

7th March 2023

OPR Ref: IP-005-23

The Planning Department, Waterford City and County Council, Menapia Building, The Mall, Waterford City, X91 FXN4

Re: Issues Paper for the Tramore Local Area Plan 2023 – 2029

A chara,

Thank you for your authority's work in preparing the Issues Paper for the proposed Tramore Local Area Plan 2023 - 2029 (the Issues Paper). The Tramore Local Area Plan, 2023 – 2029 (the LAP), which will replace the Tramore Local Area Plan 2014 - 2020, is a mandatory local area plan under section 19(1)(b) of the *Planning and Development Act* 2000, as amended (the Act).

The Office of the Planning Regulator (Office) welcomes the commencement of the planmaking process, through the publication of the Issues Paper, in view of the provisions under sections 18(4)(b) and 19(2B) and in view of the recent adoption of the Waterford City and County Development Plan 2022 - 2028 (the Development Plan) on 7th of June 2022.

The Office acknowledges your authority's work, more broadly, in advancing the preparation of the LAP.

As section 20(1) does not prescribe the requirements for public consultation at pre-draft stage for LAPs, the planning authority is commended for publishing an Issues Paper, engaging proactively with the public and notifying the Office of the intention to prepare the LAP.



In accordance with the provisions of section 31AO of the Act, the Office is obliged to evaluate and assess local area plans in the context of certain statutory parameters including:

- matters generally within the scope of section 19;
- consistency with the objectives of development plan, its core strategy, the Regional Spatial and Economic Strategy for the Southern Regional Assembly (the RSES);
- consistency with the transport strategy of the National Transport Authority;
- ministerial guidelines made under section 28;
- ministerial policy directives issued under section 29; and
- such other matters as the Minister may prescribed under section 262 or otherwise prescribe.

The Office has set out some broad issues, relevant to the preparation of LAPs, in addition to some specific issues of particular relevance to the preparation of this LAP, under the following:

- 1. Strategic Policy Framework
- 2. Development plan and core strategy
- 3. Zoning, compact growth and infrastructural services
- 4. Regeneration
- 5. Education, social and community amenities
- 6. Economic development and employment
- 7. Transport and mobility
- 8. Climate change and flood risk management
- 9. Environment and natural and built heritage
- 10. Implementation and monitoring

The Office's comments are offered without prejudice to any observations and recommendations as may be forthcoming from the Office at future stages of the plan making process. They do not affect the obligation on your planning authority to comply



with the relevant legislative requirements, or to be consistent with the fullness of the detailed policy context of the higher order plans and strategies and Ministerial guidelines.

1. Strategic Policy Framework

The planning authority will be aware that section 20(5) of the Act requires the LAP to be consistent with the objectives of the RSES, in addition to the National Planning Framework (NPF), the specific planning policy requirements (SPPRs) of section 28 guidelines and the relevant development plan.

The provisions of the RSES have generally been transposed through the Development Plan. Therefore, in ensuring consistency with the Development Plan and core strategy, the planning authority can ensure that it is also generally consistent with the RSES and NPF. However, the Office encourages the planning authority to liaise with the Southern Regional Assembly in preparation of the draft LAP to ensure consistency with the RSES, particularly where clarity is required on the objectives and guiding principles set out therein.

The Issues Paper acknowledges the full range of Specific Development Objectives (SDOs) in the Development Plan, relevant to Tramore, and helpfully invites the public to identify additional SDOs which are more local and site specific for Tramore.

The Office notes that a strategic issue for Tramore, as emphasised in RSES, is addressing the high levels of commuting experienced by the town (40%) into the Metropolitan Area from Tramore. The town has a low employment base with a Jobs to Workers Ratio of 0.42 reflecting its role as a commuter town, and a considerable challenge for the LAP will be addressing the employment / residential function of the town which will have benefits in terms addressing climate change. Opportunities to improve the public realm and attractiveness of the town centre will also support the sustainable development of the town as a place to live and work.

In aligning with the RSES, the LAP should consider the strategic vision, goals and guiding principles of the RSES, in addition to consistency with the relevant regional policy objectives (RPOs).

The LAP should also consider practical implementation issues and measures that can best be promoted via the policies and objectives of the LAP.



