



Comhairle Cathrach & Contae Phort Láirge Waterford City & County Council

RSES Material Amendment Submissions,
Southern Regional Assembly,
Assembly House,
O'Connell Street,
Waterford X91 F8PC

Friday, 11 October 2019

Re: Proposed Material Amendments to the Draft Regional Spatial and Economic Strategy for the Southern Region

Dear Mr. Kelly,

Waterford City and County Council welcomes the opportunity to make a submission on the proposed material amendments to the Draft Regional Spatial and Economic Strategy which have been on public display since the 12th of September.

Period for Public Consultation

The members of Waterford City and County Council considered the proposed Material Amendments at their plenary meeting on the 10th of October 2019. However, some concern was expressed at that meeting regarding the time period within which submissions could be made. The proposed material amendments went on public display on the 12th September, the same day as the Council's September meeting, and the late date for receipt of submissions is just one day after their October meeting. As a result there was insufficient opportunity to brief the members on the proposed material amendments or to engage with them in relation to the content of a submission to the Regional Assembly within their normal meetings calendar. Therefore, the members of Waterford City and County Council have asked that the period for the making of submissions be extended by ten days to allow for the scheduling of a workshop to consider the proposed material amendments in detail and the making of considered submissions on the relevant issues.

In the event that a formal extension of time cannot be facilitated, the planning authority request that this submission be acknowledged and that the Assembly consent to the submission of supplementary supporting documentation within the next seven days

following consideration of all of relevant matters by the members of the local authority at a workshop to be held early next week.

General Comments

At the outset the Planning Authority acknowledges the inclusion of many of its suggestions/recommendations as per submission on draft RSES.

Population Projections Material Amendment 139

The proposed population projections up to 2031 for the Waterford MASP are noted and welcomed as is the framework for a *'Balanced Concentric Metro Area for Waterford'* and the associated short term and long term objectives required to achieve this core MASP objective including inter alia provision of a new Integrated Transport Hub and new bridge crossing linking the city centre and North Quays in the short/medium term with firm commitments in relation to critical enabling infrastructure to facilitate sustained longer term concentric growth in support of the objectives for the metropolitan area as set out in the National Planning Framework.

Delivery of these objectives requires the establishment of a MASP Implementation Body and a *'distinct multi-annual funding stream linked to the NDP'*, measures which the Planning Authority welcomes. Material Amendment 101 also refers.

Regarding the residual population targets for the county outside of the MASP area, the Planning Authority notes the statement that *"the overall population projections for each county, as provided in the NPF Implementation Roadmap do not change"* [in light of the MASP population figures – new table].

Key Towns Material Amendment 7

Waterford City and County Council notes the differentiation in the settlement typology regarding the Key Towns. Six of the larger Key Towns, namely Kilkenny, Ennis, Carlow, Tralee, Wexford and Clonmel are now all denoted as *'having a comparable structure to the 5 regional growth centres identified in the NPF'*, with the aforementioned Key Towns being identified as regional economic drivers in their own right with significant capacity for population growth >30%.

While Waterford City and County Council recognises that county town function to service their respective populations, it is considered that the amended settlement policies relating to the Key Towns should make specific reference to National Policy Objective 2a of the national Planning Framework which states that:

A target of half (50%) of future population and employment growth will be focused in the existing five cities and their suburbs.

Furthermore, it is suggested that the RSES should make clear that investment in enabling infrastructure in the designated Key Towns will be assessed having regard to the order of priority for investment as set out in the National Planning Framework and the National Development Plan, including the clearly articulated national objective of enabling Waterford City to become a regional city of scale.

