

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

8<sup>th</sup> March 2019

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# RE: Southern Regional Assembly - DRAFT Regional Spatial and Economic Strategy (RSES)

Dear Sir / Madam,

This report has been prepared by the National Transport Authority (the "NTA") in response to the notification sent by the Assembly, dated 19<sup>th</sup> December 2018, and in accordance with section 31GG of the Planning and Development Act (2000, as amended) (the "Planning Act").

# Consistency of the RSES with the Issues Raised by NTA

Section 31GG of the Planning and Development Act states that:

- (1) Where a notice is received by the NTA under section 24(4) from a regional assembly (other than the regional assemblies in respect of the GDA) the NTA shall, as part of any written submission on the draft regional spatial and economic strategy, state whether, in its view, the matters raised by it in its report under section 31FF are—
- (a) satisfactorily addressed in the draft regional spatial and economic strategy, or
- (b) not satisfactorily addressed in the draft regional spatial and economic strategy.]
- (2) Where in the context of subsection (1) (b) the NTA makes a submission, it shall indicate what amendments to the draft regional spatial and economic strategy it considers should be made to ensure effective integration of transport and land use planning.

This report, (Report by the National Transport Authority on matters to be taken into consideration in the preparation of the Regional Spatial and Economic Strategy for the Southern Regional Assembly), was submitted to the Southern Regional Assembly in January 2018.

On examination of the Draft RSES, the NTA is of the opinion that it addresses the issues raised in the NTA report of January 2018 and that it provides a strong basis for the integration of land use and transport planning at regional, metropolitan area and at settlement levels.

The NTA and SRA have coordinated closely during the preparation of the Draft RSES in order that the integration of land use and transport planning/ transport investment could be appropriately considered in the hierarchy of plans, from regional down to local (settlement) level.

As such, this submission is concerned primarily with the detailed policies and objectives presented in the Draft RSES and makes recommendations on how some of these could be amended in order to provide greater clarity, and to strengthen their potential in delivering on the RSES' strategic and local objectives.

These recommendations are presented in Appendix 1 to this submission (attached).

The NTA would be happy to address any issues arising in this submission, or any other matters relating to the integration of land use and transport planning, in facilitating the Southern Regional Assembly's completion of the RSES.

Yours sincerely,

Michael Mac Aree

Head of Strategic Planning

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#### **APPENDIX 1**

#### **Chapter 3 People and Places**

## Section 3.4 Cities - Metropolitan Areas

#### Cork MASP

Under Housing and Regeneration, in setting out the basis for the consolidation of development around public transport corridors, it is recommended that this be amended to refer also, to the delivery of Cork BusConnects.

#### Limerick Shannon MASP

In reference to the transport strategy, as this process has already commenced with the key stakeholders, it is recommended that the introductory statement be amended and limited to the following –

The Limerick Shannon Metropolitan Area Transport Strategy will be instrumental in the regeneration and transformation of Limerick City and the wider Limerick Shannon Metropolitan Area.

#### Waterford MASP

Under 'Attributes, Vision and Guiding Principles', it is recommended that reference to the Planning Land Use and Transportation Study (PLUTS) be amended, with the addition of the following – In succeeding the PLUTS, a new transport strategy will be prepared for the Waterford Metropolitan Area, at an early stage, to coincide with the development plan review process, following the finalisation of the MASP.

#### **Section 3.5 Key Towns**

#### RPO 9 (Key Towns)

Under point b., it is recommended that this be amended to -

It is an objective that a local transport plan will be prepared for all of the key towns, on the basis provided for on page 152 of Chapter 6 and RPO 152 in particular.

It is important to note that the local transport plans are envisaged to deal with all aspects of integrated land use and transport planning, across all modes of transport. Its scope will not be limited to investment in sustainable transport modes.

#### RPOs for each of the Key Towns

In relation to the RPOs for each of the key towns, it is recommended that reference be made to the preparation of a local transport plan, to be used as a basis for the identification of key transport infrastructure and public transport service requirements.

# Key Infrastructure Requirements, in each of the key towns

In relation to any transport infrastructure listed, the following introductory statement is recommended –

Subject to the completion of a local transport plan for the town and its environs, the following transport interventions may be considered.

#### Kilkenny City - RPO 18

Given Kilkenny's inland location and distance from any sea ports, it is not clear why this RPO includes an objective to 'support development of freight rail services and facilities at the ports'.

