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**Waterford Metropolitan Area Transport Strategy,
National Transport Authority,
Dún Sceine,
Harcourt Lane,
Dublin 2,
D02 WT20.**

12th July 2022

**Re: Submission to the Draft Waterford Metropolitan Area Transport Strategy
SRA File Ref: 22/GD003**

A Chara,

The Southern Regional Assembly (SRA) welcomes the publication of the Draft Waterford Metropolitan Area Transport Strategy (WMATS) and opportunity for consultation. The SRA acknowledge the inputs and cooperation received from the NTA during the preparation of the Regional Spatial and Economic Strategy (RSES) for the Southern Region, including the Metropolitan Area Strategic Plans (MASPs) for Waterford, Cork and Waterford.

The RSES and MASPs provide an important statutory planning framework and policy objectives that underpins the Metropolitan Area Transport Strategy for the Waterford Metropolitan Area. Zero carbon, technology driven multi modal travel systems will lead to healthier cities and Metropolitan Areas. It will benefit a high quality of life, social inclusion and economic competitiveness for our region. Sustainable transportation is key to achieving the vision for the Southern Region to be one of Europe's most creative and innovative, greenest and livable regions.

This submission supports the strategic approach to transport infrastructure investment within our Metropolitan Areas and supports the role of the WMATS in prioritising sustainable, seamless movement across different transport modes and the support in the Draft WMATS document for the implementation of the Waterford MASP Vision for Waterford to be a dynamic, concentric Regional City of Scale. This submission identifies some of the relevant RSES Regional Policy Objectives (RPOs) and MASP policy objectives which support the aims of the Draft WMATS. It is important that due regard is given to these objectives as they will provide the policy support to ensure effective implementation.

1.0 Policy Context

It is considered that the section with sub-title 'Regional Level Policy' on page 12 should state that the RSES and MASP are statutory planning documents which require that Local Authority Development plans and other government plans and strategies demonstrate alignment with RSES and MASP policy objectives. It is also recommended that the NTA strengthen Sections 2 and 4 of WMATS to acknowledge the statutory role of objectives of the RSES and the Waterford MASP in addition to the policy objectives of the NPF. This should include a statement that the WMATS must be consistent as far as practicable, with regional objectives set out in the RSES and MASP. Relevant RPOs and MASP policy objectives should be referenced to ensure greater alignment and to assist implementation

Section 2.0 includes a strong policy context based on the RSES and Waterford MASP as well as other key policy documents. It is recommended that the key role of the WMATS in Waterford MASP implementation is highlighted as suggested with suggested re-wording para to;

'WMATS is a metropolitan area scale ~~sub-regional~~ plan and is directly informed by National and Regional Level policies and, in particular the RSES and Waterford Metropolitan Area Strategic Plan (WMASP). The key national policy documents are the National Planning Framework 2040 (NPF), the National Development Plan 2021-2030 (NDP) and the National Investment Framework for Transport in Ireland (NIFTI) and the recently published National Sustainable Mobility Policy'

In terms of the broader policy context, *Chapter 6: Connectivity* of the RSES addresses the role of transport networks to improve the sustainable movement of people and goods. Transport has a major impact on quality of life, community interaction, economic prosperity and environmental quality. It also has a major impact on the distribution of population, employment, education, socio-economic and cultural uses.

The RSES addresses the effective integration of transport and land use planning in the metropolitan areas, large towns and settlements, smaller towns, villages and rural areas. The RSES recognises the diversity of the Region, its variety of settlement patterns, economic and social conditions in the formulation of transport policies, objectives and measures.

Section 6.3.6.2 of the RSES refers to the preparation of Metropolitan Area Transport Strategies and states that these strategies will complement and support the achievement of MASP policy objectives. RPO 164 refers:

"It is an objective to develop Metropolitan Area Transport Strategies for Cork, Waterford 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 subject to required appraisal, planning and environmental assessment processes for the sustainable development of transport infrastructure and services in the metropolitan areas over a 20- year period. Metropolitan Area Transport Strategies shall undergo SEA and AA as per NPF objective NPO 75."

