) the existing need and the likely future need for housing,
- b) the need to ensure that housing is available for persons who have different levels of income,
- c) the need to ensure that a mixture of house types and sizes is developed to reasonably match the requirements of the different categories of households, including the special requirements of elderly persons and persons with disabilities,
- d) the need to counteract undue segregation in housing between persons of different social backgrounds.

Section 94 (4) states that a housing strategy shall include an estimate of the amount of:

- Housing for the purposes of the provision of social housing support within the meaning of the Housing (Miscellaneous Provisions) Act 2009, and
- Affordable housing that will be required within the county during the period of the plan.

Section 94 (5) (a) states that when making these estimates, the planning authority shall have regard to the following:

- I. the supply of and demand for houses generally, or houses of a particular class or classes, in the whole or part of the area of the development plan;
- II. the price of houses generally, or houses of a particular class or classes, in the whole or part of the area of the development plan;
- III. the income of persons generally or of a particular class or classes of person who require houses in the area of the development plan;
- IV. the rates of interest on mortgages for house purchase;
- V. the relationship between the price of housing, incomes and rates of interest for the purpose of establishing the affordability of houses in the area of the development plan,
- VI. such other matters as the planning authority considers appropriate.

Planning and Development (Amendment) (No. 2) Regulations 2018

This amendment to the Planning and Development Regulations allows for the temporary change of use of some vacant commercial premises to residential use as exempt development (subject to conditions and limitations). Development shall not exceed the provision of more than 9 residential units in any structure. The change of use, and any related works, must occur between when the Regulations come into operation on 8 February 2018 and 31 December 2021.

In addition, the existing structure or part of the structure, which is the subject of the change of use, is required to be vacant for a period of two years immediately prior to when the development takes place. The exemption applies to existing buildings that have a current commercial use (Class 1, 2, 3, and 6 of Part 4 to Schedule 2).

Project Ireland 2040 - National Planning Framework (NPF) (2018)

The National Planning Framework (NPF) is a high-level strategy that will shape growth and development in Ireland out to the year 2040. The NPF introduces the requirement for a Housing Need Demand Assessment (HNDA), referred to under National Policy Objective 20 and 37, in order to *'ensure that the plan-making system is supported by a robust methodology to inform policies and funding initiatives around housing and associated land requirements'*. The HNDA is to be developed by each Local Authority to support the preparation of housing strategies and city and county development plans, local area plans, traveller accommodation plans etc.

National Policy Objective 20 states:

'Project the need for single housing in the countryside through the local authority's overall Housing Need Demand Assessment (HNDA) tool and county development plan core strategy processes'.

National Policy Objective 37 states:

'A 'Housing Need Demand Assessment' (HNDA) is to be undertaken for each Local Authority Area in order to correlate and accurately align future housing requirements. The HNDA is:

- *to be undertaken by Local Authorities with coordination assistance to be provided by the Regional Assemblies, and at a Metropolitan scale, particularly where inter-county and inter-regional settlement interactions are to be planned for and managed;*
- *to primarily inform housing policies, housing strategies and associated land use zoning policies as well as assisting in determining where new policy areas or investment programmes are to be developed; and*
- *to be supported, through the establishment of a coordination and monitoring unit to assist Local Authorities and Regional Assemblies in the development of the HNDA (DHPLG, Regional Assemblies and the Local Authorities). This will involve developing and coordinating a centralised spatial database for Local Authority Housing data that supports the HNDA being undertaken by Local Authorities'*.

National Policy Objective 36 of the NPF confirms the importance of an integrated approach to population and housing in the planning system, and refers to Section 28 guidelines to be provided in this regard:

‘New statutory guidelines, supported by wider methodologies and data sources, will be put in place under Section 28 of the Planning and Development Act to improve the evidence base, effectiveness and consistency of the planning process for housing provision at regional, metropolitan and local authority levels. This will be supported by the provision of standardised requirements by regulation for the recording of planning and housing data by the local authorities in order to provide a consistent and robust evidence base for housing policy formulation’.

In relation to the demand for single housing in the countryside, the NFP notes the relationship between the core strategy of county development plans and the local authority’s overall Housing Need Demand Assessment (HNDA) and states that quantifying *‘the need for single housing on an evidence basis will assist in supporting the preparation of a comprehensive housing strategy and associated land use policies’.*

The NPF indicates the purpose of the HNDA tool is to:

- *‘Assist local authorities to develop long-term strategic views of housing need across all tenures.*
- *Provide a robust evidence base to support decisions about new housing supply, wider investment and housing related services that inform an overall national housing profile.*
- *Inform policies about the proportion of social and affordable housing required, including the need for different types and sizes of provision.*
- *Provide evidence to inform policies related to the provision of specialist housing and housing related services’.*

The NPF further defines the HDNA as a database which allows local authorities to run a number of different scenarios to inform key decisions on housing need and supply, and are designed to give broad, long run estimates of what future housing need might be, rather than precision estimates.

The NPF lists the following key evidence inputs that will inform and drive the HDNA model, based around:

‘1. Demographic trends, affordability trends and wider economic trends.

The use of economic forecasting or econometric work underpins this section. Data requirements include household composition/projections, house prices, rents, number of first time buyers (FTBs) and loan to value (LTV) mortgage rates, economic activity and employment rates etc.

2. Housing Stock Profile Pressures, existing need and management issues

Housing Stock Profile Pressures (and existing need) and management issues. Undertaking a detailed profile of local housing stock and stock pressures, including local authority housing, to identify the main pressures relating to supply and demand, ineffective stock and overall condition as well as priorities for future stock management. Information is required on dwelling size, dwelling type, dwelling condition and stock pressures (occupancy/under occupancy stock turnover etc.).

3. Estimate future housing need and demand.

This is broken down into: owner occupation, private sector, below market rent and social rent. Detailed guidance is provided on how to undertake this work, including how and on what evidence to base assumptions on wealth affordability, both in terms of home ownership and the different rental categories’.

The NPF adopts a growth scenario referred to as ‘regional parity’ and accordingly sets out a growth objective under National Policy Objective 1a that *‘the projected level of population and employment growth in the Eastern and Midland Regional Assembly area will be at least matched by that of the Northern and Western and Southern Regional Assembly areas combined’*.

In relation to the cities, the NPF notes it supports ambitious growth targets to enable the four cities of Cork, Limerick, Galway and Waterford to each grow by at least 50% to 2040 and to enhance their significant potential to become cities of scale.

In relation to Waterford the NPF states:

‘Waterford is the principal urban centre in Ireland’s south-east and is unique in having a network of large and strong regional urban centres in close proximity within each of the surrounding counties that both complement the role of Waterford and perform strong regional and local economic and developmental roles for their own areas’.

National Policy Objective 3b states: *‘Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints’*.

The NPF sets out a growth strategy that has a particular focus on the five cities and regional growth centres as set out in National Policy Objective 7, which refers to strengthening Ireland’s overall urban structure. National Policy Objective 8 sets out the Minimum Target Population for Waterford City and Suburbs by 2040 of 81,000 (population in 2016 was 54,000). The NPF notes that Waterford City has 20,298 resident workers, with a jobs to resident workers ratio of 1.201.

Implementation Roadmap for the National Planning Framework (2018)

The Implementation Roadmap for the National Planning Framework published in July 2018 provides transitional population projections as a range for each county. The roadmap notes that *‘the transitional population projections plot a growth trajectory set approximately mid-way between what is currently being planned for in statutory Development Plans if projected forward to 2031, and the more likely evidence based and nationally coherent projected scenario to 2031 and 2040. These ‘adjusted’ transitional figures will apply to 2026 and will also inform the period to 2031’*.

The Roadmap states that *‘scope for headroom, not exceeding 25%, can be considered to 2026 in those counties where projected population growth is projected to be at or above the national average baseline’*. The Roadmap lists County Waterford as one of these counties. County Waterford is provided with a population range of 132,000 -135,000 up to 2026, and 137,000 - 144,000 to 2031.

South-East	2016	2026	2031
Waterford	116,000	132,000-135,000	137,000-144,000
Wexford	149,000	163,000-166,000	169,000-172,500
Kilkenny	99,000	108,000-110,000	112,000-114,500
Tipperary SR	88,500	96,000-98,000	99,500-102,000
Carlow	57,000	62,000-63,000	64,000-65,500
Subtotal	509,500	561,000-572,000	581,500-598,500

Table 2.1: Transitional Regional and County Population Projections to 2031 (Source: Implementation Roadmap for the National Planning Framework, 2018).

The roadmap further refers to the role of the *'initial Regional Strategies to set the parameters for City and County Development Plans to be approved during 2021/22, to cover the period to 2026/27'*.

The NPF Implementation Roadmap also notes that the boundary of the Waterford Metropolitan Area was defined *'using a methodology that was developed having regard to similar considerations to those for Dublin and Cork, as well as key Census data'*.

The Roadmap provides a breakdown of the population for the Waterford Metropolitan Area as of 2016, indicating a total population of 59,854, and maps for each of the Metropolitan Areas.

Waterford Metropolitan Areas	Population	Area (sq.km)	Density persons/sq.km
Waterford City/County Council			
Waterford City Area	48,216	38.31	1,259
Waterford County Area	3,399	46.74	73
Waterford City and County Council	51,615	85.05	607
Kilkenny County Council Area	8,239	57.60	143
Totals/Average	59,854	143	420

Table 2.2: Metropolitan Area Population, 2016 (Source: Implementation Roadmap for the National Planning Framework, 2018).

Housing Supply Target Methodology for Development Planning - Guidelines for Planning Authorities (2020)

A Ministerial Circular and accompanying Section 28 Planning Guidelines (*Housing Supply Target Methodology for Development Planning*) were issued by Minister Darragh O'Brien in December 2020. The purpose of the circular and guidelines is to set out a consistently applicable methodology that enables National Planning Framework (NPF) population targets to be translated into household demand projections and integrated housing supply targets at both national and local levels. The projected NPF population distribution forms the basis for one of the housing demand projection scenarios modelled by the ESRI, and this remains the preferred national development scenario to 2040. The guidelines note that the projected county population ranges set out in the Implementation Roadmap for the NPF *'continue to be the population parameters for local authority development planning processes. City or County development plans must therefore plan for the identified population growth within these estimates and use them as the basis for strategic decision-making in their development plan process, including its core strategy, settlement strategy and housing policies'*.

The guidelines note that in the absence of guidance, varying approaches have been taken by different local authorities in the interpretation and application of the population projections provided, with differing assumptions and methodologies resulting in inconsistency in translating the projections into housing demand. In order to resolve this issue and *'strengthen the relationship between national and regional population projections and their integration into the development planning process at local authority level'*, the Economic and Social Research Institute (ESRI) were commissioned by the Department of Housing, Local Government and Heritage to provide a *'nationally integrated and standardised evidence base for local authorities to estimate overall housing demand'*. The ESRI identified four different scenarios for future population and housing demand.

NPF Scenario (NPF 50:50 City)

The guidelines state that the NPF 50:50 City scenario identified in the ESRI research paper¹ is broadly consistent with the National Planning Framework strategy and is therefore the '*recommended housing demand scenario to be utilised by planning authorities in their planning functions in order to plan for the provision of housing to meet projected levels of demand in their administrative area, in accordance with the NPF strategy*'.

Appendix 1 of the Ministerial Circular provides projected housing demand for each local authority area for the period 2020-2031 based on the NPF Scenario. The projected housing demand for County Waterford (as provided in Appendix 1 of the circular) is set out below in Table 2.3, and these projections have been utilised herein in the methodology for calculating housing demand for the development plan period (Section 4).

Waterford City and County Council		Annual Average	Total Households
A	ESRI NPF scenario projected new household demand 2017 to 2031	629	9,440
B	Actual new housing supply 2017-19	383	1,150
C	Homeless households, and estimated unmet demand as at Census 2016	N/A	164
D	Housing Demand 2020-31 =Total (A-B+C)/12	705	8,454

Table 2.3: Projected Housing Demand for County Waterford (Source: Table 21 of Appendix 1 - Projected Housing Demand by Local Authority Area 2020-2031, ESRI NPF Scenario Housing Supply Target').

The Section 28 guidelines provide a methodology for the application of NPF population and housing projections into local authority plan processes (in this case the Waterford City and County Development Plan 2022-2028), included below as Table 2.4.

¹ *Regional Demographics and Structural Housing Demand at a County Level*, Research Series, Number 111, Economic and Social Research Institute, December 2020.

City/County Council	Annual Average Households	Total Households	
A	ESRI NPF scenario projected new household demand 2017 to Plan end year, or quarter (pro-rata)	Total projection/ relevant time period	Total projection ^A
B	Actual new housing supply 2017 to most recent available year or quarter prior to Plan commencement	Total completions /relevant time period	Total completions ^B
C	Homeless households (latest data), and unmet demand as at most recent Census	N/A	Total existing unmet demand ^C
D	Plan Housing Demand = Total (A-B+C) (Projected ESRI NPF demand - new completions + Unmet demand)	Total Plan Demand/6 years	Total Demand for full 6-year plan period
E	Potential adjustment 1 to end 2026 portion of plan period to facilitate convergence to NPF strategy (where justified)	Mid-point between ESRI NPF and Baseline scenarios to 2026 in lieu of A above	Adjusted Total Demand
F	Potential adjustment 2 to end 2026 portion of plan period to facilitate convergence to NPF strategy, applicable where B exceeds or is close to D (where justified)	Mid-point between ESRI NPF and baseline scenarios to 2026 in lieu of A above, plus up to 25%	Adjusted Total Demand

Table 2.4: Methodology for the application of NPF population and housing projections into local authority plan processes (Source: Table 1 of Housing Supply Target Methodology for Development Planning - Guidelines for Planning Authorities (2020)).

The methodology provided in the guidelines (in addition to the worked examples set out in Appendix 1 of the guidelines) has been utilised in Section 4 to calculate the housing demand for the development plan period. The projected NPF 50:50 housing demand scenario for County Waterford has been utilised as required by the guidelines.

Circular Letter Housing 14/2021 - Re: Housing Need and Demand Assessment (HNDA)

Circular Letter Housing 14/2021 accompanies a suite of documents providing updated guidance on Housing Need Demand Assessment. The circular advises that each local authority may now undertake a Housing Need and Demand Assessment for its administrative area using the specific HNDA Guidance and Tool and other resources available provided by the Department.

The Circular states ‘it is expected that HNDA will be integrated into the development plan review process where planning authorities give notice of review of a development plan in accordance with section 11(1) of the 2000 Act, after the date of this Circular. Planning authorities may also consider variation of a development plan where a completed HNDA significantly affects a Housing Strategy in accordance with section 95(3) of the Act’.

The circular notes that the Guidance on the Preparation of a Housing Need and Demand Assessment outlines the process for compiling a HNDA and what it should contain.

The Circular states that *'the section 28 planning guidelines of 18th December facilitate decisions regarding new housing supply targets for the 6-year period of development plans that are being formulated currently, to be determined in advance of the full integration of new HNDA methodology into the Housing Strategy preparation process'*.

Furthermore, the Circular states that Planning authorities are advised *'to ensure that the relevant Housing Supply Target determined through applying the Housing Supply Target Methodology for Development Planning is used as the basis for the development plan process'*.

Accordingly, the Housing Supply Target determined through the application of the Section 28 guidelines issued in December 2020 (*Housing Supply Target Methodology for Development Planning*) is utilised as the basis for this Housing Strategy as part of the overall development plan process. The Circular notes that Department intends to issue revised Housing Strategy Guidelines under section 28 to take account of housing need and demand assessment

Guidance on the Preparation of a Housing Need and Demand Assessment

The Department of Housing, Local Government and Heritage published a guidance document accompanying the circular on the preparation of a HNDA on the 14th of April 2021. The Foreword by Minister O'Brien notes that;

'in order to ensure that the plan-making system is supported by a robust methodology to inform policies and funding initiatives around housing and associated land requirements, a Housing Need and Demand Assessment (HNDA) Framework has been developed to support the preparation of housing strategies and all related housing policy outputs'.

The guidance document has been reviewed and utilised in the preparation of the HNDA, however as prescribed in the accompanying circular, the Housing Supply Target determined through applying the *Housing Supply Target Methodology for Development Planning* is used as the basis for this Housing Strategy. This approach is supported by the guidance document which states:

'In the case of Development Plans under preparation at the time of issue of this guidance, use the methodology outlined in the December 2020 'Housing Supply Target Methodology for Development Planning' guidelines to determine annual housing demand for the 6 years of the Plan'.

The guidance document refers to the function of the HNDA stating the following:

'The HNDA is designed to be the main evidence base from which estimates of housing need and tenure breakdown are to be calculated and consequently, from which housing policy is to be determined in the Housing Strategy, as well as influencing the relevant land use zoning objectives included within the Development Plan'.

The guidance document states that a HNDA framework *'is a standardised methodology that allows local authorities to assess local housing needs, existing and future, using consistent evidence bases and within a standardised framework'*. In relation to the process, the guidance document states that a *'specific HNDA Tool (developed and made available by the Department of Housing, Local Government and Heritage) is available for use by the local authority to assist in calculating the projected number of*

homes that are likely to be required to meet the estimated need over the determined period, broken down by tenure type’.

In relation to housing demand the guidance document states:

‘The analysis of demographic and housing affordability data and the conclusions drawn from it are used to produce an estimate of total additional housing units required to meet existing and future housing need and a breakdown of tenure type’.

The guidance document includes the following table as a summation of the HNDA preparation process:

1.	Decide the time period that the HNDA will cover
2.	Compile section 1 on Housing Market Drivers
3.	Compile section 2 on Housing Stock
4.	Select the scenarios to run in the HNDA Tool
5.	Having regard to the results from the HNDA Tool, compile section 3 on estimating total additional housing units required in the local authority area over the period selected and broken down into tenure type
6.	Compile section 4 on specialist housing need (including stakeholder consultation)
7.	When complete, sign off the HNDA (Director of Service for Housing and Director of Service for Planning)
8.	Incorporate the HNDA results into housing policy within the Housing Strategy

Table 2.5: HNDA Preparation Process Summary (Source: Guidance on the Preparation of a Housing Need and Demand Assessment).

The guidance document states that the default population projection scenario is the ‘*Convergence scenario, which when combined with the default assumptions around Existing Need is consistent with the ‘Housing Supply Target Methodology for Development Planning, Guidelines for Planning Authorities’ issued under section 28 of the Planning and Development Act 2000 in December 2020’.* The Convergence scenario is equivalent to the 50:50 city scenario adjusted for new housing supply since 2017, and to facilitate convergence to NPF strategy per the section 28 guidelines.

The guidance states that the Housing Strategy must include ‘*measures that address the housing needs of the existing and future population of the area covered by the strategy. It should provide for more sustainable patterns of development by ensuring that as far as possible housing development is designed and located so as to make full use of public transport and to give access to education, employment, health and other services’.*

Project Ireland 2040 – National Development Plan (NDP) 2018-2027

The National Development Plan will, through a planned capital investment of over €4.2 billion, support the delivery of some 40,000 new social housing homes by 2021. Direct Local Authority build, acquisitions, rejuvenation of formerly empty homes and provision by housing bodies are identified as the chief delivery mechanisms. By 2021, 12,000 social housing homes will be made available annually by Local Authorities and approved housing bodies for social housing. This level of provision is to be

maintained over the remainder of the period of the National Development Plan, resulting in 112,000 households having their housing needs met in a social housing home by 2027.

The NPF warns against the intensification of social housing properties in areas that are already dense with social housing and advocates the development of diverse neighbourhoods with a healthy balance of public and private housing.

Rebuilding Ireland – An Action Plan for Housing and Homelessness (2016)

The Action Plan published in 2016 aims to address the needs of homeless people and families in emergency accommodation, accelerate the provision of social housing, deliver more housing, utilise vacant homes and improve the rental sector. Rebuilding Ireland aims to increase residential house construction to 25,000 homes per annum and to deliver 47,000 units of social housing over the period of the Plan to 2021.

Actions to meet these objectives are organised under five pillars, each of which has a series of actions set out to address the opportunities and challenges presented by Ireland's housing sector. The five pillars are set out in the Action Plan for Housing and Homelessness as follows;

- Pillar 1 – Address Homelessness

Provide early solutions to address the unacceptable level of families in emergency accommodation; deliver inter-agency supports for people who are currently homeless, with a particular emphasis on minimising the incidence of rough sleeping, and enhance State supports to keep people in their own homes.

- Pillar 2 – Accelerate Social Housing

Increase the level and speed of delivery of social housing and other State supported housing.

- Pillar 3 – Build More Homes

Increase the output of private housing to meet demand at affordable prices.

- Pillar 4 – Improve the Rental Sector

Address the obstacles to greater private rented sector delivery, to improve the supply of units at affordable rents.

- Pillar 5 – Utilise Existing Housing

Ensure that existing housing stock is used to the maximum degree possible – focusing on measures to use vacant stock to renew urban and rural areas

The Action Plan for Housing and Homelessness pledged to support the enhanced role of existing Social Housing delivery initiatives and introduced the following new mechanisms and support schemes:

- Local Authority Construction & Acquisition (also known as the Social Housing Investment Programme (SHIP))

This programme provides funding to local authorities for the provision of social housing by means of construction and acquisition and covers expenditure under the Rapid Build Housing Programme, Part

V acquisitions, Land Aggregation Scheme and the Special Resolution Fund for unfinished housing developments.

➤ Capital Assistance Scheme (CAS)

To provide essential funding to Approved Housing Bodies (AHBs) for the provision of accommodation for persons with specific categories of housing need such as Homeless and Older Persons, People with Disabilities, Returning Emigrants and Victims of Domestic Violence.

➤ Vacant Housing Repair and Leasing Initiative:

This scheme enables local authorities, having identified appropriate vacant privately-owned properties in their functional areas, to provide upfront financial assistance to meet reasonable renovation works and to enter into long term lease arrangements with property owners. Renovation costs will be recouped from rent over an agreed period.

➤ Part V Delivery:

The Action Plan sets out a commitment to ensure adequate resources are made available to both local authorities and Approved Housing Bodies. This is to allow them to purchase or lease newly built private dwellings to the fullest extent envisaged by Part V of the Planning and Development Act 2000. In addition, where appropriate, the leasing of additional privately developed dwellings beyond the extent envisaged by Part V is supported. Furthermore, the up-front purchase of the Part V social housing requirement will be facilitated, subject to the introduction of strict controls.

Housing for All - a New Housing Plan for Ireland (2021)

‘Housing for All - a New Housing Plan for Ireland’ is the government’s housing plan to 2030 stated as *‘a multi-annual, multi-billion euro plan which will improve Ireland’s housing system and deliver more homes of all types for people with different housing needs’*.

The policy has four pathways to achieving housing for all:

- Supporting home ownership and increasing affordability
- Eradicating homelessness, increasing social housing delivery and supporting social inclusion
- Increasing new housing supply
- Addressing vacancy and efficient use of existing stock

Each pathway includes a number of measures as set out below aimed at achieving housing for all.

Supporting Homeownership and Increasing Affordability

- Increased supply of new housing, up to an average of at least 33,000 per year to 2030
- An average of 6,000 affordable homes to be made available every year for purchase or for rent by Local Authorities, AHBs, the LDA and via a strategic partnership between the State and retail banks.
- A new Local Authority-led Affordable Purchase Scheme.

- A new, nationally available, affordable purchase shared-equity First Home scheme until 2025 for buyers of new-build homes in private developments.
- The LDA will be a new and important source of affordable housing on public lands, and will advance a new initiative, Project Tosaigh, to enhance the early delivery of new affordable homes.
- The LDA will deliver a significant number of homes on State lands, and in association with Local Authorities in major mixed tenure developments.
- Increased contribution by developers under Part V, up from 10% to 20%, to include affordable housing and cost rental housing.
- Launch of a newly expanded Local Authority Home Loan.
- Extended Rent Pressure Zone Protections to 2024 and rents linked to the Harmonised Index of Consumer Prices.
- Introduction of indefinite tenures for rent leases.
- Introduction of a new form of rental tenure called 'Cost Rental' homes.

Eradicating Homelessness, Increasing Social Housing Delivery and Supporting Social Inclusion

- Provide more than 10,000 social homes each year, with an average 9,500 newbuild Social Housing Homes to 2026.
- Through an updated 'Housing First National Implementation Plan', provide 1,200 tenancies over the next five years for people with a history of rough sleeping, or long-term use of emergency accommodation and who have complex needs.
- End long-term leasing of social housing by Local Authorities and AHBs through phasing out new entrants and focussing on new-build to provide social homes.
- Strengthen the Mortgage to Rent scheme to ensure it meets the needs of those in long-term mortgage arrears.
- Make improvements in the quality and quantity of Traveller-specific accommodation.
- Provide continued capital funding for housing for specific vulnerable cohorts, such as housing for older people and people with a disability, through the Capital Assistance Scheme and other social housing schemes.

Increasing new housing supply

- An annual average investment of in excess of €4bn in housing, through an overall combination of €12bn in direct Exchequer funding, €3.5bn in funding through the Land Development Agency (LDA) and €5bn funding through the Housing Finance Agency (HFA).
- Over 10,000 social homes and 6,000 affordable homes for purchase or rent per annum.
- State land bank to provide more land to the LDA to bring forward up to 15,000 homes and State to fund Local Authorities for land acquisition.
- In accordance with the National Planning Framework, focus on adequate supply of serviced zoned lands to meet housing need, at required density.
- Introduce updated Kenny Report style powers to ensure sharing of the increase in land values resulting from zoning decisions and more community gain.
- Introduce a new planning process for Large-Scale Residential Developments, to replace the Strategic Housing Development process.

- Establish Urban Development Zones, which will provide a coordinated, plan-led approach to the delivery of residential and urban development.
- Overhaul and simplify planning legislation to ensure certainty and stability.
- Bring forward reform of the Judicial Review process and introduce a new division of High Court for Planning and Environmental cases to reduce planning delays.
- Introduce a new tax to activate vacant lands for residential purposes, to replace the Vacant Site Levy.
- Provide a New Fund, Croí Cónaithe (Cities) to address acute viability challenges in urban areas that are curtailing home ownership.
- Increase skills and capacity to deliver an average of 33,000 homes per year.

Addressing vacancy and efficient use of existing stock

- A new Croí Cónaithe (Towns) Fund for servicing sites for new homes in regional towns and villages and to support refurbishment of vacant houses. Public infrastructure agencies, such as Irish Water, and local communities will work to provide serviced sites for housing. This will help attract people to build their own homes and live in small towns and villages.
- Energy retrofit supports to refurbish older vacant stock.
- Support for Local Authorities to purchase and resell up to 2,500 of the identified vacant properties in their areas. Compulsory Purchase Order (CPO) powers will be used where necessary. Local Authorities will be supported by Housing Finance Agency funding.
- Reform the 'Fair Deal' Scheme (the scheme that provides financial support to those in long-term nursing home care) to incentivise people in long-term care to rent or sell their property.
- Establish new controls on short-term lettings.
- Collect data on vacancy with a view to introducing a new Vacant Property Tax.
- Planned management and maintenance of Local Authority housing stock.
- Incentivise the refurbishment and extension of vacant properties in towns or villages, for example, through energy retrofit supports and the Urban Regeneration Development Fund (URDF) / Rural Regeneration Development Fund (RRDF) and other mechanisms.

National Vacant Housing Reuse Strategy 2018-2021

The National Vacant Housing Reuse Strategy was published in 2018 to support Pillar 5 of the Rebuilding Ireland: Action Plan for Housing and Homelessness. The strategy sets the objective to maximise the use of our existing housing stock focusing on measures to use vacant stock to renew urban and rural areas. The Strategy sets out a range of actions, grouped under five key objectives as follows:

- Objective 1: Establish robust, accurate, consistent and up-to-date data sets on vacancy.
- Objective 2: Bring forward measures to ensure, to the greatest degree possible, that vacant and underused privately owned properties are brought back to use.
- Objective 3: Bring forward measures to minimise vacancy arising in Social Housing Stock.
- Objective 4: Continued engagement with and provision of support to key stakeholders to ensure suitable vacant properties held by banks, financial institutions and investors are acquired for social housing use.

- Objective 5: Foster and develop cross-sector relationships, collaborating in partnership to tackle vacant housing matters.

Social Housing Strategy 2020

The Social Housing Strategy 2020 sets out the framework for the delivery of new social housing and for social housing assessment, delivery and financing. The Strategy is based on three pillars:

- Pillar 1: Provide for 35,000 new social housing units, over a six-year period, to meet the additional social housing supply requirements as determined by the Housing Agency;
- Pillar 2: Support up to 75,000 households through an enhanced private rental sector; and
- Pillar 3: Reform social housing supports to create a more flexible and responsive system.

Phase 1 sets a target of 18,000 additional housing units and 32,000 HAP/RAS units by the end of 2017. Phase 2 sets a target of 17,000 additional housing units and 43,000 HAP/RAS units by end 2020.

Urban Regeneration and Housing Act 2015

The Act provides that where a residential scheme is greater than 9 units developers are obliged to set aside 10% of the scheme for social or affordable housing for local authorities. The option of making of payment in lieu of social housing is no longer available.

Provision has been made for the transfer of residential units outside the lands which are subject to planning permission, but within the relevant Development Plan area. The social housing delivery options now permitted are the transfer of ownership of lands, transfer of completed social housing units on the land, transfer of ownership of completed social housing units on other land, not subject to the planning permission.

There is no longer a requirement for the developer to build housing units on other land to fulfil their Part V obligations. The Part V obligation can now be fulfilled by developers through long term leasing of properties and a combination of the Part V options above is also allowed.

A vacant site levy was also introduced, charged each year from 1 January 2018 and will be payable in arrears each year from 1 January 2019. It provides Local Authorities with the power to apply levies to property owners who do not take steps to develop vacant and under-utilised in areas identified for priority development under the local Development Plan.

National Housing Strategy for People with a Disability (2011-2016)

The National Housing Strategy for People with a Disability 2011 – 2016 was published in October 2011. The Strategy sets out the Government's broad framework for the delivery of housing for people with disabilities through mainstream housing options. The Strategy has also been affirmed in the Action Plan for Housing and has been extended to deliver on its aims and continue to guide and progress policy.

The strategy has nine strategic aims:

1. To promote and mainstream equality of access for people with a disability to the full range of housing options available suited to individual and household need.
2. To develop national protocols and frameworks for effective interagency cooperation which will facilitate person-centred delivery of housing and relevant support services.
3. To support people with a disability to live independently in their own homes and communities, where appropriate.
4. To address the specific housing needs of people with an intellectual and/or physical disability, moving from congregated settings in line with good practice, including through the development of frameworks to facilitate housing in the community.
5. To address the specific housing needs of people with a mental health disability, including through the development of frameworks to facilitate housing in the community, for people with low and medium support needs moving from mental health facilities, in line with good practice.
6. To consider good practice in the design, coordination and delivery of housing and related supports.
7. To facilitate people with a disability to access appropriate advice and information in respect of their housing needs.
8. To improve the collection and use of data/information regarding the nature and extent of the housing needs of people with a disability.
9. To provide a framework to support the delivery, monitoring and review of agreed actions.

Design Standards for New Apartments - Guidelines for Planning Authorities (December 2020)

The Ministerial Letter to Local Authorities accompanying the updated Section 28 Guidelines on Design Standards for New Apartments have been issued to give effect to restrictions on Co-living Development. The updated apartment guidelines now include a Specific Planning Policy Requirement (SPPR) for a presumption against granting planning permission for co-living/shared accommodation development, and replace the previous 2018 guidelines. The December 2020 changes solely relate to the 'Shared Accommodation' (Co-living) aspects of the guidance.

The Ministers Foreword within the updated guidelines states:

'I concluded that given the scale, location and potential impact of co-living development permitted to date, as well as the local authority-led Housing Need and Demand Assessment (HNDA) process that is being developed by my Department, that there are sufficient shared accommodation/co-living units either permitted or subject to consideration within the planning system, that may be built out to demonstrate and prove this concept, without impacting the housing system'.

The Apartment Guidelines contain a number of specific planning policy requirements, which take precedence over policies and objectives within Development Plans, Local Area Plans and SDZ planning schemes.

Specific Planning Policy Requirement 1 states:

'Housing developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms. Statutory development plans may specify a mix for

apartment and other housing developments, but only further to an evidence-based Housing Need and Demand Assessment (HNDA), that has been agreed on an area, county, city or metropolitan area basis and incorporated into the relevant development plan(s)'.

The guidelines state that into the future, a majority of households will comprise 1-2 persons and approximately half of the remainder will be three person households, and notes it is critical to accommodate the needs of increasingly more diverse household types in the context of a growing and ageing population.