2. Development plan and core strategy

Section 19(2)(b) of the Act requires that the LAP shall be consistent with the objectives of the development plan and its core strategy. A key message of the section 28 *Local Area Plan Guidelines for Planning Authorities* (2013) (LAP Guidelines) is that consistency between local area plans and the core strategy of development plans is an essential requirement, particularly in relation to the quantum and location of lands identified for development.

The Office therefore cautions against the introduction of any objectives that would conflict with the detailed provisions of the core strategy for the proposed area of the LAP and the housing supply target for the settlement.

The Office acknowledges, and welcomes, the intention of the forthcoming LAP to include a preliminary core strategy map as a first step towards identifying key spatial development of the town beyond the lifetime of the current Development Plan.

The Office notes, however, that the Issues Paper refers to the requirement for 470 housing units up to 2028, whereas the Development Plan (Table 2.4), refers to a core strategy housing supply target of 261 housing units for Tramore up to 2028. It will be necessary, therefore, to ensure that the LAP is consistent with the Development Plan in order to comply with section 19(2)(b) of the Act.

The LAP should also consider how the delivery of housing in locations that are currently serviced in terms of the social and physical infrastructure that communities expect, and are easily accessible from existing urban areas by walking, cycling and public transport can be supported and prioritised.

3. Zoning, compact growth and infrastructural services

The Office welcomed the approach to achieving compact growth, and the presentation of Table 2.4 in the Development Plan, in achieving 30% compact growth targets consistent with NPO 3c and RPO 3. Compact growth will play a central role to the achieving the National Climate Objective and the Government's obligatory target of 51% for greenhouse gas (GHG) emissions reduction by 2030 and for a carbon neutral economy by 2050. The application of mechanisms to address excess residential land use zoning consistent with Development Plan phasing, will be a critical consideration in this regard.



In this regard any provisions or standards for residential density or building height in the LAP should have regard to relevant section 28 guidelines, including *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas: Cities, Towns & Villages* (2009), *Urban Development and Building Heights Guidelines for Planning Authorities* (2018), and *Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities* (2018), and *Sustainable Urban Housing: Design Standards for New SPPRs therein.*

4. Regeneration

Both the NPF (NPO 4, 6, 18a, 18b and 35) and the policy objectives and provisions of the RSES place a strong emphasis on the opportunities for urban and village regeneration to create attractive, liveable, well-designed, high quality urban places that provide for a high quality of life and well-being. Regeneration and revitalisation of settlements through reuse of brownfield sites and vacant/underutilised buildings will play a crucial role in mitigating climate change and in achieving the Government's obligatory target of 51% for GHG emissions reduction by 2030 and for a carbon neutral economy by 2050.

The LAP provides an opportunity to identify specific regeneration projects aimed at enabling compact growth and Town Centre First implementation, consistent with the objectives of the regeneration strategy of the Development Plan and the guiding principles of the RSES for urban infill and regeneration.

While the Office notes that no specific opportunity sites to support town centre regeneration in Tramore were identified under the RSES or the Development Plan, it will be important for the LAP to identify opportunity/regeneration sites, vacant and underutilised buildings.

The LAP should also identify specific investment and/or infrastructure to support regeneration development, such as site assembly, land acquisition, and/or sustainable transport initiatives. The best use of the planning authority's own powers in terms of land activation, such as compulsory purchase, derelict sites etc. will be important in this context.

In addition to focussing private investment, a 'Plan-led' approach to regeneration through the LAP will be critical in terms of accessing funding through public funding streams such



as the Urban Regeneration & Development Fund (URDF), Rural Regeneration & Development Fund (RRDF), and will form the basis for any future 'Town Centre First Plan'.

5. Education, social and community amenities

Access to quality childcare, education and health services is a National Strategic Outcome of the NPF. In this regard, the LAP should be consistent with NPO 31, which seeks to align population and employment growth with investment in childcare and education facilities on well-located sites within or close to the existing built-up areas to meet the diverse needs of local populations. The LAP should also be consistent with the objectives of the RSES for education facilities. It should also have regard to the provisions for social audits under the *Development Plans, Guidelines for Planning Authorities (*2022) (Development Plans Guidelines) (or civic infrastructure audits under the LAP Guidelines)¹.

