

19th September 2025

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

**Re: Proposed Variation No. 1 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. 1 (proposed Variation) of the Waterford City and County Development Plan 2022-2028 (County Development Plan).

As Waterford City and County Council (Planning Authority) is aware, a key function of the Office of the Planning Regulator (Office) is the assessment of statutory plans to ensure consistency with legislative and policy requirements relating to planning. The Office has evaluated and assessed the proposed Variation under the provisions of sections 31AM(1) and 31AM(2) of the Planning and Development Act 2000, as amended (Act) and this submission has been prepared accordingly.

Overview

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

- core strategy policy and phasing;
- Residential Zoned Land Tax (RZLT) requests for rezoning;
- servicing of rural villages;
- joint retail strategy;

- blue green infrastructure strategy; and
- regeneration and active land management.

The Office is generally satisfied that the proposed changes are consistent with the core strategy and the objectives of the National Planning Framework First Revision (2025) (NPF) and Regional Spatial and Economic Strategy (RSES) for the Southern Regional Assembly. In particular, the Office notes and welcomes the inclusion of stronger land activation measures which will support housing delivery and regeneration. The preparation of a Joint Retail Strategy for the Waterford City Metropolitan Area Strategic Plan (MASP) and Metropolitan Blue Green Infrastructure (BGI) Strategy are also strongly welcomed.

The Office does, however, have concerns in relation to the proposed rezoning of a number of centrally located and serviced residential zoned lands, that would be at variance with national policy to direct housing into centrally located and serviced areas. The rationale for these zoning amendments is not clearly demonstrated, and the Office recommends that the Planning Authority reconsider these elements of the proposed Variation (Recommendation 2).

In relation to the implementation of the housing requirements under the NPF, the Office is also of the view that further clarity is required, and in particular the preparation of an evidence-based review of the current County Development Plan in accordance with the NPF Implementation: Housing Growth Requirements (2025) (Housing Growth Requirements) recently issued by the Minister (Recommendation 1).

The submission below has been prepared to provide a strategic level input to your authority in finalising the proposed Variation. It is within the above context that the submission sets out two (2) recommendations under the following key themes:

Key theme	Recommendation	Observation
Implementation of the Housing Growth Requirements	Recommendation 1	-
Residential Zoned Land Tax requests for rezoning	Recommendation 2	-

1. Implementation of the Housing Growth Requirements

Having regard to the Housing Growth Requirements, the Office welcomes the proposal to facilitate the development of Strategic Residential Reserve lands where at least 75% of New Residential (R1) lands have either been fully developed or have been fully committed to development and are being actively built out.

However, notwithstanding the note to the proposed Variation (as set out on page 12) relating to the new core strategy policy objective, the proposed Variation is not considered to fulfil the requirements for development plans to be updated to reflect the new requirements of the NPF in respect of housing as set out in the Housing Growth Requirements. These measures should, therefore, be considered an interim measure until such time as a Chief Executive's Report has been prepared in accordance with section 3.1 of the Housing Growth Requirements.

Recommendation 1 - Implementation of the Housing Growth Requirements

Having regard to the need for development plans to be updated to reflect the new requirements of the National Planning Framework First Revision (2025) (NPF) in respect of housing, and in particular to:

- NPO 42 to target the delivery of housing to accommodate approximately 50,000 additional homes per annum to 2042; and
- the NPF Implementation: Housing Growth Requirements (2025) (Housing Growth Requirements), including Policy and Objective 3 to incorporate the objectives of the Housing Growth Requirements within development plans,

the Planning Authority is recommended to make clear that the proposed Variation No. 1 of the Waterford City & County Development Plan 2022-2028 (County Development Plan) is not intended as the sole means of updating the County Development Plan to implement the NPF, having regard to the Housing Growth Requirements.

2. Residential Zoned Land Tax requests for rezoning

The Office notes the three land use zoning requests with respect to the RZLT initiative, where there would be no reduction in the quantum of land for residential purposes with respect to either of the proposed land use zonings at Matties Hill or Gracedieu Road.

Four individual parcels of land make up the land use zoning request at Tramore Racecourse, which cumulatively would result in a reduction of 23.7 ha of land that could, in theory, be considered for residential development, where lands currently zoned for Regeneration (totalling 20.6ha), Residential: Strategic Reserve (1.7ha) and Existing Residential (totalling 1.4ha) are all proposed to be rezoned as Open Space and Recreation.

The largest of the land parcels at Tramore Racecourse (c. 21.2ha) relates to the racecourse itself and a car park immediately adjacent and to the east. The Office notes that the racecourse, which was established in 1912, continues to be in active use as a racecourse. The Office is not aware of any current proposals to relocate the racecourse and as such the Office is satisfied that the lands currently comprising Tramore Racecourse and the associated car park are not currently available for development and that the proposed rezoning of these lands to Open Space and Recreation is appropriate and better reflects the current land use at this location.