2.2 Regional Policy

Regional Spatial and Economic Strategy for the Southern Region

The Regional Spatial and Economic Strategy (RSES) provides a high-level development framework for the Southern Region that supports the implementation of the National Planning Framework (NPF) and the relevant economic policies and objectives of Government. The RSES includes *'Regional Policy Objectives'* which set out a suite of regional development objectives that provide a long term strategic planning and economic framework for the development of the region, and in turn set the framework for city and county development plans. The RSES also includes a Metropolitan Area Strategic Plan (MASP) for Waterford which provides a *'high level strategic framework for the sustainable development of the Waterford Metropolitan Area'*.

The RSES states that *'the Southern Region represents over 40% of Ireland's total landmass and one third of the national population. With three of the country's five cities - Cork, Limerick and Waterford and a network of large towns, the region has a strong urban structure'*.

The region is divided into three sub-regional areas, called Strategic Planning Areas (SPAs) with Waterford located in the South-East SPA.

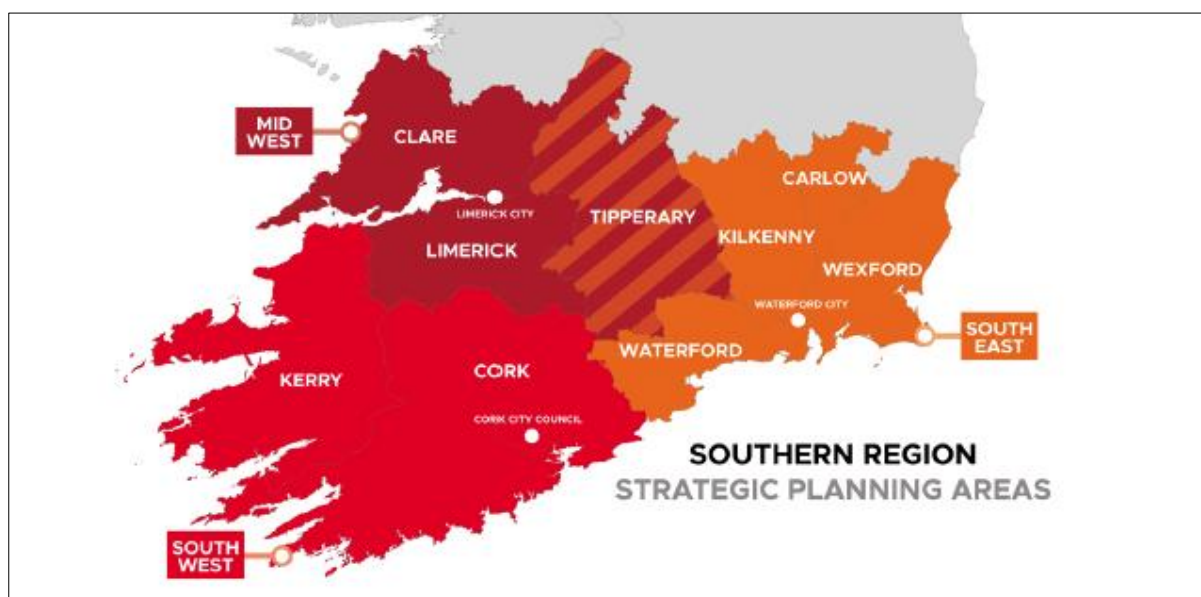


Figure 2.1: RSES Map 1.1 Southern Region & Strategic Planning Areas (SPAs)

The RSES notes that the Southern Region contains one-third of the State's population (1.6m) and is the second most populated Regional Assembly area. The highest rates of population increase were in commuter areas near to Cork and Limerick Cities and in areas close to other larger settlements. Population decline was experienced, primarily in rural and peripheral areas, with the largest decreases recorded in areas of Clare, Kerry, Limerick and Cork. Population decline was also evident in areas within Cork, Limerick and Waterford Cities.

The policies in the RSES are structured under Regional Policy Objectives (RPOs) and Metropolitan Area Strategic Plan (MASP) Policy Objectives. Relevant RPOS and objectives within the MASP have informed the development of this Housing Strategy for Waterford City and County Council.

In relation to regional strategy, Regional Policy Objective 2 (RPO 2) states *‘the overall strategy builds on cities and their associated metropolitan areas as engines of growth and seeks, in parallel, to re-position the Region’s strong network of towns, villages and diverse rural areas in an economically resilient, imaginative and smart way to foster sustainable competitive advantage’.*



Figure 2.2: Southern Region Strategy Map

RPO 10 relates to compact growth in the metropolitan areas and seeks out to *‘prioritise housing and employment development in locations within and contiguous to existing city footprints where it can be served by public transport, walking and cycling’.*

RPO 35b states that *‘Development Plans shall set out a transitional minimum requirement to deliver at least half (50%) of all new homes that are targeted in the Region’s three Cities and suburbs of Cork, Limerick and Waterford, within their existing built up footprints in accordance with NPF National Policy Objective 3b. This will be evidence based on availability and deliverability of lands within the existing built up footprints’.*

Waterford MASP

The MASP provides a high level strategic framework for the sustainable development of the Waterford Metropolitan Area based on the ambition for the City and Metropolitan area as an innovation-centred, enterprising, University City with a diverse population, a vibrant cultural sector, a thriving economy, and a significant and substantial profile that brings European and international recognition.

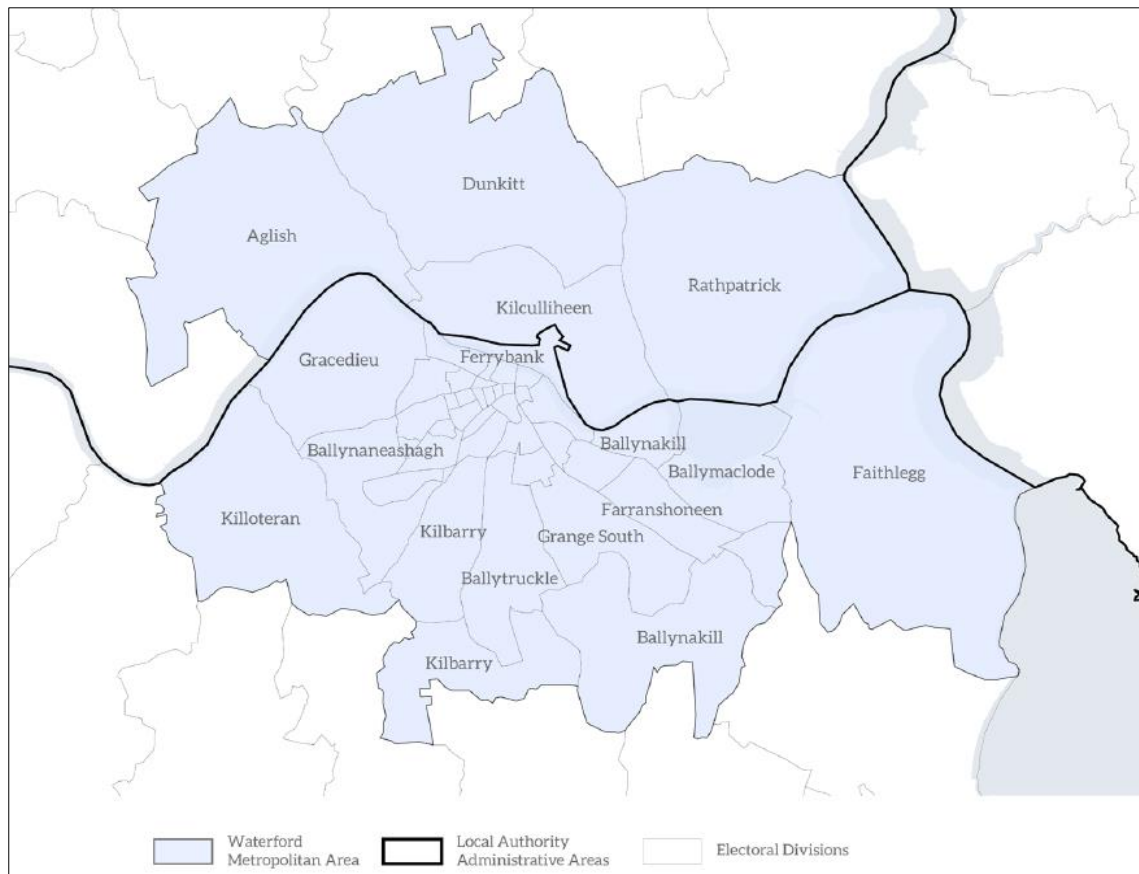


Figure 2.3: Waterford Metropolitan Area

The MASP notes that clarification has been received from the Department that the 25% Headroom identified in the NPF Implementation Roadmap can apply to the County Kilkenny area of the Waterford Metropolitan Area.

The NPF Enablers identified for the Waterford MASP include identifying infill and regeneration opportunities to intensify housing and employment development throughout city centre and inner suburban areas.

The MASP reiterates the NPF requirement that 50% of all new housing within Waterford City and Suburbs is to occur within its existing footprint, through brownfield, infill and regeneration. Outside of Waterford City and Suburbs, 30% of all new homes targeting settlements is to occur within their existing built-up footprints as per National Policy Objective 3 (c) of the NPF.

Waterford MASP Policy Objective 8 relates to Housing and Regeneration and states the following:

‘a. It is an objective to support the high-quality compact growth of Waterford City Centre and suburban areas, the assembly of brownfield sites for development and the regeneration and redevelopment of Waterford City Centre to accommodate residential use. The MASP will support initiatives which facilitate compact growth and which promote well designed high-density residential developments which protect amenities and in the city centre and suburban areas.

b. It is an objective to ensure investment and delivery of comprehensive infrastructure packages to meet growth targets that prioritises the delivery of compact growth and sustainable mobility in accordance with NPF and RSES objectives’.

2.3 Local Policy

Waterford City & County Council Traveller Accommodation Programme (TAP) 2019-2024

The Housing (Traveller Accommodation) Act 1998 amends and extends the existing Housing Acts and places a statutory obligation on WC&CC in relation to, inter alia, the following:

- 1) To prepare and adopt a Traveller Accommodation Programme (TAP), subject to periodic review, for the provision of Traveller Accommodation in the County.
- 2) To provide for a public notification and consultation process in respect of the preparation of the TAP, including an opportunity to comment on draft programmes.
- 3) To take reasonable steps to secure the implementation of the TAP in the County.
- 4) To provide for the establishment of a Local Traveller Accommodation Consultative Committee to facilitate consultation with Travellers about the preparation and implementation of Traveller Accommodation Programme.
- 5) To extend to halting sites the powers available to local authorities under the Housing (Miscellaneous Provisions) Act, 1997 relating to anti-social behaviour and estate management.

The Policy Statement in the TAP states that it *'is the policy of Waterford City and County Council to endeavour to provide accommodation appropriate to the needs of Traveller households who live in the area, who are approved applicants for accommodation by the Council and who are included in the assessment of need in the preparation of this programme. Approved housing applicants of Waterford City and County Council are all applicants who are assessed as having an accommodation need'*.

The TAP notes that the assessment of need for the Traveller Accommodation Programme 2014-2018 was carried out as two separate assessments by Waterford City Council and Waterford County Council (including the assessment of need for the Dungarvan Town Council Area).

The TAP is discussed in greater detail in Section 5 of this report.

Waterford Age Friendly Alliance City and County Strategy 2017-2022

Ireland's National Age Friendly City and Counties programme *'is part of this worldwide initiative which aim to make sure that as we age, we all can have a real say in what happens in our own lives, what happens in the areas in which we live, enjoy good health, excellent services, live in a safe environment, and participate fully in everything that is going on in our Communities'*.

The Waterford Age Friendly Strategy was developed as a result of consultation with the older people of Waterford and with the agencies and service providers involved in the delivery of services to older adults throughout the County.

The Waterford Age Friendly Strategy is structured under nine key themes that underpin the work of the Alliance during the lifetime of the strategy:

- *'Respect and Social Inclusion*
Defined as: 'ensuring that as people age they feel valued and respected'
- *Social Participation*

Defined as: 'ensuring that as people age they can participate in social, economic and public life'

- *Civic Participation and Employment*

Defined as: 'ensuring that as people age they are able to learn, develop and work'

- *Home Environment*

Defined as: 'ensuring that as people age they can stay in their own homes and communities'

- *Health/Active Living*

Defined as: 'ensuring that as people age they can live healthier, active lives for longer'

- *Transportation*

Defined as: 'ensuring that as people age they can get where they need to go when they need to go'

- *Built and Natural Environment*

Defined as: 'to ensure that as people age they are enabled by the built and social environment'

- *Safer Communities*

Defined as: 'to ensure that as people age they are safe at home and when out and about'

- *Communication and Information*

Defined as: 'to ensure that as people age they have the information they need to live full lives''.

In relation to the theme of housing and home, a strategic action is listed which aims *'to provide suitable housing for Older People and people with specific needs and requirements in sustainable age friendly communities'*.

The consultation process for the strategy revealed a *'huge need for Bungalows to allow older people to downsize/move to more suitable accommodation with downstairs bathroom/level access showers'*.

3.0 Current Contex

3.0 Current Context – Housing Market Drivers

3.1 Population

Regional Context

County Waterford is located within the Southern Regional Assembly (SRA) area, a region with approximately one third of the state’s population (1,585,906) and c. 42% of Irish state territory. The RSES for the SRA notes the region has a strong urban structure, with three of the country’s five cities and a network of large towns.

The RSES notes that all 10 local authority areas in the Southern Region have experienced growth at varying levels since 2006, and between 2006 and 2016, the highest rates of population increase were in commuter areas near to Cork and Limerick Cities and in areas close to other larger settlements.

The RSES states that in 2016, the three cities and suburbs accounted for 22% of the Region’s total population, and growth in the cities and suburbs within the region outpaced overall Regional and State level growth from 2011-2016. The Southern Region grew by 9.9% between 2006 and 2016, an additional 142,910 people. Cork County has been the primary beneficiary of population growth within the region over the period with an increase of 55,334 (15.3%).

In relation to the demographics of the region, the RSES notes that the overall age structure for the Region mirrors that of the State. Population projections anticipate large increases in the 15-24 year (+26%), 45–64 year (+14%) and 65+year (+56%) age groups between 2016 and 2031. The 0-14 year and 25-44 year age groups are projected to decrease by approximately 14%.

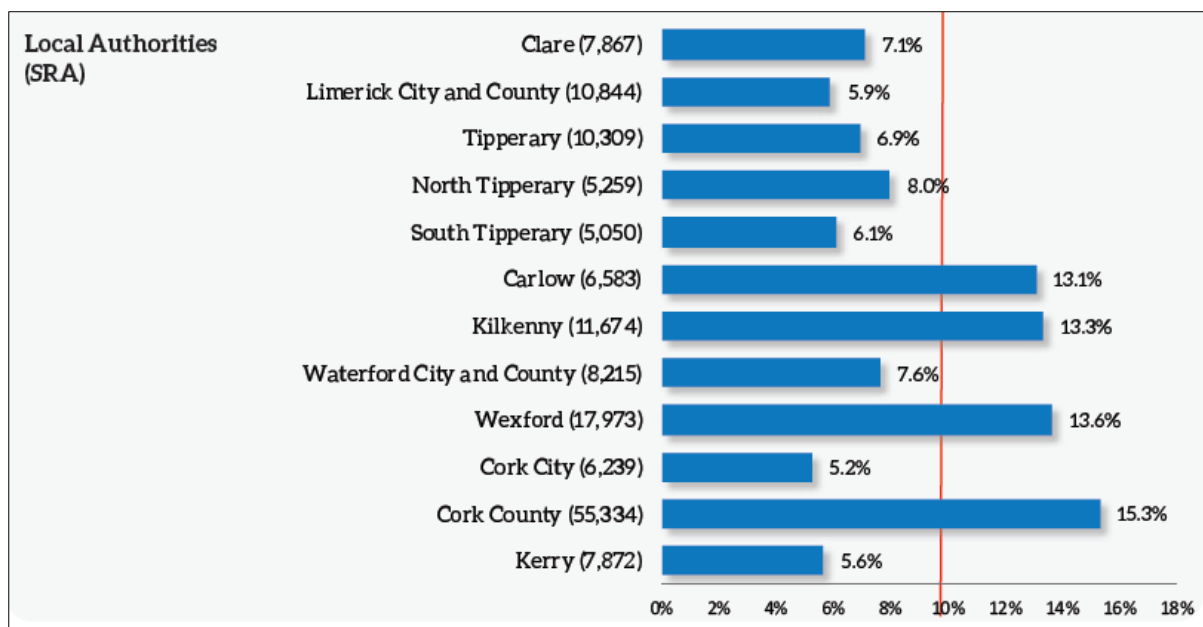


Table 3.1: County population change 2006 – 2016 (SRA Region) (Source: Table 1.3 Regional Spatial and Economic Strategy for the Southern Region (RSES))

Waterford

A socio-demographic indicator profile of Waterford City and County compiled by AIRO (All-Island Research Observatory) in 2020 notes that Waterford's population of 116,176 represents 2.4% of the State's population and that Waterford is the 19th most populated local authority in Ireland and is the 3rd most populous county in the South-East with both Tipperary (N+S 159,553) and Wexford (149,722) with higher populations.

The profile by AIRO notes that Waterford's population has grown consistently and steadily since 1996, with an increase of 22.7% (21,496) observed over twenty years (1996-2016). This increase is lower than the State average of 31.3%. Growth rates in Waterford over previous decades have been much lower at 8.5% between 1979 and 1996, and 12.9% between 1971 and 1979.

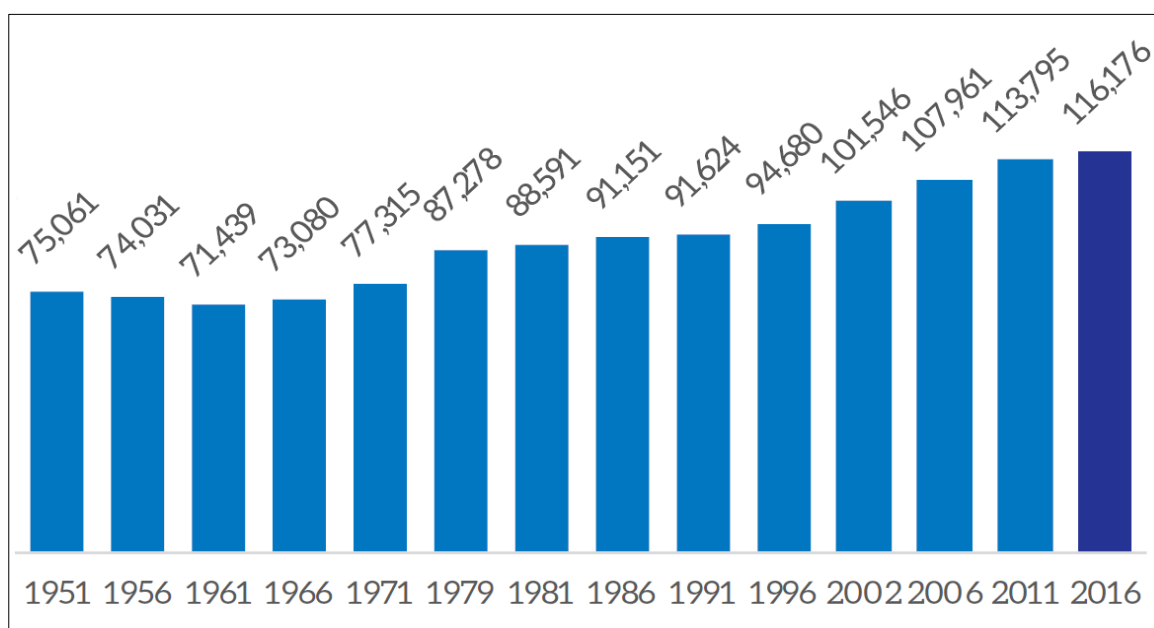
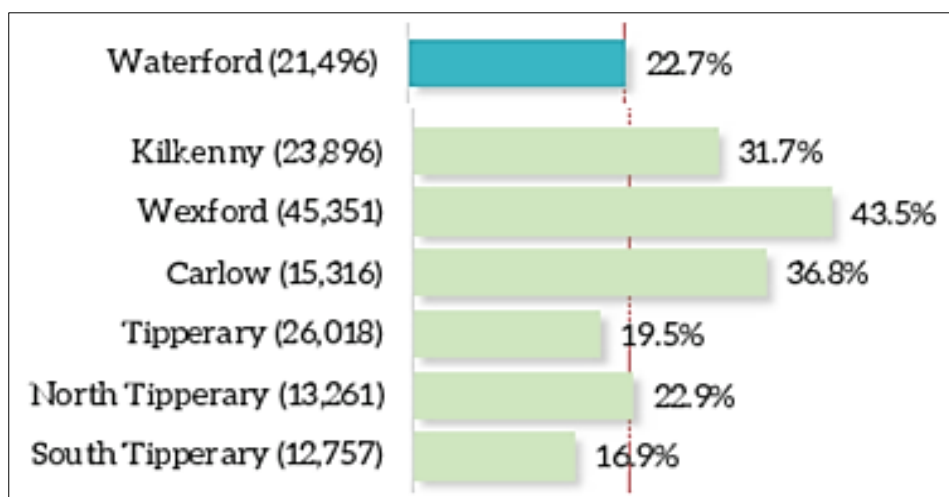


Figure 3.1: Total Population County Waterford - 1951 to 2016 (Source: Figure 1.2: A socio-demographic indicator profile of Waterford City and County, AIRO, 2020)

Analysis of census data reveals the population of County Waterford grew by 5.4% (5,834) from 2006 to 2011, with a marked slowdown in growth to 2.1% (2,381) in the following intercensal period (2011-2016) corresponding with a period of national economic contraction experienced post 2008. The rate of population increase in Waterford is lower than the Southern Regional Assembly average (+26.3) with Wexford (+43.5%), Carlow (+36.8%) and Kilkenny (+31.7%) all recording higher levels of growth.

Census 2016 reveals that the national population increased by 3.8% (173,613) from 2011 to 2016, revealing that County Waterford's growth was below the national growth figure. Of the 173,613 national increase, 138,899 was in urban areas, or 80 per cent². The historical growth figures provide some context for the determination of future population projections.

² <https://www.cso.ie/en/releasesandpublications/ep/p-cp2tc/cp2pdm/pd/>



Figure

3.2: Population Change, 1996 to 2016 (Source: AIRO & CSO)

The AIRO profile provides detailed population analysis for County Waterford sourced from the CSO. It notes that the Waterford City Municipal District (MD) is the largest in terms of population with a total population of 67,835 accounting for 58.4% of the population in the county. The Comeragh MD is the smallest and accounts for 14.7% of the county population.

The Waterford MASP area has a total population of 59,854. Of this number, 51,615 (86.2%) are located in Waterford and account for 44.4% of the total population in the county. The remaining 8,239 (13.8%) of the MASP total reside in County Kilkenny. The Key Town of Dungarvan has a population of 10,388, with Tramore at 10,381.

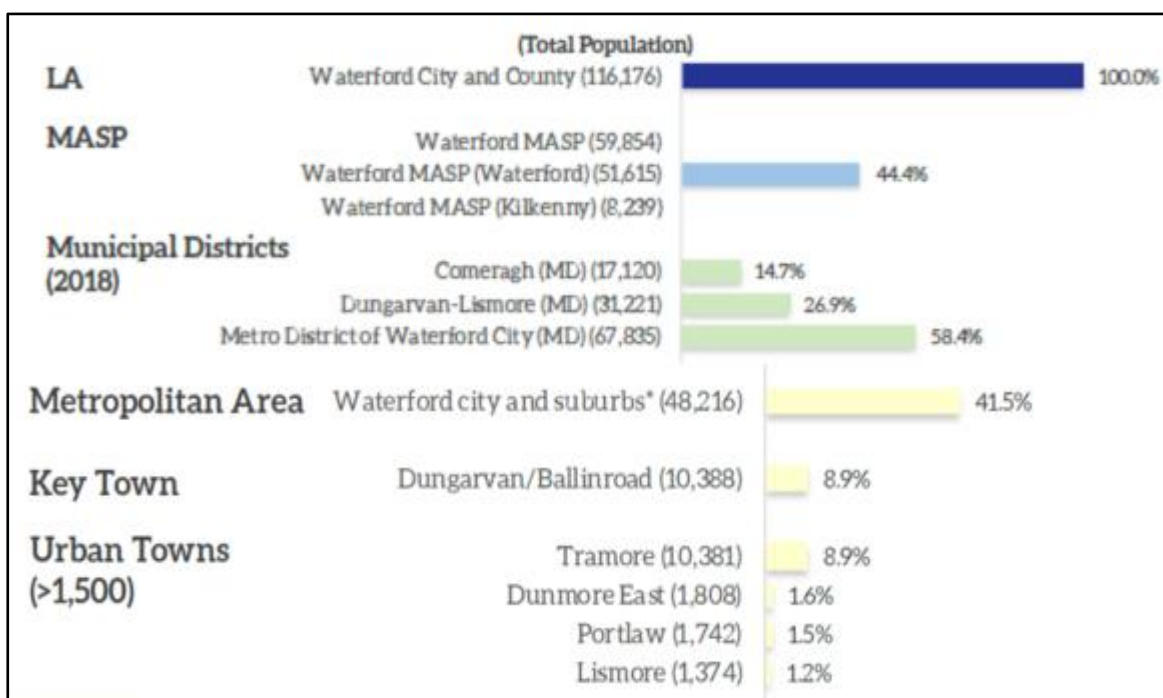


Table 3.2: Population Breakdown of County Waterford, 2016 (Source: AIRO/CSO)

Demographics

The breakdown of population in County Waterford as of Census 2016 is 58,525 females and 57,651 males, with 29,347 children recorded.

The total dependency ratio in County Waterford (proportion of the population aged 0 to 14 and over 65 as a percentage of the total population) is 36.1%. The dependency rate in County Waterford has increased by 4.1% (1,657) from 2011 to 2016 and is the 17th highest rate in the state.

Age Dependency	0-14 Years	15-64 Years	Over 65 Years	Young Age Ratio (%)	Old Age Ratio (%)	Total Dependency Ratio (%)
Persons	24,545	74,260	17,371	21.1%	15.0%	36.1%

Table 3.3: Age Dependency Ratio 2016 (Source: CSO)

The AIRO profile notes there are six settlements which have a dependent population greater than 500: Waterford City and Suburbs (16,510 or 52.1%), Dungarvan/Ballinroad (3,794 or 57.5%), Tramore (3,868 or 59.4%), Dunmore East (638 or 54.5%), Portlawn (655 or 60.3%) and Lismore (534 or 60.3%). The highest dependency rate is Villierstown at 72.5%.

In 2016, the top two counties with the highest old dependency ratios were Mayo (28.3) and Leitrim (27.4). The counties with the lowest old dependency ratios were Fingal (13.8) and Kildare (15). The Old Age Dependency Ratio is the ratio between the number of persons aged 65 and over and the number of persons aged between 15 and 64. This ratio is increasing nationally, with the figure rising from 17.4% in 2011. This trend has implications for housing and service provision.

3.2 Existing Housing Stock and Supply

A socio-demographic indicator profile of Waterford City and County was compiled by AIRO (All-Island Research Observatory) in 2020. The objectives of the study was to provide Waterford City and County Council with a wide range of socio-economic and spatial datasets, providing an evidence baseline that can support a number of spatial planning initiatives such as the review of the Development Plan for Waterford City and County. Chapter 2 of the study provides a Housing Profile which has been utilised extensively in the preparation of this Housing Strategy.

Existing Housing Stock and Composition

Census 2016 records a total housing stock of 43,549 units in County Waterford. The number of vacant units in 2016 stood at 5,194 (excluding holiday homes and those dwellings deemed to be temporarily absent). The housing vacancy rate (recorded through Census 2016) of 9.9% of the total stock within the county is higher than the state average of 9.1%.

The Waterford City and County Council Vacancy Taskforce Assessment Report which included a pilot field-based survey reports a lower vacancy rate of 4.4%. The total number of properties surveyed was 986 and the properties identified as vacant in both waves of inspections was 43.

The survey notes that *“the level of long term vacant residential dwellings that can potentially be reactivated into the liveable housing stock may be somewhat less than originally supposed”*. In addition, it states that *“a number of the properties identified as potentially long-term vacant would not be in areas that are of high demand or suitable for the social housing model”*. The pilot required

two visual inspections, six months apart, with those houses occupied between the two inspections disregarded. In the Small Area Survey Sample of 9 areas across Waterford City, the sample survey indicates lower vacancy recordings than the published data from Census 2016.

Small Area Survey Sample	Census 2011			WCCC Sample Survey 2016			Census 2016		
	Total Stock	Vacant	Vacancy Rate	Total Stock	Vacant	Vacancy Rate	Total Stock	Vacant	Vacancy Rate
9 Small Areas in Waterford City	1076	196	18.2%	1071	95	8.9%	1076	146	13.6%

Table 3.4: Waterford City Sample Survey of Vacancy (Vacancy Taskforce Assessment Report)

The AIRO profile notes a wide variation in vacancy rates across the settlements within County Waterford with recorded rates ranging from 4% (Dunmore East) to 22.7% (Cappoquin). Three settlements have more than 20% of housing units classed as vacant (less holiday homes): Cappoquin (22.7%), Kill (21.6%) and Kilmeaden (20.3%). Within the Urban Towns, Lismore has a rate of 16.2% which is more than double the rate of other settlements.

Census 2016 was the first census where data on the type of vacant dwelling was captured³. There were 2,142 holiday homes recorded in County Waterford

County Waterford - Occupancy Status	Total Dwellings
Occupied	43,719
Temporarily Absent	1,436
Unoccupied Holiday Homes	2,142
Other Vacant Dwellings	5,194
Total	52,491

Table 3.5: Occupancy Status of permanent dwellings in County Waterford (Census 2016)

Housing Tenure

The total number of households was c43,455 and the proportional breakdown of housing tenures, privately owned, privately rented and publicly rented accommodation in County Waterford is set out in Table 3.6 and Table 3.7 (as sourced from Census 2016). As can be seen home ownership in the county stood at 66.8% in 2016.

County Waterford	Owner occupied with mortgage	Owner occupied with no mortgage	Rented from a Landlord (including voluntary/co-op body)	Rented from Local Authority	Occupied free of rent	Not Stated	Total
No. of Households	12,917	16,134	7,254	5,087	696	1,367	43,455
% Households	29.7%	37.1%	16.7%	11.7%	1.6%	3.1%	

Table 3.6: Household Occupancy in County Waterford 2016 (Census 2016)

³ <https://www.cso.ie/en/releasesandpublications/ep/p-cp1hii/cp1hii/vac/>

Home ownership remains the dominant tenure in County Waterford as evident from the Census data in Table 3.6 and 3.7. Of this cohort 29.7% of households pay a mortgage, with 37.1% mortgage free.

Occupancy Tenure	Households	Household %
Owner Occupied	29,051	67%
Rented (Privately)	7254	17%
Social Housing	5,087	12%
Occupied free of rent or not stated	2063	5%
Total	43,455	

Table 3.7: Household Tenure in County Waterford (Census 2016)

Household Size

Household size cohort represents the number of people per households. 55.7% of households are 1 and 2 person households, as illustrated below in Table 3.8.

No. People per Household	Households	Persons	Households %	Persons %
1-person household	11,355	11,355	26.1%	9.9%
2-person household	12,890	25,780	29.6%	22.5%
3-person household	7,342	22,026	16.9%	19.3%
4-person household	6,766	27,064	15.5%	23.7%
5+ person household	5,196	28,177	11.9%	24.6%
Total	43,549	114,402		

Table 3.8: Household Size in County Waterford (Census 2016)

Compositionally, there were 43,549 households and an average household size of 2.67, which is marginally lower than the national rate of 2.75.

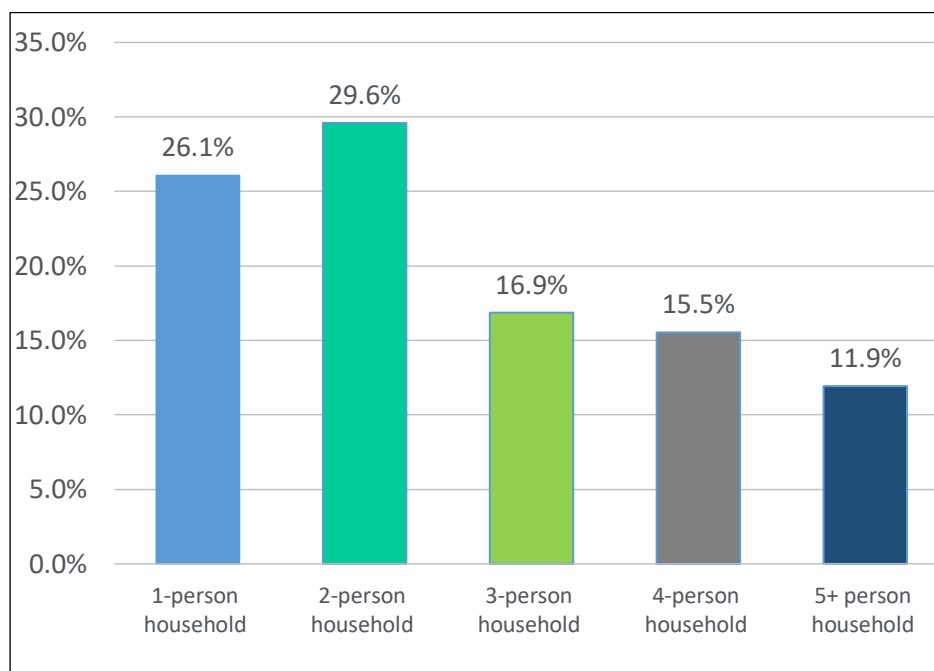


Figure 3.3: Household Size in County Waterford (Census 2016)

3.3 Unfinished Housing Development

The 2017 National Housing Development Survey which tracks progress on unfinished housing developments since 2010 indicates that there were 8 unfinished housing developments in County Waterford in 2017. Construction activity was ongoing on 2 of the sites at the time of the survey. According to the survey there were 7 vacant units spread across the developments.