The WMATS is a key implementation tool for the RSES transport strategy as provided in Chapter 6. The preparation of the Draft WMATS directly implements RPO 164 (as well as other RSES and MASP policy objectives). These provide the policy framework for WMATS implementation. *Section 2: Policy Context* of the Draft WMATS would therefore benefit from a direct reference to RPO 164. Supporting text should also detail the significant role WMATS has in implementing the RSES transport strategy, relevant RPOs and MASP policy objectives.

High-level transport investment priorities for the Waterford Metropolitan Area are set out in the RSES at Section 6.3.6.5 and it is noted that these are well reflected in *Section 2: Policy Context* of the Draft

WMATS including specific reference to Section 6.3.6.5. While Section 2 of the WMATS details many of the Waterford MASP policy objectives, the relevant RSES Regional Policy Objectives (RPOs) are not cited. The NTA should therefore consider referencing relevant RPOs from Section 6.3.6 (Transport Investment Priorities) in *Section 2: Policy Context* and under the appropriate sections of the WMATS e.g. referencing *RPO 174: Walking and Cycling* under both Sections 6 (Walking) and 7 (Cycling) of the Draft WMATS. This will assist in developing stronger alignments to the regional policy framework that the RSES provides.

In terms of the policy context for WMATS, it is important to recognise the Region as being the *Southern Region* and we would therefore request that the opening statement on page 2 is amended as follows:- *'This Strategy sets the framework for an accessible, high-quality and integrated transport network that provides for the travel demand and supports the sustainable growth of the Waterford Metropolitan Area as the major growth engine of the ~~South-East~~ Southern Region, and an internationally competitive European city region as envisaged by the National Planning Framework 2040'*.

2.0 Land Use

The RSES places strong emphasis on **Compact Growth** in how our Cities and Metropolitan Areas are developed and this is well reflected in *Section 4.0: Land Use* at section titled 'Regional Growth', with reference to RPO 10 - Compact Growth in Metropolitan Areas.

RSES policy objectives provide a strong framework for WMATS to shape the distribution of growth targets in the Metropolitan Areas by **integrating land use and transport planning**. Section 6.3.6 of the RSES states that proposals for infrastructure investment should clearly demonstrate consistency with spatial planning objectives, at regional and national level.

Sub-heading "WMATS land-use priorities" on page 24 of the Draft WMATS discusses the need for higher densities and mixed-use developments in areas where opportunities exist for sustainable transport provision. In this regard, *RPO 151: Integration of Land Use and Transport* is particularly relevant and should be clearly referenced in *Section 3: Land Use* of the Draft WMATS. As per RPO 154, land use plans shall ensure integration of transport and land use planning informed by the principles expressed in RPO 151. In addition, *RPO 165: Higher Densities* is also relevant and should be referenced:

"Local Authorities, through appropriate Development Plan policies shall ensure the consolidation of development at higher densities within existing urban centres and provision of permeability (improved for existing areas and included in any new development), with a focus on locations where it can be demonstrated that such development supports the use of walking, cycling and public transport."

Section 6.0: Integrated Land Use and Transport of the WMASP states the principles underpinning the MASP include the effective integration of transport planning with spatial planning policies, from regional to local level and the alignment of associated transport and infrastructure investment. We refer to *MASP policy objective 6 (a): Integration of Land Use and Transport* and, in particular, part (b):

"It is an objective that Core Strategies of local authority Development Plans will identify public transport corridors and nodal points on corridors in the Waterford Metropolitan Area arising from the Waterford Metropolitan Area Strategic Transport Strategy which have potential to support high density development/regeneration. Core Strategies shall identify the appropriate land use zonings for these nodal points and demonstrate the effective alignment between land use and transport infrastructure planning and delivery of the NPF Compact Growth targets as they apply to the Waterford Metropolitan Area."

