



Comhairle Cathrach & Contae Phort Láirge
Waterford City & County Council

Planning Department

First Revision to the National Planning Framework Consultation,

Department of Housing, Local Government and Heritage,

Custom House,

Dublin 1

D01 W6X0

Re: Submission to Draft Revised National Planning Framework

10th September 2024

Dear Sir/Madam,

Please find attached Waterford City and County Councils submission to the draft revised National Planning Framework.

If you require any further information, please advise.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Ivan Grimes', written over a horizontal line.

Ivan Grimes
Director of Services
Planning, Corporate, Culture, HR & IS



Draft Revised National Planning Framework (NPF), submission by Waterford City & County Council

A Chara,

This submission details the strategic view and comments of Waterford City & County Council (WCCC) to the draft revised National Planning Framework (NPF). Both the executive and elected members of WCCC and colleagues in Kilkenny County Council have been working collectively over the past number of years to give effect to the shared MASP policy objectives, mainly MASP PO 19 and PO 21 relating respectfully to the preparation of a joint retail strategy and a wide-open space and amenity strategy for our contiguous administrative areas within the MASP. Additional strategies (Strategic Integrated Framework Plan) for our shared marine area of Waterford Harbour/Suir Estuary will require additional and detailed collaborative work, also in conjunction with Wexford County Council at some time in the future. As detailed further in this submission, the governance structures required to prepare and implement such a strategy need to be put in place in the immediate term, particularly as such a MASP implementation body was initially envisaged in NPF 2018 and subsequent RSES/MASP. This submission addresses the following key issues:

1. Employment and Balanced Population Targets and Aspirations
2. Aligning the NPF and NDP
3. Waterford MASP
4. MASP Boundaries
5. MASP Implementation & Governance

1: Employment and Balanced Population Targets and Aspirations

WCCC welcomes the review of the population projections in the draft revised NPF and the predicted increase of 950,000 persons in the period 2022 – 2040, raising the national population from 5.15 m (2022 Census) to 6.1 m in 2040. We also welcome the broad adherence to the continuation of regionalisation in a manner consistent with the initial NPF. It is noted however that while Section 2.3 of the draft revised NPF refers to potential addition international migration of c. 200,000 as identified by ESRI¹ modelling, this additional population is not accounted for in the baseline population of 6.1 m. The draft NPF should consider further if the migration element of the ESRI modelling, resulting in a potential additional 200,000 population (total 6.3 m), should be taken as a low-end scenario which

¹ Bergin, A., and Egan, P. (2024). Population projection, the flow of new households and structural housing demand, ESRI Research Series 190.



may need to take greater account of climate change included migration within and to the EU and future geopolitical conditions.

Furthermore, it is considered that the population projections and associated policy objective/narrative of the NPF review should allow flexibility and scope for the regional cities and growth centres to expand at a rate which is above that predicted. Applying such an approach would empower local government to tailor core strategies and land use policy to match local need at development plan stage, while ensuring any such aspiration continues to be based on evidence through HNDA and the observed house completion data, the general guidance by the Minister, adherence to the universal principles of sustainable development and full consultation with prescribed authorities and the OPR in particular. It would also allow expansion of the designated growth centres and avoid an adverse impact or associated restriction on both urban and rural population growth in the remaining administrative area of the relevant planning authority.

Underestimating additional population growth beyond what is identified in the NPF review will deter potential public and private capital investment and place significant strain on housing and other basic infrastructure, energy supplies, employment, health and education, water/wastewater etc. We will miss the opportunity to enhance the living standards and quality of existing and new populations and the maximise the associated economic benefits.

With regard to giving local effect to the revised NPF and population growth in particular, WCCC notes the intention to publish an "implementation roadmap" in time. WCCC would suggest that comprehensive consultation should take place to achieve a consensus on how population targets and aspirations can be aligned, particularly in settlements which straddle the administrative boundaries of two or more local authorities. Given that we are now at the latter end of the NPF review process, the most effective means of achieving more flexibility with regard to population growth would be through amended policy objectives and supporting narrative. Alternatively, it may be possible to align the preparation of the roadmap with the review of the RSES and bring multiple agencies and statutory and service providers/prescribed authorities and state agencies, together to identify how and where potential for infrastructure-led development can be best achieved. This form of targeted broad bottom-up consultation, incorporating robust viability appraisal, would go a long way to implementing the strategic goals and objectives of government at all levels. NPO 11 in section 2.7 should be revised to give strong policy support to any emerging implementation roadmap.