It is an objective (NPO 4) of the NPF to ensure the creation of liveable places that are home to diverse and integrated communities and (NPO 28) providing improved integration and greater accessibility in delivering sustainable communities and associated services. This includes planning for the housing/transport/accessibility and leisure needs of an aging population (NPO 30) and for the Traveller community. The LAP should also be consistent with the objectives of the RSES for social and community facilities.

The NPF expects the local authority's *Local Economic and Community Plan 2015-2020* (LECP) should also inform the LAP to provide for the co-ordinated spatial planning of community services for the area. In addition, the local authority's *Traveller Accommodation Programme 2019-2024* should also inform the LAP.

Having regard to NPO 33 to prioritise new homes that can support sustainable development at an appropriate scale of provision relative to location, it is important that the LAP takes an integrated approach to the planning of education, social and community facilities and amenities. The LAP should consider the capacity of existing facilities, including community centres, leisure, amenity and cultural facilities to serve existing and future residents. In addition, and aligned with the need for a sustainable settlement and transport strategy, the LAP should also ensure that education, childcare, and social and

¹ The Athy Social Infrastructure Audit, which supported the Athy LAP, 2021 – 2027 is a good example of such an audit.



community facilities can be easily accessed by walking or cycling from existing and proposed new residential areas.

The LAP should give focus to the implementation of Key Specific Development Objective's to deliver on the provision of social and community facilities including TRD08 (supporting the development of indoor and outdoor performance space) and TRD09 (redevelopment of the former station house for community and commercial purposes).

6. Economic development and employment

The LAP Guidelines state that LAPs should include objectives to promote local economic development and employment growth by focusing on issues such as the creation of vibrant and dynamic city and town centres where local businesses thrive and the provision of low cost accommodation for start-up businesses.

The RSES RPO MASP Policy Objective 2 supports the socio-economic growth and continued investment, development and the enhancement of connectivity of the Waterford MASP Hinterland Towns including Tramore. Furthermore a guiding principle for the Waterford MASP is utilising key assets, particularly the river and estuarial location, linkages by sea and air and tourist attractions of Tramore.

The Waterford MASP identifies 'Waterford Airport and Business Park' as a strategic employment location with significant potential for the development of Waterford and the South East, in terms of accessibility, supporting economic development and tourism. Lands are zoned at this location to facilitate the development and expansion of the Airport as 'Airport Area'.

The Office acknowledges the significance of Waterford Airport, which is key to the development of the metropolitan area and major urban centres of the south-east. RPO 150 (c) supports the continued assistance for regional airports under the Regional Airports Programme, support the role of Waterford Airport and develops its potential as key tourism and business gateway for the regions as a complement to the services provided by the region's national airport gateways of Cork Airport and Shannon International Airport. Further WMASP Policy Objective 16 recommends that the Development Plan have sufficient policy support to incorporate policies to protect longer-term flight path public safety zones and to control uses which could adversely impact on the airport's operations



or the potential for new runway development and extensions sufficient to handle larger aircraft.

A significant feature of future employment growth in Tramore during the life of the plan, is to reduce the town's economic dependence on Waterford. This in turn would reduce the number of commuting trips to Waterford city, and be critical to reducing carbon emissions from transport in line with the *Climate Action Plan 2023*.

An integrated approach to land use and transport planning for enterprise, employment and commercial development will also play an important role in mitigating climate change and in achieving the Government's obligatory target of 51% for GHG emissions reduction by 2030 and for a carbon neutral economy by 2050.

The facilitation of retail facilities will also need to be considered to provide for the anticipated population growth. Regard should be had, in particular, to the sequential approach to the location of retail development and other provisions of the *Retail Planning Guidelines for Planning Authorities* (2012) and the position of the settlement in the retail hierarchy of the Development Plan.

7. Transport and mobility

The objectives and provisions of the NPF (NPO 27, NPO 33 and NPO 64, among others) and the RSES recognise the importance of implementing an integrated land use and transportation approach.

