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Senior Planner,
Planning Department,
Waterford City and County Council,
Menapia Building,
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Waterford.

30th August 2021

Re: Draft Waterford County Development Plan 2022-2028 – Public Consultation

Dear Sir/Madam,

The National Transport Authority ('the NTA') welcomes the opportunity to comment on the Draft *Waterford County Development Plan 2022-2028* and submits the following observations and recommendations for consideration.

Waterford Metropolitan Area Transport Strategy (WMATS)

The NTA is currently preparing a transport strategy for the Waterford Metropolitan Area in accordance with the provisions of the Southern Regional Assembly's *Regional Spatial and Economic Strategy* (SRSES) and associated *Metropolitan Area Strategic Plan* (MASP). The SRSES provisions include the policies, objectives and principles for Regional Transport across the entire Southern Region set out in Chapter 6, Section 2 'Regional Transport Strategy', in particular the relevant Regional Policy Objectives (RPOs). RPO 164, which relates specifically to the preparation of Metropolitan Area Transport Strategies, states:

It is an objective to develop Metropolitan Area Transport Strategies for Cork, Limerick-Shannon and Waterford by the NTA, TII, Local Authorities and relevant stakeholders integrating priorities for the metropolitan areas identified in the RSES Regional Transport Strategy and support investment in actions under these strategies...

The Waterford MASP includes two Policy Objectives directly related to the preparation of the WMATS, viz. 6(a) 'Integration of Land Use and Transport' and 6(b) 'Sustainable Transport'. Policy Objective 6(a) states that 'Transport investment requirements in the Waterford Metropolitan Area will be identified and prioritised, subject to the recommendations of the WMATS...', and that 'public transport corridors and nodal points on corridors [...] which have potential for high density development/regeneration' should be included in the Core Strategy of the County Development Plan based on the outcomes and recommendations of the WMATS. Policy Objective 6(b) sets out a

number of sustainable transport priorities for the Metropolitan Area and states that it is an objective to support these priorities 'subject to their consistency with the recommendations of the WMATS'.

As set out in the NTA's submission on the Issues Paper for the Waterford County Development Plan, WMATS has a critical role to play in the integration of land use and transport planning in the Waterford Metropolitan Area, as provided for in the Waterford MASP, and the objective of WMATS to provide a long-term strategic planning framework for the integrated development of transport infrastructure and services in the Waterford Metropolitan Area accords with the provisions of the SRSES outlined above.

The NTA therefore has concerns regarding the inclusion in the draft Development Plan of a number of references to the Waterford Planning, Land Use and Transport Study 2004-2020 (PLUTS). In particular, Section 5.2 includes a commitment to undertake a review of the PLUTS during the lifetime of the Development Plan. The Baseline Report for WMATS included a review of policy and guidance documents from the national to the local scales, and the PLUTS was a key input into this process. The Options Development phase of WMATS is also reviewing the objectives and recommendations of PLUTS, taking account of, *inter alia*, changes in population, employment and education across the Metropolitan Area, and a revised and expanded policy context. The NTA would therefore consider WMATS a successor to PLUTS in its overarching objective, which is reflected in the policy context provided by the SRSES and MASP, as set out above. A review of the PLUTS, either in parallel with the preparation of WMATS or following its completion, may compromise the implementation of WMATS. The NTA therefore recommends that the Council should reconsider the commitment to review the PLUTS, in light of the development of WMATS.

The NTA also notes the intention of the Council to prepare a County Transport Plan 'having regard to Local Transport Plans, WMATS and PLUTS review', as set out in Policy Objective Trans 06. No further detail is provided on the proposed content, methodology or purpose of this plan. While WMATS relates to the Metropolitan Area of Waterford City only, its preparation has taken account of the wider spatial context, including settlements beyond the Metropolitan Area boundary, and of patterns of movement at a sub-regional scale beyond the extent of the WMATS study area. However, WMATS is not intended to address transport at the county level, and the NTA would be supportive in principle of a County Transport Plan that takes account of WMATS and other work being carried out by the NTA related to public transport provision, such as Connecting Ireland and Local Link (see Bus Service Provision below).

Such a County Transport Plan should 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, as recommended in the NTA's Issues Paper submission. Of particular importance in this process would be the examination of commuting patterns to Waterford City and the key town of Dungarvan. This profiling can be used to better understand the relationship between current land use patterns and associated travel patterns. In doing so, it can also usefully 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 would also inform and be informed by the preparation of Local Transport Plans for designated settlements (see below).

Recommendations:

The NTA recommends that the intention to review the PLUTS 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.

Integration of Land Use Planning and Transport

The NTA's submission on the Development Plan Issues Paper set out a number of Guiding Principles that support the consolidation of urban-generated development within existing urban areas, in complement with the integration of land use and transport planning. These principles reflect the policies and objectives of the SRSES and the Waterford MASP, as detailed in, *inter alia*, RPO 151 and RPO 152. In this regard, 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.

Local Transport Plans

Policy Objective Trans 06 states that it is an objective to prepare Local Transport Plans (LTPs) for 'neighbourhoods within Waterford City and the urban towns of Dungarvan and Tramore based on ABTA guidance produced by the NTA and TII'. Elsewhere, the Core Strategy states that it is intended to prepare new Local Area Plans (LAPs) during the lifetime of the Development Plan for areas of Waterford City, Dungarvan/Ballinroad, Tramore, Dunmore East, Portlaw, Lismore and Gaeltacht na nDéise (Policy Objective CS 08).

