

# **Draft National Planning Framework: Ireland 2040.**

## **Submission of Waterford City & County Council**

### **1.0 Introduction:**

Waterford City & County Council welcome the document and the new approach to ensuring effective and balanced development across all regions. The NPF however may not be as effective as envisaged in its high level vision as while the policy document attempts to distribute population increase between regions, the end result will be a continuation of current trends i.e. the Eastern and Midland Region by 2040 will become much stronger at the expense of the Northern and Western Region and the Southern Region. It is also noted that the latest ESRI projections up to 2030 would suggest that the fundamental proposition of proposed population distribution has to be revisited with predicted population targets being reached earlier than 2040.

That being said however the real impact of the NPF will only be achieved through the implementation of the various structures referred to throughout the document and further clarity is required in this regard to ensure such structures achieve the effective and balanced development envisaged in the draft NPF. These fundamentals underpinning the NPF as set out herein require further attention.

### **2.0 Previous Submission:**

As part of the initial consultation on issues papers Waterford City & County Council made two submissions, one as part of a regional paper in conjunction with other local authorities in the South East Region and the second solely on behalf of the Council. The current submission on the Draft NPF builds on issues as they relate specifically to Waterford City & County Council.

The initial submission on the NPF issues papers focussed on the following key points.

- The SE needs a regional city of consequence therefore Waterford City's population must grow by at least 50,000 in the next 20yrs. The NPF must make provision for this growth in terms of a linked Capital Investment Programme.
- Development of the North Quays SDZ and key transport projects are required to support future economic growth.
- The establishment of a Waterford Technological University.

- Employment for the South East Region will have to be centred in Waterford City and the NPF will have to explicitly provide for this.
- Good internal and external connectivity is essential for a successful economy and provision of such infrastructure needs to be prioritised in the NPF.
- The NPF must prioritise the development of Waterford University Hospital in order for it to function at a scale that is appropriate to the region.
- The NPF needs to prioritise the development of the cruise industry in the heart of Waterford City.
- Waterford City needs a regional airport of an appropriate scale and the NPF should prioritise improved airport facilities and in particular a runway extension.

### **3.0 Submission on the Draft NPF.**

In relation to the initial submission from Waterford City & County Council and the contents of the draft NPF the following comments arise specifically in terms of Governance, Urban and Rural Place Making and identified Growth Enablers:

**3.1 Governance:** A critical issue for Waterford is to ensure a balanced and concentric growth of the city as envisaged in the PLUTS is achieved across administrative boundaries. A key challenge for the NPF is to provide clarity around structures and frameworks proposed to implement the NPF such as Metropolitan Area Strategic Plans (MASP), the National Smart Growth Initiative (NPO 7a), Urban Area Plans, revised Core Strategies, Housing Need & Demand Assessment, revised Sustainable Residential Development in Urban Areas and associated design manuals, alignment with capital investment plans and governance structures to be put in place as per Section 9 of the Draft NPF.

Careful and detailed consideration will be required in order to fully align national, regional and local government aspirations with the capital investment plans of statutory providers, State Agencies (particularly in the area of job creation) and government departments. In order to achieve population and job targets and the delivery of key growth enablers for Waterford city and county, some of which have been identified in the previous submission, any MASP needs to be formulated and implemented in order to achieve the appropriate level and timely release of capital investment. The draft NPF has given no clarity in relation to who will inform the drafting of a MASP and who will have ultimate responsibility for making and implementation the MAPS at both political and executive level. While the draft

NPF is a high level strategy document it needs to provide greater details on the above structures which will be relied upon to ensure effective implementation of the strategy to 2040 and the imminent RSES and next round of development plans. Without the coupling of timely and targeted capital investment across all sectors responsible for delivery of services/infrastructure to programmed elements of any future MASP, it is likely that the NPF will not succeed in achieving the effective and balanced development of the regions. While it is recognised that there is a regional/local administrative and governance dimension to these issues, the NPF needs to be more specific in terms of how such structures will best inform and implement change.

**3.2 Urban Place Making:** The particular focus on urban place making as referred to in NPO 4 raises critical issues such as liveability, diversity, integration, high quality and well designed places and high quality of life. While Waterford City & County Council recognises that delivering on all of these issues is critical to realising sustainable urban communities and places, these cannot be achieved without focussed capital investment on behalf of the state and its agencies in order to overcome both existing deficits and legacies of poor investment along with ensuring the focus of future development delivers in terms of NPO 4. This is best served with investment in education and job creation. In order to achieve these aspirations the concept of collaboration enshrined in NPO 24 should be reiterated in terms of achieving urban place making and the critical mass of the regional cities.