This MASP policy objective supports the Draft WMATS in its aim to integrate new mixed-use development at appropriate densities with high capacity public transport infrastructure in conjunction with more attractive walking and cycling networks and public realm improvements.

3.0 Strategy Development

In the paragraph on ‘Developing the Strategy’ on page 29, an additional reference to the RSES and MASP would be beneficial, as indicated below:

‘WMATS has been developed to provide a transport network to underpin the population and employment growth envisaged for the Waterford Metropolitan Area under the NPF and the RSES and Waterford MASP population and employment targets to 2040 and beyond’.

4.0 Walking and Cycling

Section 6.3.6.10 of the RSES states that active walking and cycle infrastructure will support active health initiatives and healthy communities, encourage transition to sustainable modes of travel, promote sustainable mobility and significantly assist our transition to a lower carbon society. Please also refer to *RPO 174: Walking and Cycling* in Chapter 6 of the RSES. Section 6.1 of the Waterford MASP states that ‘In a compact urban area like Waterford, the objective to develop Sustainable Travel will require a strong focus on cycling and walking, making Waterford a more Walkable City’

The outcomes for walking and cycling under Sections 6 and 7 of WMATS are supported and include important principles for enhanced permeability, integration of walking routes within road, bus and cycling network improvements, age friendly public realm, walking routes to school in addition to accessibility and universal design.

Population and employment growth, new initiatives, preparation of a Metropolitan Wide-Open Space, Recreation and Greenbelt Strategy under the Waterford MASP (W MASP Policy Objective 21) inter alia, will give opportunities for further sustainable transport initiatives and corridors, especially greenway opportunities. It will be important that Sections 6 and 7 seeks flexibility to encourage on-going and future new initiatives, especially through the lower tiered plans including Development Plans and Local Transport Plans, that build upon the platform of the WMATS.

5.0 Bus and Rail

Section 6.1 of the Waterford MASP states identifies development of a Metropolitan Area Public Transport system including routes from the City Centre to SETU (South East Technological University), Waterford University Hospital, Port of Waterford at Belview as key improvements to create a more attractive, greener and better connected Metropolitan Area. In this regard, the Bus Connects and associated bus measures contained in Sections 8 of WMATS will be the core element of the public transport system and are supported (RSES *RPO 171: Bus* refer).

It is important that a clear statement of intent is included under Section 8 that the bus network will accelerate the transition to zero carbon fuel sources and technologies, with appropriate levels of investment in modern fleet and zero carbon refueling sources and infrastructures to support the comprehensive bus network.

A green, zero carbon public transport system needs urgent progress to meet RSES commitments for a zero-carbon region and society. Transitioning to electrification and alternative fuel sources for the rail network and trains is signaled in Section 9 but this needs significant strengthening. Committing such progress to the latter half of a 20-year strategy is out of step with urgent actions needed to address climate change and optimise new technology.

The RSES and Waterford MASP include key policy objectives in support of rail transport including support for relocation of the main railway station to the North Quays to improve accessibility to the city centre as well as optimal use of the rail network, connecting Waterford at a regional and national level including development of commuter rail services into Waterford and retention of the Waterford -Rosslare Rail line for future freight and passenger rail connectivity to Rosslare Europort (RSES RPO 170 and Waterford MASP Policy Objective 7 refers).

These key rail elements of transport connectivity are reflected in Section 9.0 but could be strengthened with reference to the specific RSES and MASP policy objectives that will support WMATS policy.

In relation to Rail Freight, the extant and active freight rail connection to Port of Waterford should be identified in the context of the new freight rail service launched in 2021.

