



Oifig an  
Rialaitheora Pleanála  
Office of the  
Planning Regulator

2<sup>nd</sup> October 2026

The Planning Department,  
Waterford City and County Council,  
1<sup>st</sup> Floor, Menapia Building,  
The Mall,  
Waterford,  
X91 PK15.

**Re: Proposed Variation No. 2 of the Waterford City and County Development  
Plan 2022-2028**

A chara,

Thank you for your authority's work in preparing the Proposed Variation No. 2 (proposed Variation) of the Waterford City and County Development Plan 2022-2028 (Development Plan).

As Waterford City and County Council (Planning Authority) is aware, a key function of the Office of the Planning Regulator (Office) is to evaluate and assess statutory plans to ensure consistency with legislative requirements and national and regional planning policy. The Office has undertaken this evaluation and assessment pursuant to Part 3 of the Planning and Development Act 2024 (Act) and its functions under section 546, and this submission sets out the outcome.

In this context, submissions may include recommendations and observations. Recommendations arise where the Office identifies clear inconsistencies with legislative provisions or policy frameworks and are intended to be addressed to ensure compliance. Observations highlight areas where further clarification, justification, or refinement would strengthen the plan. The submission may also include advice to support the proper planning and sustainable development of the area.

Following adoption of the Variation, the Office will carry out a further assessment under section 63 of the Act.

## 1. Overview

The proposed Variation includes a number of changes to the following elements of the Development Plan:

- text updates to the Vision Statement of OPS11 relating to Yellow House, Kilbarry, Waterford City in appendix 21 Regeneration and Opportunity Sites arising from the Residential Zoned Land Tax (RZLT) process;
- the provision of new text and a new North Quays Planning Scheme Policy Objective W City 32;
- amendments to policy objective relating to Developer Lead Infrastructure by updating the wording of Utility, Energy and Communication Policy Objective UTL 06;
- provision of five new settlement level Specific Development Objectives referenced as: Dunmore East DMD017, Tramore TRD016, Dungarvan DGDO023, Waterford City WCD032 and Waterford City WCD033;
- updates to the wording of Core Strategy Policy Objective CS 08;
- inclusion of a new appendix 23 to the Development Plan relating to Tramore, including a Local Transport Plan (LTP), Stormwater Management Plan, Social Infrastructure Audit and Urban Design Concept Development document relating to Tramore (Tramore Urban Design Concept document); and
- inclusion of a new appendix 24 to the Development Plan relating to Dungarvan including a LTP, Stormwater Management Plan, Social Infrastructure Audit and Urban Design Concept Development document relating to Dungarvan (Dungarvan Urban Design Concept document).

The Office welcomes the work undertaken by the Planning Authority to date in relation to the preparation of the proposed Variation. In particular, in terms of flood risk management the Planning Authority is commended for preparing Stormwater Management Plan which includes details of Sustainable urban Drainage Systems (SuDs) for the settlements of Tramore and Dungarvan.

The Urban Design Concept Development documents for Dungarvan and Tramore, including Framework Plans for Shandon, Monang and Monvoy, are proposed to be incorporated into new appendices 23 and 24 of the Development Plan. In this regard,

the identification of brownfield opportunity sites in both settlements is welcomed and aligns with the National Planning Framework First Revision (2025) (NPF) and the Regional Spatial and Economic Strategy (RSES) objectives that promote regeneration, compact growth and the creation of attractive, high-quality urban places. The reuse of brownfield and underutilised sites also supports climate change mitigation and the revitalisation of settlements.

However, the Office notes that the Framework Plan for the Monvoy lands, Tramore is not fully aligned with the corresponding development plan zoning objectives. The document should therefore be amended to ensure consistency with the zoning framework set out in the Development Plan.

The submission also includes a recommendation regarding the inclusion of priority transport measures, timeframes as well as implementation and monitoring arrangements set out within the Tramore and Dungarvan LTPs into the Development Plan.

The following recommendation and observation set out below are intended to support the Planning Authority in further strengthening the proposed Variation and ensuring its effective implementation:

| <b>Subject</b>                                                      | <b>Recommendation</b>            | <b>Observation</b>            |
|---------------------------------------------------------------------|----------------------------------|-------------------------------|
| <a href="#">Consistency within the Development Plan</a>             | -                                | <a href="#">Observation 1</a> |
| <a href="#">Integration of land use planning and transportation</a> | <a href="#">Recommendation 1</a> | -                             |

## **2. Consistency within the Development Plan**

Development plans should provide a coherent planning framework, identifying and zoning land consistent with the overall development strategy. As the zoning map, zoning objectives and land-use matrix collectively form part of the statutory development plan, they should be interpreted as a coherent whole. The land-use matrix should give effect to the purpose of the zoning objective and should not permit forms of development that would undermine or conflict with the stated objective of the zoning. As stated within section 43(9) of the Act, there is a legislative onus for a

planning authority to ensure that the development plan is internally consistent and coherent.

The Planning Authority's intention via the proposed Variation is to insert the Urban Design Concept Development and Framework Plan documents as new appendices into the Development Plan.