A mandatory national target of 51% reduction in GHG emissions by 2030 will be implemented through the *Climate Action Plan 2023*, which commits to delivering an additional 500,000 daily sustainable journeys by 2030 (an increase of 14% on current levels) through, among others, a significant increase in walking and cycling, supported by the goals of government's *National Sustainable Mobility Policy* (2022).

An integrated approach to land use and transport planning will be central to achieving these targets. In addition to the above, the LAP should be informed by the guiding principles and be consistent with the RPOs of the RSES relating to integration of land use and transport planning, where applicable.

The RSES sets out guiding principles for integration of land use and transport planning and identifies the requirement for local transport plans (LTPs) for certain settlements



and/or under certain circumstances. The Office acknowledges and welcomes the Development Plan policy objective (Trans 04) to prepare a Local Transport Plan (LTP) for Tramore, within one year of adoption. The LTP can include priorities for the town in terms of public transport infrastructure and services, cycle investment and improvements to the pedestrian environment. In turn, the RSES advocates that policies, objectives and measures that emerge from the LTP should be incorporated into the LAP.

The LTP will be key to informing the objectives, policies and measures in the LAP so that the modal share targets for Tramore set out in the Development Plan can be achieved. The NTA and TII ABTA Advice Note and *ABTA How to Guide Guidance Document Pilot Methodology* (2021) should be considered by the planning authority in preparing any LTP. The planning authority is advised to consult with the transport authorities in advance of preparing the LTP.

The transport strategy of the LAP should also demonstrate consistency with the Avoid-Shift-Improve principle, the implementation of the Decide Provide approach and the 10minute town concept.

The proactive implementation of the *Design Manual for Urban Roads and Streets* (revised 2019), including in particular 'filtered permeability', will ensure that over time the area will better accommodate pedestrians and cyclists, in addition to public transport where available. Similarly, the implementation of the NTA's *Permeability Best Practice Guide* will also ensure enhanced pedestrian and cycle routes within the area of the LAP.

8. Climate change and flood risk management

It is a National Strategic Outcome of the NPF to transition to a low carbon climate resilient society. It is an objective (NPO 52) of the NPF to ensure that the planning system responds to national environmental challenges and that development occurs within environmental limits. The NPF acknowledges climate change as a national environmental challenge and it is an objective (NPO 54) to reduce Ireland's carbon footprint in support of national targets for climate policy mitigation and adaptation, including targets for GHG emissions reduction.

The effective implementation of climate mitigation objectives through the LAP, consistent with national and regional policy objectives (and guiding principles) identified by the Office



under each of the themes, above, will be critical to the achievement of the Government's GHG emissions reduction target to mitigate climate change.

In terms of climate adaptation, flood risk management is the most critical climate change adaptation measure to be addressed in the LAP, informed by Strategic Flood Risk Assessment (SFRA). The planning authority should ensure that it has regard to the detailed requirements and provisions of the section 28 *Planning System and Flood Risk Management Guidelines for Planning Authorities* (2009) (Flood Guidelines). The planning authority is advised to liaise with the OPW regarding the requirements in respect of the LAP.

The planning authority should overlay the flood risk zones on any proposed land use zoning maps, to illustrate the potential flood risk arising and to demonstrate how the sequential approach has been applied. The planning authority is also requested to make a copy of digital mapping data available to the Office and to the OPW to facilitate assessment.

As noted, below, the implementation of objectives for green and blue infrastructure consistent with national and regional policy objectives should also form an important part of the LAP's response to climate change adaptation.

In accordance with NPO 57, the LAP is required to integrate sustainable water management solutions, such as Sustainable urban Drainage Systems (SuDS). In this regard the Office would draw the planning authority's attention to *Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas, Water Sensitive Urban Design, Best Practice Interim Guidance Document* (2021) which was issued by the Department of Housing, Local Government and Heritage after the adoption of the Development Plan.

9. Environment and natural and built heritage

The planning authority is the competent authority for the purposes of Strategic Environmental Assessment (SEA) and Appropriate Assessment. The planning authority will be aware of its obligations and responsibilities under the SEA Directive and under the Habitats Directive.

In this regard the planning authority is required to have regard to the revised section 28 Strategic Environmental Assessment Guidelines for Regional Assemblies and Planning



Authorities (2022). It should also consider the Appropriate Assessment of Plans and Projects in Ireland Guidance for Planning Authorities (2010), as revised.