Following the inspection of the 8 unfinished housing development sites in 2017, the number of unfinished housing developments was reduced to 5, a reduction of c.62% from 2016 to 2017. This information was published in the 2017 Annual Progress Report on Actions to Address Unfinished Housing Developments.

3.4 Housing Permissions

A detailed analysis of trends in planning permissions is included in Section 5.2 herein. In relation to trends in planning permissions for residential units, the proportion of one off housing as a percentage of overall housing granted had been in decline since 2015, standing at 13.3% in 2019. An increase in percentage terms is noted in 2020, which may relate to the impacts of Covid-19 on completions of larger schemes. The quantum of one off houses permitted annually (and indeed overall residential permissions) can be observed to trend to some degree with economic performance, with lower numbers observed during the economic recovery phase in the early to middle part of the last decade.

Figure 3.4 below details units granted planning permission by type, illustrating that multi—unit housing developments have been the most prominent type in recent years. Apartments/private flats have started to become a more substantial proportion of overall permissions in recent years.

This data is sourced from the Central Statistics Office (CSO).

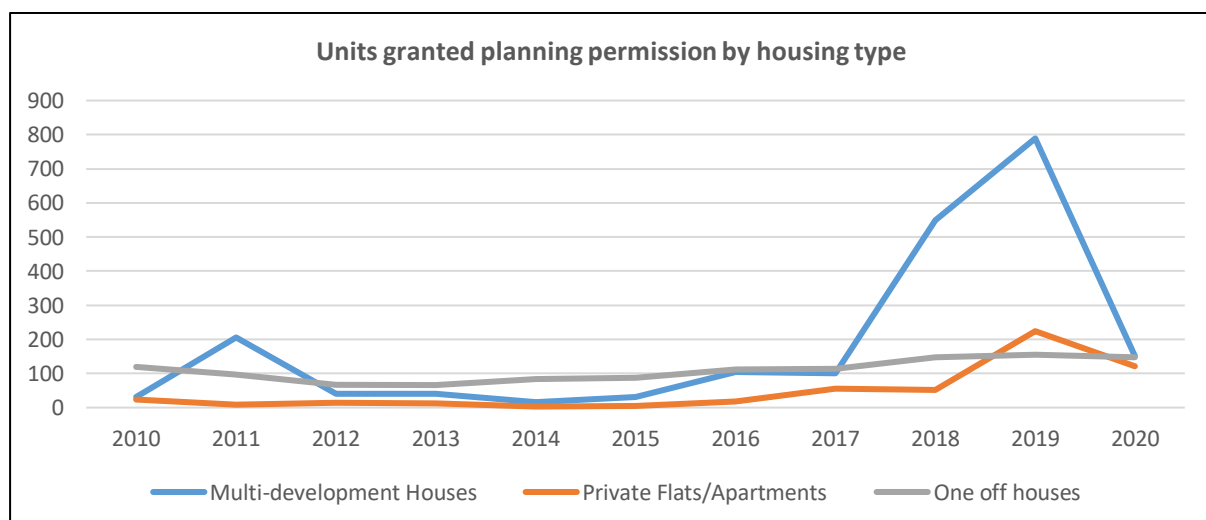


Figure 3.4: Household Size 2016

3.5 Social Housing

The Summary of Social Housing Assessments 2020 brings together information provided by local authorities on households in their functional area that are qualified for social housing support but whose social housing need is not currently being met. It is a point-in-time assessment of the identified need for social housing support across the country.

The summary document notes an increase of 15.8% in the number of households qualifying for social housing support was recorded in Waterford City and County from 2019 to 2020, an increase of 173. This is noted as the largest increase in the country over the period.

The largest cohort of applicants is within the 30-39 age bracket (main applicant) at 365. There were 37 applicants aged 70 +, and 194 applicants aged less than 25.

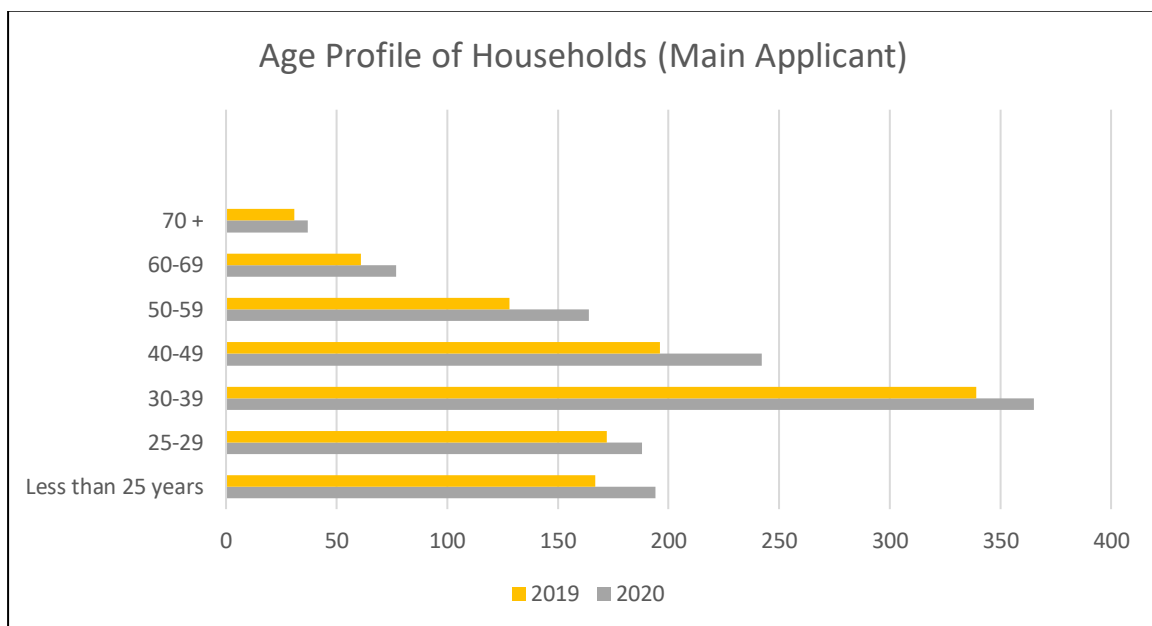


Figure 3.5: Age Profile of Households (Main Applicant)

3.6 Employment Rates

Waterford is located within the South-East NUTS III region which has the highest level of unemployment across Ireland’s eight NUTS III regions. The figures for Q3 2020 show a State unemployment level of 7.1% and a level of 7.7% in the South-East Region.

Analysis of Census 2016 reveals that the total number of the Labour Force classed as Unemployed in Waterford is 8,323 and accounts for 15.4% of the labour force within the county. This rate is higher than the State average of 12.9%. This accounts for 2.8% of those unemployed in the State (297,396) and 8.6% of those unemployed in the Southern Regional Area (97,103).

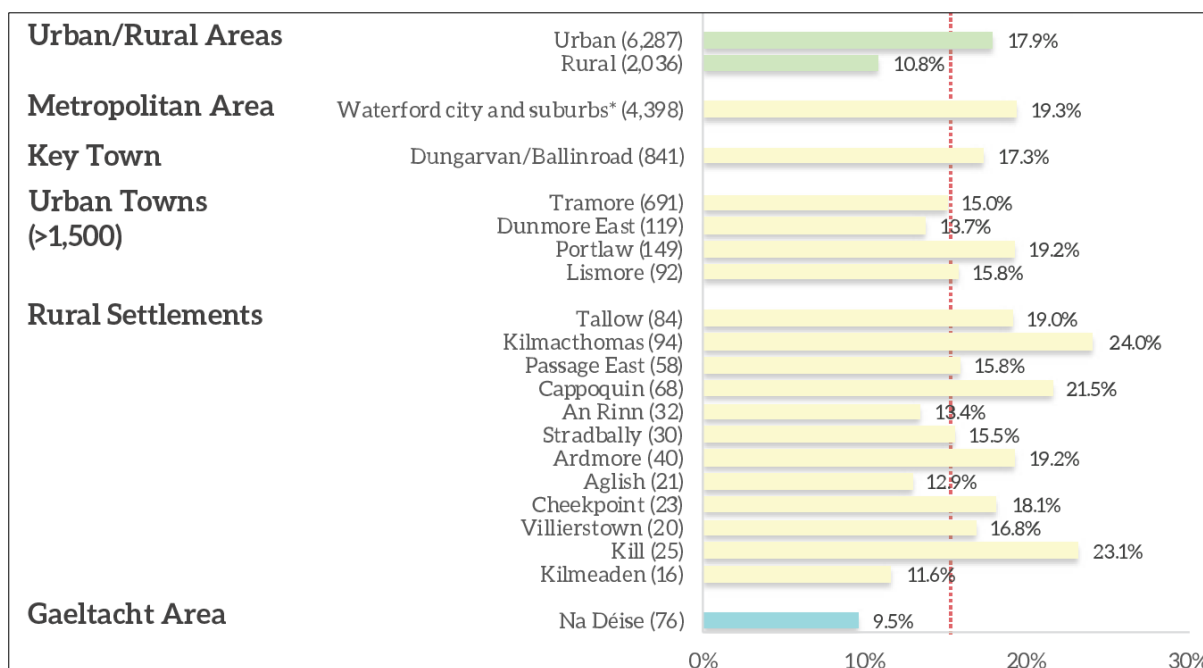


Figure 3.6: Labour Force Unemployed (PES), 2016 (Source: AIRO/CSO)

A socio-demographic indicator profile of Waterford City and County compiled by AIRO (All-Island Research Observatory) in 2020 provides further analysis of the employment situation in the county, noting that the Labour Force Unemployment Rate in Waterford at 15.4% is significantly lower than the Waterford MASP rate of 18%. Figure 3.6, sourced from the AIRO report, compares the labour force unemployment rate across the various tiers of the settlement hierarchy within County Waterford.

Unemployment rates range from 11.6% in Kilmeaden to 24% in Kilmacthomas. Urban areas in Waterford recorded a higher rate of 18.3% (6,287) when compared with rural areas which had a rate of 10.8% (2,036).

Within the MASP area the highest rates of labour force unemployment are in central areas of Waterford City in areas such as Larchville, Kingsmeadow and Poleberry.

4.0 Housing Need Demand Assessment

4.0 Housing Need Demand Assessment

This section of the Housing Strategy includes the determination of housing requirements in Waterford over the lifetime of the development plan. Demographic, economic and social inputs have been examined and utilised to estimate projected population, households and associated housing needs in County Waterford between the 2022 and 2028 lifetime of the plan. The time period that the HNDA covers in this instance aligns with the plan period.

This section builds on the analysis of the current housing context in Section 3 which considered the existing housing stock and composition, housing tenure, planning permissions for housing and the existing social housing stock. Section 4 seeks to project and determine the future housing requirements over the plan period. This section is structured according to the stages outlined below in Table 4.1.

Stage	
1.	Determination of Annual Population Projections
2.	Determination of Average Household Size and Additional Households Required
3.	Calculation of Estimated Distribution of Household Disposable Incomes
4.	Calculation of Average Annual Household Disposable Income Distribution
5.	Calculation of Average Monthly Household Disposable Income Distribution
6.	Determination of Distribution of Total Anticipated Households
7.	Determination of Distribution of Additional Households
8.	Calculation of Projected House Price Bands
9.	Calculation of Mortgage Capacity of Households
10.	Calculation of Projected Needs for Ownership
11.	Calculation of Ability to Access Private Rental
12.	Summary of Projected Social Housing Needs

Application of NPF population and housing projections into the development plan

Guidance issued under Section 28 of the Planning and Development Act (*Housing Supply Target Methodology for Development Planning - Guidelines for Planning Authorities (2020)*) provides a methodology for the application of NPF population and housing projections into local authority plan processes (Table 1 of the guidelines).

The guidelines state that the identified NPF 50:50 City scenario is the recommended housing demand scenario to be used by planning authorities in their planning functions, and this approach is illustrated in Table 1 within the guidelines and through a number of worked examples.

The Waterford County Development Plan period will run from Q3 2022 – Q2 2028, and the methodology provided in the Section 28 guidelines have been applied to this six-year local authority development plan period. The methodology provided in the guidelines (in addition to the worked examples set out in Appendix 1 of the guidelines) has been utilised in Table 4.2 below to calculate the housing demand for the development plan period.

The projected NPF 50:50 housing demand scenario for County Waterford has been utilised as required by the guidelines. The actual new housing supply from 2017 to Q2 2021 is sourced from CSO completions data, and an assumption/estimation has been made on housing completions up to Q2 2022 in the county as required by the methodology (estimation is based on analysis as discussed further below). The convergence adjustment applied to the methodology (as provided for in Section 28 guidelines) is utilised as the ESRI NPF scenario for Waterford is higher than the ESRI Baseline scenario.

Table 4.2 below calculates the housing demand for the 6 year development plan period, providing a figure of 4,824. The source of the figures utilised is indicated (where applicable). Data from the CSO (including Census 2016), the Department of Housing, Local Government and Heritage (DHLGH), and the Economic and Social Research Institute (ESRI) was utilised as prescribed in the guidelines.

Waterford City & County Council		Annual Average Households	Total Households	
A	ESRI NPF scenario projected new household demand 2017 to Plan end year, or quarter (pro rata) - Q2 2028	Total Projection/relevant time period 608 (6,991/11.5)	Total Projection 6,991 ^A	From ESRI Research
B	Actual new housing supply 2017 to - Q2 2022, most recent available year or quarter prior to Plan commencement (estimated future delivery projected based on analysis)	Total completions/relevant time period 402 (2,209/5.5)	Total Completions 2,209 ^B	From CSO Completions data
C	Homeless households (latest data), and unmet demand as at most recent Census	N/A	Total existing unmet demand 164 ^C	From DHLGH and Census
D	Plan Housing Demand = Total (A-B+C) (Projected ESRI NPF demand - new completions + Unmet demand)	Plan total demand/6 years 782 (4692/6)	4,946	
E	Potential adjustment 1 to end 2026 portion of plan period to facilitate convergence to NPF strategy (where justified)	Mid-point between ESRI NPF and baseline scenarios to 2026 in lieu of A above	Adjusted Total Demand	
E1	ESRI Baseline scenario projected new household demand 2017, to Q4 2026	576 (5,757/10)	5,757	From ESRI Research
E2	ESRI NPF scenario (50:50) projected new household demand 2027 - Q2 2028	-	990	From ESRI Research
E3	Mid-point between A-E1 (ESRI NPF and Baseline scenarios to Q4 2026)	588 (5,879/10)	$(6,991^A - 990^{E2} + 5,757^{E1} / 2) = 5,879$	
E4	Adjusted Total Plan Demand calculation based on E2 + E3 in lieu of A above	804 (4,824/6)	$990^{E2} + 5,879^{E3} - 2,209^B + 164^C = 4,824$	

Table 4.2: Methodology for the application of NPF population and housing projections into Waterford City & County Development Plan 2022-2028

As noted above, the adjustment allowed for in the S.28 guidelines 'Housing Supply Target Methodology for Development Planning' have been applied to facilitate convergence to the NPF strategy (i.e. Adjustment 1).

Housing supply data was available to Q2 2021 from the CSO and a projection was undertaken to Q2 2022 to calculate the actual new supply figure (Row B) from 2017 to Q2 2022. Projections for future housing delivery are based upon analysis of available completion data in the county, the restart of

construction following Covid 19, analysis of commencement notices in the county and forecasts provided by the ESRI in their Summer 2021 Quarterly Economic Commentary⁴.

The ESRI have revised their forecasts upwards from their spring forecast of 15,000 new dwelling completions in 2021 and 16,000 in 2022, stating the following: “Overall, given that construction activity resumed partly in mid-April and in full by May, we revise our previous forecast regarding new dwelling completions and now expect that a total of 18,000 new dwellings will be delivered in 2021, while for 2022 we forecast a return to the pre-pandemic levels with 21,000 completions”. The ESRI also note that a total of 1,530 commencements were registered in the first two months of 2021, almost 65 per cent less compared to the first two months of 2020.

CSO completions data (available at the time of writing) provides the total for the county from 2017 to Q2 2021 as 1,832. Projections from this point out to Q2 2022 provide an additional 377 units providing a total new housing supply of 2,209 from 2017 - Q2 2022. The development plan housing demand figure has informed this Housing Strategy and further calculations outlined herein.

4.1 Determination of Annual Population Projections

As noted herein, the Implementation Roadmap for the National Planning Framework published in July 2018 provides transitional population projections as a range for each county. It plots a growth trajectory set approximately mid-way between what is currently being planned for constituent statutory County / City Development Plans if projected forward to 2031, and the more likely evidence based and nationally coherent projected scenario to 2031 and 2040. These ‘adjusted’ transitional figures apply to 2026 and will also inform the period to 2031.

Section 28 Planning Guidelines (*Housing Supply Target Methodology for Development Planning*) released in December 2020 note that the ‘established NPF Roadmap population projections for each county continue to be the population parameters for local authority development planning processes. City or County development plans must therefore plan for the identified population growth within these estimates and use them as the basis for strategic decision-making in their development plan process, including its core strategy, settlement strategy and housing policies’.

In the case of County Waterford, the roadmap provides a population projection of 132,000-135,000 for 2026, and 137,000-144,000 for 2031. These transitional population projections have been rounded to the nearest 500 persons and expressed as a range with 20% variation.

South-East	2016 Population	2026 Projection	2031 Projection
Waterford	116,000	132,000-135,000	137,000-144,000
Wexford	149,000	163,000-166,000	169,000-172,500
Kilkenny	99,000	108,000-110,000	112,000-114,500
Tipperary SR	88,500	96,000-98,000	99,500-102,000
Carlow	57,000	62,000-63,000	64,000-65,500
Subtotal	509,500	561,000-572,000	581,500-598,500

Table 4.3: Transitional Regional and County Population Projections to 2031 (Source: Implementation Roadmap for the National Planning Framework, 2018).

⁴ K. McQuinn, K., O’Toole, C., Kostarakos, I., and Coffey, C. (2021). Quarterly Economic Commentary - Summer 2021. Economic and Social Research Institute (ESRI).

The Regional Spatial and Economic Strategy notes that between 1996 and 2016, Ireland's growth rate was approximately 7.5%. A socio-demographic indicator profile of Waterford City and County compiled by AIRO (All-Island Research Observatory) in 2020 notes that Waterford's population has grown consistently and steadily since 1996, with an increase of 22.7% (21,496) observed over twenty years (1996-2016). Growth rates over previous decades have been much lower at 8.5% between 1979 and 1996, and 12.9% between 1971 and 1979. Analysis of census data reveals the population of County Waterford grew by 5.4% (5,834) from 2006 to 2011, with a marked slowdown in growth to 2.1% (2,381) in the following intercensal period (2011-2016) corresponding with a period of national economic contraction experienced post 2008. The historical growth figures provide some context for the determination of future population projections.

The ESRI research paper titled '*Regional Demographics and Structural Housing Demand at a County Level, December 2020*', funded by the Irish Department of Housing, Local Government and Heritage (under the collaborative research programme between the Department and the ESRI) provides detailed county level population projections to 2040, and is referred to in Circular Letter Housing 14/2021 issued on the 14th of April 2021, and accompanying document 'Guidance on the Preparation of a Housing Need and Demand Assessment'.

The guidelines issued in April 2021 state that in the case of Development Plans under preparation at the time of issue of the guidance, the methodology outlined in the December 2020 'Housing Supply Target Methodology for Development Planning' guidelines should be utilised to determine annual housing demand for the 6 years of the Plan.

This methodology requires the utilisation of the NPF 50:50 City scenario which is broadly consistent with the National Planning Framework strategy and consequently, the 2018 NPF 'Roadmap' document and the population parameters specified therein. Section 28 guidelines (*Housing Supply Target Methodology for Development Planning - Guidelines for Planning Authorities (2020)*) state that the '*established NPF Roadmap population projections for each county continue to be the population parameters for local authority development planning processes. City or County development plans must therefore plan for the identified population growth within these estimates and use them as the basis for strategic decision-making in their development plan process, including its core strategy, settlement strategy and housing policies*'.

Therefore, the identified population growth targets for County Waterford outlined in the NPF Implementation Roadmap have been utilised in this Housing Strategy and HNDA. Utilising population growth scenarios that align with NPF targets, the future population of County Waterford was estimated annually out to 2026 and 2031. The NPF population projections were availed of to develop an interpolation of the required increase per annum for County Waterford from the baseline year 2016 (Census) to NPF target years 2026 and 2031. This allowed for the determination of annual population projections for the development plan period.

The projected population growth in County Waterford throughout the plan period and beyond is outlined in Table 4.4 below. The high end of the NPF population projections have been utilised for 2026 and 2031.

Year	Population Total	Source	Percentage Increase	Annual Projected Population Increase	Total Population Increase 2022 – 2028
2006	107,961	Census	-		
2011	113,795	Census	5.40%		
2016	116,176	Census	2.09%		
2017	118,058		1.62%	1882	
2018	119,940		1.59%	1882	
2019	121,822		1.57%	1882	
2020	123,704		1.54%	1882	
2021	125,586		1.52%	1882	
2022	127,491		1.52%	1905	
2023	129,401		1.50%	1910	
2024	131,306		1.47%	1905	
2025	133,151		1.41%	1845	
2026	135,000	* NPF 'High' Projected	1.39%	1849	
2027	136,826		1.35%	1826	
2028	138,628		1.32%	1802	13,042
2029	140,420		1.29%	1792	
2030	142,195		1.26%	1775	
2031	144,000	* NPF 'High' Projected	1.27%	1805	

Table 4.4: Projected population growth in County Waterford

4.2 Determination of Average Household Size and Additional Households Required

This stage determines the additional increase in households per annum over the Development Plan period based on the application of an average household size for the projected population established in Stage 4.1 above.

The Census 2016 results indicate that County Waterford has a population to household ratio of 2.67, compared to state average of 2.75. However, the NPF states that this is expected to decline to around 2.5 by 2040, while also acknowledging that household sizes in urban areas tend to be smaller than in the suburbs or rural parts of the country. In line with this projected trend, a graduated average household size is utilised within this plan.

The projected housing demand for the 6 year development plan period as calculated in Table 4.2 above is 4,824, providing an annual average housing demand for County Waterford of 804 units (as shown in Table 4.5). This average has been utilised in projecting the annual household numbers, albeit a higher number of units is anticipated in the post-Covid 19 recovery phase in 2022-2024.

Housing supply data was available for 2017 to 2020 from the CSO, and this data was used to populate the table below (No. Anticipated Houses Per Annum). Census 2016 reveals that the number of households in County Waterford is 43,549. As noted above, projections of future housing delivery are based upon analysis of available completion data in the county, the restart of construction following Covid 19, analysis of commencement notices in the county and forecasts provided by the ESRI.

The Waterford County Development Plan period will run from Q3 2022 – Q2 2028. Table 4.5 has been structured to correspond with this plan period. The ESRI forecast a total of 18,000 new dwellings will be delivered in 2021, and 21,000 in 2022. Based on these expected trends in housing delivery and a ramping period post Covid-19, housing delivery in County Waterford is expected to be highest in 2023 and 2024 with a marginal decrease in subsequent years.

Year	Population Total	No. of Households (Private)	Average Household Size	No. Anticipated Houses Per Annum	Total Anticipated Houses between Q3 2022 - Q2 2028	Average Anticipated Houses Per Annum Between Q3 2022 - Q2 2028
2006	107,961					
2011	113,795					
2016	116,176	43,549	2.67			
2017	118,058	43,829	2.69	280		
2018	119,940	44,255	2.71	426		
2019	121,822	44,699	2.72	444		
2020	123,704	45,179	2.73	480		
2021	125,586	45,527	2.76	348		
2022 (H1)	126,539	45,364	2.79	185		
2022 (H2)	127,491	45,991	2.77	464		
2023	129,401	46,707	2.77	716		
2024	131,306	47,542	2.76	835		
2025	133,151	48,348	2.75	806		
2026	135,000	49,140	2.74	792		
2027	136,826	49,930	2.74	790		
2028 (H1)	137,727	51,095	2.69	421	4,824	804
2028 (H2)	138,628	51,695	2.68	340		
2029	140,420	52,623	2.66	761		
2030	142,195	53,551	2.65	758		
2031	144,000	54,479	2.64	755		

Table 4.5: Projected households over the plan period

As shown in Table 4.5, the average household size is thus projected to be 2.69 at the end of the plan period (2028). The number of households in County Waterford is expected to increase to 51,095 by Q3 2028.

4.3 Calculation of Estimated Distribution of Household Disposable Incomes

This stage calculates the estimated distribution of household disposable incomes for each of the 10 household deciles in 2016. Disposable income is the amount of income, after tax is deducted, that is available for spending and saving. It provides an important measure of housing affordability in an area i.e. the ability of a household to purchase their own home.

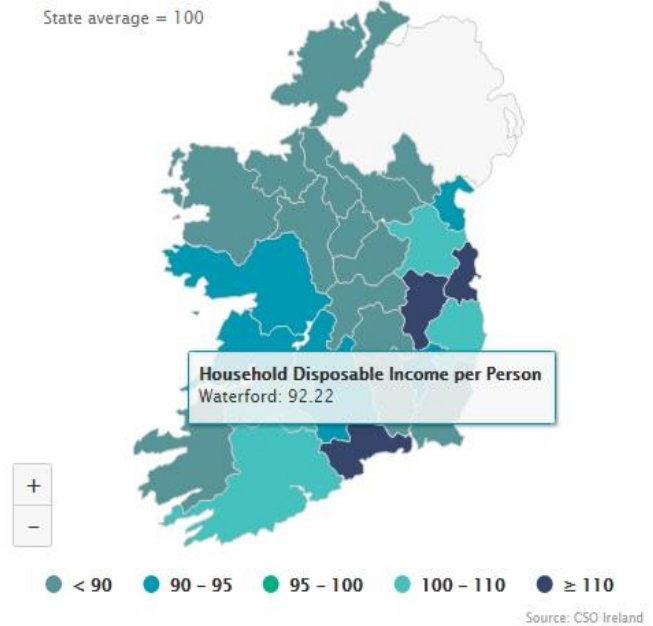
The CSO's Household Budget Survey (2015-2016) provides weekly and annual disposable incomes at national level, and this has been adjusted to county level based on application of "inflation/deflator" rate.

A deflator of 92.22 has been applied to County Waterford based on the CSO report on County Incomes and Regional GDP from 2018.

The data is divided into ten income deciles to represent the proportion of households in County Waterford within each decile during the survey.

Table 4.6 indicates that in 2017 after tax, about one third of the households in County Waterford (i.e. the first three deciles) have an average annual disposable income of up to €23,972.

Map 1 Household Disposable Income per person 2018



Income Range	Average Weekly Disposable Income (State) (€) (2009-2010)	Average Weekly Disposable Income (State) (€) (2015-2016)	% Change from 2009-2010 to 2015-2016	Assumed Annual % Increase from 2010 to 2016	Adjusted Average Weekly Disposable Income (State) (€) (2017)	% of Households in Each Category (State)	Average Annual Disposable Income (State) (€) (2017)	Waterford County Deflator	Waterford Average Annual Disposable Income (€) (2017)	No. of Households in Waterford (2016)
1st Decile	188.91	197.40	4.49%	0.90%	199.18	9.83%	10,357.18	0.922	9551.39	4,281
2nd Decile	300.98	324.40	7.78%	1.56%	329.46	10.57%	17,131.95	0.922	15799.09	4,603
3rd Decile	431.28	465.86	8.02%	1.60%	473.31	10.47%	24,612.32	0.922	22697.48	4,560
4th Decile	549.20	593.56	8.08%	1.62%	603.18	10.44%	31,365.13	0.922	28924.93	4,547
5th Decile	669.46	725.85	8.42%	1.68%	738.04	10.25%	38,378.30	0.922	35392.47	4,464
6th Decile	802.56	865.88	7.89%	1.58%	879.56	9.94%	45,737.17	0.922	42178.82	4,329
7th Decile	972.03	1026.46	5.60%	1.12%	1037.96	9.62%	53,973.73	0.922	49774.57	4,189
8th Decile	1183.82	1215.55	2.68%	0.54%	1222.11	9.65%	63,549.93	0.922	58605.74	4,202
9th Decile	1472.66	1473.25	0.04%	0.01%	1473.40	9.61%	76,616.66	0.922	70655.88	4,185
10th Decile	2289.38	2229.05	-2.64%	-0.53%	2217.24	9.62%	115,296.27	0.922	106326.22	4,189
,Total						100.00%				43,549

Table 4.6: Calculation of the distribution of disposable household incomes (annual and weekly) during the baseline year

4.4 Calculation of Average Annual Household Disposable Income Distribution

This stage provides the estimated distribution of annual household disposable incomes for each of the 10 household deciles throughout the plan period. To inform the forward projection of affordability in County Waterford during the plan period, the baseline income has been inflated annually using forecasted growth rates in relation to Gross Domestic Product (GDP). Table 4.7 above provides the Average Annual Disposable Income for 2017, calculated by applying the Waterford County deflator of 0.92.

The forecasted GDP rates have regard to the ongoing Covid-19 pandemic and the risk highlighted by the ESRI that further economic impacts might occur once income supports are withdrawn⁵. The CBI note that the 'Covid-19 pandemic will remain the main determinant of the economic outlook this year and in 2022⁶ in their Quarterly Bulletin (QB2) published in April 2021.

Based on the current economic outlook (including impacts of Covid-19 and Brexit) and the latest forecasted GDP growth rates (from the Department of Finance, Central Bank and the ESRI), GDP growth of 1.7% is applied for 2021 and a conservative forecasted GDP growth rate of 2.9% has been applied from 2022 onwards. The key outputs of this are shown are the forecasted annual average disposable household income for each decile shown in Table 4.7 below.

	2020	2021	2022	2023	2024	2025	2026	2027	2028
% Growth	0.8%	1.7%	2.9%	2.9%	2.9%	2.9%	2.9%	2.9%	2.9%
1st Decile	10844	11029	11349	11678	12016	12365	12723	13092	13472
2nd Decile	17938	18243	18772	19316	19876	20453	21046	21656	22284
3rd Decile	25770	26208	26968	27750	28555	29383	30235	31112	32014
4th Decile	32841	33399	34367	35364	36390	37445	38531	39648	40798
5th Decile	40184	40867	42052	43271	44526	45818	47146	48513	49920
6th Decile	47889	48703	50115	51569	53064	54603	56186	57816	59492
7th Decile	56513	57473	59140	60855	62620	64436	66305	68227	70206
8th Decile	66539	67671	69633	71652	73730	75868	78069	80333	82662
9th Decile	80221	81585	83950	86385	88890	91468	94121	96850	99659
10th Decile	120720	122772	126333	129996	133766	137645	141637	145744	149971

Table 4.7: Calculation of Average Annual Household Disposable Income Distribution (€) in County Waterford

⁵ https://www.esri.ie/system/files/publications/QEC2020WIN_0.pdf

⁶ <https://www.centralbank.ie/docs/default-source/publications/quarterly-bulletins/qb-archive/2021/quarterly-bulletin-q2-2021.pdf?sfvrsn=6>

4.5 Calculation of Average Monthly Household Disposable Income Distribution

This stage provides the estimated distribution of monthly household disposable incomes for each of the 10 household deciles throughout the plan period. This has been based on the same information as Stage 4.4 (i.e. Calculation of Average Annual Household Disposable Income Distribution) and scaled to provide the monthly (rather than annual) estimates of disposable income per household in each decile.