In terms of delivering such urban places it is also important that functional powers of local authorities for the purposes of active land management be enhanced, particularly CPO powers, so as to ensure the speedy release of brownfield sites and the facilitation of necessary infrastructure. The proposals set out in NPO 12 are noted and it is important that local authorities would have an appropriate level of input into the functions of any national land development agency where they relate specifically to lands within the authority's administrative area. Therefore a concept of collaboration and partnership should be also enshrined in NPO 12.

To achieve the aims of NPO 4 and the circular economy envisaged in NPO 55, it is vital that processes facilitating the redevelopment of existing building stock in urban centres are rationalised. In this regard it is essential that standards which relate to new build developments are not simply applied to refurbishment proposals also. Issues such as site

assembly, provision of universal access and provision of adequate private open space are considered substantial blockages to redevelopment of older urban areas, issues which are further complicated by multiple consent procedures. In addition it is noted that NPO 11 refers to utilising “performance criteria” for the purposes of alternative design solutions and greater clarity in this regard, along with removing constraints for urban refurbishment proposals, would be welcomed in the final NPF.

It is also noted that there is no stated target for reuse of existing building stock in urban/rural settlements and the provision of such a target would be helpful in terms of supporting future development plan policies and realising the objectives of the draft NPF. Coupled to this there is a need for “real” financial incentives to promote such redevelopment, without which targets will not be readily achieved.

Utilising EU and OECD methodologies and CSO/NTA models and data to define metropolitan regions or city region catchments provides a structure to making such designations however there should be further discussion at regional and local level so as to ensure the methodology is appropriate for each regional city taking cognisance of the range in size, scale and function of each city and particular geographical and infrastructural constraints.

**3.3 Rural Place Making:** One of the key challenges in achieving sustained growth of smaller towns and settlements is the provision of infrastructure and in particular waste water treatment. Therefore while the provisions of section 4.4 and NPO 15, 16 & 17 are all welcomed, the NPF must stress the need to urgently target capital investment in waste water infrastructure and this must be supported by Irish Water. If such investment priorities are not specified as part of the NPF and RSES processes then subsequent development plans may well fail to sequence development and other investment priorities within settlements and the broader settlement hierarchy. There is also a need to provide new engineering solutions and a flexible modular approach to proprietary treatment which will allow existing infrastructure to expand in order to facilitate future development in urban and rural settlements without interrupting services to existing users. It seems futile to allocate a population increase to rural villages and the countryside without proper targeted investment in infrastructure. The result will be that smaller inadequately services settlements will further decline with associated increase in disadvantage while housing in the countryside will accommodate the majority of population growth.

While the draft NPF identifies the concept of metropolitan areas or hinterlands based on EU and OECD definitions and which would sit within what are currently termed areas under urban pressure, it does not make any reference to either retaining or amending areas which are considered strong rural areas or structurally weak rural areas. Perhaps it is envisaged that the provision of housing in such areas will be demonstrated through the proposed HNDA process but this is not clear. Greater clarity is therefore required in terms of rural area designations.

Achieving a balanced and effective population growth at local and regional level between urban and rural areas as envisaged in the draft NPF will be difficult. This difficulty will be exacerbated by the text set out in section 4.3 which states “an average target does not mean that individual settlements or rural areas cannot exceed the general targeted rate of growth, it just means that everywhere can’t.” This provision may well result in continued development of one-off housing in the countryside at the expense of rural towns with populations up to 10,000. Taken in conjunction with the stated requirement of “economic need” referred to in NPO 18b (rural housing in rural areas under urban influence), both provisions could place excessive development pressure on areas of countryside where services may not be readily available for rural communities and could disadvantage the sustainable development of rural towns. The provision of section 4.3 could therefore run counter to the premise underpinning the draft NPF which seeks to strengthen urban fabric and function across the regions and rationalise the provision of services accordingly. A solution may lie in the identification of equitable population growth targets for both rural towns and housing in the countryside which will secure the delivery of sustainable communities.

Coupled with this issue it is considered that the population threshold for urban towns is excessively high and may result in stagnation of certain settlements and the excessive growth of others by either a lack of capital investment or excessive concentration of population respectively. There is a need therefore to reassess the relevant thresholds and ensure that there are clear directions provided to rationalise the approach to designations and facilitate a partnership approach between regional and local government at RSES level to ensure solutions to this issue are fit for purpose at a local level.