6.0 Roads and Streets

The RSES sets out the importance of maintaining, improving and protecting the strategic function of the key transport corridors. The steady-state maintenance and safety of the National Roads network is critical to ensure that the existing extensive transport networks are maintained to a high level and to ensure high-quality levels of service, accessibility and connectivity for transport users.

Additionally, investment in maintaining regional and local roads and strategic road improvement projects to unlock development opportunities and to support road based public transport is a key RSES priority.

Section 10 of the Draft WMATS refers to important road projects which are supported in the RSES and Waterford MASP and the principles and objectives identified are supported. It is noted that proposed measures include the River Suir Sustainable Transport Bridge, a pedestrian/public transport bridge a future Downstream River Crossing and a New Link Road from Abbey Road to Belmont to improve sustainable connectivity, all measures identified at Section 6.1 of the Waterford MASP which will create a more attractive greener and better connected Metropolitan Area.

The RSES encourages the integration of nature-based design solutions for mitigation design in road projects (RPO 168 Regional and Local Roads refers) and the SRA have published a *Framework for Blue Green Infrastructure (BGI) and Nature-based Solutions (NBS)*, which provides a methodology on using natural systems throughout project lifecycles and could be referenced in the WMATS in relation to roads and other infrastructure projects associated with the Strategy.

7.0 Parking

The development of a strategically located network of Park and Ride facilities in the metropolitan area integrated with the public transport, rail and bus, is supported. At present, there are no dedicated, permanent Park and Ride facilities within the Waterford Metropolitan Area and the Waterford MATS addresses this with the identification of an initial Park and Ride location linked to proposed Bus Route 3 on the approach to the city from the North-West. Proposals for Park and Ride locations will assist in addressing this shortfall. The development of Mobility Hubs throughout the metropolitan area is a positive additional support.

There will be opportunities for Park and Ride sites to facilitate different types of modal change and the opportunities to integrate cycle parking, bicycle share schemes, car share schemes, EV charging stations etc. should be maximised. *RPO 162: Multi-Modal Travel Integration* of the RSES is relevant and, inter alia, states:

“Investment is sought in infrastructure to provide for integration between all modes of transport to support the use of sustainable travel choices

8.0 Freight, Delivery and Servicing

The recognition that our export orientated economy and servicing growth will continue to generate growing HGV movement is important. The Draft WMATS has identified a number of important measures that will assist the efficient management of these movements. The importance of freight management through the Southern Region, especially between our metropolitan areas, Tier 1 and Tier 2 Ports and Airports is a strong priority of the RSES and within the Waterford MASP.

The strategic regional road and rail corridors, including the TEN-T, are supported for their role in efficiently moving freight for our export orientated economy. A regional freight strategy will be pursued as per *RPO 141: Regional Freight Strategy*. The WMATS statement in Section 12 that it supports the development of this Regional Freight Strategy is welcomed.

9.0 Supporting Measures

Section 13 sets out a comprehensive series of supportive measures which are needed to combine with infrastructure to achieve greater levels of transition to active travel, public transport and multi-modal travel. Also included are measures to promote technology change and integrate greater use of real time passenger information systems, mobility as a service (MaaS), smart mobility and Autonomous Vehicles.

The SRA welcome this inclusion and recommend that integrating technology change needs to have a heightened emphasis. Rather than a support, new technologies and MaaS networks will be transformative in changing behavior and facilitating ease of transition across different modes to suit daily transport needs, providing a real alternative to private car ownership and improving mobility for all society. *RPO 161: Smart Mobility* states:

“It is an objective to support the transformative potential of E- Mobility, autonomous vehicles, Mobility as a Service transport solutions and other emerging innovations in the transport and mobility sector through transport planning at regional, metropolitan and local level. Seek investment in actions and initiatives that position the Region as a leader in the digital transformation of transportation, E-Mobility and sustainable mobility.”

Waterford seeks to establish itself as a Smart City, recognising that technology will increasingly become the platform to significantly transition how society moves with ease, safety, affordability and frequency throughout the city and metropolitan area on public transport and active modes.