With respect to the remaining three land parcels, the Office notes that a submission made on behalf of the Waterford and Tramore Racecourse Company Limited as part of the RZLT process (reference no. WFD-C59-21), relates only to lands zoned Existing Residential to the east of the racecourse. It is stated that the subject lands are directly connected to the racecourse where the site is used for car parking, and for the parking of equine vehicles.

No justification has been provided regarding the proposed rezoning of either land parcel zoned Existing Residential to the east and south-east of the racecourse, or the lands zoned Regeneration to the south of the racecourse. Therefore, the Office is not satisfied that sufficient justification has been provided to change the zoning of these three land parcels to Open Space and Recreation. As these lands are all centrally located, are serviced by water, wastewater and by public transport, the Office does not support the change of land use zonings at these locations to Open Space and Recreation, which would prohibit the development of housing.

The Planning Authority is advised to note Recommendation 1 above in relation to the need for a review of zoned land in County Waterford, to determine the potential need for additional zoned land to meet the revised housing growth requirements for the county set out in the Housing Growth Requirements.

Recommendation 2 - Residential Zoned Land Tax requests for zoning

Having regard to the compact and sustainable growth of Tramore and in particular to;

- NPO 42 to target the delivery of housing to accommodate approximately 50,000 additional homes per annum to 2042; and
- NPO 43 to prioritise the provision of new homes at locations that can support sustainable development,

the Planning Authority is recommended to make the proposed Variation No. 1 of the Waterford City and County Development Plan 2022-2028 at Tramore Racecourse without any land use zoning changes at the following locations:

- (i) lands zoned Existing Residential to the east of the racecourse and north of the Old Waterford Road;
- (ii) lands zoned Existing Residential to the southeast of the racecourse, to the east of the Old Waterford Road; and
- (iii) lands zoned Regeneration to the south of the racecourse and to the west of the Old Waterford Road.

3. Servicing of rural villages

The Office notes the proposed changes with respect to the rural towns, rural villages and rural nodes. According to the recently published Uisce Éireann water and wastewater capacity registers, 3 of the 14 rural villages identified in the Core Strategy Table of the County Development Plan, currently have insufficient wastewater capacity (Bonmahon/Knockmahon, Lemybrien/Kilrossanty and Touraneena) with an envisaged completion date for improvement works to the former two villages of post 2029. However, the Office notes and is satisfied with the inclusion of text in relation to the rural villages, specifically where settlements may facilitate additional numbers of houses in instances where 'it is demonstrated that infrastructure and services can support the proposal'.

4. Joint retail strategy

The Office welcomes the preparation of the Joint Retail Strategy for the Waterford City MASP which has been undertaken in accordance with Policy Objective 19 of the RSES.

The Office notes the requirements for both convenience and comparison floorspace which can largely be accommodated through vacant floorspace and extant retail permissions. The Office also notes the opportunity presented by the already constructed shopping centre at Ferrybank to meet the retail needs of the surrounding community. The proposed relocation of the train station and the sustainable transport bridge will greatly enhance the connection between Ferrybank and the retail core to the south.

5. Blue and green infrastructure strategy

The Office notes and commends the Planning Authority on the preparation of a BGI Strategy. The realisation of the priorities identified in the BGI Strategy will enhance the current BGI network which will in turn enhance the quality of life for both existing and future populations.

An improved network of blueways and greenways also provides opportunities to promote sustainable transport thereby reducing carbon emissions which also supports the National Transport Authority's active travel policies, including the Greenway which has been identified as Strategic Project 3 in the BGI Strategy. The success of the extension to the Greenway will be determined by the continued cross border collaboration between both planning authorities in Waterford and Kilkenny and the relevant landowners.

The Office commends the inclusion of international BGI examples and the Planner's Check List for New Development in the BGI Strategy.

6. Regeneration and active land management

The Office notes and supports the proposal by the Planning Authority with respect to the acquisition and activation of land for development and specifically the inclusion of Policy Objective CS 18 relating to Compulsory Purchase Order (CPO) powers. Active land management is central to the timely and coordinated delivery of development objectives outlined in the County Development Plan. While acquisition of lands is the most desirable approach in the first instance, it is accepted that situations may arise that may hinder acquisitions including fragmented land ownership. In such circumstances, the Office considers it reasonable that CPO powers may be considered in acquiring lands especially where they specifically relate to national or regional planning policy.

Summary

The Office requests that your authority addresses the recommendations outlined above. As you are aware, the report of the Chief Executive of your authority prepared for the elected members under section 13 of the Act must summarise these recommendations and the manner in which they will be addressed.

At the end of the process, your authority is required to notify this Office within **five working days** of the decision of the Planning Authority in relation to the proposed Variation. Where your authority decides not to comply with the recommendations of the Office, or otherwise makes the plan in such a manner as to be inconsistent with the recommendations made by this Office, then the Chief Executive shall inform the Office and give reasons for this decision.

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 plans@opr.ie.

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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 Plans Evaluation

Designated Public Official under the Regulation of Lobbying Act 2015