#### 3.7 - Rural Areas

As stated in the pre-draft submission of January 2018, the NTA would reiterate its concern that the RSES enables a clear distinction to be defined between urban and rural generated housing demand. Development which supports the rural economy and the rural social fabric should be strongly promoted in the RSES. However, the phenomenon of urban-generated development and population growth in rural areas, which ultimately requires significant investment to serve this population and to facilitate long-distance commuting, should be addressed in the RSES, with a view to limiting a continuation of this trend and at the same time, supporting the NPF objective of 'smart compact growth' in cities, large and smaller towns. This issue has already been identified in the NSS Irish Spatial Perspectives – Paper 13 and the NSS Implementation Report (2010).

In light of these concerns, it is recommended that RPO 25 addresses the issue of urban generated rural housing in a manner which will restrict the development of rural housing based on clearly defined eligibility criteria. This should facilitate the requirements of rural communities, whilst controlling the pressures for urban influenced housing demand.

Furthermore, given the extensive nature of the Southern Assembly Area's rural hinterland areas, it is of critical importance that the RSES highlights the role rural transport services can perform in providing for social and economic connectivity between small villages/ rural areas and larger towns. It is therefore recommended that specific reference is made in the RSES to the need for and provision of rural public transport services, in meeting the needs of rural communities and in supporting the role of towns in serving their rural catchments.

# Chapter 6 - Connectivity (Section 2 - Regional Transport Strategy)

#### 6.3.3.1 - The Role of Transport

It is recommended that a more broadly based list of strategic objectives is included here. In its predraft submission, the NTA included the following <u>Strategic Objectives</u>:

- support improved strategic and local connectivity;
- expand attractive public transport and other alternatives to car transport;
- recognise the role of the car and cater appropriately for it;
- reduce congestion; and

 cater for the demands associated with longer term population and employment growth, in a sustainable manner

#### This can be achieved by:

- a) Supporting the achievement of 'compact, smart growth' through the achievement of 'mutual consistency' between land use and transport planning/ investment/ service provision.
  - Related to this, it is recommended that the RSES include a policy objective which promotes the application of higher development densities in appropriate locations, with an associated consideration being given to reduced constraints on building height;
- b) Strengthening public transport, walking and cycling accessibility / connectivity <u>within</u> Cork, Limerick and Waterford / environs and their associated metropolitan areas;
- c) Strengthening public transport connectivity <u>between</u> the cities of Cork, Limerick and Waterford, with improved services and reliable journey times;
- d) Strengthening intra-regional connectivity,
  - between the Metropolitan Areas and large towns, and
  - between the large towns.

This should include improved public transport services and reliable journey times;

- e) Strengthening <u>inter-regional connectivity</u>, through the improvement of inter-urban road and rail connectivity, with a particular emphasis on improved connectivity between the largest urban centres and access to ports and airports, for the movement of both people and goods;
- f) Protecting the capacity of inter-urban road connectivity within and around the largest cities, ports and airports, through effective traffic management and transport demand management;
- g) Strengthening <u>intra-regional connectivity</u>, by providing for an effective Regional Road network, with a particular emphasis on improved connectivity between large towns, smaller towns/ villages and rural areas;
- h) Providing public transport infrastructure and services to meet the needs of smaller towns, villages and rural areas; and
- i) Developing a comprehensive network of safe cycling routes in the three cities / associated metropolitan areas, and to provide similar facilities in other towns and villages, where appropriate.

# 6.3.3.2 - Framework for the Integration of Transport Planning with Spatial Planning Policies

In Table 6.1, under *Metropolitan Areas*, the following amendment is recommended – *Metropolitan Area Transport Strategies currently being prepared for Cork and Limerick / Shannon, with a similar transport strategy proposed for Waterford, to succeed the PLUTS 2004-2020.* 

# 6.3.5 — Regional Policy Objectives for the Integration of Transport Planning with Spatial Planning Policies

# Integration of Land Use and Transport Planning

#### RPO 149 - Land Use Plans

Reference is made in this RPO to the 'guiding principles expressed in the transport strategy of the RSES'. Is this in reference to Section 6.3.3.1?

#### **Local Transport Plans**

#### **RPO 152 Local Transport Plans**

It is recommended that the following be added -

#### LTPs will:

- Maximise the opportunities for the integration of land use and transport planning;
- Assess the existing traffic, transport and movement conditions within the Plan area and in its wider context;
- Plan for the efficient movement of people, goods and services within, to and from the Plan area;
- Identify the extent to which estimated transport demand associated with local development objectives can be supported and managed on the basis of existing transport assets; and
- Identify the transport interventions required within the Plan area and in the wider context, to effectively accommodate the anticipated increase in demand.