Underpinning the projected population growth is the need to provide additional jobs, dispersed across Dublin, the regional cities, and other locations of scale, capable of maintaining and attracting inward migration and building critical mass across the regions. Section 4.3 of the draft NPF correctly identifies that not all urban settlements have a self-sustaining equilibrium between resident populations/workers and availability of jobs and such a balance is not always possible for a myriad of commercial, infrastructural, and other reasons. WCCC welcomes the inclusion of NPO 15 in this regard and the mix of geographic options being retained for potential employment growth. It is noted also the content of Appendix 2 and would suggest that the NPF review should consider the identification of aspirations for jobs: resident workers ratio in cities and larger towns while recognising the current functions of such cities and urban centres in their commuter catchments.



Table 4.1 should be amended to include these broad ratio aspirations for each regional city along with the baseline figures from Appendix 2. This would provide a spatial focus for state agencies such as EI and the IDA to attract investment and deliver jobs regionally and locally in support of building sustainable population growth.

2: Aligning the NPF and NDP

Following on from the comments above regarding projected population growth and the continuation of policy seeking to achieve balance regional development, WCCC would also consider that public investment experienced across the regions to date would suggest that there is a misalignment between the spatial aspirations of the current NPF and the economic reality of the NDP and derived public investment programs. Taking cognisance of the principal aspirations of the NPF to deliver regional cities and their sustainable hinterlands as viable alternatives to the primate Dublin city region, failure to invest in delivering vital infrastructure to the regions will undermine the national spatial policy envisaged in the NPF to date.

The NPF review needs to firstly overcome this persistent historic failure in strategic regional investment and secondly identify a viable mechanism to devolve greater control over the investment priorities to regional and local government agencies while structuring how and when that investment can be delivered. At the regional city/ MASP level, the need for functioning implementation bodies to support existing government agencies and as mentioned further in point no. 5 of this submission, is critical to achieving an infrastructure-led approach to delivering the aspirations of the NPF and the current review. The business as usual which persists despite national spatial policy aspiration to the contrary cannot be overcome without a disruptive intervention through the revised NPF which will deliver transformational change to the regions and cities. Without such change, the regional disparities will persist, Dublin will continue to overheat unsustainably, and the regions will continue to struggle to achieve critical mass.

3: Waterford MASP

With reference to the particular key future growth enablers for Waterford City & Metropolitan area as set out in section 3.4 of the draft revised NPF, WCCC would comment as follows while suggesting that for each regional city the bullet points should be replaced with a numeric reference or similar. By way of a general observation, WCCC would suggest that the relevant key enablers identified in the MASP which are not already included in the draft revised NPF, should be referenced in the final emerging NPF.

There should also be clear and unambiguous commitment to establishing and supporting the political and executive functions of a MASP Implementation Group to deliver a regional city of scale and quality which can fully support its broader regional population.

Second bullet point: The identification of infill and regeneration opportunities has been achieved, the relevant locations are well documented by the local authorities and other state agencies such as the LDA. What WCCC suggests is that the text of the NPF review should seek to deliver homes and jobs and the associated enabling infrastructure. The commercial delivery of enabling service



infrastructure such as water, waste water, and public transport needed to support brownfield sequential and compact growth, continues to struggle when faced with the commercially viable green field development on the city periphery which is invariably located proximate to the brownfield lands. This is a particularly acute problem in smaller cities and larger urban towns.

Third bullet point: This should not be restricted to existing communities only given that new communities will be critical to support the growing and expanding city. Therefore, existing, and new communities should be referenced.