	% Households	2020	2021	2022	2023	2024	2025	2026	2027	2028
% Growth		0.8%	1.7%	2.9%	2.9%	2.9%	2.9%	2.9%	2.9%	2.9%
1st Decile	9.83%	904	919	946	973	1001	1030	1060	1091	1123
2nd Decile	10.57%	1495	1520	1564	1610	1656	1704	1754	1805	1857
3rd Decile	10.47%	2148	2184	2247	2313	2380	2449	2520	2593	2668
4th Decile	10.44%	2737	2783	2864	2947	3032	3120	3211	3304	3400
5th Decile	10.25%	3349	3406	3504	3606	3711	3818	3929	4043	4160
6th Decile	9.94%	3991	4059	4176	4297	4422	4550	4682	4818	4958
7th Decile	9.62%	4709	4789	4928	5071	5218	5370	5525	5686	5851
8th Decile	9.65%	5545	5639	5803	5971	6144	6322	6506	6694	6889
9th Decile	9.61%	6685	6799	6996	7199	7408	7622	7843	8071	8305
10th Decile	9.62%	10060	10231	10528	10833	11147	11470	11803	12145	12498

Table 4.8: Calculation of Average Monthly Household Disposable Income Distribution (€) in County Waterford

4.6 Determination of Distribution of Total Anticipated Households

This stage provides the estimated distribution of total household units for each of the 10 household deciles throughout the plan period. The number and distribution of total households per decile throughout the plan period has been estimated from the distribution of housing units in the State from the Household Budget Survey⁷. This has been reflected upon in order to determine the projected number of private households per decile per year during the plan period.

Specifically, this has been based on the outputs of Stage 4.2 (i.e. Determination of Average Household Size and Additional Households Required) in relation to number of private households per year during the plan period as well as the distribution of housing units in the State from the Household Budget Survey.

⁷ CSO (2017) Household Budget Survey 2015-2016 - Table HS029: Households in sample by deciles and year.

Table 4.9 identifies the distribution of total households across each of the ten deciles during the plan period.

	% Households	2021	2022	2023	2024	2025	2026	2027	2028
1st Decile	9.83%	4475	4539	4631	4723	4814	4905	4995	5086
2nd Decile	10.57%	4812	4881	4980	5079	5177	5274	5371	5469
3rd Decile	10.47%	4767	4835	4933	5031	5128	5224	5320	5418
4th Decile	10.44%	4753	4821	4918	5016	5113	5209	5305	5402
5th Decile	10.25%	4667	4733	4829	4925	5020	5115	5209	5304
6th Decile	9.94%	4525	4590	4683	4776	4868	4960	5051	5143
7th Decile	9.62%	4380	4442	4532	4622	4711	4800	4888	4978
8th Decile	9.65%	4393	4456	4546	4637	4726	4815	4904	4993
9th Decile	9.61%	4375	4438	4527	4617	4706	4795	4883	4973
10th Decile	9.62%	4380	4442	4532	4622	4711	4800	4888	4978
Total	100.00%	45527	46176	47111	48047	48975	49899	50816	51744

Table 4.9: Distribution of total households per decile (No. Households) in County Waterford

4.7 Determination of Distribution of Additional Households

This stage provides the estimated distribution of additional anticipated household units for each of the 10 household deciles throughout the plan period. The number of additional anticipated households per decile has been estimated throughout the plan period. Table 4.10 identifies the distribution of additional anticipated households across each of the ten deciles during the plan period.

	% Households	2022 (H2)	2023	2024	2025	2026	2027	2028 (H1)
1st Decile	9.83%	46	70	82	79	78	78	41
2nd Decile	10.57%	49	76	88	85	84	84	44
3rd Decile	10.47%	49	75	87	84	83	83	44
4th Decile	10.44%	48	75	87	84	83	82	44
5th Decile	10.25%	48	73	86	83	81	81	43
6th Decile	9.94%	46	71	83	80	79	79	42
7th Decile	9.62%	45	69	80	78	76	76	41
8th Decile	9.65%	45	69	81	78	76	76	41
9th Decile	9.61%	45	69	80	77	76	76	40
10th Decile	9.62%	45	69	80	78	76	76	41
Total	100.00%	464	716	835	806	792	790	421

Table 4.10: Distribution of additional households per decile (No. Households) in County Waterford

4.8 Determination of Projected House Price Bands

Property price transaction data in County Waterford for 2020 has been analysed as part of the exercise to project house price bands. The Register includes new and second-hand properties. 2020 has been chosen to reflect the current market context and to understand latest house pricing and distribution of residential units per price band. The analysis carried out (based on the Property Price Register) reveals there were 1,272 transactions in County Waterford in 2020 across the eight price bands. For the purpose of this exercise, any properties that were sold for below market price have been omitted. In 2020, there were a total of 111 residential properties that sold for below market price in Co. Waterford. The following analysis of house price trends and historic transactional housing market data allows for a calculation of projected house price bands and projected annual price increase or decrease based on the percentage split of the eight price bands.

Price Bands / Value Distribution (2020)	Number of Transactions	% Total
0 – 100,000	219	17%
100,001 – 150,000	247	19%
150,001 – 200,000	244	19%
200,001 – 250,000	252	20%
250,001 – 300,000	133	10%
300,001 – 350,000	59	5%
350,001 – 400,000	49	4%
400,001+	69	5%
Total	1,272	100%

Table 4.11: Property Price Transaction Data for 2020 in County Waterford⁸

It is noted that c.55% of the property transactions in 2020 were in the sub €200,000 price range, with c.9% of properties selling for more than €350,000. Having considered the most recent house price activity in the County (i.e. 2020), it is important to review historical trends in property price fluctuation to provide greater insight into potential house price change over the development plan period. This analysis of historic house prices included the following information sources:

- Table HPA02 2011 – 2020 - (CSO Residential Property Transactions Data)⁹,
- Table HPM02 2011 – Q1 2021 - (CSO Residential Property Transactions Data)¹⁰,
- Residential Property Price Register 2011 - Q1 2021¹¹, and
- Daft Quarterly Reports 2011 - Q1 2021.

⁸ Residential Property Price Register (2020) Transactional data for 2020, <https://www.propertypriceregister.ie/website/npsra/pprweb.nsf/PPR?OpenForm>.

⁹ CSO (2020) Residential Property Transactions Data – Table HPA02 (2011–2019), <https://data.cso.ie/table/HPA02>.

¹⁰ CSO (2020) Residential Property Transactions Data – Table HPM02 2011 –2020, <https://data.cso.ie/table/HPM02>.

¹¹ Residential Property Price Register (2011-2020), <https://www.propertypriceregister.ie/website/npsra/pprweb.nsf/PPR?OpenForm>.

The post 2008 recession and subsequent economic contraction resulted in average price decreases of c.16.7% and 3.6% in County Waterford in 2011 and 2012. The subsequent period of economic growth has resulted in large variances in house prices but in the main a trend of sustained increase is noted from 2014 onwards. Given the large variations observed post-recession and during the subsequent recovery and periods of growth, the average house price change over the period requires context and input from other recent economic data in order to provide a reliable basis for predicting future changes in average house prices from 2022 onwards. In addition, the impact of the COVID-19 pandemic (discussed further below) is now evident with the availability of data for 2020 and Q1 2021 and must be factored into the prediction of future house price trends.

The historic house price data for County Waterford allows for understanding of the local market context and how broader economic shifts and macroeconomic trends transfer locally. Data from the Residential Property Price Register, the CSO and Daft has been analysed and year on year trends (mean percentage change) have been presented below in Table 4.12.

Year	RPPR	CSO HPA02	CSO HPM02	Daft	Average
2011 (Base Year)	-	-	-		
2012	-15.4%	-17.2%	-18.4%	-15.8%	-16.7%
2013	-6.6%	0.4%	0.0%	-8.2%	-3.6%
2014	2.5%	11.5%	11.3%	5.7%	7.8%
2015	5.5%	5.2%	4.9%	15.1%	7.7%
2016	7.3%	11.8%	12.6%	8.5%	10.0%
2017	12.5%	9.1%	9.3%	6.9%	9.4%
2018	13.6%	13.0%	12.2%	7.4%	11.6%
2019	9.1%	7.2%	7.3%	2.4%	6.5%
2020	4.3%	6.1%	6.1%	5.1%	5.3%
2021 (Q1)	0.9%	-	2.0%	8.7%	3.9%

Table 4.12: Historic house price trends (Mean % Change) in County Waterford (Source: RPPR, CSO, Daft)

In terms of the data presented in Table 4.12, residential property transactions data available from the CSO (CSO Table HPA02) provided a mean sale price for each year of the 2012-2020 period, with 2011 used as the Base Year. Data from 3 sources was available for Q1 2021 at the time of writing. Analysis of the Residential Property Price Register reveals a 0.9% increase in Q1 2021 on the mean figure from 2020.

CSO Table HPM02 indicates a 6.1% increase in 2020 on the 2019 average, and a 2% increase in Q1 2021 on the 2020 average. Data from Daft indicates a 5.1% increase in 2020 on the 2019 average. The Daft.ie House Price Report for Q1 2021 includes the following data for Waterford:

Waterford County	Waterford City
Quarter-on-Quarter change: 2.3%	Quarter-on-Quarter change: 3.0%
Year-on-Year change: 6.1%	Year-on-Year change: 11.4%

The average year on year change was 8.7% as of Q1 2021 in Waterford based on the Daft House Price Report. The average increase based on the 3 sources for Q1 2021 is 3.9%.

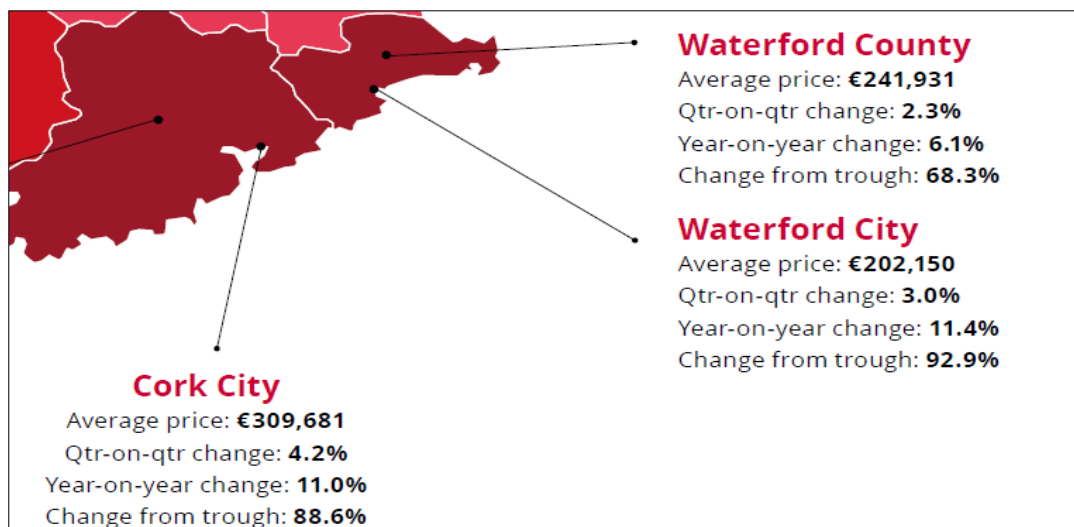


Figure 4.1: Daft House Price Report - Q1 2021 – House Price Data Waterford

The Daft.ie House Price Report for Q2 2021 was published on the 28th of June 2021. Figure 4.2 below provides average list prices and year on year change as set out in the report. The average year on year change was 21.2% in Waterford County and 14.8% in Waterford City, with average list prices of €266,506 and €199,562 respectively. The report notes price rises in all markets and states the ‘largest price differences are in rural regions and counties with Longford, Wexford, Waterford, Kerry and Roscommon all seeing price rises above 20% year on year’.¹²

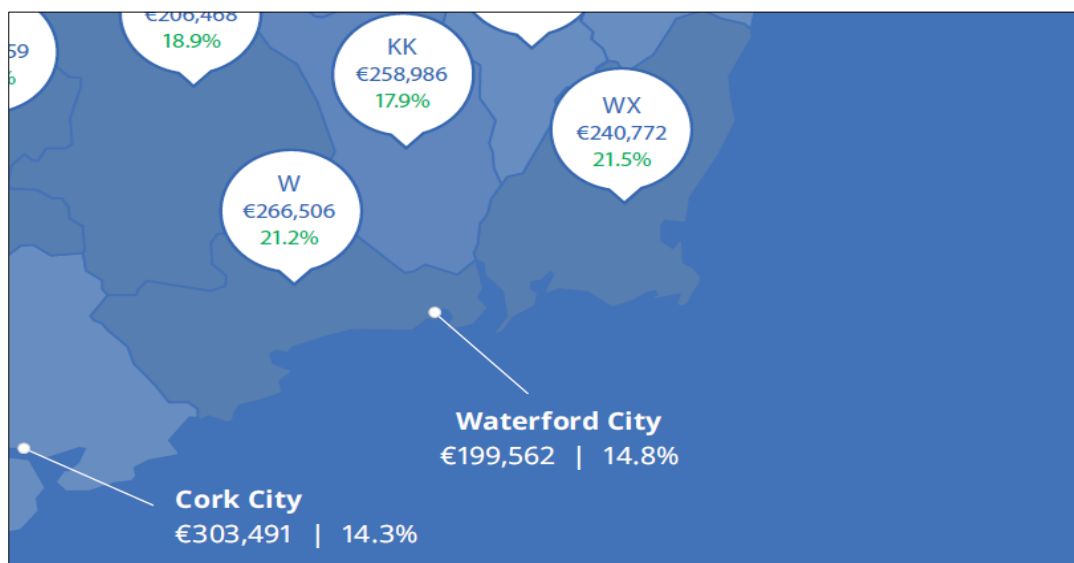


Figure 4.2: Daft House Price Report – Q2 2021 – House Price Data Waterford

The Daft.ie House Price Report for Q2 2021 includes a snapshot of asking prices nationwide and annual change across a number of house types. The snapshot illustrates that prices in Waterford City have increased across all house types listed in the last year with the largest percentage increase seen in 3 bed semi-detached units and 2 bed terraced units.

¹² The Daft.ie House Price Report – 2021 Q2

		1 bed apartment		2 bed terraced		3 bed semi-d		4 bed bungalow		5 bed detached	
OTHER CITIES	Cork City	€136	23.0%	€177	28.6%	€262	28.4%	€437	19.8%	€535	27.4%
	Galway City	€128	20.5%	€167	26.1%	€247	25.8%	€412	17.4%	€505	24.8%
	Limerick City	€103	23.6%	€135	29.2%	€200	29.0%	€333	20.3%	€408	28.0%
	Waterford City	€89	23.6%	€116	29.3%	€172	29.0%	€287	20.4%	€351	28.0%
MUNSTER	Waterford Co	€100	14.7%	€124	23.2%	€177	24.2%	€346	27.3%	€347	21.4%
	Kerry	€85	13.7%	€105	22.1%	€150	23.1%	€294	26.1%	€295	20.3%
	Cork Co	€97	10.4%	€121	18.5%	€172	19.5%	€338	22.5%	€339	16.8%
	Clare	€81	9.6%	€101	17.8%	€143	18.7%	€281	21.6%	€282	16.0%

Figure 4.3: Asking Prices Nationwide (Source: Daft House Price Report – Q2 2021)

On balance, the data points to the potential that COVID-19 had a moderate deflating effect on house price increases in County Waterford in 2020 and 2021, having regard to the higher growth trends observed in previous years. House prices have increased nonetheless, and reports indicate a strong supply side constraint. Anecdotal evidence indicates that an increase in remote working/more flexible working arrangements during the pandemic is leading to strong demand for housing outside of the larger cities and towards more rural areas.

The Daft.ie House Price Report notes that supply shortages have led to rising house values stating that ‘the net result of strong demand and very weak supply can be seen in availability, the stock of homes on the market at any point in time. There were fewer than 12,000 homes available to buy on March 1 this year, down 40% on the already very low level seen a year ago. There is no precedent for availability this tight in the post-Celtic Tiger housing market’. The report notes just over 3,600 properties on the market in Munster on March 1, down from 6,066 on the same date a year ago.

In terms of considering the future impact of Covid 19 on the housing market and house price trends, research by the ESRI¹³ published in May 2020 considers different economic scenarios and their corresponding potential impact on house prices. Their baseline scenario sees house prices increasing by just over 3 per cent in 2021. The report concludes by noting supply shortages may put additional upward pressure on house prices when the domestic economy recovers.

Further research by the ESRI¹⁴ on the Irish property market published on the 30th September 2020 states:

‘COVID-19 has already had an unprecedented impact on the Irish economy and this has extended to the housing and rental markets. While government support schemes are likely to keep incomes stable in the near term, as these measures are unwound and the labour market struggles to recover, incomes are likely to fall, putting downward pressure on housing demand’.

¹³ Allen-Coghlan M. and K. McQuinn (2020). ‘Property prices and COVID-19 related administrative closures: What are the implications?’ Working Paper No. 661, Economic and Social Research Institute (ESRI). Available online at: <https://www.esri.ie/publications/property-prices-and-covid-19-related-administrative-closures-what-are-the-implications>.

¹⁴ Allen-Coghlan, M., C. O’Toole and K. McQuinn (2020). ‘Assessing the impacts of COVID-19 on the Irish property market: An overview of the issues’, Special Article, *Quarterly Economic Commentary*, Economic and Social Research Institute (ESRI). Available online at: <https://www.esri.ie/publications/assessing-the-impacts-of-covid-19-on-the-irish-property-market-an-overview-of-the>.

The report by the ESRI notes also that the COVID-19 support measures introduced have insulated the housing market to some extent, however the decline in the number of housing completions will lead to some supply side constraints. Some demand side impact is also pointed to by the ESRI¹⁵ in 2021 with the phasing out of the Pandemic Unemployment Payment (PUP) and the Temporary COVID-19 Wage Subsidy Scheme (TWSS).

A further complication is noted in the medium-long term with the potential increase in remote working impacting the structural demand for housing at both a national and regional level, with the potential that a broader distribution of population occurs leading to house price increases in rural areas, with potential impacts for County Waterford.

The Society of Chartered Surveyors Ireland (SCSI) published their Annual Residential Property Review & Outlook for 2021¹⁶ on the 18th of January which forecasts price increases ranging from 3% in Dublin to 5% in Munster. The SCSI note price expectations are underpinned by lack of supply and economic performance. In further support of potential price increases in counties such as Waterford, the report notes the increase in home working is driving higher interest and prices in the regions.

To further inform potential house price change over the development plan period, projected inflation rates have been examined and used to predict average annual price increases. Data from Statista notes the inflation rate in Ireland in 2019 amounted to 0.88, turning negative in 2020 at – 0.2%¹⁷. Ireland's inflation rate is forecast to stabilize over the coming years at around two percent.

In relation to the distribution of house price bands, transaction data from 2020 has been utilised to inform the distribution reflected in Table 4.13. 55% of the property transactions in 2020 were in the sub €200,000 price range, with c.9% of properties selling for more than €350,000. This information has supported the calculation of projected house price bands.

Table 4.12 indicates an average price increase of 5.3% in 2020 and 3.9% in Q1 2021 in County Waterford. With the relaxation of Covid-19 restrictions, price increases are expected to increase further in 2021 and a 5% increase has been selected for the purposes of modelling projected house price bands. In Table 4.13 below, market changes to the end of the plan period have been factored in, including a projected annual increase in average house prices of 4% (in 2022) and 4% thereafter (from 2022 onwards) outlined below. The projected increases are based on analysis of the data outlined above including reports from the ESRI, SCSI and the CSO, and HNDA Guidance from the Department of Housing, Local Government and Heritage which includes a 'Modest Growth' House price scenario of 4% growth.

¹⁵ Ibid., p.5.

¹⁶ Available online at: <https://scsi.ie/residential-property-review-and-outlook-2021/>

¹⁷ <https://www.statista.com/statistics/375229/inflation-rate-in-ireland/>

Year	Average Price Increase	1st Band (€)	2nd Band (€)		3rd Band (€)		4th Band (€)		5th Band (€)		6th Band (€)		7th Band (€)		8th Band & Above (€)
2020	5.3%	100000	100001	150000	150001	200000	200001	250000	250001	300000	300001	350000	350001	400000	400001
2021	5.0%	105000	105001	157500	157501	210000	210001	262500	262501	315000	315001	367500	367501	420000	420001
2022	4.0%	109200	109201	163800	163801	218400	218401	273000	273001	327600	327601	382200	382201	436800	436801
2023	4.0%	113568	113569	170352	170353	227136	227137	283920	283921	340704	340705	397488	397489	454272	454273
2024	4.0%	118111	118112	177166	177167	236221	236223	295277	295278	354332	354333	413388	413389	472443	472444
2025	4.0%	122835	122836	184253	184254	245670	245672	307088	307089	368505	368507	429923	429924	491341	491342
2026	4.0%	127749	127750	191623	191624	255497	255498	319371	319373	383246	383247	447120	447121	510994	510995
2027	4.0%	132858	132860	199288	199289	265717	265718	332146	332148	398575	398577	465005	465006	531434	531435
2028	4.0%	138173	138174	207259	207261	276346	276347	345432	345433	414519	414520	483605	483606	552691	552693

Table 4.13: Calculation of Projected House Price Bands (In Euro)

4.9 Calculation of Mortgage Capacity of Households

The following analysis considers housing affordability and determines whether households in each decile can qualify for a mortgage that enables them to purchase a house in the lowest price band, based on the current Central Bank of Ireland (CBI) rules on mortgage lending. These CBI rules include the 90% LTV limit which requires a minimum deposit of 10% before you can get a mortgage and the LTI limit which restricts the amount of money one can borrow to a maximum of 3.5 times gross income.

The model set out below in Table 4.14 establishes, based on these CBI macro-prudential rules outlined above, whether households in County Waterford could qualify for a mortgage that would enable them to purchase a house in the lowest price band under these rules.

If household gross income multiplied by 3.5 is less than 90% of the house value in the lowest projected price band, the household do not qualify for a mortgage that would enable them to purchase a home, and therefore progress to the private rental assessment (Step 11). Those households that can qualify for a mortgage progress to the needs assessment for ownership (Step 10). If households do not qualify for a mortgage and cannot afford private rental they then progress to social and affordable housing.

Table 4.14 outlines that in 2021 the first and second deciles do not have sufficient gross household income to meet the requirements of the CBI rules (i.e. 3.5 times their gross income is less than 90% of the house value in the lowest projected price band). From 2022 onwards, the third decile does not have sufficient income. Therefore, these deciles do not qualify for a mortgage and progress to the private rental calculation (and from there to social and affordable housing if they cannot afford private rental). Those households that can qualify for a mortgage progress to the needs assessment for ownership.

Year	Range	Additional Anticipated HH	Upper Value of Cheapest Price Band	Min LTV (90% of Cheapest House Price)	Maximum LTI (3.5 LTI)	Mortgage Qualification	Additional Anticipated HH That Qualify for a Mortgage	Additional Anticipated HH That Do Not Qualify for a Mortgage
2021	1st Decile	34	105000	94500	39704	No	0	34
	2nd Decile	37			65720	No	0	37
	3rd Decile	36			94560	Yes	36	0
	4th Decile	36			122654	Yes	36	0
	5th Decile	36			154783	Yes	36	0
	6th Decile	35			192659	Yes	35	0
	7th Decile	33			235018	Yes	33	0
	8th Decile	34			287318	Yes	34	0
	9th Decile	33			368396	Yes	33	0
	10th Decile	33			581859	Yes	33	0
	Total	348						277
2022	1st Decile	46	109200	98280	40856	No	0	46
	2nd Decile	49			67625	No	0	49
	3rd Decile	49			97302	No	0	49
	4th Decile	48			126211	Yes	48	0
	5th Decile	48			159272	Yes	48	0
	6th Decile	46			198246	Yes	46	0
	7th Decile	45			241833	Yes	45	0
	8th Decile	45			295650	Yes	45	0
	9th Decile	45			379080	Yes	45	0
	10th Decile	45			598732	Yes	45	0
	Total	464						321

2023	1st Decile	70	113568	102211	42041	No	0	70
	2nd Decile	76			69587	No	0	76
	3rd Decile	75			100124	No	0	75
	4th Decile	75			129871	Yes	75	0
	5th Decile	73			163891	Yes	73	0
	6th Decile	71			203995	Yes	71	0
	7th Decile	69			248847	Yes	69	0
	8th Decile	69			304224	Yes	69	0
	9th Decile	69			390073	Yes	69	0
	10th Decile	69			616096	Yes	69	0
	Total	716					495	221
2024	1st Decile	82	118111	106300	43260	No	0	82
	2nd Decile	88			71605	No	0	88
	3rd Decile	87			103028	No	0	87
	4th Decile	87			133637	Yes	87	0
	5th Decile	86			168644	Yes	86	0
	6th Decile	83			209911	Yes	83	0
	7th Decile	80			256063	Yes	80	0
	8th Decile	81			313047	Yes	81	0
	9th Decile	80			401385	Yes	80	0
	10th Decile	80			633962	Yes	80	0
	Total	835					577	258
2025	1st Decile	79	122835	110552	44514	No	0	79
	2nd Decile	85			73681	No	0	85
	3rd Decile	84			106016	No	0	84
	4th Decile	84			137512	Yes	84	0
	5th Decile	83			173534	Yes	83	0
	6th Decile	80			215999	Yes	80	0

	7th Decile	78			263489	Yes	78	0
	8th Decile	78			322125	Yes	78	0
	9th Decile	77			413025	Yes	77	0
	10th Decile	78			652347	Yes	78	0
	Total	806					557	249
2026	1st Decile	78	127749	114974	45805	No	0	78
	2nd Decile	84			75818	No	0	84
	3rd Decile	83			109090	No	0	83
	4th Decile	83			141500	Yes	83	0
	5th Decile	81			178567	Yes	81	0
	6th Decile	79			222263	Yes	79	0
	7th Decile	76			271130	Yes	76	0
	8th Decile	76			331467	Yes	76	0
	9th Decile	76			425003	Yes	76	0
	10th Decile	76			671265	Yes	76	0
	Total	792					548	244
2027	1st Decile	78	132858	119573	47134	No	0	78
	2nd Decile	84			78017	No	0	84
	3rd Decile	83			112254	No	0	83
	4th Decile	82			145604	Yes	82	0
	5th Decile	81			183745	Yes	81	0
	6th Decile	79			228708	Yes	79	0
	7th Decile	76			278993	Yes	76	0
	8th Decile	76			341079	Yes	76	0
	9th Decile	76			437328	Yes	76	0
	10th Decile	76			690732	Yes	76	0
	Total	790					546	244

2028	1st Decile	41	138173	124356	48501	No	0	41
	2nd Decile	44			80279	No	0	44
	3rd Decile	44			115509	No	0	44
	4th Decile	44			149826	Yes	44	0
	5th Decile	43			189074	Yes	43	0
	6th Decile	42			235341	Yes	42	0
	7th Decile	41			287084	Yes	41	0
	8th Decile	41			350971	Yes	41	0
	9th Decile	40			450011	Yes	40	0
	10th Decile	41			710763	Yes	41	0
	Total	421						291

Table 4.14: Determination of Mortgage Qualification for Household

4.10 Calculation of Projected Needs for Ownership

This section sets out the calculation of the approximate affordable house price for each of the ten deciles per year during the plan period based on the application of the annuity formula. Housing Affordability is associated with disposable income available to a household. An assumed preference for home ownership over rental has been applied as part of this modelling and assessment of needs.

The annuity formula utilised herein is set out in the Model Housing Strategy¹⁸ document published by the Department of the Environment and Local Government (as it was called at the time of publication). This formula determines the maximum affordable house price for each of the income deciles based on a number of variables discussed below. The Annuity Formula is based on the determination of an 'Affordability Threshold', a 'Loan to Value Ratio', an 'Annual Percentage Rate (APR) – Interest Rate', the determination of a 'Monthly Percentage Rate (MPR) - Interest Rate', and the determination of a 'Loan Term (Years/Months)'.

Following this, the calculation of the household surplus and/or deficit per price band has been undertaken with respect to the number of households that can qualify for a mortgage.

Section 93(1) of the Planning and Development Act, 2000, provides an appropriate definition of affordability by setting criteria for an eligible person as a:

'person who is in need of accommodation and whose income would not be adequate to meet the payments on a mortgage for the purchase of a house to meet his or her accommodation needs because the payments calculated over the course of a year would exceed 35 per cent of that person's annual income net of income tax and pay related social insurance'.

Therefore, if housing costs exceed 35% of a household's disposable income (HDI), the housing is deemed to be unaffordable as housing costs consume a disproportionately high percentage of the Household Disposable Income. In addition to a maximum affordability threshold of 35% of HDI, the following key variables have been used for calculation purposes:

- LTV ratio of 0.90,
- Annual interest rate (APR) of 3%,
- Loan term of 25 years.

25 years has been chosen as the loan term given the relative affordability of house prices in Waterford.

This formula therefore determines the maximum affordable house price for each of the ten income deciles as detailed in Table 4.15. Based on this information, the number of households not meeting the affordability criteria can be calculated.

It should be noted, that whilst some of the lower deciles have a maximum affordable house price that is higher than the lowest price band for that year, as outlined in the preceding step, these households would not qualify for a mortgage due to the current Central Bank rules.

¹⁸ DoE&LG "Part V of the Planning and Development Act, 2000, Housing Supply: A Model Housing Strategy and Step-by-Step Guide" (December, 2000).

	% Households	2021	2022	2023	2024	2025	2026	2027	2028
1st Decile	9.83%	75370	77556	79805	82119	84501	86951	89473	92067
2nd Decile	10.57%	124671	128286	132006	135834	139774	143827	147998	152290
3rd Decile	10.47%	179106	184300	189644	195144	200803	206627	212619	218785
4th Decile	10.44%	228247	234866	241677	248685	255897	263318	270955	278812
5th Decile	10.25%	279282	287381	295715	304291	313115	322196	331539	341154
6th Decile	9.94%	332833	342485	352417	362637	373154	383975	395110	406569
7th Decile	9.62%	392771	404161	415882	427943	440353	453123	466264	479785
8th Decile	9.65%	462458	475869	489669	503870	518482	533518	548990	564910
9th Decile	9.61%	557545	573714	590352	607472	625089	643216	661870	681064
10th Decile	9.62%	839020	863351	888389	914152	940662	967942	996012	1024896

Table 4.15: Approximate affordable house price (€) in County Waterford per decile

The following calculation continues the examination of affordability by assessing housing surplus and/or deficit per price band with regard to the number of households that can qualify for a mortgage. This calculation is based on additional households required, the projected house price bands, the determination of households that can qualify for a mortgage and the calculation of housing affordability. Table 4.16 therefore sets out the housing surplus/deficit per price band.

A surplus in a given price band has been identified where the number of housing units anticipated is greater than the number of households that qualify for a mortgage and have the ability to purchase a home at the upper value of that house price band. A deficit has been identified in a given price band where there are fewer households anticipated compared to the number of households that qualify for a mortgage and have the ability to purchase a home at the upper value of that house price band.

Throughout the plan period, there is generally a housing surplus in the lower price bands and housing deficit in the higher price bands as identified in Table 4.16. However, a sufficient number of houses is anticipated overall as households in the upper price bands can purchase a house in a lower price band.

Additionally, the bottom three deciles from 2022 onwards will not qualify for a mortgage (due to the current Central Bank rules), therefore there will be a sufficient number of houses within County Waterford for those households that qualify for a mortgage and have the ability to purchase a home at the upper value of the lowest house price.