The overall approach of the national Planning Framework is to avoid the “business as usual” model by clearly recognising the regional cities of Cork, Limerick and Waterford as being the principle drivers and enablers of sustainable and balanced regional development. This approach and order of priorities is clearly supported by a number of National Policy Objectives within the National Planning Framework including policy NPO7:

Apply a tailored approach to urban development, that will be linked to the Rural and Urban Regeneration and Development Fund, with a particular focus on:

- *Dublin;*
- *The four Cities of Cork, Limerick, Galway and Waterford;*
- *Strengthening Ireland’s overall urban structure, particularly in the Northern and Western and Midland Regions, to include the regional centres of Sligo and Letterkenny in the North-West, Athlone in the Midlands and cross-border networks focused on the Letterkenny-Derry North-West Gateway Initiative and Drogheda-Dundalk-Newry on the Dublin-Belfast corridor;*
- *Encouraging population growth in strong employment and service centres of all sizes, supported by employment growth;*
- *Reversing the stagnation or decline of many smaller urban centres, by identifying and establishing new roles and functions and enhancement of local infrastructure and amenities;*
- *Addressing the legacy of rapid unplanned growth, by facilitating amenities and services catch-up, jobs and/or improved sustainable transport links to the cities, together with a slower rate of population growth in recently expanded commuter settlements of all sizes;*
- *In more self-contained settlements of all sizes, supporting a continuation of balanced population and employment growth.*

And policy NPO8:

To ensure that the targeted pattern of population growth of Ireland’s cities to 2040 is in accordance with the targets set out in Table 4.1.

Therefore, we would request that all references to population and employment growth in Key Towns should be considered in the context of already established high level national policy regarding regional, city and county targets.

With regard to the settlement of Dungarvan as referred to in Material Amendment 19, Waterford City and County Council requests that reference to *Flood Defence measures* be included in section e.

Towns and Villages Material Amendment 20

The inclusion of text relating to investment in service delivery is welcomed and is a critical element in securing the future of rural settlements. It is suggested that the text in the amended subsection c of RPO 24 should seek the timely delivery of infrastructure taking cognisance of settlement hierarchies as set out in relevant development plans.

Rural Areas Material Amendment 21

Waterford City and County Council notes the additional of the term '*local*' as a criteria relating to establishing a need for single housing in the rural countryside. The Council would consider that this additional criteria for single housing in the rural area exceeds materially the provisions for establishing a housing need as set out in NPO 19 of the NPF. It is considered therefore that the material amendment is inappropriate at best, will undermine the broader spatial strategy contained in the NPF and as such should be removed.

It must also be stated that the material amendment to the policy as proposed is premature until such time as the amended Ministerial guidelines relating to sustainable rural housing is made, along with the associated SEA and AA reports as the environmental impact resulting from the addition of the "local" need criteria needs to be fully considered in terms of European sites, RBMP and other environmentally sensitive sites which support the broader network of the former sites and habitats. Finally it is noted that the mitigation measure identified in the EAR accompanying the Directors Report on Material Amendments recommends removing the term "or local".

Networks Material Amendment 22, 23, 24, 30 (Section 2.2.4 of Directors Report)

It is important to acknowledge inter-urban networks (both road and rail) as regional drivers of growth and in this regard WCCC welcomes RPO C including in particular reference to:

- Limerick-Waterford Transport & Economic Corridor
- Waterford-Kilkenny-Carlow-Dublin M9/Rail Network

The detailed description of the attributes of Limerick-Waterford transport corridor is noted and welcomed including the support of the RSES for further development and investment in this corridor including potential upgrade of N24 to motorway standard. It is recommended however that the Eastern Corridor referred to in RPO C & D include reference to Belview port to ensure sustainable logistic and transport solutions are maximised while supporting synergies across the port network and its specialist facilities.

Land Development Agency Material Amendment 28

The text of the material amendment to RPO 33 should be refined to include a reference not only to State lands but private owned land also.

Marine and Coastal Assets Material Amendment 36, 37

The Planning Authority welcomes the objective to support the region as a leader in the field of R & D regarding the marine economy. With regard to RPO 77 however it is considered that emerging Strategic Integrated Framework Plans (SIFPs) for major river estuaries delivered during the life of the RSES should receive the same level of support set out for the Shannon SIFP in terms of policy/ financial/expertise.

Transition to a Low Carbon Economy Material Amendments 38-48

The additional RPOs focusing on climate change resilience, adaptation and regional decarbonisation including associated mitigation measures are welcomed as are new objectives supporting implementation of the Offshore Renewable Energy Plan and District Heating Schemes.