While the NTA is supportive of the intention to use the ABTA methodology in the development of LTPs, it is recommended that LTPs should be prepared for all areas for which an LAP is proposed, and Policy Objective Trans 06 should be revised to reflect this recommendation.

Recommendation:

The NTA recommends that Local Transport Plans should be prepared, using the ABTA process, for all proposed Local Area Plan areas.

Planning for Bus Service Provision, including Rural Areas

The NTA's Issues Paper submission included a number of recommendations regarding bus service provision in Waterford City and across the wider county. It was recommended that the Development Plan should:

- include a policy to support and develop public transport routes throughout the county through collaboration with the NTA;
- take cognisance of the opportunities presented by investment currently being committed to the improvement of bus infrastructure and services for the appropriate consolidation of future development in areas which support the use of public transport;
- consider the requirements of public transport in all urban plans and projects, such as local area plans, traffic management schemes, and urban realm schemes; such requirements would include, *inter alia*, suitable infrastructure on public transport corridors to improve safety and efficiency for public transport users, including retro-fitting within existing development areas; and

- include a policy to ensure that public transport infrastructure is considered as part of any significant residential or commercial development, comprising, *inter alia*, an evaluation of the requirement for new bus stops, turnaround facilities, pedestrian access and layover facilities.

The NTA welcomes the commitment to the above recommendations throughout the draft Development Plan and, in particular, 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.

Subsequent to the conclusion of the Issues Paper consultation, the NTA commenced the preparation of Connecting Ireland, a public transport programme that aims to improve the quantity, quality and utility of public transport outside of the major urban areas across Ireland. This is in parallel with the continuing development of the Local Link rural transport programme, which has the stated aim of providing ‘a quality, nationwide, community-based public transport system in rural Ireland which responds to local needs’.

While work on Connecting Ireland is ongoing, and its implementation is contingent on securing exchequer funding, the NTA welcomes the Council’s commitment to supporting this 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.

Achieving Modal Change

Section 5.4 outlines the mode split for the county and for certain settlements in 2016 using CSO data, in the context of national and regional mode split figures, and sets out high level mode share targets for cycling and public transport use for the county, viz. 10% for cycling, in accordance with the target set by the National Cycle Policy Framework, and 20% for public transport use. While supportive of the inclusion of mode share targets in the Development Plan, the NTA submits that the targets included should relate to identified settlements, as well as to the county as a whole. Such targets should be achievable, taking account of the transport and movement context for each settlement, i.e. the availability of public transport, and current trip patterns for intra- and inter-settlement travel. Measures for the achievement of mode share targets should then be identified through the development of Local Transport Plans. As proposed previously, The NTA would be willing to work with the Council on the development and analysis of sustainable transport indicators, in conjunction with the Office of the Planning Regulator.

Recommendation:

The NTA recommends that the Development Plan should aim to identify mode share targets for each mode, for designated settlements as well as for the county as a whole.

Roads

As noted above, the objective of the Transport Strategy is to provide a long-term strategic planning framework for the integrated development of transport infrastructure and services in the Waterford Metropolitan Area. This includes an assessment of the need for roads and provision for private car traffic. In this regard, the NTA notes the inclusion of a number of roads objectives in the Draft Development Plan within the Metropolitan Area, as set out in Policy Objective Trans 50. In addition,

the SRSES/MASP also contains a number of road proposals under Policy Objective 6(b) 'Sustainable Transport'. As stated in that Policy Objective, these schemes have been included 'subject to their consistency with the recommendations of the WMATS'. It is the intention of the NTA that WMATS will provide context and determination for which road schemes are provided for and why, as well as providing indicative time frame for implementation, and the NTA recommends that a conditional statement similar to that included in MASP Policy Objective 6(b) should be added to any proposed list of road schemes included in the Development Plan.

Recommendation:

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'.

Parking

Section 5.14 sets out the Development Plan policy on car parking. The NTA is supportive of the approach outlined, that sets maximum car parking standards rather than minimum requirements and takes account of the policy on car parking for residential development set out in the *Sustainable Urban Housing: Design Standards for New Apartments Guidelines*. The NTA also supports Policy Objective Trans 54, which states 'We will complete a review of Waterford City Car Parking Strategy over the lifetime of the Development Plan.' It is recommended that such a review should be informed by the recommendations of WMATS, when complete. The NTA also acknowledges Policy Objective Trans 57, which provides that '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.' Such objectives can make a meaningful contribution to the regeneration and renewal of urban centres, which is a critical consideration in implementing the 10-minute neighbourhood concept in a post-pandemic environment.

As noted in Section 5.15, 'high quality secure cycle parking at origins and destinations is considered to be a key element of any strategy aimed at encouraging cycling.' The NTA welcomes the various Policy Objectives related to cycle parking in the draft Plan, in particular Trans 62 as it relates to cycling as part of a multi-modal transport landscape, further supporting the use of public transport by extending its catchment.

Recommendation:

The NTA recommends that the review of the Waterford City Car Parking Strategy should take account of the recommendations of WMATS.

Conclusion

The NTA acknowledges that the Draft Development Plan is generally consistent with the objectives of the SRSES and Waterford MASP in its support for:

- 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; and
- other supporting measures including transport demand management and transport integration.

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.

I trust that the views of the NTA will be taken into consideration in the finalisation of the County Development Plan, and the NTA is available to discuss in further detail any issues arising from the comments and recommendations included in this submission.

Yours sincerely,

A handwritten signature in dark ink, reading "Michael Mac Aree". The signature is written in a cursive, flowing style.

Michael Mac Aree

Head of Strategic Planning