# 6.3.6.3 - Cork Metropolitan Area Transport Investment Priorities

Amend the introductory paragraph on p.156, as follows:

Transport Investment by ... will be identified and prioritised through the Cork Metropolitan Area Transport Strategy (CMATS). The following transport investment objectives have been identified for consideration, in the preparation of the Transport Strategy: ....

<u>Under point (c)</u>, there appears to be duplication between **8**. and **16**. It is envisaged that the Northern Distributor Road will be orbital in nature and would provide access to the north east environs of the City.

# 6.3.6.4 – Priorities for the Limerick-Shannon Metropolitan Area Transport Strategy

Amend the introductory paragraph on p.158, as follows:

Transport Investment by ... will be identified and prioritised through the Limerick-Shannon Metropolitan Area Transport Strategy (LSMATS). The following transport investment objectives have been identified for consideration, in the preparation of the Transport Strategy: ....

A number of the objectives listed, relate to transport matters which are located partially or entirely outside of the Limerick-Shannon Metropolitan Area and as such may not fall within the scope of the LSMATS. This would need to be clarified in the way these objectives are presented. Some of these objectives relate to inter-regional/ national connectivity, it could be stated that these have been taken as a 'given', for inclusion in the preparation of the LSMATS.

#### 6.3.6.5 - Priorities for the Waterford Metropolitan Area Transport Strategy

It is recommended that the first paragraph on page 159 is changed to the following:

Transport investment priorities ... will be identified as part of a transport strategy to be prepared for the Waterford Metropolitan Area. Transport investment will be guided by the following high level objectives.

The second paragraph ("Detailed objectives will be set out . .") should be moved to the end of the section, after point g.

#### 6.3.6.6 - Road Network

# RPO 158 - Investment in Strategic Road Connectivity

Under point b., amend as follows:

Maintain ... by targeted transport demand management and infrastructure improvements.

#### **RPO 159 - National Road Projects**

Insert the following amendments as follows:

The provision of the following Strategic Road Projects ... Sustainable Mobility, subject to the completion of metropolitan area transport strategies, where relevant and robust feasibility studies

In the list of measures under "the provision of the following Strategic Road Projects", it is not clear which road(s) are being referred to under "Orbital road network improvements in the Cork Metropolitan Area". For example, both a "northern distributor road" and a "Cork Northern Ring Road" are referred to in other parts of this RSES document.

# RPO 160 - Investment in National, Regional and Local Roads

In the first paragraph, amend as follows:

Enhanced Regional Accessibility subject to the recommendations of the three MASPs, the preparation of associated metropolitan area transport strategies and the preparation of local transport plans for the key settlements and other urban centres ....

In the list of transport initiatives, change initiatives to measures and include the following:

• Cork Northern Distributor Road

. and remove reference to the Cork Metropolitan Area Transport Strategy.

Insert the following into the final paragraph:

Local Authorities ... . These projects will be selected and prioritised in accordance with the RSES objectives and the hierarchy of transport plans at regional, metropolitan area and settlement levels. For those projects identified for progression, these will be developed in accordance ....

#### 6.3.6.8 - Bus

#### **RPO 163**

In the second bullet point, insert the following:

Network reviews ... with a view to providing *improved* local bus services.

#### 6.3.6.10 - Walking and Cycling

#### RPO 166 - Walking and Cycling

General Comment – This RPO does not deal substantively with walking, only cycling.

In the third bullet point, insert the following:

Provide **for a** safe cycling <del>routes</del>-**environment** in towns and villages <del>where appropriate</del>, across the region.

In a new bullet point, insert the following:

Place walkability and accessibility by walking mode as a central objective in the planning and design of all new developments / new development areas, transport infrastructure and public transport services.

#### Other Recommendations -

Emphasise the role of metropolitan area transport strategies and local transport plans in informing network development (walking and cycling), make specific reference to walking and cycling objectives (accessibility to services at the local level, connectivity to other modes, safety, directness, amenity, permeability, etc.) and how these relate to transport investment priorities.

In making the case for investment in walking and cycling, this would be strengthened by cross referencing with other RPO's which deal with planning principles, permeability, etc. thus supporting walking and cycling modes.