With regard to the material amendment to RPO 100 it is suggested that after the term “support carbon sequestration” the term “and enhancement of biodiversity” be included. With regard to new RPO H, the final sentence should read “Statutory land use plans shall take account of the risk to coastal erosion and flooding, whereby the opening up of new lands for development should be avoided in areas at risk of coastal erosion and flooding.”

Regional Freight Strategy Material Amendment 60

The Planning Authority notes the provision for a Regional Freight Strategy and the role of Limerick Junction as a “*national passenger and freight hub*”.

As outlined in the Planning Authority’s submission on the draft RSES, the development of Rosslare and Waterford Ports and associated Waterford-Rosslare rail line is critical to the economic development of the region. In this regard it is recommended that the material amendment be revised to ensure that any national rail freight and passenger hub at Limerick Junction be fully supported through improvements to freight and logistics facilities/network at both Rosslare and Waterford/Belview ports. Any regional strategy must include all elements of the port network to be fully effective and efficient.

In terms of RPO 141, reference to Port of Waterford should include reference to the ports strategic plan which is being finalised at present.

Local Planning Objectives Material Amendment 67

Although not a material amendment per se, there is a conflict identified under bullet point no. 4 in the text which needs to be clarified referring to the terms “shall, will, should, would”.

Local Transport Plans Material Amendment 68

In addition to the amendments set out relating to LTP’s, there should be a reference to retrofitting permeability as part of the transport planning process.

Rural Wastewater Treatment Programmes Material Amendment 98

The term “subject to settlement hierarchies and core strategies set out in development plans” should be inserted at the end of the proposed material amendment.

Improved Regional Connectivity To/From Waterford Material Amendment 73 & 138

The Planning Authority welcomes the additional text and objectives regarding regional connectivity including amendments strengthening RPO 158: Investment in Strategic Road Connectivity.

It is noted that the South East Waterford City Region (SEWCR) has been amended to *Waterford and the South East*. The Planning Authority would favour retention of the SEWCR which it is considered would better reflect the primacy of Waterford’s role in the region.

TUSE Material Amendment 85

Waterford City and County Council had requested that an objective be included in the final RSES document supporting the location of the headquarters and main campus for TUSE in Waterford City Metropolitan Area.

With the exception of the use of the phrase “transform and grow the Waterford Metropolitan Area” under MASP PO 11 of the draft RSES, there is no specific reference to providing the focus for any university in Waterford City. It is also noted that the campus locations have been expanded across the region with Wexford now being included as part of TUSE. It is critical to the delivery of a nationally and internationally successful university that it is given a strategically located city base from which to develop.

Monitoring the Strategy Material Amendment 103

Bullet point no. 1 should be amended to include reference to “urban area plans”.

Material Amendment 140, 141, 142, 137

The Planning Authority welcomes the additional objectives pertaining to Housing and Regeneration, and Employment & Enterprise. The Planning Authority will work with the Regional Assembly and adjoining local authorities to clearly identify the location and extent of strategic lands for housing, new neighbourhoods and employment through the upcoming Development Plan review process.

However, it is noted that there is a lack of specific references to strategic developments within the Waterford City Region such as the Viking Triangle, Waterford Port, and the Technical University for the South East along with pharmaceutical and life science sectors as vital employment and enterprise generators for Waterford and the larger region. Notwithstanding, the New MASP Policy Objective R on *Economic Resilience and Clusters* is welcomed [Material Amendment 142].

The Planning Authority welcomes the recognition of the North Quays Innovation District and objectives pertaining to the delivery of same. Additional objectives under Sustainable Transport including provision of an additional downstream crossing are noted and welcomed as a clear statement in relation to critical enabling infrastructure for the medium to longer term sustainable development of the Waterford City Region – Waterford MASP Policy Objective 6 [Material Amendment 137].

Retail Material Amendment 143

The additional text to MASP PO 16 Retail is welcomed. In terms of point (b) it is recommended that reference to culture should read “Cultural Quarter” while the heritage experience available in the “Viking Triangle” should also be identified.