Year	Range	Additional Anticipated HH That Qualify for a Mortgage	Running Total	Affordability Threshold	Household Price Band(s)	Upper Value of Price Band	HH that Qualify for a Mortgage Able to Purchase at Upper Value	% of Housing Units Anticipated per Price Band	Housing Units Anticipated per Price Band	Housing Surplus (+) of Deficit (-) per Price Band
2021	1st Decile	0	0	75370	1st Band	105000	0	17%	48	48
	2nd Decile	0	0	124671	2nd Band	157500	32	19%	54	22
	3rd Decile	36	36	179106	3rd Band	210000	35	19%	53	18
	4th Decile	36	73	228247	4th Band	262500	35	20%	55	20
	5th Decile	36	108	279282	5th Band	315000	33	10%	29	-4
	6th Decile	35	143	332833	6th Band	367500	30	5%	13	-17
	7th Decile	33	177	392771	7th Band	420000	26	4%	11	-15
	8th Decile	34	210	462458	8th Band	None	N/A	5%	15	-
	9th Decile	33	244	557545						
	10th Decile	33	277	839020						
	Total	277						100%	277	71
2022	1st Decile	0	0	77556	1st Band	109200	0	17%	55	55
	2nd Decile	0	0	128286	2nd Band	163800	0	19%	62	62
	3rd Decile	0	0	184300	3rd Band	218400	45	19%	62	16
	4th Decile	48	48	234866	4th Band	273000	46	20%	64	17
	5th Decile	48	96	287381	5th Band	327600	45	10%	34	-11
	6th Decile	46	142	342485	6th Band	382200	41	5%	15	-26
	7th Decile	45	187	404161	7th Band	436800	36	4%	12	-24
	8th Decile	45	232	475869	8th Band	None	N/A	5%	17	-
	9th Decile	45	276	573714						
	10th Decile	45	321	863351						
	Total	321						100%	321	91

2023	1st Decile	0	0	79805	1st Band	113568	0	17%	85	85
	2nd Decile	0	0	132006	2nd Band	170352	0	19%	96	96
	3rd Decile	0	0	189644	3rd Band	227136	70	19%	95	25
	4th Decile	75	75	241677	4th Band	283920	72	20%	98	26
	5th Decile	73	148	295715	5th Band	340704	70	10%	52	-18
	6th Decile	71	219	352417	6th Band	397488	63	5%	23	-40
	7th Decile	69	288	415882	7th Band	454272	56	4%	19	-37
	8th Decile	69	357	489669	8th Band	None	N/A	5%	27	-
	9th Decile	69	426	590352						
	10th Decile	69	495	888389						
Total	495						100%	495	137	
2024	1st Decile	0	0	82119	1st Band	118111	0	17%	99	99
	2nd Decile	0	0	135834	2nd Band	177166	0	19%	112	112
	3rd Decile	0	0	195144	3rd Band	236221	83	19%	111	28
	4th Decile	87	87	248685	4th Band	295277	85	20%	114	30
	5th Decile	86	173	304291	5th Band	354332	82	10%	60	-22
	6th Decile	83	256	362637	6th Band	413388	75	5%	27	-48
	7th Decile	80	336	427943	7th Band	472443	66	4%	22	-44
	8th Decile	81	417	503870	8th Band	None	N/A	5%	31	-
	9th Decile	80	497	607472						
	10th Decile	80	577	914152						
Total	577						100%	577	155	
2025	1st Decile	0	0	84501	1st Band	122835	0	17%	96	96
	2nd Decile	0	0	139774	2nd Band	184253	0	19%	108	108
	3rd Decile	0	0	200803	3rd Band	245670	81	19%	107	26
	4th Decile	84	84	255897	4th Band	307088	83	20%	110	28
	5th Decile	83	167	313115	5th Band	368505	80	10%	58	-22
	6th Decile	80	247	373154	6th Band	429923	73	5%	26	-47
	7th Decile	78	324	440353	7th Band	491341	64	4%	21	-43

	8th Decile	78	402	518482	8th Band	None	N/A	5%	30	-
	9th Decile	77	480	625089						
	10th Decile	78	557	940662						
	Total	557						100%	557	146
2026	1st Decile	0	0	86951	1st Band	127749	0	17%	94	94
	2nd Decile	0	0	143827	2nd Band	191623	0	19%	106	106
	3rd Decile	0	0	206627	3rd Band	255497	80	19%	105	25
	4th Decile	83	83	263318	4th Band	319371	82	20%	108	26
	5th Decile	81	164	322196	5th Band	383246	80	10%	57	-22
	6th Decile	79	243	383975	6th Band	447120	72	5%	25	-47
	7th Decile	76	319	453123	7th Band	510994	64	4%	21	-43
	8th Decile	76	395	533518	8th Band	None	N/A	5%	30	-
	9th Decile	76	471	643216						
	10th Decile	76	548	967942						
Total	548						100%	548	139	
2027	1st Decile	0	0	89473	1st Band	132858	0	17%	94	94
	2nd Decile	0	0	147998	2nd Band	199288	0	19%	106	106
	3rd Decile	0	0	212619	3rd Band	265717	81	19%	105	24
	4th Decile	82	82	270955	4th Band	332146	123	20%	108	-14
	5th Decile	81	163	331539						
	6th Decile	79	242	395110	5th Band	398575	68	10%	57	-11
	7th Decile	76	318	466264	6th Band, 7th Band	531434	110	8%	46	-63
	8th Decile	76	394	548990	8th Band	None	N/A	5%	30	-
	9th Decile	76	470	661870						
	10th Decile	76	546	996012						
Total	546						100%	546	135	

2028	1st Decile	0	0	92067	1st Band	138173	0	17%	50	50
	2nd Decile	0	0	152290	2nd Band	207259	0	19%	57	57
	3rd Decile	0	0	218785	3rd Band	276346	44	19%	56	12
	4th Decile	44	44	278812	4th Band	345432	66	20%	58	-8
	5th Decile	43	87	341154						
	6th Decile	42	129	406569	5th Band	414519	37	10%	30	-6
	7th Decile	41	169	479785	6th Band	483605	33	5%	13	-20
	8th Decile	41	210	564910	7th Band, 8th Band	None	N/A	9%	27	-
	9th Decile	40	251	681064						
	10th Decile	41	291	1024896						
Total	291						100%	291	84	

Table 4.16: Calculation of Surplus/Deficit in Housing Available to Additional Households That Qualify For a Mortgage

4.11 Calculation of Ability to Access Private Rental

This section considers the households that cannot afford to access housing through the private rental market (i.e. those households that will not meet the affordability criteria to privately rent a home during the Development Plan period). It considers background information on rental price and demand by unit type within the current rental market in County Waterford.

Data from the Residential Tenancies Board (RTB) has been analysed to understand rental market trends and average rent prices by unit type. This facilitates a projection of estimated rental cost by unit type during the plan period. Based on this and the household income, a calculation of the number of households who don't meet the affordability criteria to privately rent a home has been undertaken.

The key inputs to this calculation therefore include disposable income per decile (established in Section 4.3), historical trends in rental prices, and the projected market rents per unit type (set out below). The demand for a particular unit type has been factored to estimate what type of unit the additional anticipated households are more likely to prefer to rent. If a household does not have sufficient income to meet the private rental rates for a unit in a given year (i.e. 35% of their disposable income is less than average market rent), they cannot afford the rent by themselves. Given that those households who do not qualify for a mortgage also cannot afford private rent, these households require social housing supports.

Year	One bed	Two bed	Three bed	Four plus bed	All bedrooms	YOY Change
	€	€	€	€	€	%
2020	579	747	773	1056	804	1%
2019	604	766	823	1018	798	9%
2018	538	704	757	948	732	9%
2017	469	657	692	893	670	8%
2016	480	601	628	844	620	7%
2015	449	545	611	739	580	N/A
Average	520	670	714	916	701	

Table 4.17: Historic rental prices by unit type in County Waterford

Trends in rental price change can be observed year on year from the data in Table 4.17 and these trends have been utilised in conjunction with other economic data considered in Section 4.8 to project annual growth rates in average rental prices of different unit types in the county. The projected rental price by unit type during the plan period is outlined in Table 4.18. Based on historic trends and analysis of the current rental market, a 4% growth figure per annum was adopted for the projections. This aligns with HNDA Guidance which includes a 4% 'Modest Growth' scenario for rental prices.

Year	One bed	Two bed	Three bed	Four plus bed
2021	602	777	804	1098
2022	626	808	836	1142
2023	651	840	870	1188
2024	677	874	904	1235
2025	704	909	940	1285
2026	733	945	978	1336
2027	762	983	1017	1390
2028	792	1022	1058	1445

Table 4.18: Projected rental prices by unit type in County Waterford

The number of households not meeting the affordability criteria (housing costs below 35 per cent of a household's disposable income) for private rental during the plan period are quantified below in Table 4.19. This calculation therefore takes into account rental prices, disposable incomes and the demand for a particular unit type, which has been considered in order to estimate what type of unit the additional anticipated households are most likely to prefer to rent. This preference has been informed by current data on the size of unit types in the county. The households quantified below that cannot do not qualify for a mortgage and cannot afford private rental are therefore considered to require social and affordable housing.

	2021	2022	2023	2024	2025	2026	2027	2028
1 bed	9	16	25	30	29	28	22	22
2 bed	21	41	64	74	72	71	70	38
3 bed	27	52	80	93	90	88	88	47
4 + bed	14	28	43	50	48	47	47	25
Total	71	137	212	247	239	235	234	125

Table 4.19: Number of Additional Anticipated Households That Do Not Qualify for a Mortgage and Cannot Afford Private Rental

A calculation has also been undertaken to determine the number of households that can afford private rental during the plan period despite not qualifying for a mortgage (Table 4.20). Of those households that do not qualify for a mortgage, an annual average of 82 households can afford to rent a 1 bedroom unit during the plan period. However, based on analysis of household size in County Waterford, a 1 bedroom unit would only be suitable for c.12% of these households, providing the totals outlined below in Table 4.20.

All other units in the private rental market are not considered to be affordable/adequately sized during the plan period and therefore those households that cannot qualify for a mortgage and cannot afford private rental during the plan period are considered to require some form of housing support.

	2022	2023	2024	2025	2026	2027	2028
1 bed	6	9	11	10	10	10	5
2 bed	0	0	0	0	0	0	0
3 bed	0	0	0	0	0	0	0
4 + bed	0	0	0	0	0	0	0
Total	6	9	11	10	10	10	5

Table 4.20: Number of Additional Anticipated Households That Do Not Qualify for a Mortgage and Can Afford Private Rental

4.12 Summary of Projected Social and Affordable Housing Needs

Section 94 (4) of the Planning and Development Act 2000 (as amended) states that a housing strategy shall include an estimate of the amount of social and affordable housing that will be required within the county during the period of the plan. Section 94 (5) (a) states that when making these estimates, the planning authority shall have regard to the supply of and demand for houses generally, the price of houses generally, the income of persons generally, the rates of interest on mortgages for house purchase and the relationship between the price of housing, incomes and rates of interest for the purpose of establishing the affordability of houses in the area of the development plan.

Section 4 of this report complies with the requirements of Section 94, and the estimates of social and affordable housing requirements have had regard to the factors outlined above, as detailed in the stages of Section 4. The Social (and Affordable) Requirements reflect the projected extent of ‘housing need’ during the strategy period. This relates to the additional anticipated households during that time and therefore it is in addition to the current extent of unmet need as per the social housing waiting list discussed in Section 3 and Section 5 of this report.

This section summarises the anticipated social and affordable housing need in County Waterford informed by the analysis undertaken and outcomes of the previous sections which considered affordability and the ability of households to access mortgages or the private rental market. The analysis does not differentiate between social and affordable housing need as income thresholds and criteria for affordable housing are unavailable at the time of writing.

The anticipated social and affordable housing need for County Waterford during the plan period is summarised below in Table 4.21, and is based on the assessments of affordability and mortgage qualification detailed in the preceding sections of this report.

The number of households that do not qualify for a mortgage and cannot afford private rental provides the anticipated social and affordable housing figure. It should be noted that affordability is based on whether rental costs are less than 35% of disposable income. Some households may be availing of private rental accommodation currently and paying more than 35% of disposable income, and this is not captured by this assessment of social housing need.

	H2 2022	2023	2024	2025	2026	2027	H1 2028
No. of Additional Anticipated Households	464	716	835	806	792	790	340
No. of Additional Households That Do Not Qualify for a Mortgage	143	221	258	249	244	244	130
No. of Additional Anticipated Households that Do Not Qualify for a Mortgage and Cannot Afford Private Rental	137	212	247	239	235	234	125
Social Requirement as a % of Total Additional Anticipated Households	30%	30%	30%	30%	30%	30%	37%

Table 4.21: Identified Housing Requirements over the plan period

The Waterford County Development Plan period will run from Q3 2022 – Q2 2028 and Table 4.21 accounts for this period. The identified social and affordable housing requirement ranges from 212 to 247 units annually during the plan period, equivalent to c.30% of the total of additional anticipated households in County Waterford.

As noted in the preceding sections, in the case of County Waterford, a number of households that do not qualify for a mortgage can afford private rental for a 1 bed unit during the plan period, however a 1 bedroom unit would only be suitable for c.12% of these households.

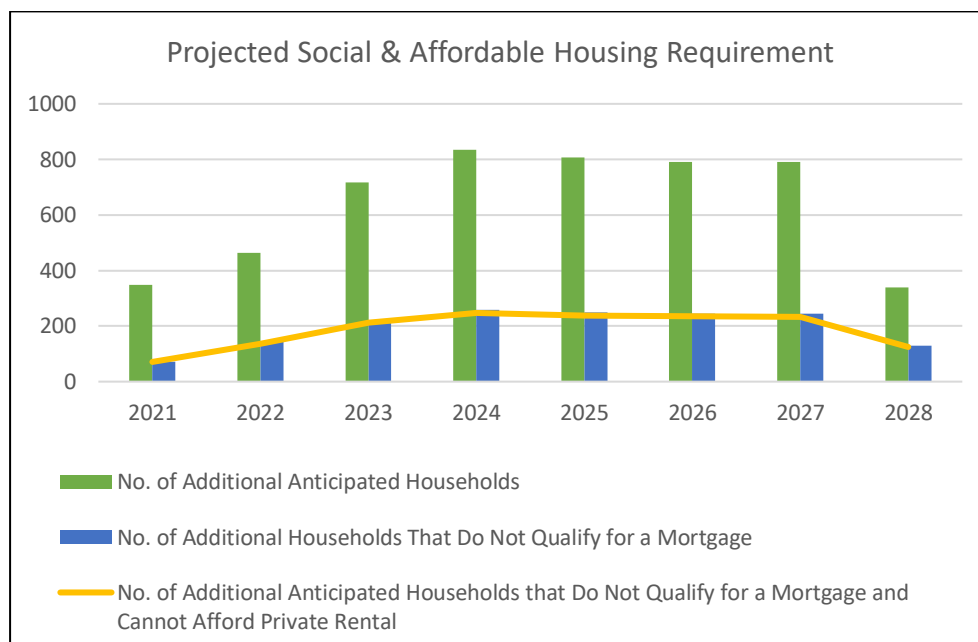


Figure 4.22: Summary of projected housing requirements over the plan period

5.0 Analysis of Housing Requirements in Waterford

5.0 Analysis of Housing Requirements in Waterford

5.1 Introduction

The following section considers specific elements of future housing demand in Waterford including the demand for single one-off dwellings in the countryside during the plan period, household size cohort, household tenure and social housing supply and demand. The NPF roadmap provides a population projection for County Waterford of 132,000 - 135,000 for 2026, and 137,000-144,000 for 2031. The projected housing demand for each local authority (as per the ESRI NPF Scenario Housing Supply Target) was outlined in Appendix 1 of the Ministerial Circular issued in December 2020 (Re. Structural Housing Demand in Ireland and Housing Supply Targets).

The projected housing demand for the 6 year development plan period as calculated in Table 4.2 (Section 4) is 4,824, providing an annual average housing demand for County Waterford of 804 units (as shown in Table 4.5). During the plan period it has been determined that 1,489 households of the additional anticipated households will not qualify for a mortgage during this period. The identified social and affordable housing requirement ranges from 212 to 247 units annually during the plan period, equivalent to c.30% of the total of additional anticipated households in County Waterford.

5.2 Single Housing in the Countryside

National Policy Objective 20 of the NPF states: ‘Project the need for single housing in the countryside through the local authority’s overall Housing Need Demand Assessment (HNDA) tool and county development plan core strategy processes’. Analysis of planning permission data from 2010 to 2020 (including total units permitted (Figure 5.1) and permissions granted for one off housing in Waterford (Table 5.1)) has been undertaken to assist in projecting the need for single housing in the countryside during the plan period. The data helps to understand typical quantum’s per annum of one off houses being permitted in the county and the proportion of overall residential permissions they comprise. In Table 5.1, ‘All Dwellings’ refers to multi-unit housing developments, one off houses/single houses in the countryside, private flats and apartments. Figure 5.1 reveals that the total number of permitted units in Waterford has trended upwards since 2015, peaking at 1168 units permitted in 2019, corresponding with positive economic growth following a lag period post 2011.

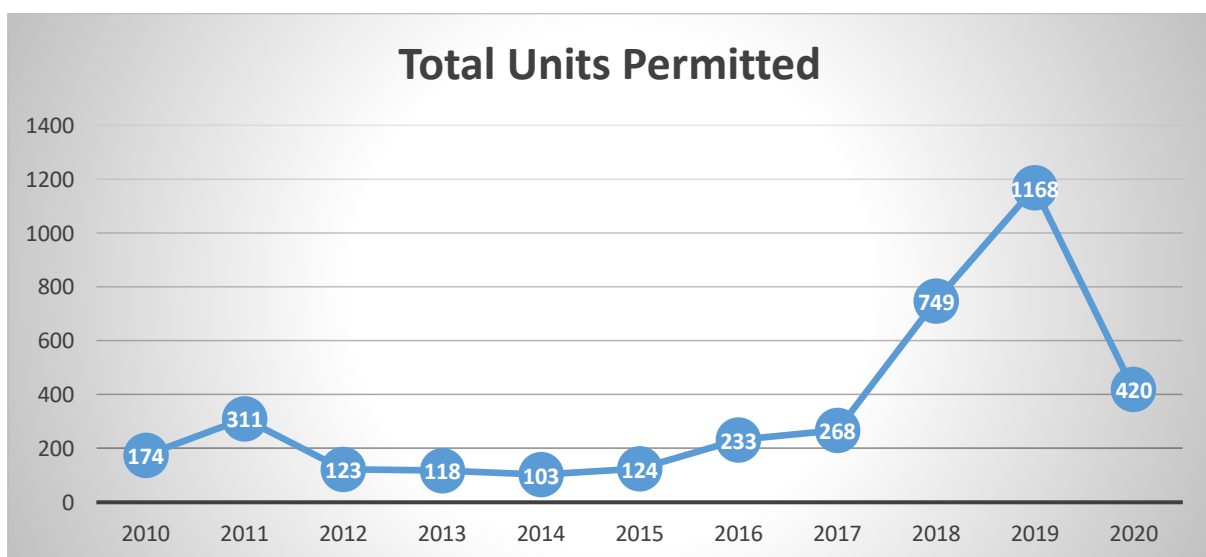


Figure 5.1: Total Units permitted in County Waterford (2010-2020)

Table 5.1 below illustrates the permissions for one-off dwellings as a percentage of total permissions for residential units during 2010 – 2020. This data identifies that on average approximately 31.5% of all granted residential units within any given year have been for single one-off dwellings. Data up to Q4 2020 is available from the CSO at the time of writing.

Year	Dwelling Type	Total		Dwelling Type	Total	One off Houses as a % of Total
2010	One off houses	119		All Dwellings	174	68.4%
2011	One off houses	96		All Dwellings	311	30.9%
2012	One off houses	67		All Dwellings	123	54.5%
2013	One off houses	66		All Dwellings	118	55.9%
2014	One off houses	84		All Dwellings	103	81.6%
2015	One off houses	87		All Dwellings	124	70.2%
2016	One off houses	111		All Dwellings	233	47.6%
2017	One off houses	113		All Dwellings	268	42.2%
2018	One off houses	148		All Dwellings	749	19.8%
2019	One off houses	155		All Dwellings	1168	13.3%
2020	One off houses	147		All Dwellings	420	35%
	Total	1,193		Total	3,791	
				Average (2010-2020)		31.5%

Table 5.1: Analysis of Permitted Applications for Single Houses in the Countryside in County Waterford (2010-2020)

In relation to trends in planning permissions for residential units, the number of one-off houses permitted has increased year on year since 2013 (increasing from 66 in 2013 to 155 in 2019). In 2019 a Strategic Housing Development (SHD) was permitted by An Bord Pleanála which contributed to the spike in total units permitted. The quantum of one off houses permitted annually (and indeed overall residential permissions) can be observed to trend to some degree with economic performance, with lower numbers observed during the economic recovery phase in the early to middle part of the last decade.

Given the overall number of units permitted per year averages at c. 340, the percentage of the total which are one off houses can be skewed in a given year by for instance a large housing development for multiple units being permitted. Therefore, the percentage is less important than the quantum of one offs permitted per year. This quantum provides an indication of the potential projection for single housing permissions over the development plan period.

Figure 5.2 below details units granted planning permission by type, illustrating that multi—unit housing developments have been the most prominent type in recent years. Apartments/private flats have started to become a more substantial proportion of overall permissions in recent years. As noted above, a large spike in units granted is observed in 2019, where a Strategic Housing Development (SHD) was permitted by An Bord Pleanála, contributing to the large increase in multi-development houses and apartments permitted.

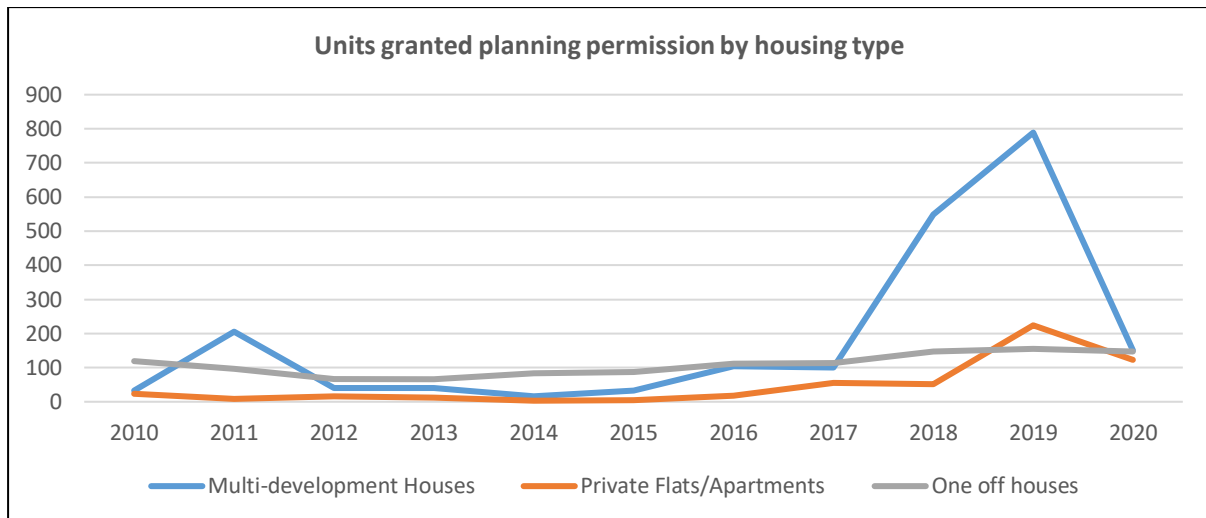


Figure 5.2: Units permitted by housing type in County Waterford (2010-2020)

To assist further in complying with the NPF requirement to project the need for single housing in the countryside, forecasts have been undertaken based on historical data with confidence intervals utilised (Figure 5.3). The intervals (or confidence bounds) illustrate the outer limits within which the single housing values from 2021 - 2028 are likely to fall within.

The probability limits utilised in this calculation are 95% confidence level. In Figure 5.3, the trend line for one off houses is illustrated in a solid bold orange line, forecasting figures from 162 to 218 annually out to 2028.

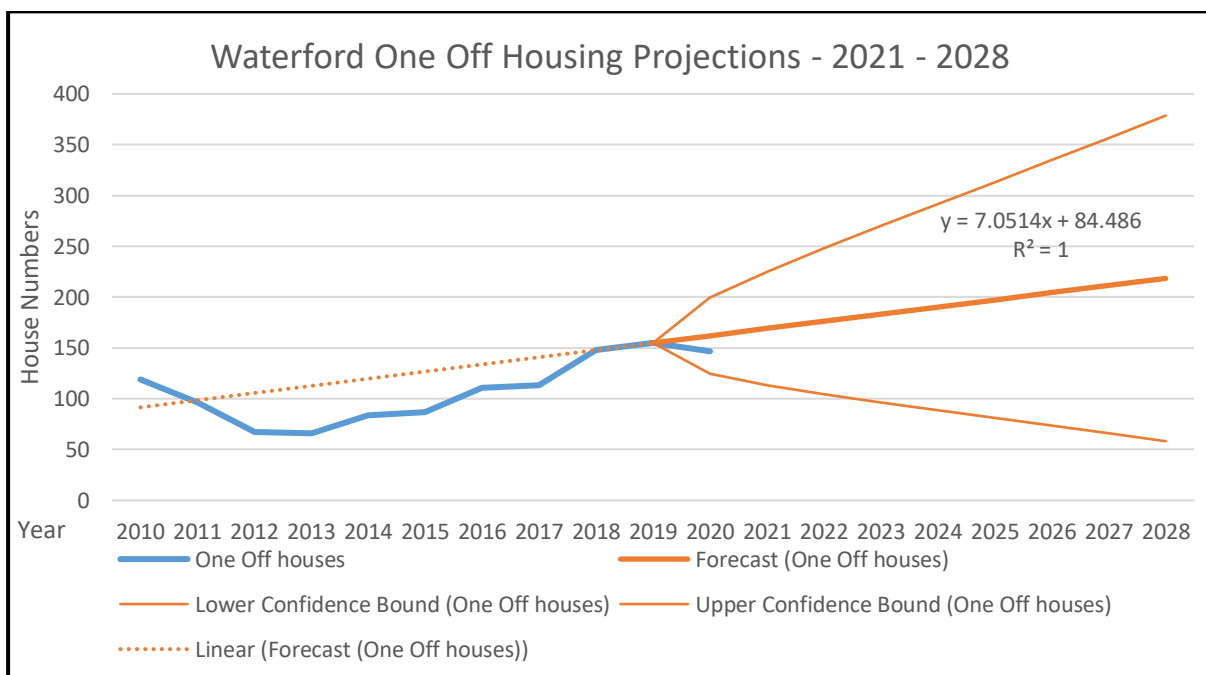


Figure 5.3: County Waterford One-off Housing Projections (2021-2028)

Projections based on data from 2010 - 2019 indicated a 95% confidence interval of 124-200 for the number of one off houses in 2020. Based on 2020 data, the actual one off house figure of 147 is within this confidence interval but trends closer to the lower limit. The analysis is presented numerically in Table 5.2 illustrating the forecasted one off house numbers per year to 2028, and the upper and lower confidence bounds (intervals).

A number of socio-economic factors are currently at play which may influence the demand for one-off housing including the ongoing impact of Covid-19, the impact of an increase in remote working, and the transposal of NPF policies on rural housing (National Policy Objective 19 in particular) into county development plans. In relation to policy impacts, the Office of the Planning Regulator (OPR) is tasked with evaluating local authority forward planning including development plans, local area plans etc., and providing statutory observations to ensure consistency with relevant regional or national policies. Analysis of OPR submissions thus far indicates the transposal of NPF policies on rural housing into county development plans will most likely lead to a more restrictive approach to one-off housing, particularly in rural areas under urban influence. This has a potential to lead to a spike in one-off housing applications prior to a new development plan coming into force, as applicants anticipate the introduction of a more restrictive regime or policy implementation and aim to apply prior to this.

Having regard to the above and based on current economic conditions arising from Covid-19, it is likely the years 2021 and 2022 will be between the lower confidence bound and the forecast figure.

Year	One Off House Permissions	Forecast (One Off houses)	Lower Confidence Bound (One Off houses)	Upper Confidence Bound (One Off houses)
2010	119			
2011	96			
2012	67			
2013	66			
2014	84			
2015	87			
2016	111			
2017	113			
2018	148			
2019	155			
2020	147	162	124	200
2021		169	113	225
2022		176	104	248
2023		183	96	270
2024		190	89	292
2025		197	81	313
2026		204	74	335
2027		211	66	357
2028		218	58	379

Table 5.2: County Waterford One-off Housing Projections (2022-2028)

Regression analysis has been undertaken to understand the relationship between one off housing and potential correlating factors, namely projected population growth and employment rates. Figure 5.4 provides regression analysis for the relationship between one off housing and unemployment rates from 2011 to 2020 (based on regional unemployment data from the CSO Labour Force Survey (LFS) and the CSO Quarterly National Household Survey (QNHS))¹⁹.

¹⁹ <https://www.cso.ie/en/statistics/labourmarket/>

The Labour Force Survey²⁰ and the Quarterly National Household Survey available from the CSO provides unemployment data at a national level and regional level via the NUTS classifications. Unemployment data for the South-East Region which includes Waterford has been analysed and used to populate regional unemployment figures from 2011-2020 (utilised in Figure 5.4 and Table 5.3).

The R² value of 0.83 arising from the regression analysis indicates a strong negative affect of the unemployment rate on one off housing permissions - i.e. higher unemployment has a negative impact on the number of one off house permissions.

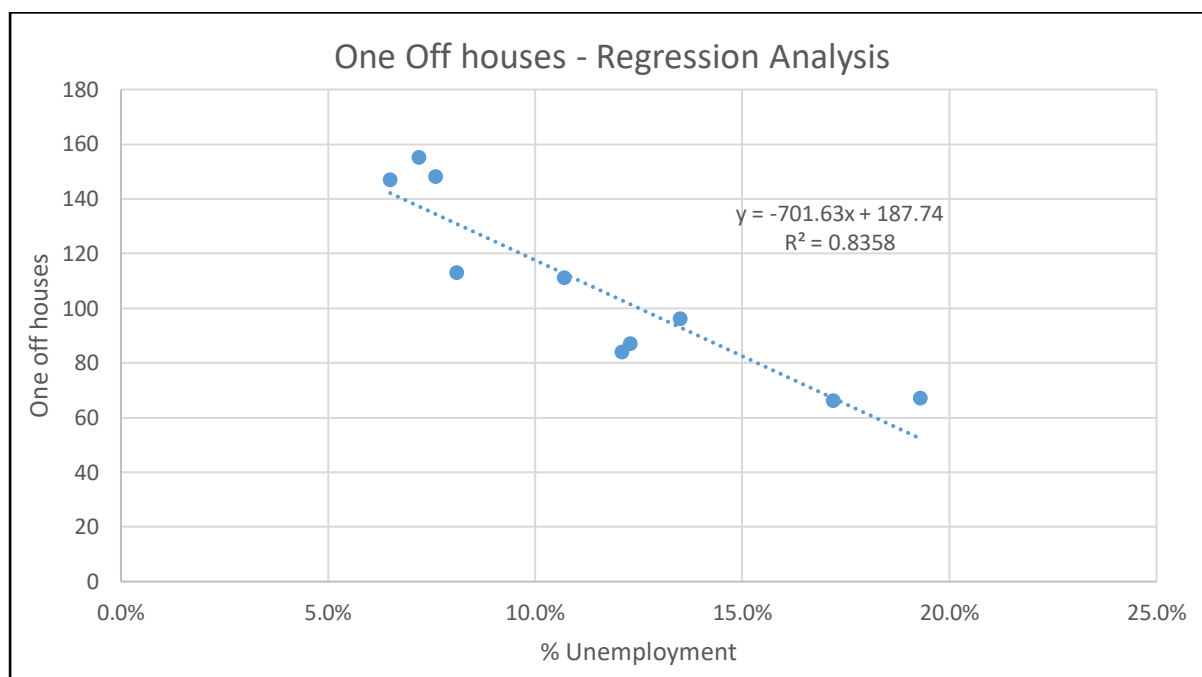


Figure 5.4: One off houses and unemployment – Regression Analysis

Table 5.3 below provides the numerical projections based on the link between one off housing permissions and the unemployment rate. Unemployment data from the CSO²¹ reveals that COVID-19 has continued to have a significant impact on the labour market in Ireland in April 2021.

The standard measure of Monthly Unemployment was 5.8% nationally in April 2021 (Seasonally Adjusted Figure), however the COVID-19 Adjusted Measure of Unemployment could indicate a rate as high as 22.4% if Pandemic Unemployment Payment (PUP) recipients are classified as unemployed. This alternative measure is down from 23.8% in March 2021 and from 30.5% in April 2020, illustrating the impact of the lifting of Government restrictions.

Table 5.3 below provides regional unemployment for the South-East from 2011-2019 sourced from the CSO Labour Force Survey (LFS) and in particular data classified by NUTS3 regions and ILO (International Labour Organisation) Economic Status. The LFS is the official source of labour market statistics for Ireland including the official rates of employment and unemployment.

The employment level for 2020 is based on the COVID-adjusted level of employment published by the CSO. The average monthly unemployment rate for 2020 was approximately 18.7 per cent according to the ESRI.

²⁰ <https://www.cso.ie/en/releasesandpublications/er/lfs/labourforcesurvey/lfsquarter32020/>

²¹ <https://www.cso.ie/en/releasesandpublications/er/mue/monthlyunemploymentdecember2020/>

Projected unemployment is available at a national level from sources such as the ESRI and the Central Bank. This information is not available at a regional level and therefore the national figure has been utilised to project a regional unemployment figure.

The ESRI in their Spring 2021 Quarterly Economic Commentary state:

'The average monthly unemployment rate for 2020 was 18.7 per cent. We estimate that the unemployment rate in Q4 of 2021 will be approximately 10 per cent with the average unemployment rate for 2021 overall being 16.7 per cent. We believe it is unlikely that the unemployment rate will approach its pre-COVID low of 4.7 per cent until 2023 at the earliest. We forecast that unemployment will average 7.3 per cent for 2022 as we expect growth in consumption, exports and investment to drive an improvement in the labour market'.