However, the Illustrative Framework Plan for 73 ha greenfield lands at Monvoy in Tramore, as set out in chapter 4 of the Development Framework for Monvoy, show residential block layouts within the High Amenity (HA) and Residential: Strategic Reserve (SRR) zoned areas. The zoning matrix table 11.2, Volume 2 of the Development Plan identifies that Residential Schemes are not permitted within High Amenity (HA) zoning. It is noted that the proposed Variation does not include any proposals to rezone lands at Tramore or Dungarvan.

The Planning Authority has also not undertaken a risk assessment in order to establish whether a Stage 3 detailed flood risk assessment is required to be carried out (as set out in section 2.21 of The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009)) for the High Amenity (HA) lands at Monvoy where there is potential flood risk associated with a watercourse at the southwestern end of the lands.

As a result, there is a lack of consistency between the current zoning, the zoning matrix and the proposals shown within the High Amenity (HA) zoning at Monvoy as set out in the Framework Plan. The Planning Authority is advised to reassess this approach in the proposed Variation.

#### **Observation 1 - Consistency within Development Plan**

Having regard to the need to ensure that the development plan is internally consistent and coherent, the Planning Authority is advised to review and amend the proposals within the High Amenity (HA) lands at Monvoy as set out in the Urban Design Concept Development - Tramore & Development Framework - Monvoy to ensure that the document is consistent with the zoning objectives for the relevant lands.

### 3. Integration of land use planning and transportation

The Office welcomes the preparation of two LTPs for Tramore and Dungarvan which are to be inserted into the Development Plan via the proposed Variation. This responds to Development Plan Volume 1, chapter 5, Policy Objective Trans 04 and the RSES which advocates that policies, objectives and measures that emerge from the LTP should be incorporated into the statutory land use plans.

The LTPs include priority measures for the settlements relating to public transport infrastructure and services, cycle investment and improvements to the pedestrian environment. They also set out timeframes for delivery for both settlements.

Irrespective of the inclusion of the LTPs as appendices to the proposed Variation, the Office considers that priority measures relating to Tramore and Dungarvan, the associated timeframes, as well as implementation and monitoring arrangements, should be clearly set out in a clear and transparent manner within the Development Plan itself to support the integration of land use and transportation, as per Regional Policy Objectives (RPOs) 11(c), 12(f), 151, 152 and 154 of the RSES for the Southern Regional Assembly.

#### **Recommendation 1 - Integration of Land Use and Sustainable Transport**

Having regard to the need for the integration of land use and sustainable transportation, and having considered:

- RPO 11(c) of the RSES requiring the preparation of local transport plans for Key Towns;
- RPO 12(f) of the RSES seeking investment in sustainable transport through a Local Transport Plan, including development of a town bus services in support of the compact 10-Minute city concept;
- RPOs 151, 152 and 154 of the RSES requiring the integration of transportation and land use planning; and
- the Climate Action and Low Carbon Development Act 2015, as amended, mandatory target to reduce greenhouse gas emissions by 51%, the Climate Action Plan 2025 and associated actions, including the National Sustainable Mobility Policy (2022) targets to reduce vehicle kilometres travelled per

year, and the National Investment Framework for Transport in Ireland (2021),

the Office recommends that the Planning Authority insert the priority measures, the associated timelines, implementation and monitoring arrangements arising from the Tramore Local Transport Plan and the Dungarvan Local Transport Plan into chapter 5, Volume 1 of the Waterford City and County Development Plan 2022-2028.

#### 4. Other Matters

The Planning Authority should clarify if the six buildings shaded grey on the Strand Street to Ladies Slip area of Tramore set out on the Indicative Concepts layout page 36 of the appendix 23 Urban Design Concept Development - Tramore & Development Framework- Monvoy document are all to be referenced as 'Opportunity sites / vacant Building' as per point 7 of the legend.

#### 5. Summary

The Office requests that the Planning Authority addresses the recommendation and observation set out above.

As part of this process, the Chief Executive's report to the elected members, prepared under section 58(11) of the Act should summarise the Office's recommendations and outline how it is proposed to address them.

Following adoption of the Variation, the Planning Authority is required to:

- provide the Office with a copy of the adopted Variation, together with any submissions received from the Minister, regional assemblies, and the National Transport Authority during the plan preparation process, within **one week** of adoption;
- inform the Office, **as soon as practicable**, where it decides not to comply with a recommendation, including the reasons for this decision; and
- publish notice of the Variation within **one week** of adoption, confirming that the Development Plan as varied will be available for inspection (online and at a specified location) no later than **five weeks** after adoption.

The Office looks forward to continued constructive engagement with the Planning Authority. If further clarification or discussion would be helpful, the Office would be pleased to assist and can be contacted at [plans@opr.ie](mailto:plans@opr.ie).

Is mise le meas,

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A handwritten signature in dark ink, appearing to read 'AM O'Connor'.

**Anne Marie O'Connor**

Deputy Regulator and Director of Planning Policy Implementation

Designated Public Official under the Regulation of Lobbying Act 2015

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