These innovations have potential to radically alter the transportation landscape and change the way our cities work. Much of this innovation will be led by the private sector and will need a rapid and flexible response from regulators. The Waterford Metropolitan Area should seek to be at the forefront of this change and this should be brought to the fore in the WMATS.

An additional Supporting Measure which could be included in Section 13.0 is the Development of a “**10-minute Cities**” initiative for Waterford, promoting the ability for individuals to access all essential services within a 10-minute walk / cycle or public transport connection from people’s homes. This initiative or multiple 10-minute city initiatives could inform a localized approach to implementation of WMATS (which could be co-ordinated and scaled up). The ‘10-minute city and town concept’ is referenced on page 11 of WMATS as part of the National Sustainable Mobility Policy and is supported by RSES RPO 176, with an additional implementation tool available on the SRA website – the *Ten-Minute Towns Accessibility & Framework Report*, which sets out a methodology for mapping and

developing the '10 Minute Town' concept. (developed as part of the MATCH-UP Interreg Europe Project).

10.0 Climate Action

Section 14.0 on Climate Action Management with its focus on Transport Demand Management and requirements to reduce Greenhouse gas emissions is noted and welcomed. The approaches outlined are supported by RSES Policy Objectives in Chapter 5 in support of a Low Carbon Energy Future (RPO 87), Regional decarbonization (RPO 90), Decarbonisation in the Transport sector (RPO 91) and RPOs 92 and 93, which address electric vehicle infrastructure.

We referred earlier to a *Framework for Blue Green Infrastructure (BGI) and Nature-based Solutions (NbS)* developed by the SRA. Given the emphasis in the *Climate Action Plan 2021* and RSES policy on Building Resilience to Climate Change (RPO 89) to improve adaptive capacity, is there scope for an additional strand in Section 14.0- an 'Approach 4' to provide cross-cutting support for climate action management in WMATS through greater emphasis on Blue Green Infrastructure (BGI) and Nature-based Solutions (NbS). This additional strand would address RSES policy objectives for climate action as well as supporting implementation of Actions in the *Climate Action Plan 2021*, such as Actions 464, 473 and 474 with regard to the use of Nature-Based solutions in design works associated with urban drainage systems, a necessary element to all transport infrastructure projects.

11.0 Implementation

Setting timebound short, medium and long- term implementation targets for key elements of the strategy under Section 15 of the Draft WMATS are welcomed. This will provide a focus for all stakeholders and clearly illustrates the need for joined up actions and collaborative project management across stakeholders to win investment and meet targets.

As the RSES and Waterford MASP has set transport investment objectives to be considered in the preparation of the metropolitan area transport strategies, it will be important that implementation of WMATS Measures are closely linked and coordinated with the overall implementation structure to be established for Waterford MASP implementation. Proposals for this are under consideration, aligned with the proposed City Development Boards and will involve the Department of Housing, Local Government and Heritage, the Southern Regional Assembly, Kilkenny and Waterford Local Authorities as well as the relevant government agencies such as NTA.

The level of co-ordination between infrastructure planning and project delivery, allowing for appraisal, design, consultation, planning and environmental assessment processes, in the context of brownfield and infill development targets, is unprecedented given the targets of the NPF. A commitment should be sought from the relevant Government Departments to resource and enable the appropriate level of multi discipline project design, implementation and delivery teams across local authority and stakeholder agencies to assist delivery of WMATS.

RPO 8 Compact Growth in Metropolitan Areas seeks a host of pro-active forward planning measures within the metropolitan areas to enable infrastructure led growth and integration of land use projects with metropolitan transport strategies.

It is also important that progress is communicated transparently for stakeholders. Seeing continual progress and advancement of key projects under WMATS will signal confidence for many stakeholders in advancing complimentary projects and masterplans.