Material Amendment No. 2 (Section 2.2.1 of Directors Report)

Reference is made to “Priority Areas for Action” in the Material Amendments to Chapter 2 (climate change). It would be helpful if these priority areas could be clarified. It may also be useful to refer to the Avoid/Shift/Improve approach which could be used in considering policy alternatives in terms of both climate adaptation and mitigation and the means to achieving decarbonisation. The RSES needs to identify a clear methodology for transposing the high level targets set out in the Climate Action Plan to measurable and achievable policies and objectives at a local level. The implementation structures referred to in the Material Amendments need to be given priority and the RSES should clearly identify when these can be put in place.

Waterford MASP

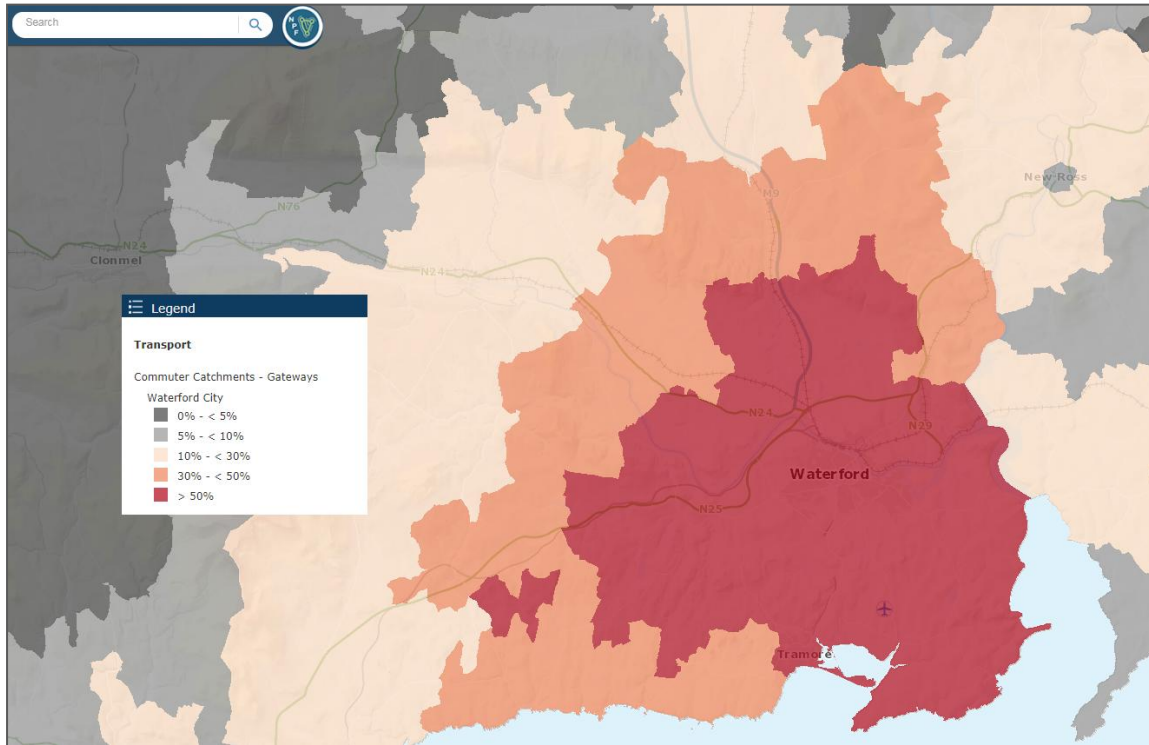
The exclusion of Waterford Airport, which adjoins the MASP to the south, was considered by Waterford City and County Council to be a weakness of the MASP strategy and in its submission on the draft RSES it was requested that the matter be re-examined and that Waterford Airport be included within the MASP boundary.

The local authority notes the Director’s response to previous submissions which states that the MASP boundaries are set out at a national level and are not to be redefined through the RSES process. However, we now note that the material amendments which are currently on public display propose a redrafting of the MASP boundary for Limerick City.