It is an objective (NPO 52) of the NPF to ensure that the planning system responds to national environmental challenges and that development occurs within environmental limits. The planning authority should ensure the LAP is consistent with objectives of the NPF concerning environmental protection (NPO 52, NPO 57, NPO 58, NPO 60, NPO 62, NPO 63, NPO 64 and NPO 65, among others), in addition to the objectives or guiding principles of the RSES.

In particular, the Office highlights the importance of integrating green and blue infrastructure into the LAP, in accordance with NPO 58 and the objectives and guiding principle of the RSES. Planning for green and blue infrastructure, such as public parks and water bodies can contribute to climate change adaptation, in particular flood risk management through nature-based solutions. It can also make a positive contribution to climate mitigation, when integrated with greenways, and have positive impacts on biodiversity.

Regarding built-heritage, NPO 17, the RSES and several section 28 guidelines (LAP Guidelines and the Development Plans Guidelines, among others) recognise that protecting, conserving and managing sites and features of special interest, in addition to public realm improvements, can instigate a heritage-led regeneration of settlements to generate economic benefits in terms of tourist footfall, improved retail environment and improved quality of life. The re-use of built heritage will contribute to compact growth and regeneration and to climate change mitigation having regard to embodied carbon.

Although the key built-heritage related objectives and policies are contained in the Development Plan, the planning authority should consider what location specific objectives or measures would assist in the protection or improvement of built heritage over the period of the LAP. In this regard the planning authority should have regard to the *Architectural Heritage Protection Guidelines for Planning Authorities* (2011), as amended.

10. Implementation and monitoring

The NPF and the RSES place increased emphasis on and recognise the importance of monitoring the implementation of statutory strategies and plans, as a measure of plan



effectiveness and to continually update a relevant evidence base to inform future planning strategies.

The planning authority will be aware of its duty and function under section 15(1) and 15(2) of the Act, to secure the objectives of the Development Plan and to report on progress achieved. As the implementation of the objectives of the LAP derive from the objectives of the Development Plan, the obligations under the aforementioned subsections are also relevant to the LAP.

The planning authority is therefore encouraged to provide for monitoring of implementation of the objectives of the LAP, having regard to the provisions of the Development Plans Guidelines and the LAP Guidelines.

Summary

In summary, the Office commends your authority for the preparation of this Issues Paper. The Office advises your authority to pay particular attention to the following issues in the preparation of the LAP:

- the housing supply targets for Tramore should be consistent with the Waterford City and County Development Plan 2022 – 2028;
- consider policy support measures to address the employment / residential function of the town, which would contribute to reducing the high percentage of commuting experienced by the town;
- the proposed preliminary core strategy map should consider how to prioritise housing delivery in areas close to the facilities and services of the town centre, where land is already served by appropriate infrastructure or is capable of being serviced within the plan period, and is accessible by walking, cycling and public transport;
- support 'Waterford Airport and Business Park' as an economic driver for the town as a strategic employment location;
- identify opportunity/regeneration sites, vacant and underutilised buildings, together with specific investment and/or infrastructure to support regeneration development, such as site assembly, land acquisition, and/or sustainable transport initiatives;



- align with the RSES regarding the continued investment and development of the town as a key tourism driver for the Waterford metropolitan area;
- the LAP should be informed by the preparation of a Local Transport Plan and should integrate land use and transport planning to provide for enhanced active and sustainable transport modes to help achieve the 10-minute town concept. The planning authority is advised to consult with the NTA and TII in this regard; and
- prepare an updated Strategic Flood Risk Assessment (SFRA) and include policies and objectives in relation to the implementation of SuDS and nature based solutions as a means for managing surface water run-off at key development sites. The planning authority is advised to consult with the OPW in this respect.

The Office looks forward to reviewing the future draft LAP and is committed to continued positive engagement with your authority in implementation of national and regional policies at the county and local level.

Please feel free to contact the staff of the Office in the context of your authority's responses to the above, which we would be happy to facilitate. Contact can be initiated through the undersigned or at plans@opr.ie.

Is mise le meas,

C'Onna

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