Fourth bullet point: Greenfield areas for new and emerging city neighbourhoods in City South West (Ballybeg and Kilbarry) and City North West (Gracedieu and Carrickphierish) have been identified in the Waterford City and County Development Plan 2022 – 2028 and have been identified for growth in statutory plans since the 1990's. It is considered that these should be specifically referenced in the NPF review.

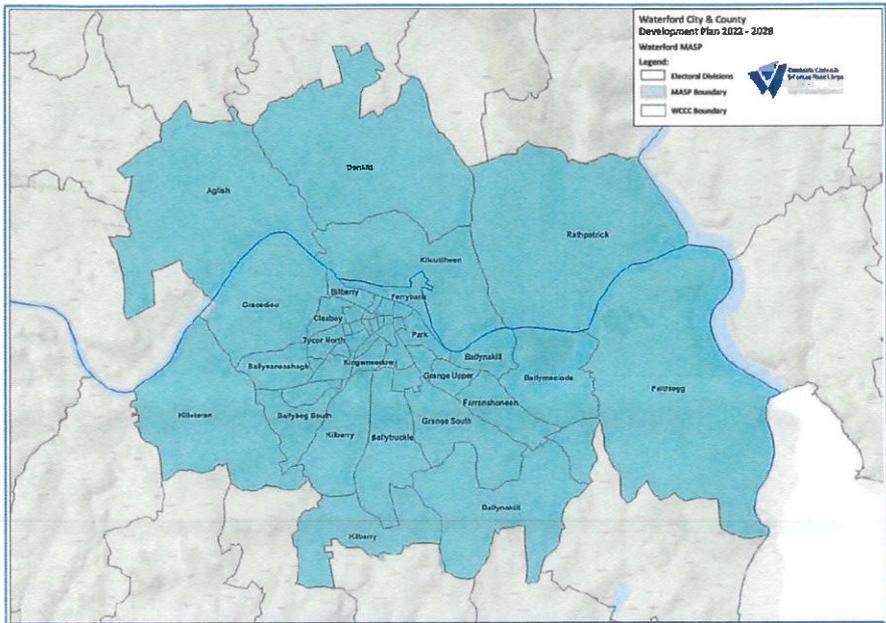
Fifth bullet point: Reference should be made to public realm and urban amenity projects in and around the Cultural Quarter (O'Connell Street), both South and North Quays and public areas along the Medieval City Wall such as Jenkins Lane and Spring Garden.

Sixth bullet point: The role of smart specialisation and clustering is recognised in Section 4.4 of the draft revision of the NPF. The new university status of SETU and its importance for the broader city region is understated. The bullet point should clearly refer to the symbiosis between education and innovation and its importance as a location for smart specialisation, for providing a sustainable basis for employment and associated employment growth, while raising the status, profile and capacity of the university and region.

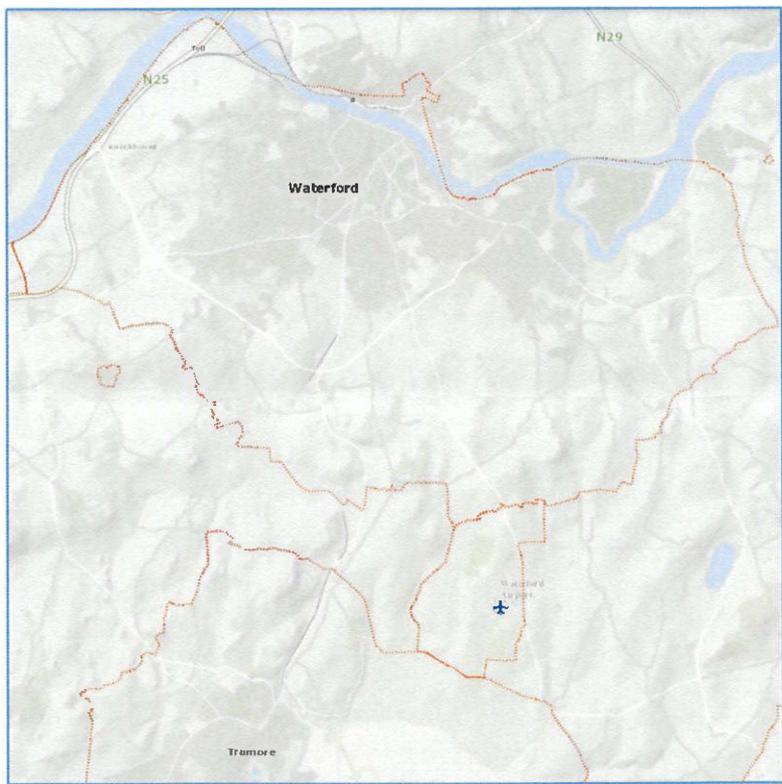
Eighth bullet point: Regional connectivity should be capable of being enhanced not only via improved journey times by road, but also by improved journey times across all modes, while enhanced international connectivity should also be supported for passengers and freight. This should refer to international functions of Belview Port, Waterford Airport, the national road network and required upgrades/bypasses, particularly the N25 and N72 at Dungarvan and additional river crossing to service Waterford city.