# Introduction to the Metropolitan Area Strategic Plans (MASP) in the Southern Region

#### **General Comment:**

It is recommended that great consistency is applied in the way the MASPs are presented, between Cork, Limerick and Waterford In this regard, a standard definition and explanation should be given in each of the MASPs, regarding the spatial definition for each of the metropolitan areas. Furthermore, it is recommended that the paragraph numbers for each of the MASPs is standardised.

# **Draft Cork Metropolitan Area Strategic Plan**

#### 1.2 Overview

Page 209, insert the following:

... the strategic road network *including new or improved orbital routes on the northern and* southern sides of the city of which the Northern Ring Road is key. ... Delivery of an integrated multimodal transport network and consideration of these initiatives through a as informed by the Cork Metropolitan Area Transport Strategy (CMATS), ...

# 1.3 Context of other Strategic Planning Initiatives – (Cork MASP 1)

Page 210, insert the following:

**b.** To promote the Cork Metropolitan Area as a cohesive single *functional entity* metropolitan employment and property market ... .

# 1.7 Cork Metropolitan Area Strategic Plan and the Wider Region (Cork MASP 4)

a. ... to the Kerry Hub and Knowledge Triangle and strengthen connectivity to on the TEN-T Network Corridor.

#### 3.0 National Enablers

Page 222, insert the following:

- 11<sup>th</sup> Bullet point Improved traffic flow around transport offer within and in the environs of the City through a package of measures, (e.g. upgrade of the N40, including:
  - improvements to the radial and orbital distributor road network, including a northern distributor road;
  - improvements to and more effective management of the strategic road network, including the existing N40 and a future Northern orbital route;
  - delivery of Cork BusConnects;
  - delivery of the Metropolitan Area Cycle Network; and
  - provision for walkability/permeability/accessibility in the planning, design and delivery of new development.

transport infrastructure and public transport services—the provision of the Northern Ring Road and enhanced public transport and cycle network)

#### Cork MASP 6 - National Enablers

Insert the following, on page 225:

<u>Point a.</u> ... progress co-ordination between the principal stakeholders, subject to **the** recommendations of the CMATS (see section 4.0) and the required feasibility ...

<u>Cork MASP 8 – Cork Metropolitan Area Transport Strategy</u> Key Transport Objectives (to be informed by Cork Metropolitan Area Transport Strategy)

Insert the following changes:

Seek-delivery of the following subject to Subject to the finalisation of the Cork Metropolitan Area Transport Strategy (CMATS) and the outcomes of required appraisal, planning and environmental assessment processes:

<u>Point b.</u> ... the public transport corridors and station-nodal points public transport nodes on these corridors ... arising from the <u>Cork Metropolitan Area Strategic Transport Strategy CMATS</u> which have the ... .

The following principles Transport Investment Objectives are supported by the SRA as a basis for the sustainable growth of the Cork Metropolitan Area for investment and sustainable delivery in ... subject to the recommendations of the CMATS and to feasibility ...

<u>Point d.</u> Secure the long term strategic aim of reopening the ra8il route linking Cork and Midleton to Youghal ...

<u>Comment:</u> Youghal is not located within the Metropolitan Area, it is not likely to be included in the CMATS and as such, there may be an alternative location in the report, for this objective.

<u>Point e.</u> <u>Cork BusConnects Core Bus Network:</u>— A comprehensive network of <u>enhanced</u> high frequency bus services <u>operating on a core radial and orbital bus network as provided for in CMATS providing radial services to other corridors and orbital services across the network. Core Radial Bus Network, Orbital Bus Network, Cross City Network, Supporting Radial Bus Services, Bus Priority, ...</u>

Point f. City Centre Movement Strategy: ...

<u>Point g.</u> Walking: ... through improved walking networks, district and neighbourhood walking networks, city and town centre accessibility walkability, with a particular focus on new development areas, access to services at the local level (including public transport, schools, shops, amenities) and improved pedestrian accessibility to and within in the City Centre area, Town / District Centres and Neighbourhood Centres walking network, district and neighbourhood walking networks, city and town centre accessibility.

<u>Point h.</u> Cycling: ... support cycling through infrastructures improved cycle infrastructure, integration with public transport services and connectivity to key destinations, including cycle lanes, ...

<u>Point i.</u> Public Transport Integration: provision for interchange opportunities *across all modes of transport*, together with ...

<u>Point m.</u> **Supporting Measures**: Further measures to support the delivery of the Strategy **CMATS key transport objectives** ...