The Quarterly Bulletin (QB2) published by the Central Bank of Ireland in April 2021 forecasts the unemployment rate to be 8.1 per cent in 2022. A mid-point between these two estimates has therefore been adopted in this report for 2022. Finally, as noted above, based on the relationship between national and regional unemployment figures for the South-East observed in recent years (i.e. the South-East tends to have an unemployment figure 1.4% higher than the state average), a regional unemployment figure has been projected for the years 2021-2028 by adding 1.4 to the national unemployment projection.

Year	One Off House Permissions	Unemployment Rate (Regional)	
2011	96	13.5%	
2012	67	19.3%	
2013	66	17.2%	
2014	84	12.1%	
2015	87	12.3% ²²	
2016	111	10.7%	
2017	113	8.1%	
2018	148	7.6%	
2019	155	7.2%	
2020	147	20.1%	Covid-Adjusted
2021	61	18.1% ²³	Covid-Adjusted
2022	123	9.2%	
2023	139	7.0%	
2024	145	6.1%	
2025	145	6.1%	
2026	145	6.1%	
2027	145	6.1%	
2028	145	6.1%	

Table 5.3: One-off Housing Projections (2022-2028) based on regression analysis

As noted above, historical trends indicate a strong negative affect of the unemployment rate on one off housing numbers - i.e. higher unemployment has a negative impact on the number of one off house permissions. The regression analysis summarised in Table 5.3 provides a projection of one off housing permissions based on the regional unemployment rate, indicating an average of 141 from 2022-2028.

²² <https://www.cso.ie/en/releasesandpublications/er/qnhs/quarterlynationalhouseholdsurveyquarter42015/>

²³ <https://www.esri.ie/publications/quarterly-economic-commentary-spring-2021>

Anomalies can be observed in the analysis related to Covid-19 for 2020, as the high rate of unemployment (COVID-19 Adjusted Measure of Unemployment) did not dampen one-off housing permissions. Covid-19 has had many and varied impacts on the housing sector, including an increase in remote working, migration of people away from cities and an increase in demand for rural housing; which may explain in part the anomaly observed in 2020. Similarly, the projection of 61 for 2021 is likely to understate the actual total, given the Covid impacted unemployment rate.

Regression analysis was also undertaken to understand the relationship between one off housing and projected population growth. In this case, the R² value of 0.84 shows strong positive correlation between population and one of house numbers – i.e. as population increases it will have a strong upward effect on one off housing (all things being equal). The regression analysis examines two factors for projection purposes; in reality many factors will impact one off housing permissions, particularly rural housing policy.

Year	Population Total	One off houses
2011	113,795	96
2016	116,176	111
2017	118,058	113
2018	119,940	148
2019	121,822	155
2020	123,704	147
2021	125,586	172
2022	127,491	184
2023	129,401	196
2024	131,306	208
2025	133,151	219
2026	135,000	231
2027	136,826	242
2028	138,628	253

Table 5.4: One-off Housing Projections (2022-2028) (Relationship with population growth)

Other variables may impact the demand for single housing in the countryside during the plan period, such as the impact of remote working and Covid-19 on settlement and employment patterns, however the analysis provided herein is considered to provide data-led projections based on observable trends and analysis.

5.3 Household Size Cohort

Analysis of the historic household sizes has been undertaken to help predict household composition over the plan period. Analysis of the average intercensal change from 2006 – 2016 has been considered and annualised to assist with forecasting future change in the number of people per household.

Trends in County Waterford broadly reflect a national trend of fewer people per household, and this trend is forecasted to continue over the plan period. 1 and 2 person households will form the largest overall cohort over the plan period, amounting to a combined total of 57.9% of all households by 2028. The number of households comprising of 4 people or more will continue to decline between 2022 and 2028.

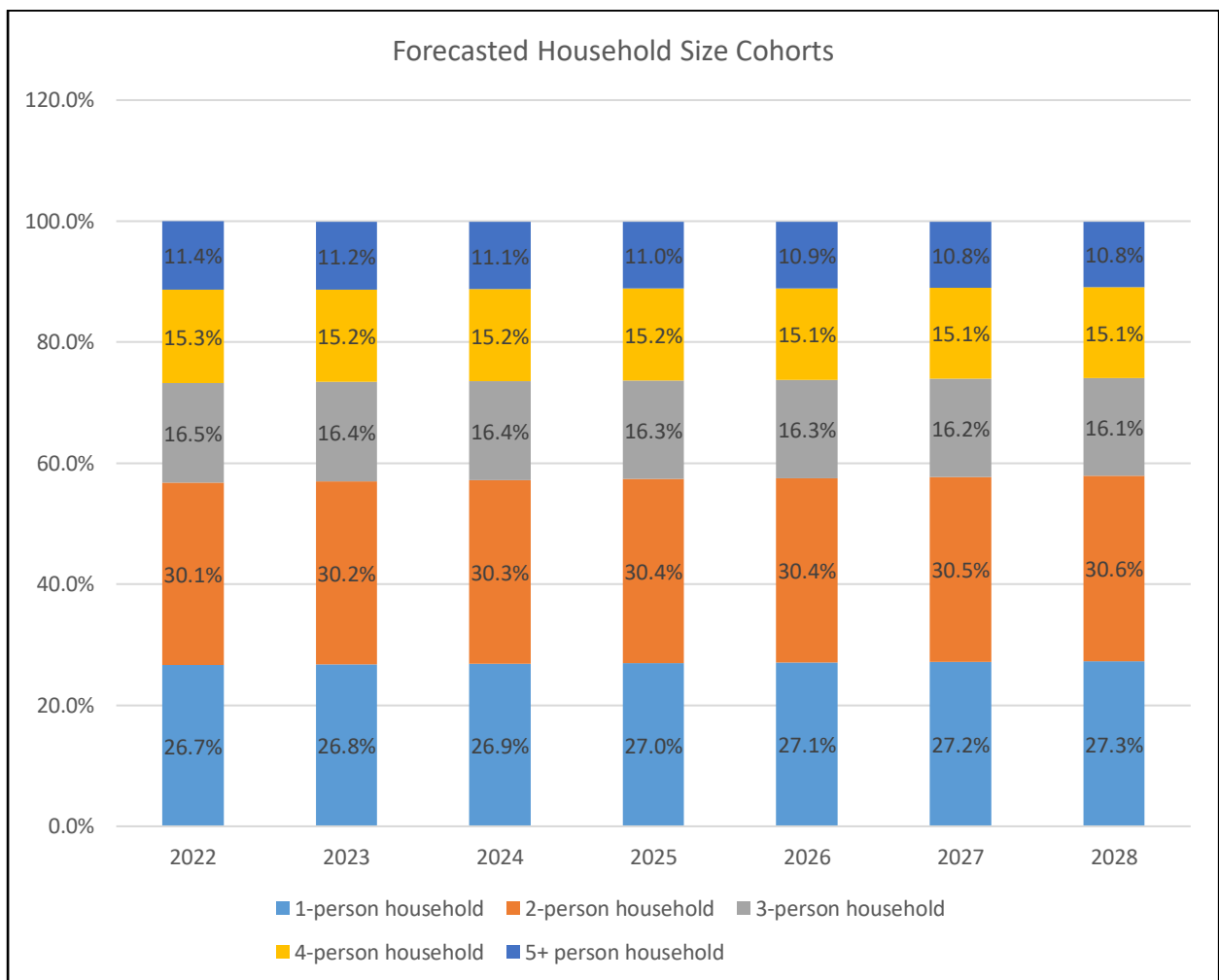


Figure 5.5: Forecasted household size cohorts during the plan period

5.4 Household Tenure

The NPF identifies the need to estimate the demand for different tenure types during the development plan period. This estimation has been informed by the historic tenure split observed in County Waterford during the intercensal change from 2006 – 2016 which has been considered and annualised to assist with forecasting future change in tenure split. The ‘type of occupancy’ categories are as provided by the CSO.

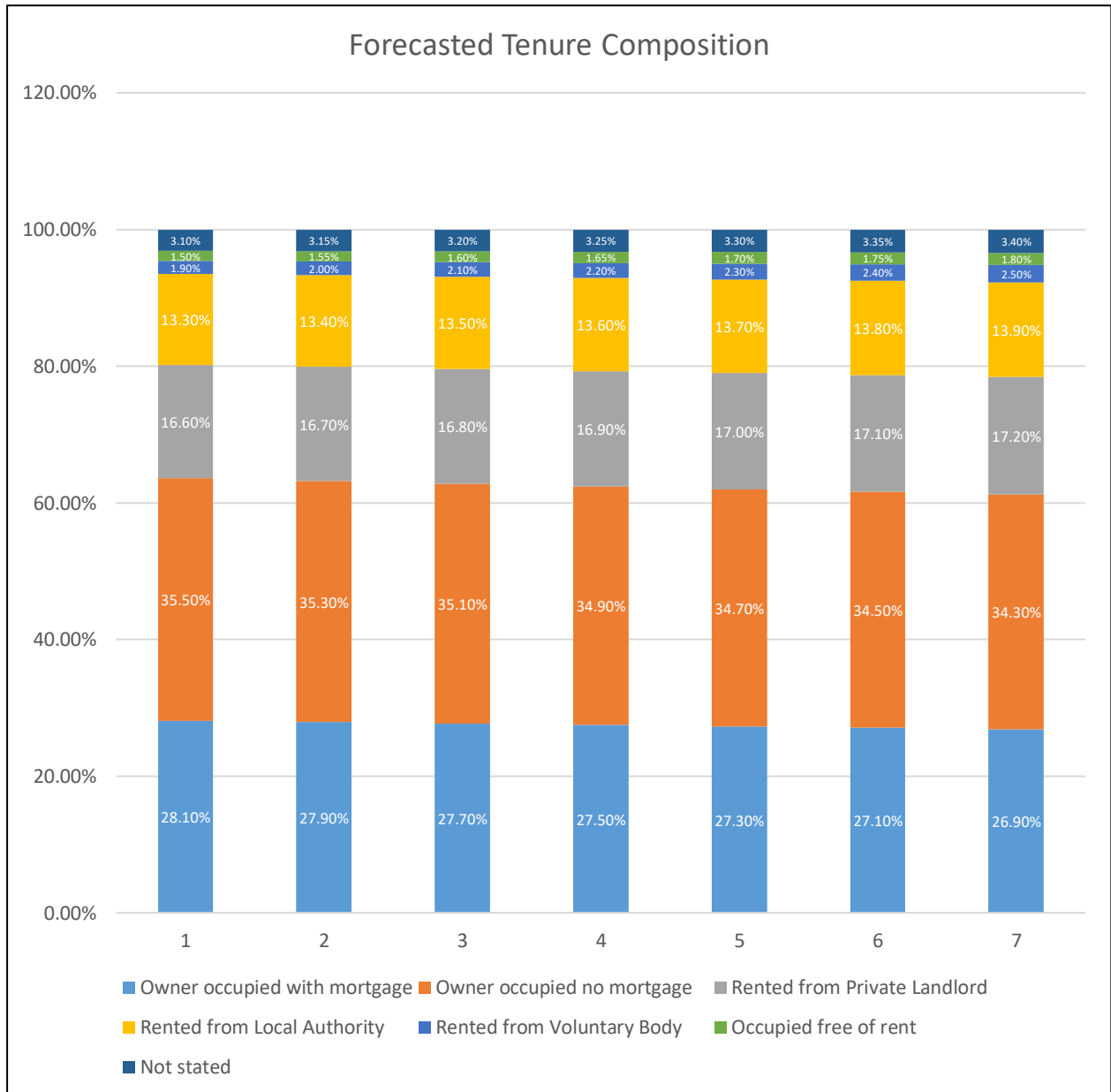


Figure 5.6: Forecasted household occupancy during the plan period

By 2028, it is forecasted that 61.2% of all households will be owner occupied in County Waterford (including with mortgage and without mortgage). It is forecasted that private rental figure will increase to 17.2% in 2028, and that the units rented from a voluntary body will increase to 2.5%. It is forecasted that units rented from the local authority will increase to 13.9% by 2028.

5.5 Social Housing Supply and Demand

Existing Social Housing Needs

The existing social housing need is discussed in Section 3.5. In summary, the social housing waiting list for County Waterford stands at 1,267 at the time of writing. This existing need does not account for the future needs assessed in Section 4, which would be in addition to any remaining need unmet at the beginning of the strategy period 2022- 2028.

There was an increase of 15.8% (173 households) in the number of households qualifying for social housing support recorded in Waterford City and County from 2019 to 2020. The largest cohort of applicants is within the 30-39 age bracket (main applicant) at 365. There were 37 applicants aged 70 +, and 194 applicants aged less than 25.

The location preference and preference in terms of accommodation size has been compiled by Waterford City and County Council for different parts of the county. In Waterford City, the data illustrates that Ferrybank and the North West Suburbs are the most preferred locations (Table 5.5). The data in the following tables includes HAP, RAS and Voluntary Bodies.

The majority of applicants have a stated preference for a 1 bed unit (789), equating to more than half of all applicants.

FIRST AREA OF CHOICE	1 bed	2 bed	3 bed	4 bed	Total
Ballybeg/Kilbarry	26	11	6	3	46
Central/Inner City	142	46	10	0	198
Dunmore Road	105	67	36	2	210
Farran Park	1	0	0	0	1
Ferrybank	214	89	31	3	337
Larchville/Lisduggan	81	49	11	1	142
North West Suburbs	142	77	33	5	257
Sacred Heart	78	49	23	1	151
Total City	789	388	150	15	1342

Table 5.5: Waterford City - First Choice Location Preference and Unit Size Preference

In Dungarvan the most preferred location is Abbeyside and the total number of applicants is 203. In Tramore the total number is 138.

Abbeyside	51	26	7	1	85
Ballinroad	14	8	2	0	24
Dungarvan	45	35	13	1	94
Total Dungarvan	110	69	22	2	203
Tramore	68	55	10	5	138

Table 5.6: Dungarvan and Tramore - First Choice Location Preference and Unit Size Preference

In the remained of the county, Dunmore East and Kilmacthomas are listed as the most preferred location.

Sheltered Housing	36	0	0	0	36
Dunmore East	14	11	3	1	29
Kilmacthomas	9	12	4	0	25
Kilmeaden	15	4	2	0	21
Crooke	10	8	1	0	19
Lismore	6	3	4	1	14
Portlaw	7	5	2	0	14
Kill	9	1	1	0	11
Cappoquin	7	2	1	0	10
Tallow	3	5	2	0	10

Table 5.7: Waterford County - First Choice Location Preference and Unit Size Preference

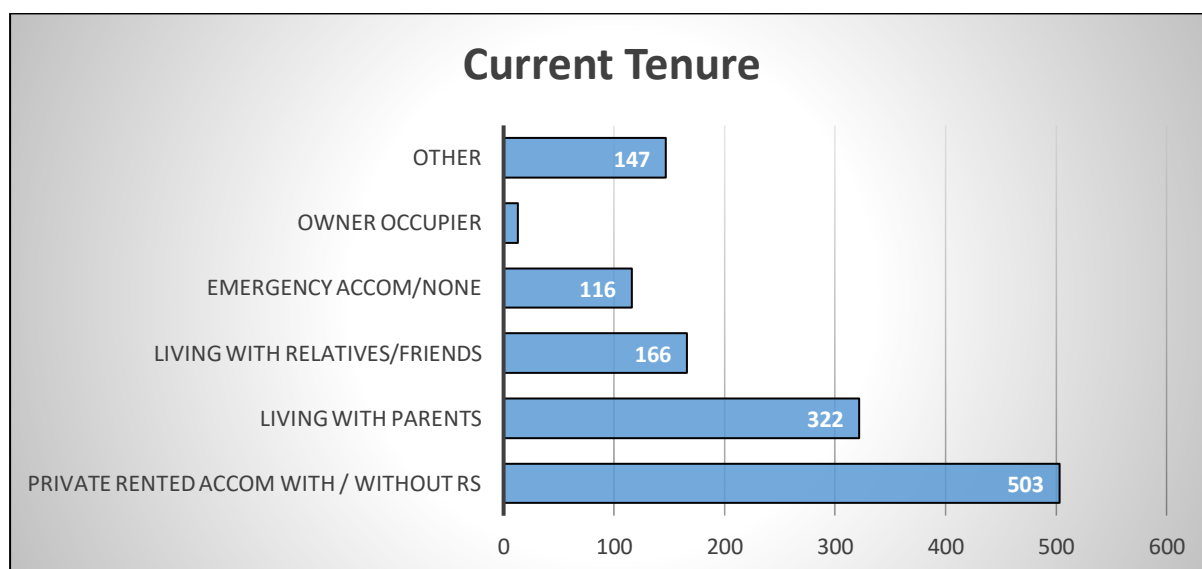


Figure 5.7: Social housing need – current tenure

In relation to the duration of time applicants have been on the social housing waiting list in County Waterford, the largest cohort is noted within the 1-2 years bracket, however a sizeable number of applicants are on the waiting list for 7 years or greater.

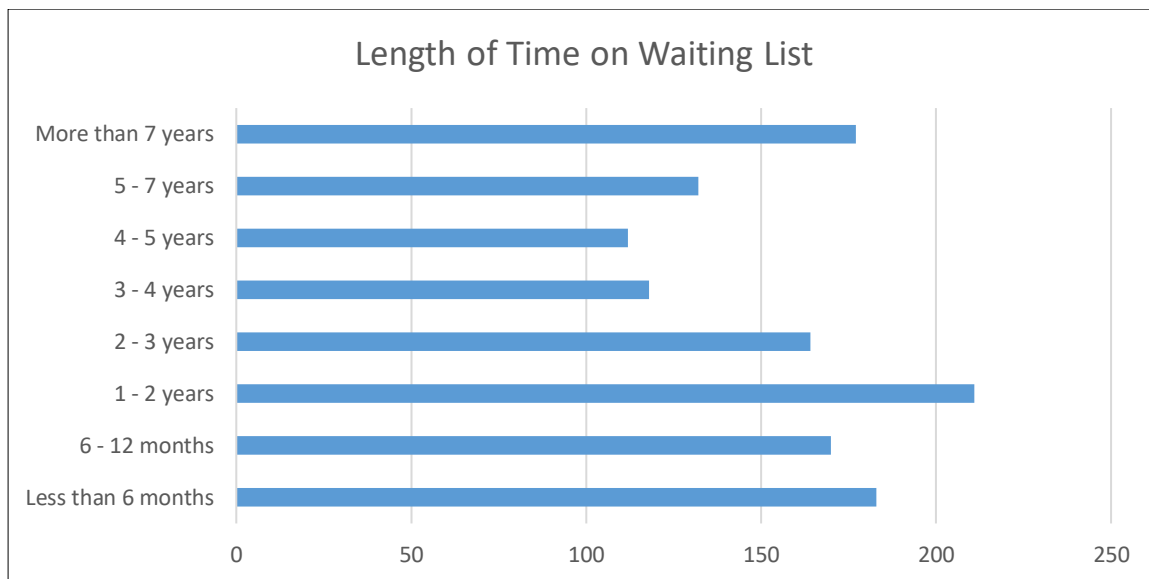


Figure 5.8: Length of Time on Record of Qualified Households (Waiting List)

Homelessness & Emergency Accommodation

The number of households who have presented to Waterford Council Homeless Services has increased substantially year on year with 1,267 households presenting during 2020 (information provided by the Housing Section of Waterford City & County Council). Of those, 756 received a formal homeless assessment with 146 single persons and 25 families accommodated in Temporary Emergency Accommodation (TEA) during 2020. Of the 756 households which received an assessment, 76% were single and 24% were families.

As of the 30th April 2021 there were 55 single persons and 7 families in TEA in Waterford.

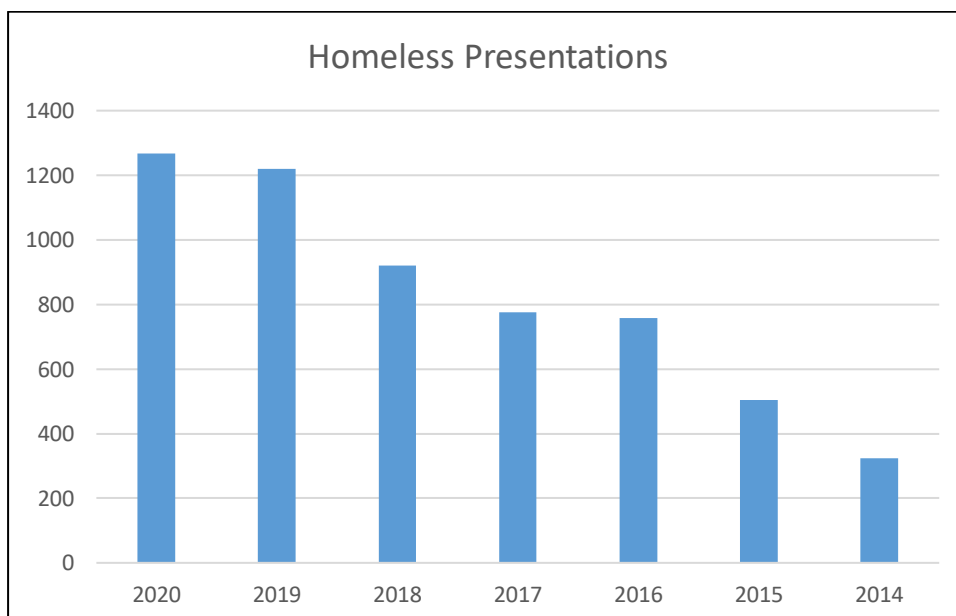


Figure 5.9: Homeless Presentations 2014-2020 (County Waterford)

In relation to capacity, there are 20 “Own Front Door” (OFD) units provided in Waterford City and 2 units in Dungarvan. The number of Section 10 (S10) Temporary Emergency Accommodation (TEA) beds/units varies as there is flexibility to meet demand as it arises. Temporary Emergency Accommodation can be utilised for long term or transitional accommodation as the need arises, however, the number of S10 TEA beds based on the service level agreements in place is 69 based in Waterford City.

Waterford City & County Council have prioritized homeless preventions, supported exits and sustained tenancies in 2020 through partnership and collaborative working with the Health Service Executive (HSE) and the various Homeless Service Providers in Waterford; and by utilising various projects in Waterford Integrated Homeless Services centre including:

- Homeless Prevention & Support Service,
- Advice & Information Service,
- Tenancy Support & Sustainment Service,
- Homeless HAP Place Finder Service and;
- Housing First Service.

In relation to the spatial distribution of social housing need, the core strategy prioritises growth in the settlement hierarchy to Waterford City, Dungarvan and Tramore, in line with national and regional policy contained in the NPF and the RSES.

The location preference data for social housing discussed above also notes that Waterford City, Dungarvan and Tramore are the most preferred locations for housing applicants.

The policy framework under the NPF and RSES for concentrating growth to urban and built up areas, urban in-fill and regeneration will impact the spatial distribution of housing, with development plans required to comply with this policy direction. Therefore, it is reasonable to conclude that social housing need will increase in the higher tier settlements of Waterford where population and growth is being focused and directed to.

Deprivation

A review of the Pobal Deprivation Index and Geoprofiling Reports reveals the Pobal HP Index score for County Waterford in 2016 was -2.35 which is considered marginally below average. The AIRO report summarises the key findings for Waterford in relation to the deprivation index and notes that relative to the State, the South-East Region has a higher level of deprivation. As the graph illustrates, the relative affluence and deprivation score for the State is 0.6, while the corresponding value for the South-East Region is -3.2. Both Waterford City and County are more deprived than Ireland as a whole, with Waterford City recording a rate of -4.8 (similar to Wexford) and Waterford County recording a rate of -0.6.

The Waterford City South LEA has by far the lowest level of deprivation with a score of -9.7. While still classed as marginally below average (-10 to 0) this LEA is very close to being classed as ‘Disadvantaged’. With the exception of Waterford City East (3.5), all other LEAs are also classed as marginally below average.

Figure 5.11 sourced from Pobal classifies each of the 504 Small Areas (SAs) in Waterford on the basis of their scores on the HP Pobal Affluence and Deprivation Index. As the map shows, most of Waterford, and in particular rural Waterford, is classified on the Pobal HP Index as being ‘marginally above average’ or ‘marginally below average’.

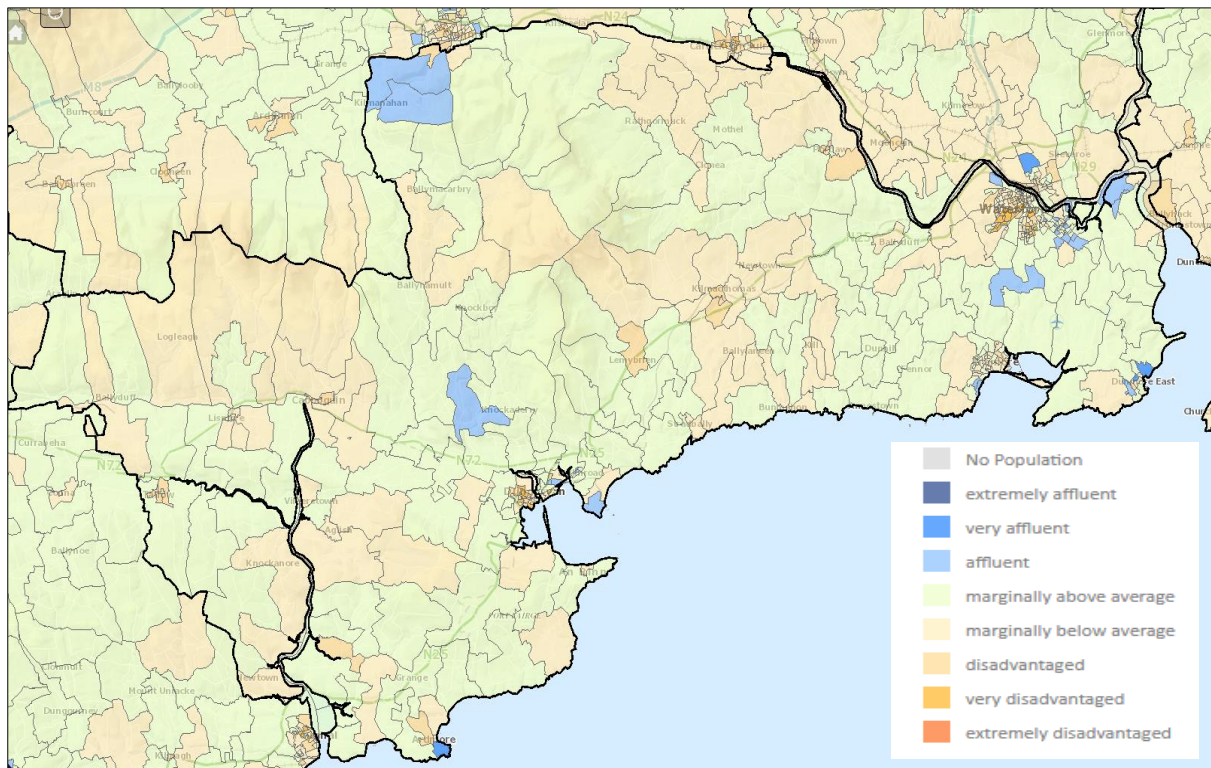


Figure 5.11: Pobal Deprivation Map 2016 (County Waterford)

The northern half of the county has almost equal numbers of SAs that are classified as ‘marginally below average’ and ‘marginally above average’. Below-average and disadvantaged values pertain in much of Waterford’s MASP area and in towns such as Dungarvan and Tramore.

The highest levels of disadvantage are located within the MASP area in areas such as Larchville, Lisduggan and Morrison’s Road. Across Waterford City and County (including Kilkenny MASP area) a total of 110 SAs are classed as Disadvantaged or Very Disadvantaged. This accounts of a total population of 24,821 or 20% of the total population.

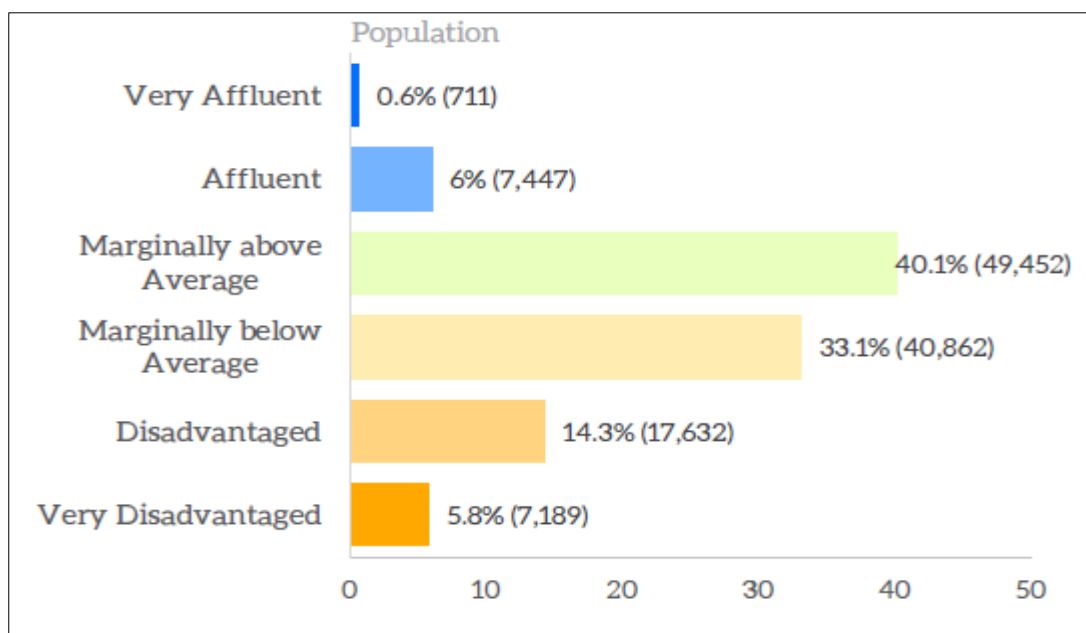


Figure 5.12: Waterford - Pobal HP Deprivation Index, Relative Score 2016 - by Population (Source: Pobal/AIRO)

Based on analysis of the Pobal Geoprofiling Reports (insert included as Table 5.8 below) and the Pobal Deprivation Map for County Waterford, and having regard to the settlement strategy and planning policy in regards to population distribution, it is considered there is likely to be a social housing need in Waterford City, Dungarvan, Tramore and Dunmore East.