4: MASP Boundaries

Significant discussion took place at the time of preparing NPF 2018, the subsequent RSES/ MAPS and the Waterford City & County Development Plan 2022 – 2028 regarding the spatial extent of the MASP. The currently defined footprint for the MASP, identified in Map 1 below, excludes two significant attributes, namely the town of Tramore and Waterford Airport, the latter being contiguous but outside the MASP. The boundaries and spatial relationship of the MASP, Tramore and Waterford Airport is set out in Map 2.



MAP 1: Waterford MASP Extent



MAP 2: Contiguous Boundaries of Waterford MASP, Waterford Airport & Tramore



The symbiotic relationship between Waterford City and Tramore has been recognised in the development plan and while WCCC would aspire to enhance the self-sustaining function of Tramore, the town continues to play a strong role in the housing market of the Waterford City region given its coastal location and associated amenities, and the range of services and facilities provided for its community. In this regard it is worth noting that the development plan annual monitoring reports to the OPR and the mid-term review report for the Council have all identified that grants of permission for housing within the built-up area continues to expand at a rate equating to 23% of that experienced by Waterford City.

While infrastructure-led development was not recognised as a guiding principle for sustainable development at the time when Tramore began to expand significantly in the mid 1990's, it could be said that the town has reasonably caught up with many elements of critical infrastructure, including wastewater services, water supply, education and to some degree public transport. Notwithstanding, some deficits persist relating to the provision of open space and amenity, sport infrastructure, drainage networks, enhanced water supply to parts of the town, the availability of broader employment opportunities locally, transport infrastructure and public transport. The point to be made here is that much of what the draft revised NPF sets out as key requirements for making sustainable and strong urban places and new communities already exists in Tramore and the local housing and other markets function well. Within this existing content, Tramore needs continued public investment to ensure it can meet the needs of its existing and future communities and it is suggested that this may be best achieved from within the MASP rather than as a standalone settlement. This would address a deficit in the draft revised NPF which does not include any reference to new locations within the MASP for new communities and it is suggested that Tramore has already achieved significant steps towards a sustainable future. The critical missing element of local employment opportunities to complement Waterford City without adversely affecting the city potential will take time to address however, Tramore is of a scale and its spatial relationship with the city make it prime for the application of Transport Oriented Development (TOD). This would align with the aspirations of the draft revised NPF as expressed in NPO 15.

TOD however as it is understood in the draft revised NPF would suggest that high-capacity public transport as referred to in NPO 10 and elsewhere, has a bias towards light rail-based infrastructure. It is the view of WCCC that high frequency and high-capacity road-based bus services should be considered as an alternative to the rail-based service and potentially a precursor to same, where scale of development is insufficient to support the commercial rail-based option. Tramore is already served by a high frequency service (every 20 minutes) to and from Waterford City along the regional road network (R675). It is important that the potential to further enhance this capacity and frequency, in conjunction with quality bus priority measures along the route between Tramore and the city centre is recognised and supported in the draft NPF revision. This would further support the role of SETU and the UNESCO Learning City and would significantly support the achievement of modal shift aspirations of the NTA and WCCC as set out in the Waterford City & County Development Plan 2022 – 2028 and would align with the potential requirements of the current draft Bus Connects Waterford.