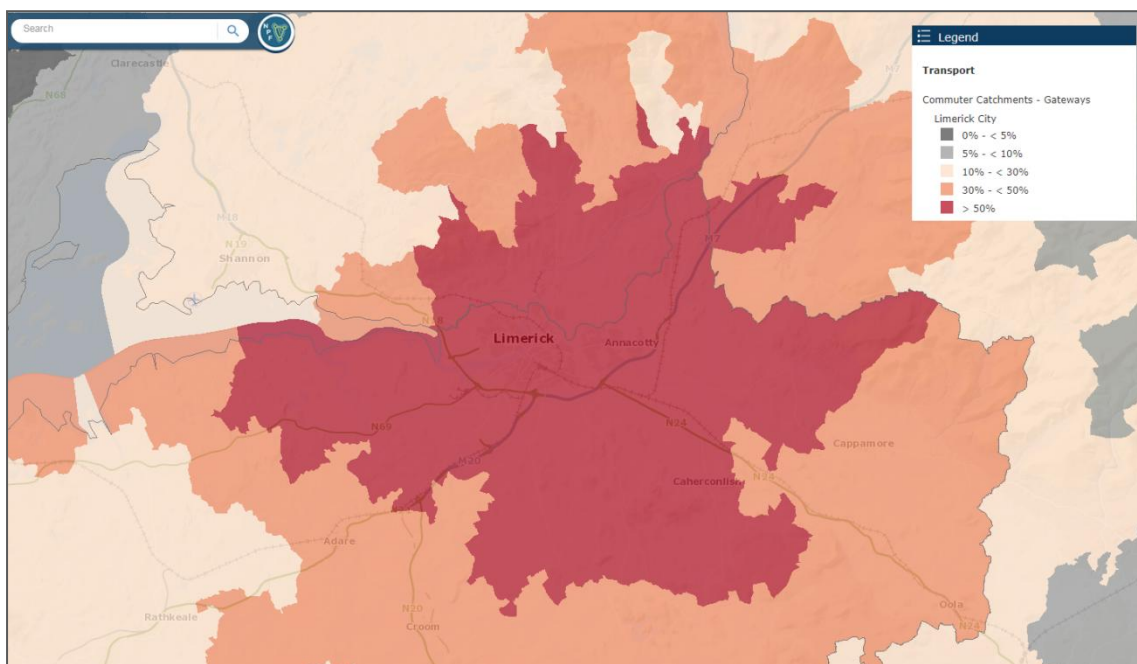
Waterford City and County Council insist that any redrafting of any of the MASP boundaries should have an evidence based approach and a clear methodology for the delineation of such boundaries which cannot be applied in isolation but which must be applied equally to all three MASPs within the Southern Region.

In the event that some or all of the MASP boundaries are to be reviewed, Waterford City and County Council would again request that the regional airport located on the fringes of the City and proximate urban areas with established commuter links, such as Tramore, should again be considered for inclusion within the Waterford City MASP.

To illustrate our concerns in this regard, we attach two maps which were prepared by the All Ireland Research Observatory (AIRO) of NUI Maynooth in support of the National Planning Framework. The first map clearly show that there are extensive areas to the south of Waterford City including the Regional Airport, Tramore and Dunmore East which recorded more than 50% of their working population commuting into the city on a daily basis. However, these areas are excluded from the Waterford City MASP.



On the other hand, only between 10% and 30% of the working population of Shannon commute into the city of Limerick but it is included within the Limerick City MASP.



The foregoing maps clearly illustrate an issue in relation to the methodology which has been used to date to define the MASP boundaries. Any attempt to further redefine these boundaries through the RSES process would need to be supported by a very clear methodology which should be applied equally to all three MASP areas. Such an approach is absolutely necessary to ensure a consistency of approach in the interest of transparency, implementation and the consistent monitoring of outcomes.

We accept that the current MASP boundaries were not set by the Regional Assemblies and that they were in fact determined at a national level through Circular FPS04/2018 and the “Implementation Roadmap for the National Planning Framework”. We note that these boundaries are intended to be dynamic and may be subject to periodic review having regard to changing circumstances and suggest that they should now be reviewed given that a full review of all County and City Development Plans is imminent following adoption of the relevant Regional Spatial and Economic Strategies. Such a timely review, whether at regional or national level, is essential to ensure a consistency of approach across all regions and cities throughout the state.

Liam McGree
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Waterford City and County Council
Friday, 11 October 2019