ED Name	Total Population 2016	Deprivation Score 2016	Age Dependency Ratio 2016	Lone Parents Ratio 2016	Proportion with Primary Education Only 2016	Proportion with third level education 2016	Unemployment rate-Male 2016	Unemployment rate-Female 2016
Annestown	822	2.95	40.19	12.50	13.00	36.87	7.77	8.80
Ardmore	206	0.06	41.26	4.00	12.00	45.45	19.61	4.76
Ardmore	739	-0.85	35.82	24.60	11.00	36.98	17.27	10.33
Ballybeg North	2757	-16.75	37.12	49.00	22.33	14.67	32.79	27.99
Ballybeg South/Ballynaneashagh	309	-4.01	45.31	6.00	12.00	38.31	18.03	20.00
Ballybricken	145	-9.71	42.76	45.00	19.00	24.76	29.41	16.67
Ballyduff	306	1.47	35.62	18.00	18.00	30.20	6.67	10.00
Ballydurn	186	1.80	33.87	5.00	14.00	31.62	14.04	5.41
Ballyhane	474	-2.11	42.96	16.00	9.50	27.28	10.76	12.97
Ballyheeny	590	-5.18	40.16	15.50	11.00	26.37	19.13	16.61
Ballyin	508	0.64	39.05	4.50	15.50	30.18	10.84	5.26
Ballylaneen	263	-1.22	38.78	10.00	16.00	32.18	12.00	7.69
Ballymacarbry	511	3.19	39.87	16.00	10.50	36.55	11.31	6.29
Ballymacart	362	1.00	38.17	15.50	17.50	33.01	6.83	11.93
Ballymaclode	1247	7.18	37.92	6.00	7.25	50.23	7.57	5.75
Ballynakill	2125	2.28	35.99	12.67	9.33	47.34	11.32	10.69
Ballynakill (Pt.)	420	2.33	49.76	9.00	10.00	34.21	8.42	1.54
Ballynamult	169	3.43	32.54	6.00	10.00	31.25	6.52	4.88

Ballysaggartmore	337	-0.80	36.50	12.00	21.00	24.02	8.33	5.88
Ballytruckle	5938	-5.54	30.80	34.90	11.14	23.59	23.23	19.73
Bilberry	802	-1.57	26.59	20.00	14.50	34.72	22.62	23.17
Bohadoon	301	2.98	45.51	10.00	10.00	33.70	6.76	5.26
Cappagh	361	3.90	33.72	11.50	9.00	32.75	6.91	4.94
Cappoquin	1253	-7.42	38.09	23.83	20.17	22.04	16.11	17.20
Carrickbeg Rural	450	-1.95	38.65	21.00	13.00	26.12	11.90	7.54
Carrigcastle	269	-6.74	31.97	26.00	18.00	27.84	19.48	28.57
Carriglea	533	2.93	37.22	12.50	17.00	38.01	8.78	5.08
Castlerichard	492	0.88	39.56	12.00	17.00	29.90	6.47	7.00
Centre A	791	-2.49	30.42	45.60	13.80	29.17	31.52	25.89
Centre B	236	-10.28	27.12	32.00	14.00	30.08	38.36	33.33
Clashmore	404	2.42	35.43	10.00	13.50	28.78	6.19	7.68
Cleaboy	2556	-3.73	30.04	26.67	10.89	23.47	13.87	13.29
Clonea	430	-1.25	33.30	29.50	15.00	23.15	8.39	14.72
Clonea	2280	5.33	35.11	19.00	9.89	40.69	9.71	9.88
Colligan	703	5.61	40.69	7.67	7.00	36.13	6.30	6.71
Comeragh	435	-7.85	37.36	30.50	17.50	28.36	21.97	12.08
Coumaraglin	247	2.82	36.03	8.00	15.00	28.82	8.00	8.51
Custom House A	353	-4.98	32.50	29.33	13.00	27.01	30.06	24.73
Custom House B	269	-5.20	21.21	43.00	16.00	30.44	46.84	27.84
Dromana	790	-1.28	39.65	18.00	16.33	29.03	12.62	11.96
Dromore	241	-2.69	37.76	10.00	16.00	30.67	16.39	6.12
Drumcannon	372	2.51	38.71	16.00	10.00	37.76	7.69	8.96
Drumroe	273	2.34	32.60	25.00	8.00	37.10	11.69	6.38
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
Dungarvan Rural	1902	1.05	38.73	18.17	12.17	32.43	13.18	9.46
Dunhill	247	2.85	38.06	7.00	10.00	40.88	11.11	7.55
Faithlegg (Pt.)	2152	3.25	37.43	13.50	10.25	37.65	10.21	9.26
Farranshoneen	5607	7.90	32.09	16.05	4.57	51.30	10.29	8.33
Fenoagh	214	-2.56	39.72	15.00	8.00	31.20	13.73	10.26
Ferrybank	858	-10.98	42.64	21.25	18.25	22.10	21.40	14.58
Fews	347	-1.60	35.73	10.00	15.00	32.51	16.67	9.52
Fox'S Castle	457	3.86	34.80	4.50	15.50	30.10	8.36	2.38
Gardenmorris	426	-1.78	39.91	23.50	13.50	27.15	13.61	7.53
Georgestown	206	4.84	40.78	14.00	12.00	30.83	7.55	2.22
Glen	423	-3.02	37.05	14.50	12.00	23.24	12.61	11.80
Glenwilliam	164	0.13	37.80	9.00	22.00	28.30	10.87	0.00
Gortnapeaky	203	-0.66	44.33	17.00	21.00	22.40	4.00	14.29
Gracedieu	1662	-3.26	35.18	27.75	8.00	32.73	24.57	21.15
Graignagower	521	0.09	34.72	23.50	16.00	27.61	9.43	9.98
Grallagh	235	3.65	35.32	10.00	11.00	34.04	6.06	7.69
Grange	356	1.91	42.42	15.00	13.00	26.26	6.02	6.15
Grange North	883	-14.99	44.45	37.50	19.25	16.03	24.24	20.17
Grange South	2722	-2.80	37.23	28.40	12.90	31.72	20.68	14.37
Grange Upper	2412	3.45	37.14	15.50	6.50	48.96	13.15	12.56
Gurteen	354	0.41	40.11	11.00	14.00	33.78	7.69	9.23
Islandikane	2337	4.66	38.72	13.71	7.43	43.00	11.32	7.90
Keereen	227	-3.51	32.60	30.00	12.00	20.26	10.00	10.87
Kilbarry	1137	2.25	30.36	20.75	5.75	34.53	17.66	15.38
Kilbarry (Pt.)	253	11.37	39.13	12.00	3.00	61.31	4.76	6.38
Kilbarrymeaden	391	-7.09	39.39	20.00	17.50	22.42	13.76	19.27

Kilcockan	214	-3.11	40.65	17.00	24.00	23.94	9.43	10.26
Killea	1571	5.84	36.37	20.00	10.25	40.41	12.41	10.26
Killoteran	574	-0.96	35.47	16.00	13.50	32.55	12.73	10.38
Kilmacleague	398	0.24	34.17	5.00	10.00	29.92	13.16	6.49
Kilmacomma	465	2.20	39.90	19.50	15.00	33.27	13.52	10.12
Kilmacthomas	1367	-9.28	34.99	32.40	21.20	18.08	22.12	18.01
Kilmeadan	746	-4.87	36.06	26.00	12.00	23.86	19.48	14.39
Kilmeadan	757	0.32	36.07	13.67	12.67	32.39	14.44	5.94
Kilronan	214	10.49	35.98	11.00	6.00	47.06	1.89	6.38
Kilwatermoy East	122	2.23	42.62	7.00	20.00	32.93	9.09	4.00
Kilwatermoy West	203	4.23	39.41	8.00	13.00	35.54	7.27	4.76
Kingsmeadow	1093	-15.55	35.19	36.00	27.00	15.67	31.68	22.77
Kinsalebeg	574	-1.59	39.33	3.33	14.67	30.83	14.00	10.92
Knockaunbrandaun	210	-4.52	35.71	18.00	24.00	26.47	10.91	20.93
Knockmahon	396	-2.22	41.13	17.00	15.00	31.11	16.71	10.67
Larchville	944	-25.72	40.71	68.75	35.50	4.82	40.55	35.38
Lisduggan	993	-23.83	44.07	48.80	38.20	7.13	39.60	25.04
Lismore Rural	1237	-0.72	40.14	19.80	13.00	32.25	8.87	9.56
Lismore Urban	666	-5.39	34.57	26.00	14.75	26.28	15.64	17.15
Military Road	763	-13.83	36.45	45.75	28.75	16.32	30.28	12.30
Mocollop	244	0.57	36.07	5.00	19.00	28.14	9.72	9.80
Modelligo	328	1.46	40.55	10.00	18.00	31.22	6.59	10.00
Modelligo	294	4.26	38.10	9.00	11.00	26.06	3.61	3.77
Morrisson's Avenue East	510	-10.22	34.60	35.00	24.00	23.26	22.06	13.55
Morrisson's Avenue West	300	-18.07	40.00	45.00	25.00	10.19	26.09	31.48
Morrisson's Road	490	-20.32	38.60	51.33	38.67	11.46	33.15	34.05
Mothel	462	-0.69	31.93	13.50	12.00	27.75	13.93	7.07
Mount Sion	849	-8.39	25.47	41.60	20.00	26.81	29.65	28.14
Mountkennedy	433	5.32	35.31	9.50	14.50	30.92	2.31	8.19
Mountstuart	89	-5.74	49.44	33.00	7.00	29.27	16.67	11.11
Newcastle	487	2.23	39.21	9.00	11.50	34.41	9.51	7.23
Newport'S Square	543	-18.57	34.74	54.00	28.00	10.81	34.54	30.88
Newtown	1064	-0.62	41.32	34.00	12.75	40.76	10.36	8.47
Newtown	471	-2.87	38.21	13.50	19.50	24.89	10.70	11.80
Park	1520	0.33	22.65	40.22	12.44	37.97	26.20	23.15
Pembrokestown	500	3.48	36.02	12.50	11.50	41.22	12.15	7.04
Poleberry	1357	-2.47	26.25	43.29	15.14	30.34	22.71	21.54
Portlaw	1629	-5.87	38.32	22.33	18.50	22.76	17.73	14.05
Rathgormuck	236	5.35	45.34	6.00	16.00	28.37	5.36	5.71
Rathmoylan	1149	1.33	32.91	16.80	8.00	36.22	16.01	13.02
Reisk	1144	3.66	35.46	12.00	11.50	37.67	10.14	7.61
Ringville	1365	2.63	38.09	11.40	10.20	39.80	11.35	7.94
Roanmore	812	-14.75	35.12	57.67	25.00	17.02	31.89	30.03
Ross	279	3.07	36.56	9.00	14.00	32.95	7.35	6.90
Seskinan	414	-3.00	35.75	16.00	17.50	20.99	11.51	4.41
Shortcourse	301	-14.32	23.40	50.00	24.50	15.02	45.62	26.36
Slievekeale	593	-12.24	37.20	45.00	21.67	15.26	21.13	15.70
St. Mary'S	685	0.73	39.64	6.67	11.00	37.96	11.02	8.86
Stradbally	808	-0.85	38.03	15.75	13.75	34.52	14.92	13.18
Tallow	1262	-7.78	37.65	16.20	18.00	18.31	19.29	14.38
Templemichael	414	-0.97	35.29	8.00	10.50	28.41	14.51	5.67
The Glen	742	-4.61	25.87	42.00	10.60	24.40	32.48	29.91
Ticor North	2152	-7.71	37.34	23.86	19.29	18.23	15.93	14.15

Ticor South	381	-12.22	41.41	49.00	23.00	16.68	17.02	18.20
Tinnasaggart	86	4.25	34.88	0.00	4.00	25.49	8.70	0.00
Tramore	9293	-1.33	37.12	28.75	9.61	34.77	18.48	13.59
Whitechurch	205	4.92	33.17	14.00	13.00	27.56	3.77	2.63
Woodstown	600	4.85	39.96	9.00	7.33	44.41	10.08	4.96

Table 5.8: Pobal Geoprofiling Report County Waterford (EDs)

Traveller Accommodation

The Waterford City & County Council Traveller Accommodation Programme (TAP) 2019-2024 notes that a midterm review of the 2014-2018 TAP was conducted in 2016 and an updated assessment of need for the City and County was carried out. The need as identified is outlined in the following table.

Accommodation Type	Existing Need	Projected Need	Total
Standard Housing	20	7	27
Group Housing	5	-	5
Halting Site	5	9	14
Transitional Housing	3	-	3
Rental Accommodation Scheme	9	-	9
Private Rented/HAP Scheme	-	3	3
Total	42	19	61

Table 5.9: Summary of Proposed Accommodation need by Type Following the Mid Term Review

The highest demand in existing need is for Standard Housing and RAS. In terms of projected need the highest demand is for accommodation on Halting Sites. Standard Housing includes houses provided directly by Waterford City & County Council and by Approved Housing Bodies.

The accommodation provided during the 2014-2018 period included:

- Standard Housing units - 31
- Group Housing – 4
- Halting Site - 2

The TAP notes that In November 2018 there were 224 Traveller families resident in Waterford City and County. These families were living in a range of accommodation types including Standard Housing, Serviced Halting Site bays, Approved Housing Bodies and Private rented/RAS.

Of the 224 families and individuals identified in the Annual Estimate of Traveller families 2018, 148 had been satisfactorily accommodated leaving a total of 76 families and individuals whose accommodation needs have not been met.

The TAP includes the following breakdown of the accommodation type needed which was determined following an assessment of the accommodation needs of the 76 families and individuals without long term accommodation:

Accommodation Type	Number of Units required
Standard Housing	36
Group Housing	16
Halting Site	21
Long Term Supported Accommodation	3
Total	76

Figure 5.13: Existing Need for Traveller accommodation in County Waterford

The TAP also includes projected need for the period 2019-2024 included below in a summary table of existing and new household need.

Accommodation Type	Existing Need	New Household Need	Total Need
Standard Housing	36	15	51
Private Rented Accommodation	-	5	5
Halting Site	21	5	26
Transitional Housing	3	-	3
Group Housing	16	-	16
Total	76	25	101

Figure 5.14: Existing and Projected Need for Traveller accommodation in County Waterford

6.0 Conclusion

6.0 Conclusion

The Housing Strategy has been prepared in accordance with the requirements of the Planning and Development Act 2000 (as amended) taking into account the following:

- the existing need and the likely future need for housing in County Waterford,
- the need to ensure that housing is available for persons who have different levels of income,
- the need to ensure that a mixture of house types and sizes is developed to reasonably match the requirements of the different categories of households, including the special requirements of elderly persons and persons with disabilities,
- the need to counteract undue segregation in housing between persons of different social backgrounds.

The Housing Strategy provides a framework to inform future policies and objectives relating to housing in Waterford City and County. It includes the determination of housing requirements in County Waterford over the period of the development plan 2022-2028. Demographic, economic and social inputs have been examined and utilised to estimate projected population change, income change, housing affordability, household formation and associated housing needs in County Waterford. These inputs have been sourced from the CSO, ESRI, CBI, Daft, RPPR and from Waterford City and County Council amongst other sources. The information sourced is correct at the time of writing, however it is acknowledged that projected economic data, population and planning permission data may be impacted by the ongoing COVID-19 pandemic.

The Housing Strategy complies with the NPF requirement to undertake a Housing Need Demand Assessment (HDNA) to correlate and accurately align future housing requirements. The HDNA undertaken for County Waterford and documented herein provides a robust evidence base to support decisions about new housing supply, the proportion of social and affordable housing required, and the provision of specialist housing and housing related services. The HDNA undertaken can perform as a database to allow scenario testing to inform key decisions on housing need and supply, in line with NPF requirements. The HNDA contained herein also complies with National Policy Objective 20 of the NPF which requires a projection of the need for single housing in the countryside during the plan period.

The Housing Strategy includes an estimate of the amount of social and affordable housing that will be required within the county during the period of the plan in order to comply with Section 94 (4) of the Planning and Development Act, 2000 (as amended). In preparing the housing strategy, the Summary of Social Housing Assessments 2020 (prepared under section 21(a) of the Housing (Miscellaneous Provisions) Act 2009) has been analysed insofar as it relates to the development plan area.

As noted herein, the Housing Strategy has taken cognisance of the significant changes in planning legislation and policy, notably the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES) for the Southern Region.

The report considers the potential increase in remote working impacting the structural demand for housing at both a national and regional level, with potential implications for distribution of population. In this regard, the Housing Strategy has had regard to the evolving situation regarding COVID-19 and assumptions made throughout the report are based on the best available evidence at the time of writing.

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. This average has been utilised in projecting the annual household numbers, albeit a higher number of units is anticipated in the post-Covid 19 recovery phase in 2023-2024.

The identified social and affordable housing requirement ranges from 212 to 247 units annually during the plan period, equivalent to c.30% of the total of additional anticipated households in County Waterford. As noted in the preceding sections, in the case of County Waterford, a number of households that do not qualify for a mortgage can afford private rental for a 1 bed unit during the plan period, however a 1 bedroom unit would only be suitable for c.12% of these households, and this has been factored into the overall need.

The social (and affordable) requirements reflect the projected extent of 'housing need' during the strategy period. This relates to the additional anticipated households during that time and therefore it is in addition to the current extent of unmet need as per the social housing waiting list discussed in Section 3 and Section 5 of this report.

In relation to the spatial distribution of social housing need, the core strategy prioritises growth in the settlement hierarchy to Waterford City, Dungarvan and Tramore, in line with national and regional policy contained in the NPF and the RSES. The location preference data for social housing discussed above also notes that Waterford City, Dungarvan and Tramore are the most preferred locations for housing applicants. The policy framework under the NPF and RSES for concentrating growth to urban and built up areas, urban in-fill and regeneration will impact the spatial distribution of housing, with development plans required to comply with this policy direction. Based on analysis of the Pobal Deprivation Index, Pobal Geoprofiling Reports and the Pobal Deprivation Map for County Waterford, and having regard to the settlement strategy and planning policy in regards to population distribution, it is considered there is likely to be a social and affordable housing need in Waterford City, Dungarvan, Tramore and Dunmore East.

The number of households who have presented to Waterford Council Homeless Services has increased substantially year on year with 1,267 households presenting during 2020 (information provided by the Housing Section of Waterford City & County Council). Waterford City & County Council have prioritised homeless preventions, supported exits and sustained tenancies in 2020 through partnership and collaborative working with the Health Service Executive (HSE) and the various Homeless Service Providers in Waterford.

In compliance with the NPF requirement to project the need for single housing in the countryside, forecasts have been undertaken based on historical data with confidence intervals utilised (Figure 5.3). The intervals (or confidence bounds) illustrate the outer limits within which the single housing values from 2021 - 2028 are likely to fall within, forecasting figures from 162 to 218 annually out to 2028 (based on historical data). The regression analysis summarised in Table 5.3 provides a projection of one off housing permissions based on the regional unemployment rate, indicating an average of 141 from 2022-2028. Other variables may impact the demand for single housing in the countryside during the plan period, such as the impact of remote working and Covid-19 on settlement and employment patterns or the impact of government policy and planning policy, however the analysis provided herein is considered to provide data-led projections based on observable trends and analysis.



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

Final Report

November 2021



Comhairle Cathrach & Contae Phort Láirge

Waterford City and County Council

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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.

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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.

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. SFRA's 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 discussing 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

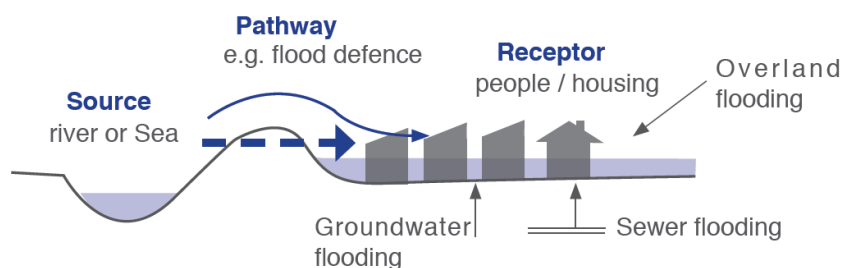


Fig. A1: Sources, pathways and receptors of flooding

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 2-1: 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 2-2: 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.'* SFRAs 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:

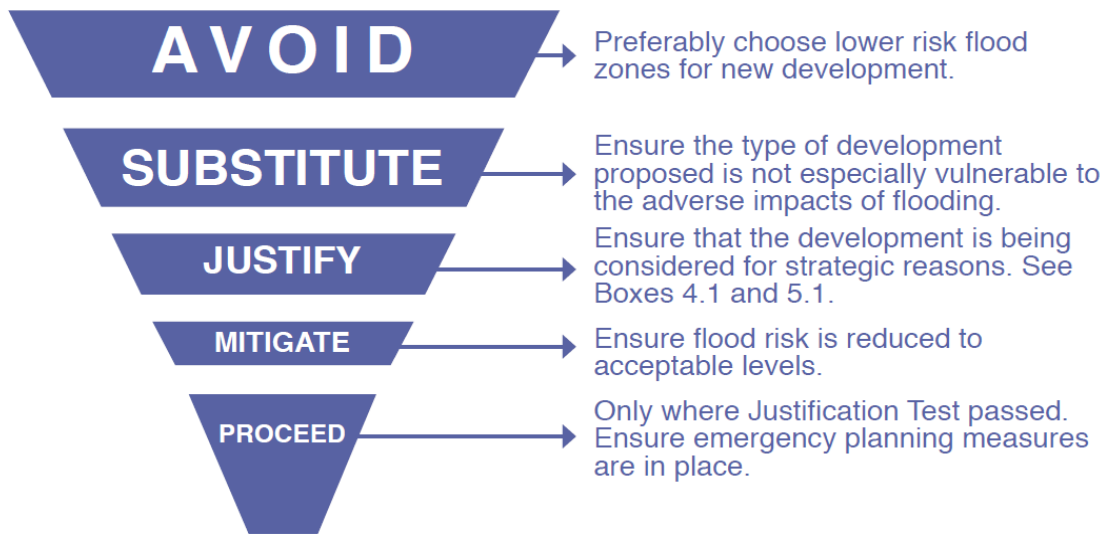
- Adopting a staged and hierarchical approach to the assessment of flood risk;
- Adopting a sequential approach to the management of flood risk, based on the frequency of flooding (identified through Flood Zones) and the vulnerability of the proposed land use.

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 4-3. 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 relief 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 4-1: Available flood risk data

Description	Coverage	Robustness	Comments on usefulness
Suir CFRAM Study	<p>Areas for further assessment (AFAs), or settlements falling along modelled lengths, in County Waterford are:</p> <ul style="list-style-type: none"> Waterford City (Model 9) Portlaw (model 7) Ballymacarbry (model 5D) 	<p>Flood Zones and flood extents for current and future scenarios provided by OPW.</p>	<p>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.</p>
South Western CFRAM Study	<p>Areas for further assessment (AFAs), or settlements falling along modelled lengths, in County Waterford are:</p> <ul style="list-style-type: none"> Aglish Ballyduff Tallow 	<p>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.</p>	<p>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.</p>
South Eastern CFRAM Study	<p>Areas for further assessment (AFAs), or settlements falling along modelled lengths, in County Waterford are:</p> <ul style="list-style-type: none"> Dungarvan and Ringphuca Dunmore East Tramore 	<p>High, but does not include wave overtopping /breaking so doesn't represent storm damage.</p>	<p>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</p>
Irish Coastal Protection Study (ICPSS)	<p>Still water tidal extents for 200 year and 1000 year events for the whole coastline.</p>	<p>High, but does not include wave overtopping /breaking so doesn't represent storm damage.</p>	<p>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</p>

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 4-2: 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, 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, Portlaoigh, Ballymacarbray, 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.

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, Heilbhic, Cheekpoint, Dungarvan, Dunmore East, Passage East, Portlawn 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

There are a number of flood relief schemes in County Waterford, including walls and / or embankments in Waterford City, Dungarvan, Portlawn and an area to the east of Tramore. 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 intention 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,

¹ Suir CFRAM Study Hydraulics Report, Final, July 2016

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.

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 4-3). 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 4-3: 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	Zoning objectives have been

Class	Category	Place	Level of assessment with this SFRA
		Clonmel Environs	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 with the settlement boundary. Plan Making 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, Kilbrien, Knockanore, Mellary, Modeligo, Piltown, Whitechurch.	A screening of risk has been carried out with the settlement boundary. Plan Making 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 5-1: 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

	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.

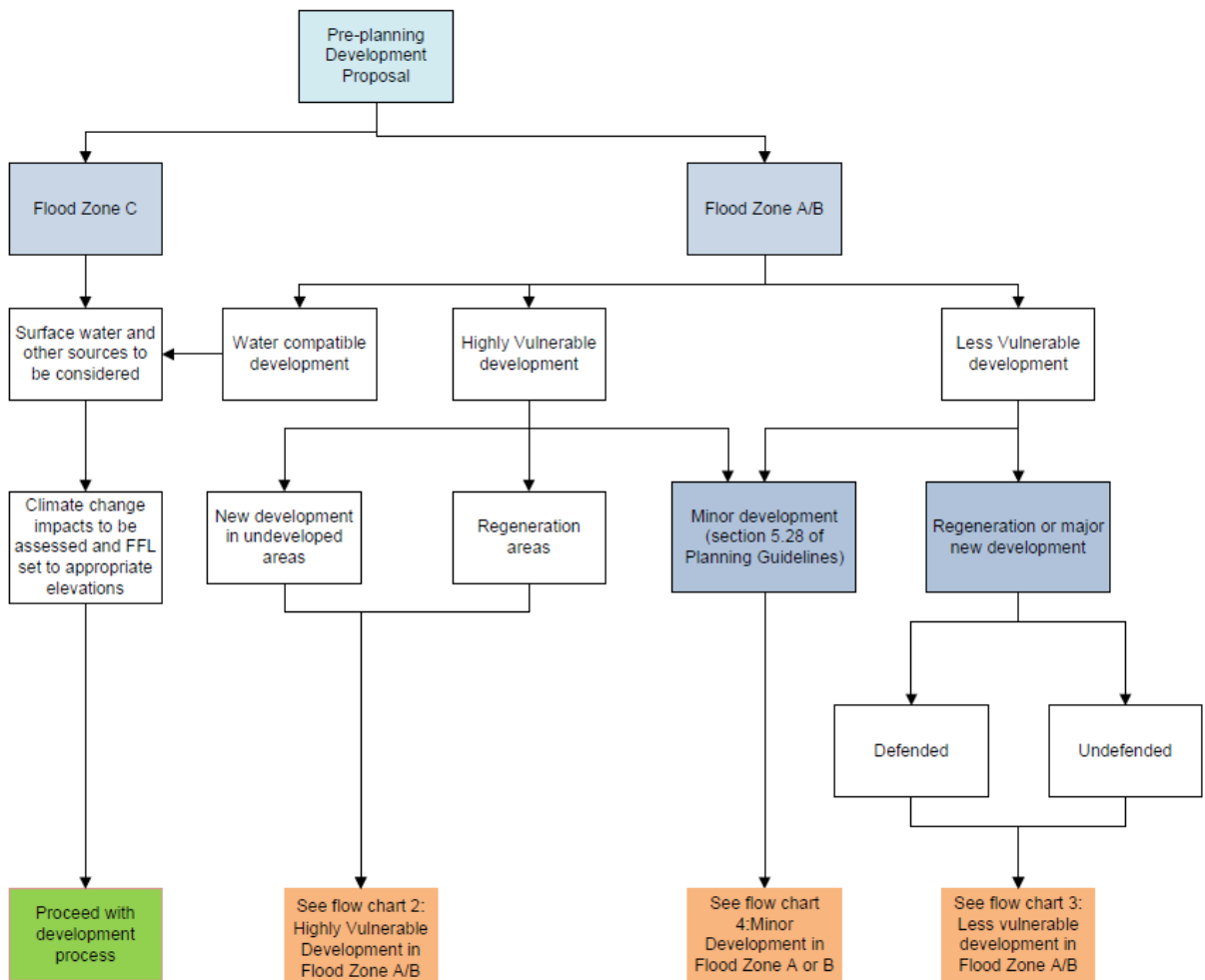
5.2 Development Scenarios and Flow Charts

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 triggered.

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, GSDSDS 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 5-2: 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 area, 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 5-3: 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 Aghlish 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
- Croke
- 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
- Portlaw
- 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 chance 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.

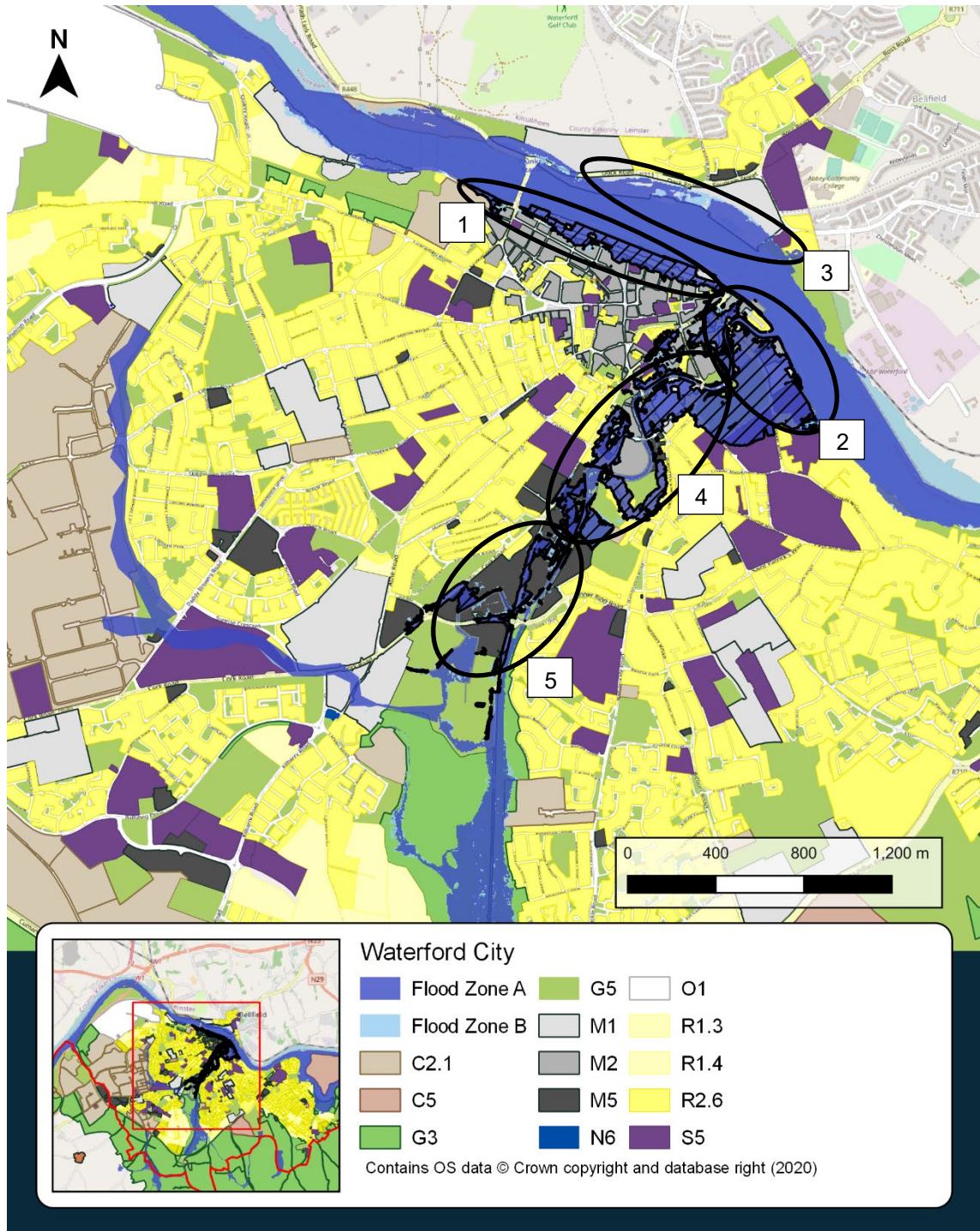


Figure 7-1: Waterford City and Environs Zoning

Table 7-1: 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 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 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 7-2: 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
The urban settlement is targeted for growth	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 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.
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.
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 located on the approach to the city centre and potential for redevelopment within the floodzone 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 floodzone 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.
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.
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	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

Justification test for sites within Flood Zone A and / or B	Area 4 - Town centre and mixed use	Area 5 - Upstream mixed use development
	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.	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.
Result	Pass	Pass
Recommendation for zoning	Retain current zoning and land use.	Retain current zoning and land use.

Table 7-3: 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 development type is required to achieve the proper planning and sustainable development of the urban settlement	These scattered areas of development lands are predominantly under residential use with some commercial uses in and around the city centre/quays. It is likely that redevelopment will be confined to minor development types.	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 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

Justification test for sites within Flood Zone A and / or B	Scattered areas of Existing residential	Ballybeg / Kilbarry
		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 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.	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 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.

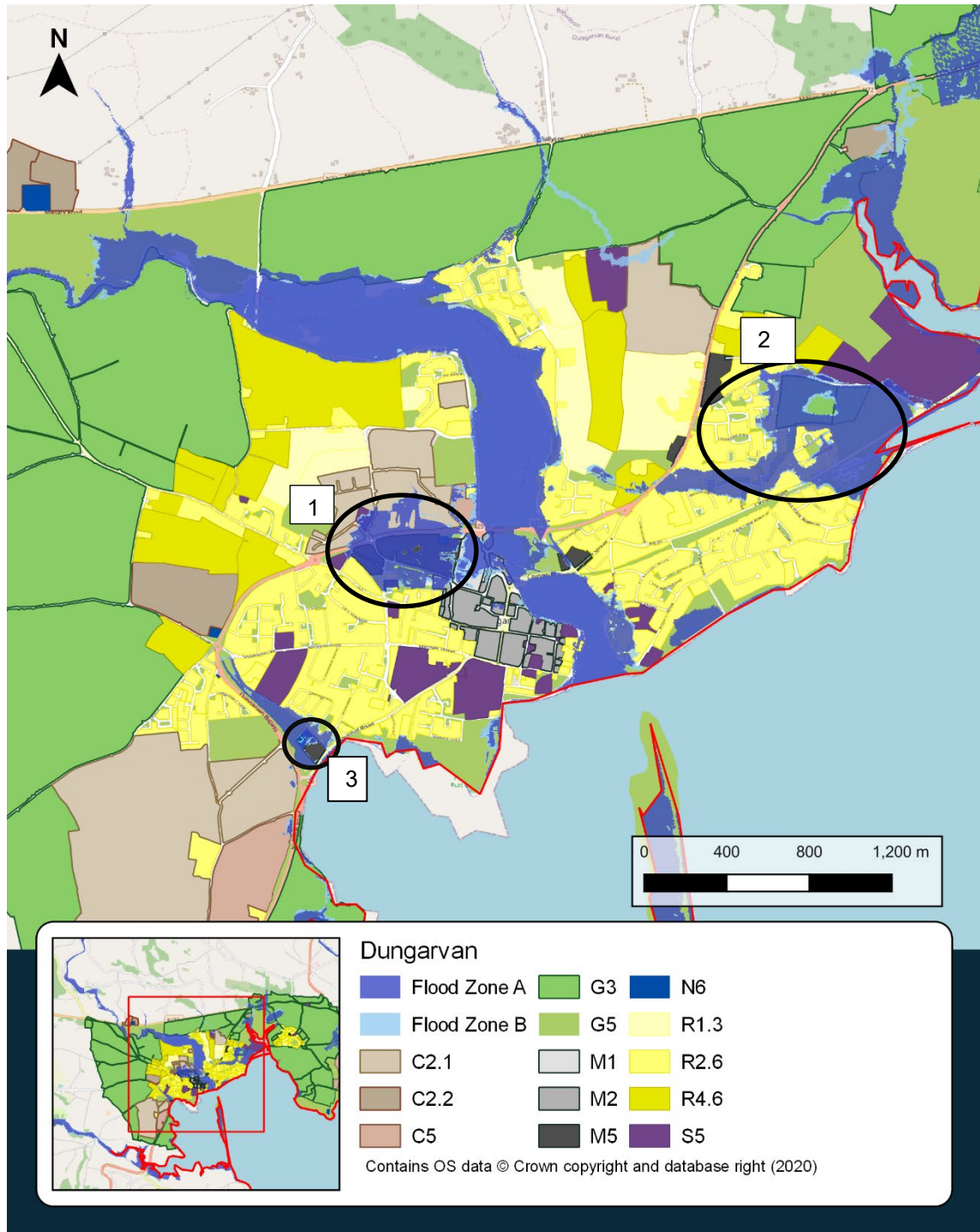


Figure 7-2: Dungarvan Zoning

Table 7-4: 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
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
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
	<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.