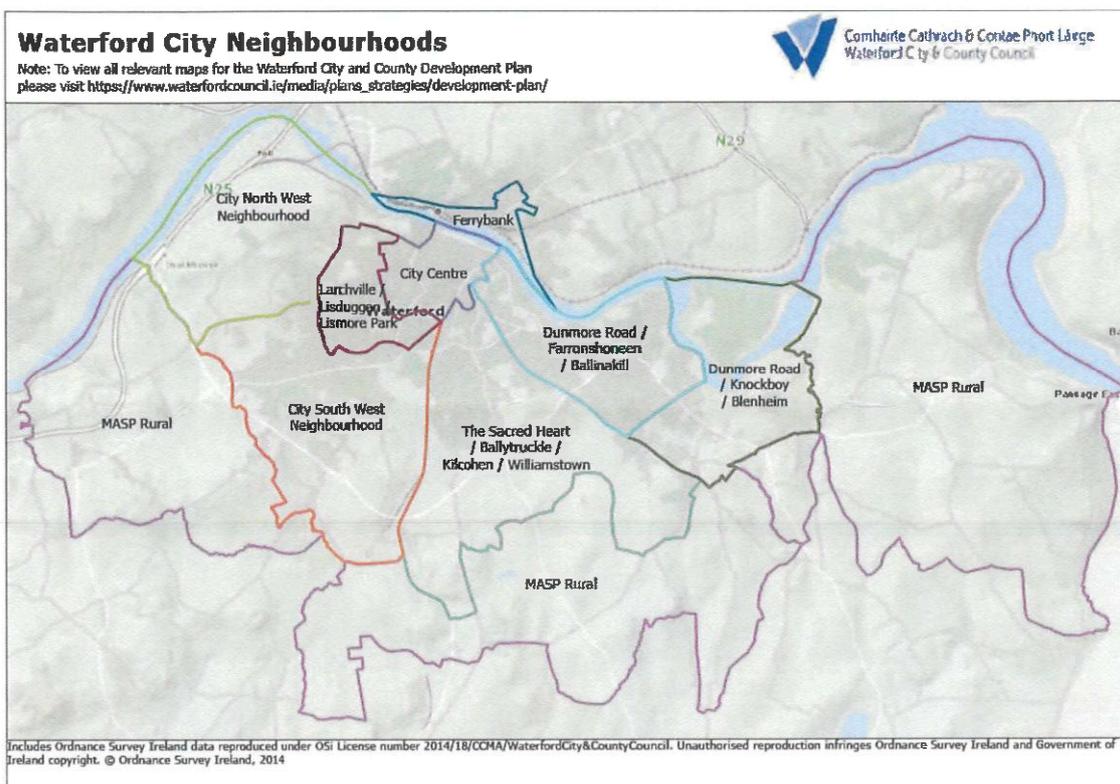


With regard to the future of Waterford Airport and its capacity to support the regional, national, and international aspirations of Waterford City, there has been considerable progress in delivering a commercial operation at the airport in a manner consistent with the guiding principles and key enabler number 7 as defined in section 3.2 of the current MASP. Significant private and public investment has been secured to implement the infrastructural improvements to the facility and the relevant consents are in place to implement the works. WCCC has also invested in quality roads infrastructure linking the airport to the city and the national motorway and rail networks. It is considered that greater progress can be made to deliver an international gateway in Waterford Airport if the spatial footprint of the airport were aligned with that of the MASP. The current NPF and MASP documents recognise the important role to be played by Waterford Airport in support of the MASP but identify the airport lands outside the MASP area. The opportunity posed to correct this through the NPF review, should be taken to inform the next MASP, post 2031. It should be mentioned also that NPO 6 of the draft revised NPF could be read to assume that all regional cities will be aligned through Dublin as a primate city within an urban hierarchy, which WCCC would consider is not what is intended. To this end NPO 6 should reflect the independence of regional aspirations of the regional cities to achieve international connectivity through air and sea routes.