**3.4 Key Growth Enablers:** With regard to Key growth enablers for Waterford City as identified in section 3.9 of the Draft NPF, the following are noted:

- North Quays: While Section 3.9. of the draft NPF refers to assisting in delivery of the North Quays SDZ, the reference to the new bridge should state pedestrian **and** public transport bridge only as the provision of public transport on this route is essential to secure the sustainable development of the North Quays site. In addition to the North Quays, other opportunities for the regeneration of key urban areas should be specified and suitably prioritised in the final NPF i.e. the former Waterford Stanley site at Bilberry and the former Waterford Crystal site and neighbouring vacant sites at Kilbarry/Cork Road.
  
- University: While the expansion of the city's third level institution is recognised as a growth enabler, the draft NPF fails to specify re-designation of WIT as a university, despite identifying the need for a university at city level under section 5.2. The position of the final NPF on university status for WIT in Waterford needs to be strengthened in order to be consistent in terms of its identification of enabling infrastructure across all cities. This is critical if the City and region are to provide an appropriate third level university education for the population and assist in attracting further investment in both educational fields and high quality jobs. Given the demographic trends outlined by the ESRI which underpin the draft NPF, the decision and investment required to designate WIT with university status and implement change needs to be completed in the immediate term so as to deliver on university education by 2025 and the population and job targets set out in the draft NPF.
  
- Waterford University Hospital: The further expansion of population within Waterford city and its region along with the demographic trend towards ageing population over the life of the NPF i.e. 23% of population in 2040 over 65 years, will place additional burden on the provision of health care and it is vital that the facilities at WUH are expanded and developed in order to provide adequate health care for the community into the future.
  
- Timely delivery of infrastructure: Achieving a city of scale as envisaged in the draft NPF will require substantial capital investment to connect the city both internally and externally. With regard to the former, timely completion of the outer ring road and new river crossing giving connectivity to Belview Port and the M9, new and improved radial and inner city roads, improvements to public transport (bus/rail)

and an additional city centre vehicular bridge crossing over the River Suir are all required to facilitate the expansion of the city as envisaged in the PLUTS and the draft NPF while improvements to the M24/M20, Waterford Airport and Belview Port are required to enhance the role of Waterford regionally, nationally and at a broader EU level.

The M24 needs to be put firmly on the agenda as does the M20. There is also a need for robust and proper evaluation of what are the priority sections of such routes to be delivered in the short/medium term. The appropriate and sustainable delivery of both projects must be considered in tandem, particularly in terms of the totality of environmental constraints, utilising existing infrastructure (M8) and designing major interchanges between the M24 and M20.

Commuter rail and bus services linking Waterford with Clonmel, Wexford, Kilkenny and Carlow should be afforded priority in order to achieve a transition to a low carbon transport sector and reducing the impacts of climate change. This will also assist in enhancing synergies and connectivity between the larger towns of the region and their associated services.

- Metropolitan Cycle Network: The proposal to extend the Greenway from WIT to the city centre is welcomed as this forms a critical final link in connecting Dungarvan to Waterford city centre and the proposed Greenway to New Ross. In addition to this, further cycle infrastructure is required to link Waterford city to Tramore and the coast and extend cycleways and pedestrian routes along the River Suir within Waterford City.
- Green infrastructure and biodiversity networks: With the targeted increase in size of Waterford City which will require the use of new greenfield lands beyond those currently zoned for residential and other uses, there will be a requirement to integrate existing habitats of value into new developments and utilise such features for amenity and infrastructural purposes, particularly storm water runoff. Furthermore there will be additional loading placed on older service networks to accommodate new urban growth and in many instances this will require application of soft infrastructure to manage storm water runoff and the impacts of climate

change in terms of increased frequency and severity of storm events. Enhancing the biodiversity value of such infrastructure and linking corridors of biodiversity value should be at the core of all infrastructural measures and the NPF should prioritise such measures as they relate to Waterford City.

It is recognised that while much of the detail relating to such infrastructure identified above will be provided through sectoral plans and the RSES it is considered that failure to provide additional clarity for same in the final NPF would be a lost opportunity to secure the development of Waterford City as envisaged in sections 1 – 3 of the draft NPF. The final NPF should therefore identify the need to support the growth enablers as set out above.

#### **4.0 Conclusion**

Waterford City & County Council, in highlighting the above issues, seeks to ensure that the underlying principles and vision of the draft NPF are carried through to implementation at a national, regional and local level. This submission highlights the need for greater clarity with regard to the policies of the draft NPF and the structures envisaged to ensure effective and balanced development is implemented. The NPF needs to give greater clarity regarding the identified implementation structures to ensure that RSES and development plans can be consistently formulated and delivered nationally.

The population targets require further consideration in terms of changes in predicted population figures while further consideration need to be given in the NPF as to how future population growth can be accommodated across both urban and rural areas and how such areas are defined. Waterford City & County Council therefore requests that the issues raised herein be given further consideration in the final NPF.