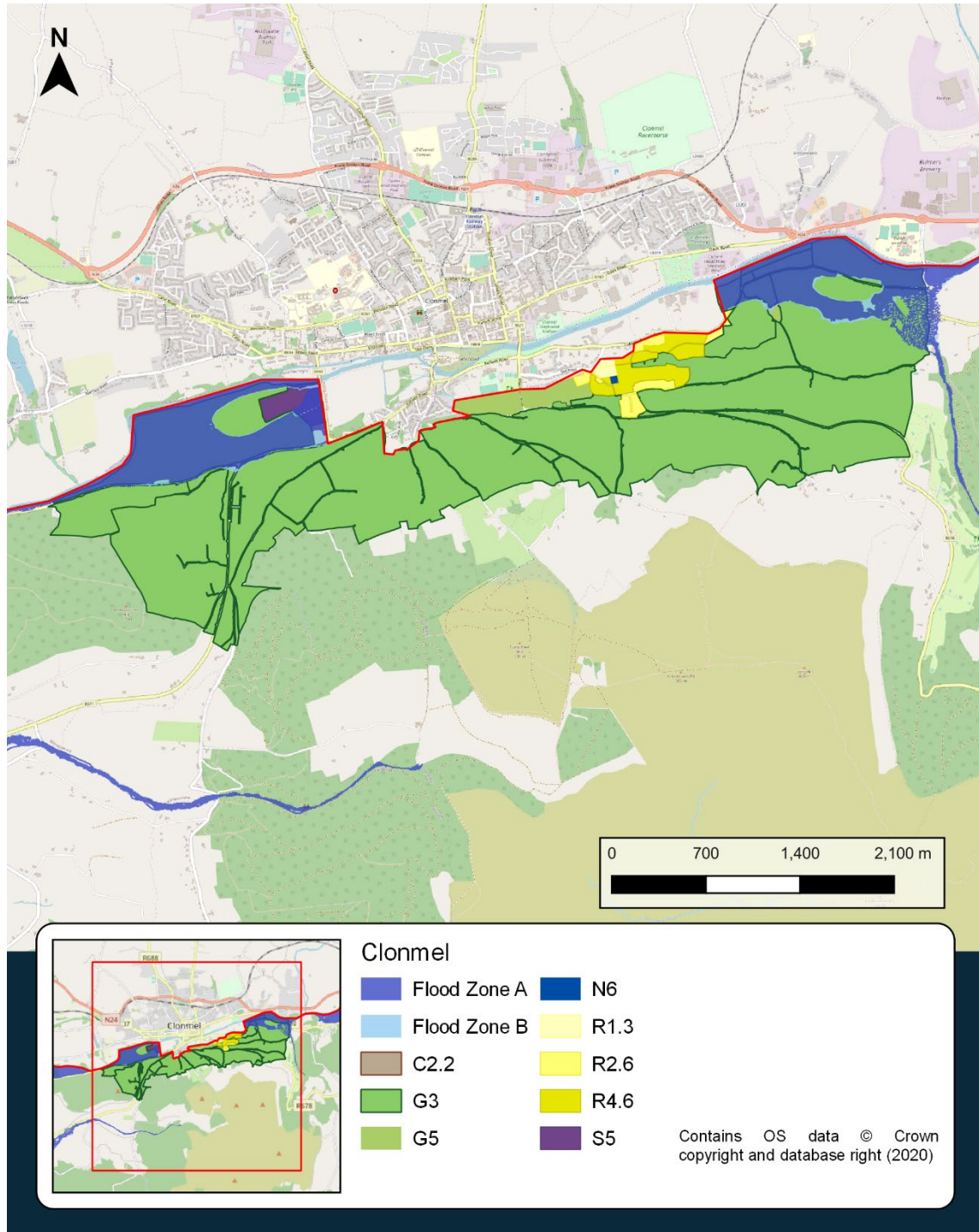


Figure 7-3: Clonmel Zoning

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.

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.

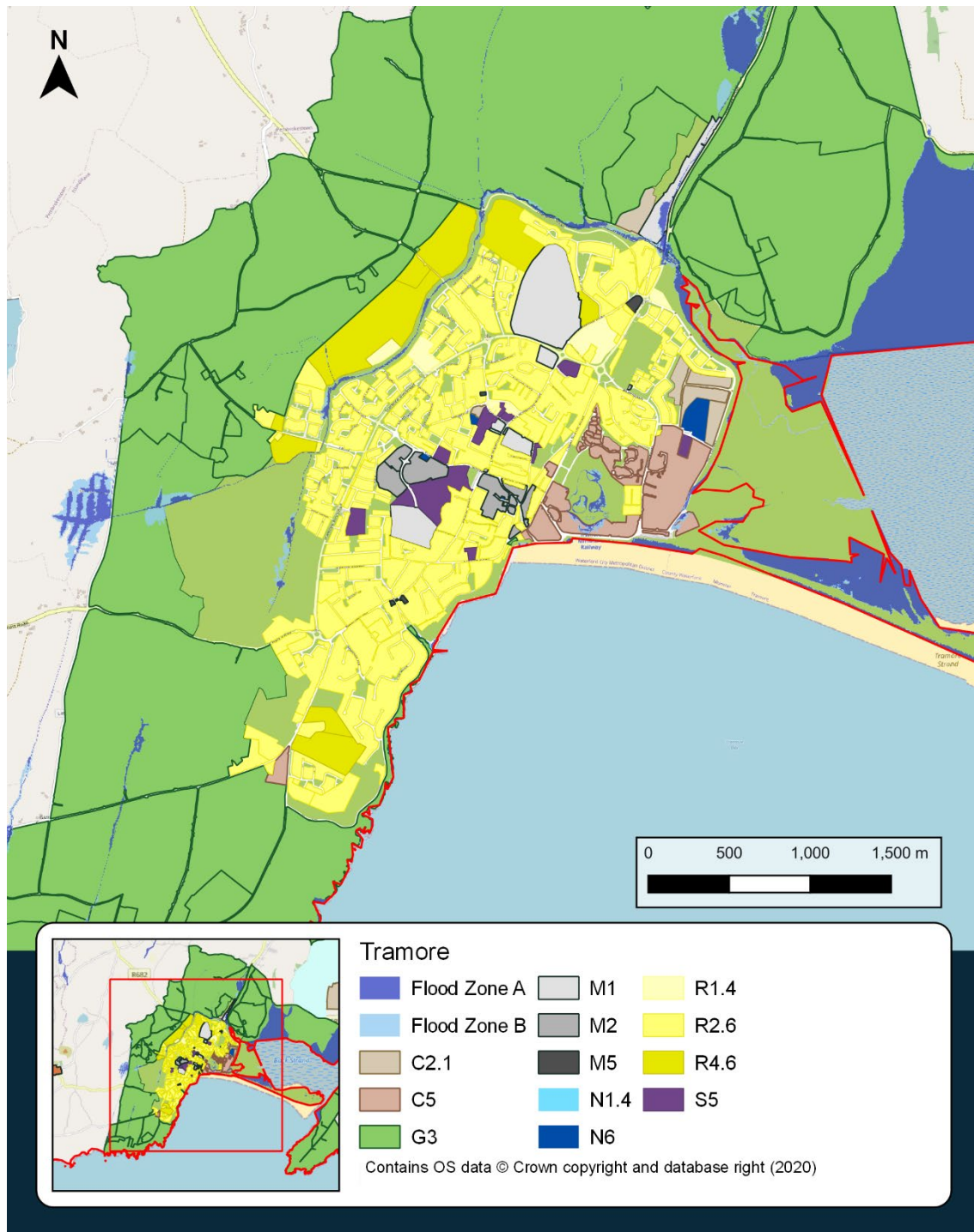


Figure 7-4: Tramore Zoning

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.

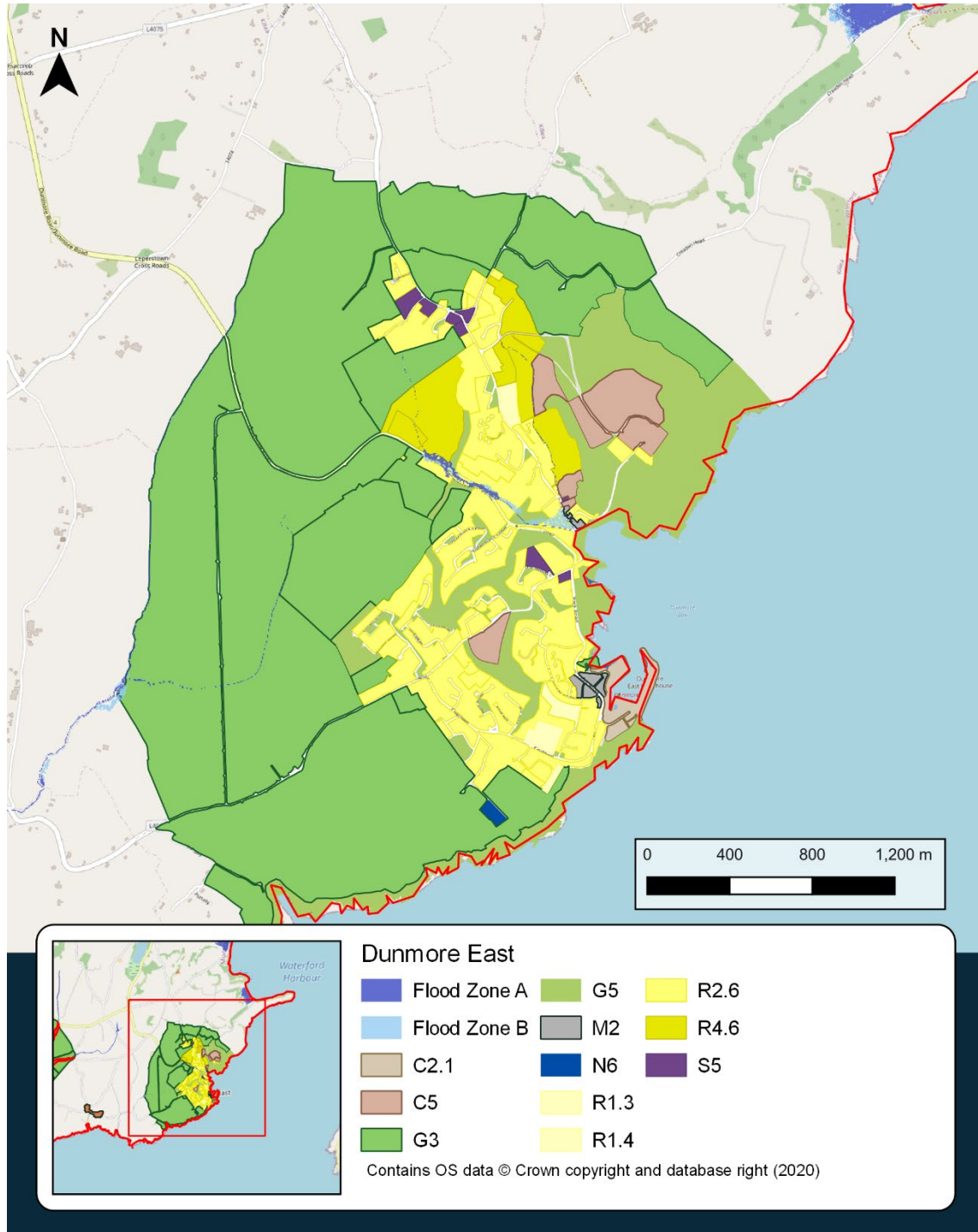


Figure 7-5: Dunmore East Zoning

There are areas New Residential, Existing Residential, Strategic Reserve and Industrial, 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).

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 passed 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. 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.

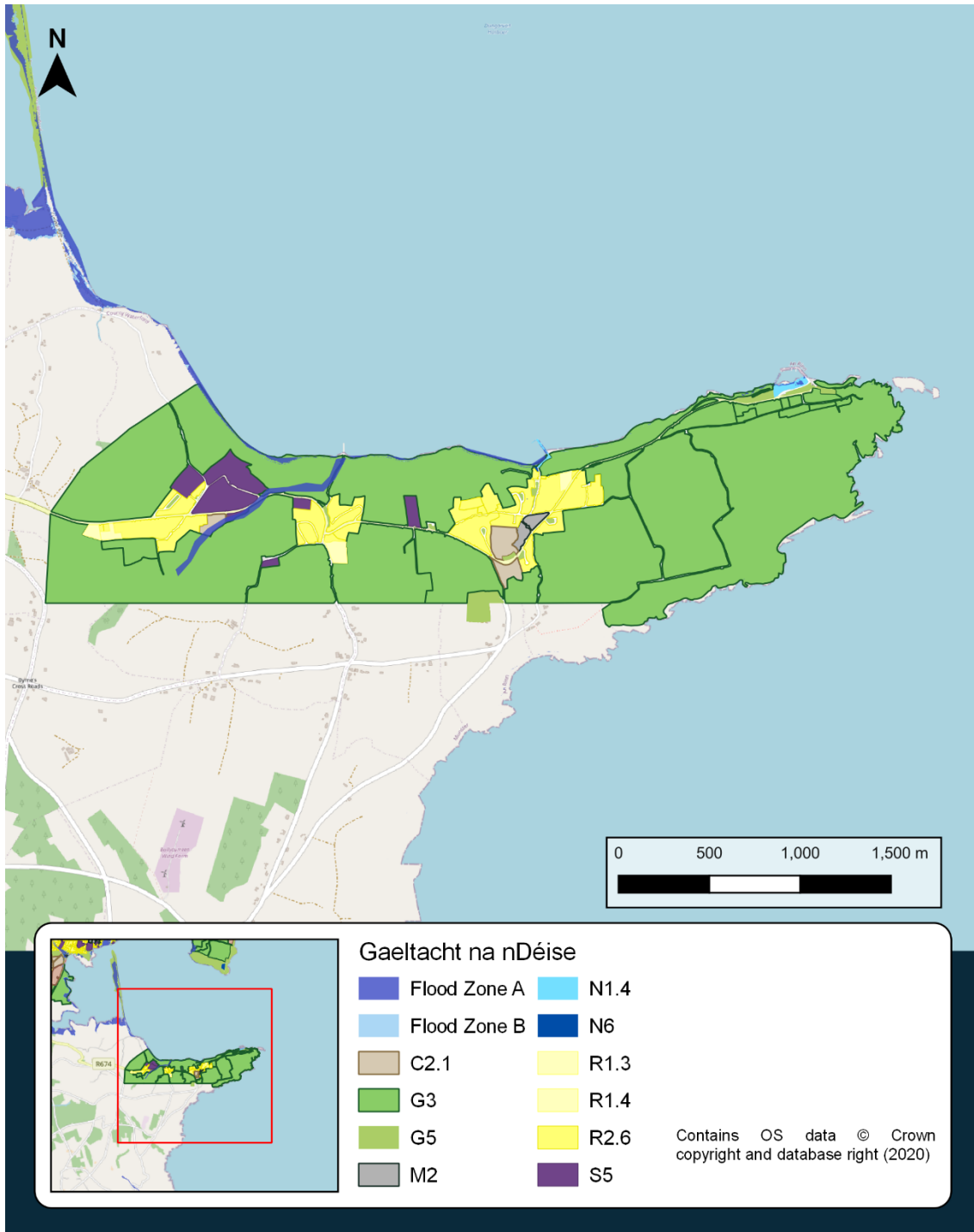


Figure 7-6 Gaeltacht na nDéise Zoning

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.

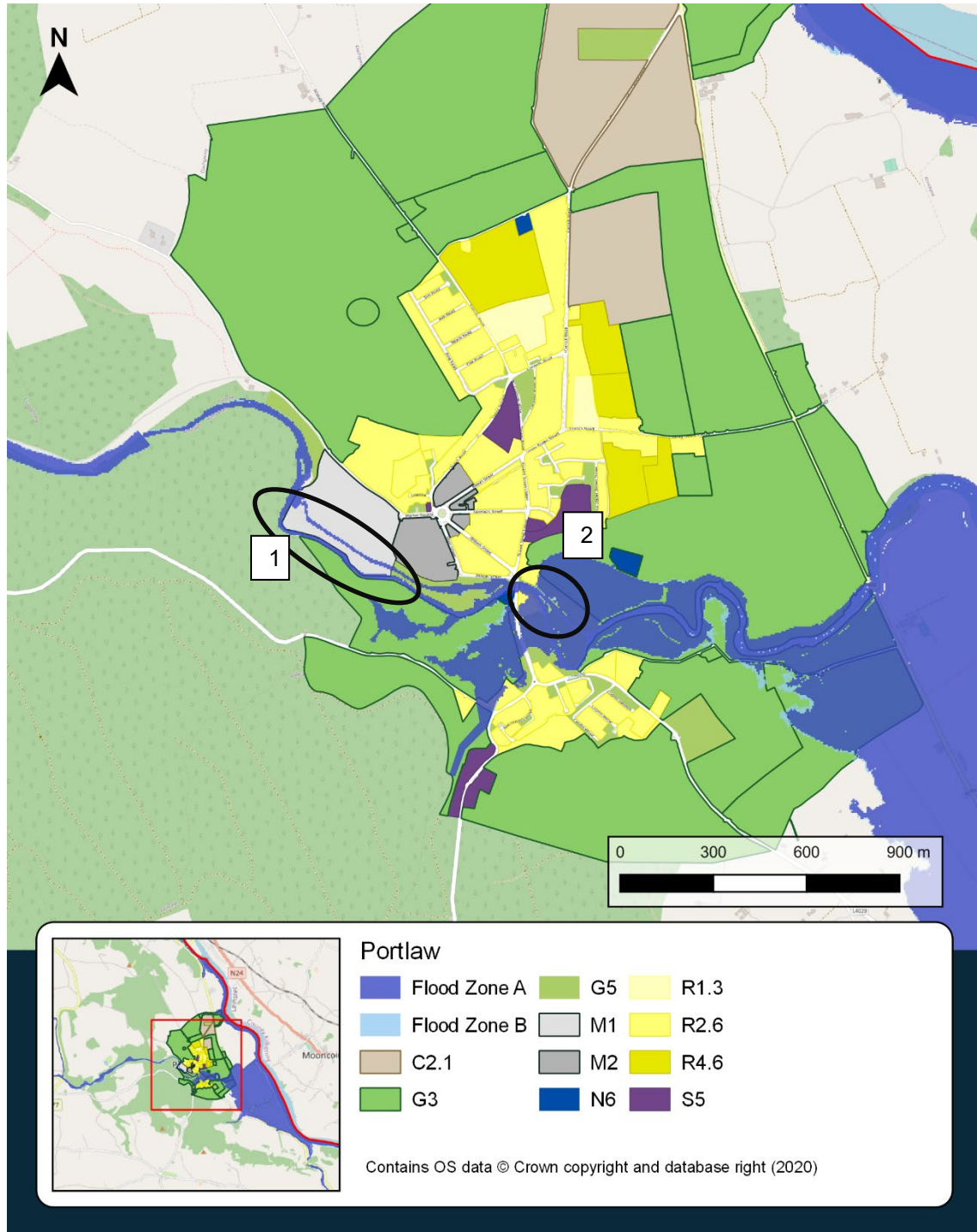


Figure 7-7: Portlaw Zoning

7.2.8 Rural Villages and Rural Nodes

As part of the screening assessment, fluvial and/or tidal risk has been identified in a number of Rural Villages and Rural Nodes.

- Aglish
- Ardmore
- Ballyduff upper
- Ballymacarbry
- Bunamahon
- Cappoquin
- Cheekpoint
- Clashmore
- Clonea
- Dunhill
- Fenor
- Kilmacthomas
- Kilmeaden
- Lemybrien
- Passage East
- Tallow

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 and less vulnerable development is not considered to have passed the Justification Test and 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.

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
- Dungarven and Environs
- Dunmore East
- Passage East
- Portlaw
- 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.

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, Aglish 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.

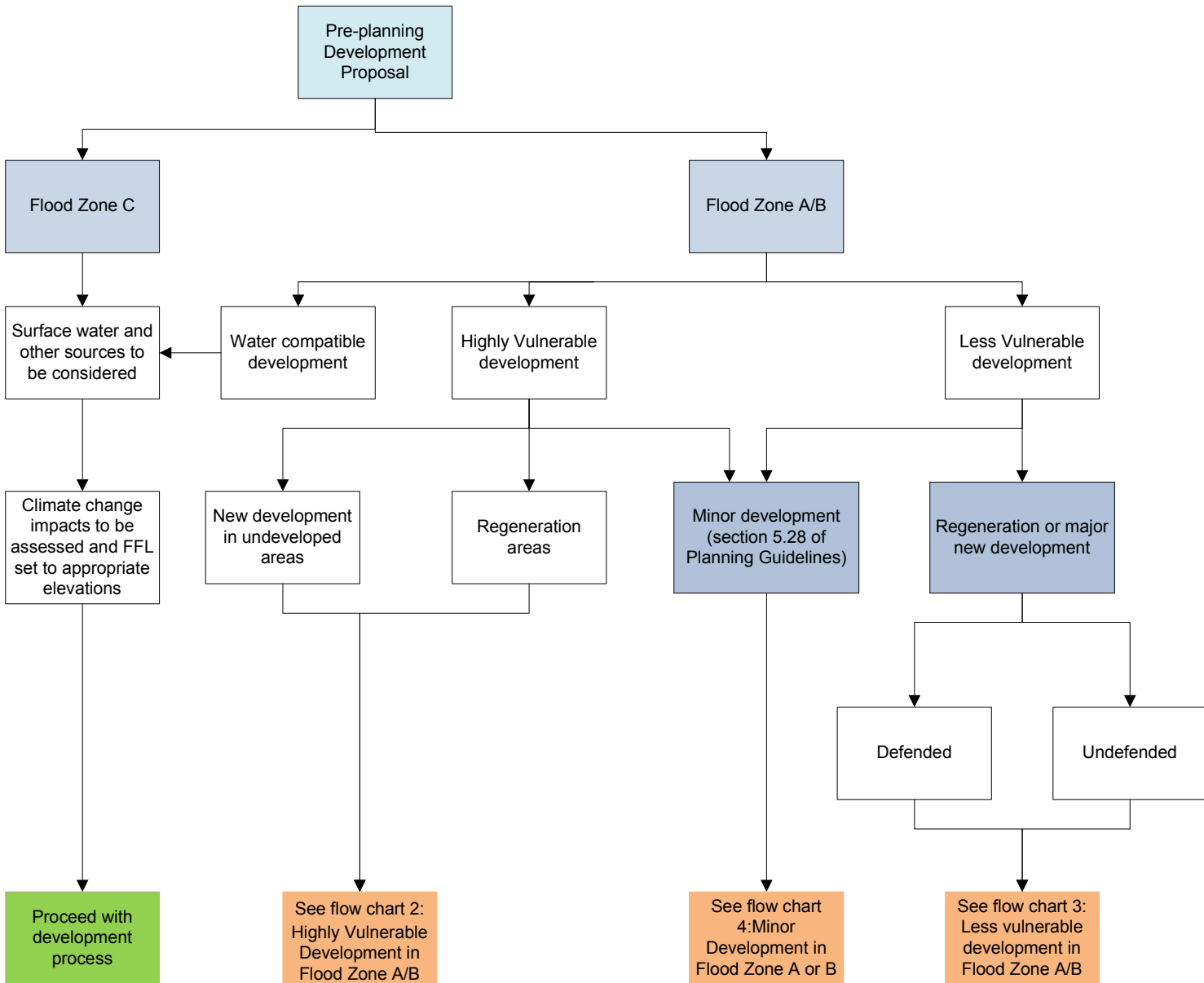
Table 8-1: SFRA Review Triggers

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

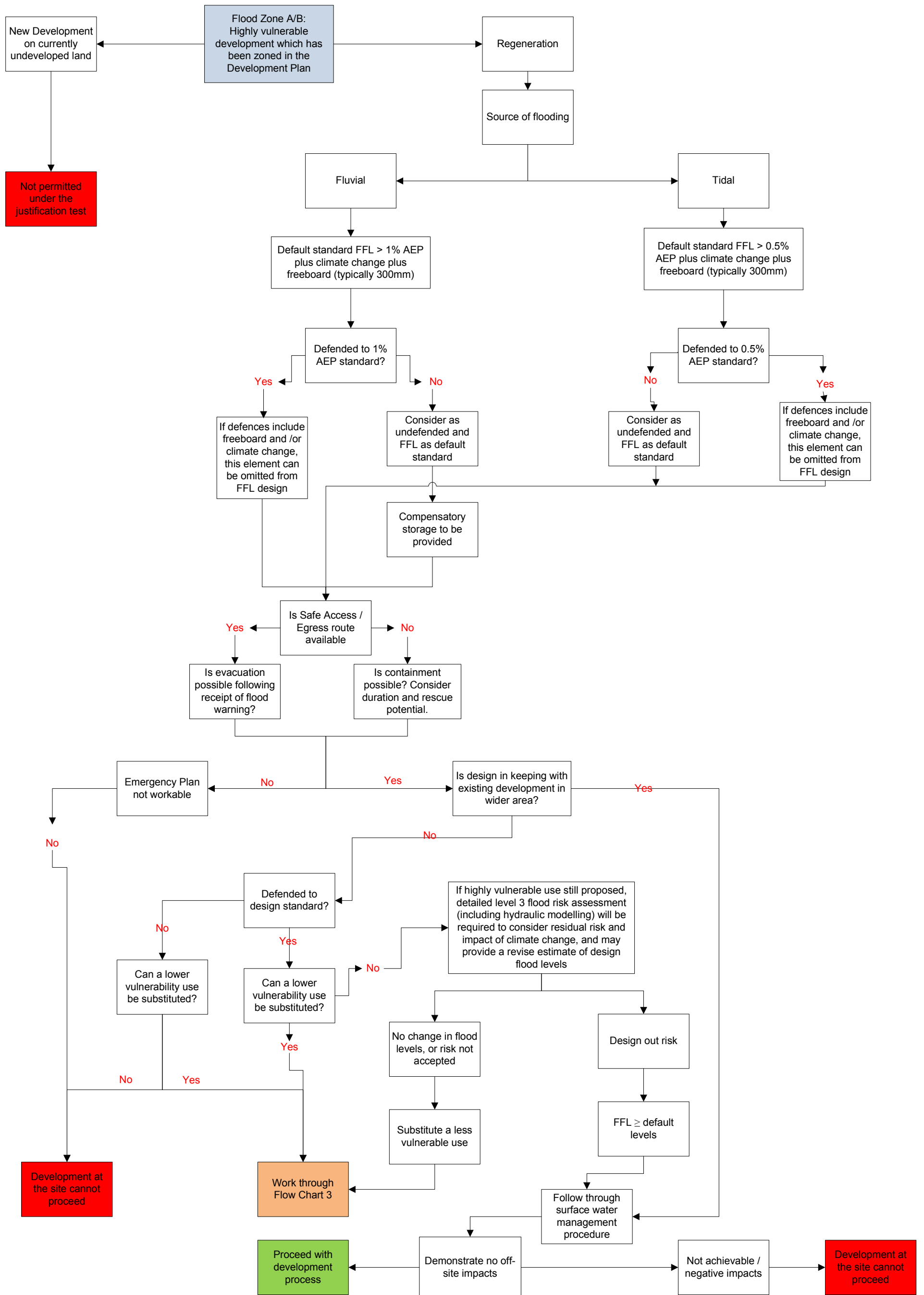
Appendices

A Development Flow Charts

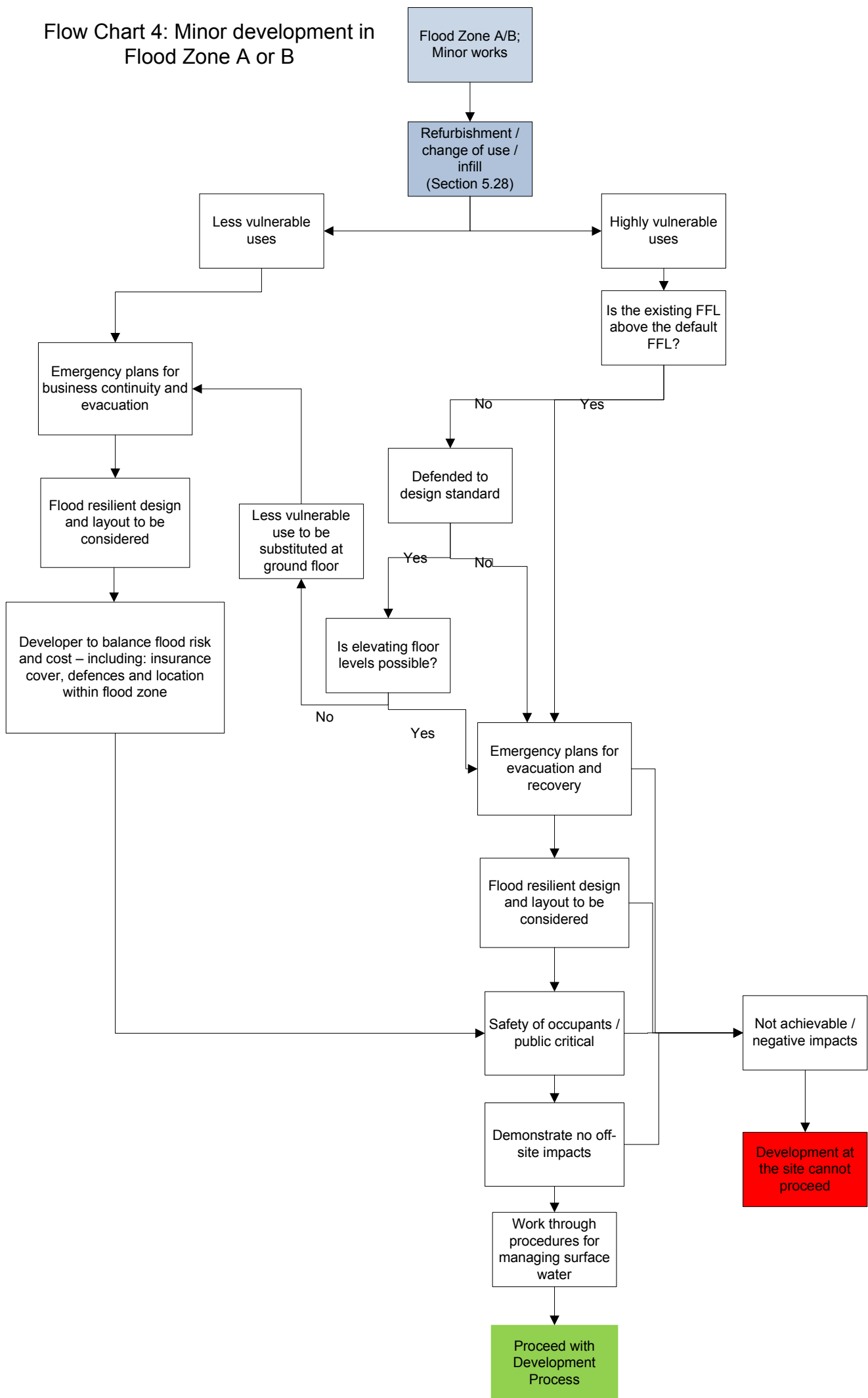
Flow Chart 1: Development Management Process



Flow Chart 2: Highly Vulnerable Development in Flood Zone A/B



Flow Chart 4: Minor development in Flood Zone A or B



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