WCCC suggests that the following three locations within its administrative area along with expanding areas of Ferrybank in Kilkenny be identified in the draft revised NPF as candidate areas for significant urban expansion in the MASP and provide a narrative to support the inclusion of Tramore and Waterford Airport in the next iteration of the MASP:

- 1 City North West Neighbourhood including Carrickphierish and Gracedieu (Map 3 below).
- 2 City South West Neighbourhood including Kilbarry, Ballybeg and SETU (Map 3 below).
- 3 Ferrybank.
- 4 Tramore town.

These have potential as candidate Urban Development Zones where development will be dependent on viability appraisal/assessment and a functioning MASP implementation body. The text of NPO 92 as it refers to the anticipated reviews of the various RSES and potential for consideration of the wider city region in Dublin and Cork should be amended to include consideration of the wider city regions in all regional cities for reasons, some of which are referred to above.



MAP 3: City Neighbourhoods

Furthermore, given the focus in NPO 96 on Urban Development Zones (UDZ) and associated supporting narrative to identify the importance of UDZ to the sustainable development of urban areas and identification of enabling infrastructure, the text of the NPO could be amended to give greater clarity for the need to ensure the relevant lands to which these may be applied should be identified through the next iteration of RSES and MASP.

5: MASP Implementation & Governance

While the draft revised NPF refers to the changes in land use planning provided for in the planning bill 2023 i.e., urban area plans, priority area plans and urban development zones, which will bring about significant change in how urban areas are planned into the future, the document fails to make a strong policy commitment to ensure real and timely implementation of enabling infrastructure identified to address local need identified through the statutory plan making process.

While Section 10.1 of the NPF review refers to the changes required in governance to secure the NPF and NDP outputs and signposts the views of the ESRI² and OECD³ in this regard, it is stated that such recommendations go beyond the scope of a spatial planning strategy. While this may be correct in

² The National Development Plan 2023: Priorities and capacity, (ESRI 2024)

³ Towards Balanced Regional Attractiveness in Ireland: Enhancing the Delivery of the National Planning Framework in Ireland, (OECD 2023)



some respects, it is important that any spatial strategy provides a vision of what governance structures are needed and guidance as to how such structures should be configured, particularly where that spatial strategy has a national dimension.

The NPF review can support this at a strategic level via refocussed and restated commitments to formation of MASP implementation bodies. In the case of Waterford City and pursuant to the commitments of the current MASP to put in place an implementation body within one year of publishing the current MASP, the local authorities of both Waterford and Kilkenny, along with the Southern Regional Assembly, have identified an appropriate executive and political governance structure to deliver MASP but this has yet to be supported nationally. Each regional city will require a bespoke approach as to the composition and role of their respective implementation body and should be supported and facilitated in this approach nationally. It is considered that the NPF review should prioritise and commit to establishing such a structure for each of the regional cities within a period of months, post completion of the NPF review process.

In this regard it is suggested that NPO 92 should be amended to state clear commitment to deliver on the new governance arrangements to coordinate and deliver of MASP enablers between local authorities, regional and national government, funding agencies and statutory providers etc and that such a governance structure is a fundamental requirement to deliver cities of sufficient scale and quality as envisaged in NPO 13 of the review and elsewhere. The wider city region dimension of each regional city should be provided for in NPO 92, not just those of Dublin and Cork.

The implementation bodies, once established, would play a significant role in informing future Ministerial guidance relevant to their individual MASP areas, particularly in relation to urban development standards, density, building height, etc. WCCC considers that the current suite of recent ministerial guidelines has failed to adequately provide local parameters relevant to individual city locations as the scale, intensity and spatial pattern of new growth/ regeneration are individual to each regional city. As such a local response is required as opposed to a national standard which may not be appropriate to all cities, key towns, and other larger urban centres. While there is some scope for distinctive local references in the design of new neighbourhoods and places, industry and building standards along with commercial realities, work to counter any potential expression of individuality in building design and layout. The application of a national standard places a significant risk on the loss of local innovation in design, layout, and the creation of unique places for new communities to become established.

Ivan Grimes

Director of Services

Planning, Corporate, Culture, HR & IS

10th September 2024