12.0 Strategy Outcomes

Strategy outcomes in Section 16 are beneficial to measure implementation and success of the strategy. It is noted that further revisions are envisaged through the review process as infrastructure is improved and demand management measures are adopted by both local authorities.

Stronger performance should be encouraged and pursued, especially to maximise the active and public transport infrastructure investment through WMATS and support targeted actions within projects and lower tiered plans for maximum modal change outcomes.

The Strategy Outcomes infographic shows the 2040 peak modal share for private car to be 50% of journeys by 2040 (reduced from 69% in 2016). This infographic also shows that between 2016 to 2040 the mode share of walking will increase from 25 to 27%, public transport will increase from 4 to 11%, and cycling will increase from 2.0 to 11%.

While these are positive steps in the right direction, further revisions are required to ensure targets are ambitious enough in the context of climate emergency and the need to transition to a low carbon society with immediate steps.

As a comparison, the National Smarter Travel Targets 2009-2020 sought to achieve a reduction of work-related commuting by private car to 45% of modal share by 2020 and commuting by walking, cycling, public transport and car sharing to 55% of modal share by 2020. WMATS targets and outcomes to 2040 appear understated by comparison despite having a 20 year time horizon.

The envisaged revisions through the review process should set a significant higher bar and should be continually reviewed throughout implementation. Given the relatively compact nature and scale of Waterford City and suburbs and the scope for integrated land use and transportation planning along with sustainable transport measures for the full strategy period, it is considered that the WMATS should, through its review process, set a higher level of ambition in outcomes/targets to achieve a reduction in private car, increase in public transport, walking and cycling by 2040 compared to 2016 baseline performance, strengthening such performance from that sought under the National Smarter Travel Targets 2009-2020

Higher achieving targets and outcomes are a benchmark for other plans and actions and can encourage creativity, innovations, community initiatives and commercial opportunities that help behavioral change.

As an example, in many European cities E-scooters are emerging as a successful new mode for increased green mobility allowing a further range than cycling alone and share schemes, similar to bicycle share schemes. Legislation and guidelines may evolve to facilitate changing technology and infrastructure on our streets for E Mobility. There are many new approaches and innovations not yet foreseen which may emerge to help achieve a high standard of modal change.

The measurement of lower vehicular emissions is also positive but similar to the points above on modal change, a significant step change to zero carbon energy sources for the transport sector needs to occur. Public transport fleets and freight need to transition with urgency to lower and zero carbon fuels in addition to private car. Technologies and investment in fleet and energy infrastructures need to match the corridors and frequency of services planned. The responsibility for lower carbon emissions needs to extend beyond private car (as indicated in the strategy outcome infographic showing an 83% reduction in car CO2 emissions).

It is considered that the WMATS should, through its review process, set a higher level of ambition in outcomes/targets for lower carbon emissions to reflect hastened transition to lower and zero carbon

emissions across private transport, public transport and freight, optimizing integration of smart technologies, renewable sources, energy infrastructure and modernization of fleets

Technology changes in a Smart City will assist the ability to monitor and measure performance in lower carbon emissions. A target for improved air quality for example could be included as a measure and strategy outcome to pursue.

Continual review and improvement in targets need to be built into implementation. The importance of measuring progress through targets in transportation is strongly emphasized in the RSES and *RPO 163: Sustainable Mobility Targets* refers.

Conclusion

The SRA strongly supports the initiative of metropolitan area transport strategies and welcomes this opportunity to engage and consult with the NTA on the Draft WMATS. Co-ordination with the NTA and TII in the preparation of the RSES and MASPs was strong and beneficial. The publication of the WMATS is a significant step in RSES and MASP implementation and we welcome this opportunity to provide input.

Our RSES team are available to the NTA team to follow up on any aspects of this submission and to continue to work with the NTA towards the finalisation of the WMATS.

Please do not hesitate to contact us with any clarities raised in the above.

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Director, Southern Regional Assembly