# Cork MASP 9 – Strategic Road Network Improvements

Insert the following, on page 226:

<u>Point c.</u> Advancing *investment in* orbital <del>traffic management solutions</del> *transport corridors*, through the implementation ...

<u>Point h.</u> Cork Northern Distributor Road, connecting the N8, all radial distributor roads in the Northern suburbs and environs of the City, the N20 and the N22.

# 5.3 Monard Strategic Development Zone ...

Insert the following, on page 234, 235:

# North Environs-Kilbarry-Blackpool

Connectivity to the Northern Distributor Road

#### **Blarney**

development of rail station Junction to N20 (this needs clarification)

#### Midleton

Inter-urban greenway and other public transport measures (as outlined in CMATS)
 Implementation of CMATS sustainable transport measures (walking, cycling and public transport), connecting with and within Midleton.

#### 6.1 Employment Generation

Insert the following, on page 238:

• Effective competitive, smart and Integrated public transport ...

# 6.4 - Role of Tier 1 Port of Cork

Insert the following on page 243:

... is a premier multi-purpose deep sea water port facility ....

# **Draft Limerick-Shannon Metropolitan Area Strategic Plan**

# 1.3 Limerick City - Infrastructure and Transformative Projects ....

Replace Bullet Point 10, on page 252, with the following:

Subject to the recommendations of the Limerick Shannon Metropolitan Area Transport Strategy (LSMATS), a package of integrated transport investment measures will be implemented, providing for the sustainable expansion of the City, on a consolidated basis and enabling the achievement of the Metropolitan Area's strategic economic development objectives and the development of the strategic employment locations as specified in the MASP.

# 1.4 Shannon – The infrastructure requirements for Shannon ...

Insert the following on page 253, before the bullet points:

To enable the sustainable growth of Shannon as an integral part of the Limerick-Shannon Metropolitan Area, as an international gateway and a strategic employment node on the Limerick-Galway corridor, the LSMATS will identify a package of integrated transport investment measures, providing the basis for Shannon's future transport requirement. The following measures will be considered, as part of this process:

#### 2.4 Travel Patterns

Insert the following, on page 256:

The proportion of the population who travel to Work/Education using Green Modes of Transport walking, cycling or public transport ...

... there is a need to ensure proper the effective integration of land use and transportation policies planning to achieve greater development consolidation and a reduction in car dependency to promote more sustainable modes of travel.

The ... (MWASP) 2012-2030 identified the need for greater investment in the rail network within the Metropolitan Area and the wider Mid-West Region that local passenger and national freight activity return from the available rails infrastructure is underutilised.

Delete the commentary that follows on from this, until the final sentence:

There is a new now an opportunity to examine the potential that rail has, in meeting the future transport requirements of the Metropolitan Area and the wider Mid-West Region against the assumed level and distribution of population growth for increased line usage, in anticipation of future population growth etc. ....

Given current patron passenger numbers, the existing public transport offering and upgraded road infrastructure ... .

#### 2.5 Vision

Clarify the following, on page 257:

"Sustainable Management and compact growth will offer the platform to address key challenges ... "

Insert the following in the Vision Statement:

"To create a sustainable, smart, climate change resilient ..."

## 2.6 Guiding Principles

Insert the following on Page 258:

Under "Accelerate housing delivery", refer also to development intensification within the existing urban footprint of Limerick City, as a basis for achieving a more optimal use of existing transport assets.

#### 3.0 National Enablers

Under the transport-related enablers (bullet points 8-11) on page 259, it is recommended that the transport investment priorities listed on page 7 of the NTA's pre-draft submission are included, as presented.

# 4.0 Integratedion of Land Use and Transportation Planning

## 4.1 Transportation Investment

... A Limerick Shannon Metropolitan Area Strategic-Transport Strategy (LMATS) will be prepared during the lifetime of this MASP. Sustainable transportation Integrated land use and transport planning is dealt with in more detail in Chapter 6 of the RSES.

Amend the second paragraph on page 261 by inserting the following, after the first sentence: Transport Investment requirements in the Limerick Shannon Metropolitan Area will be identified and prioritised through the LSMATS. The following objectives have been identified for consideration, in the preparation of the Transport Strategy: ....

<u>Limerick Shannon MASP Policy Objective 6 Sustainable Transportation Investment in Sustainable</u>

Transport Infrastructure and Services

<u>Under Point b.</u> ... which have the potential for to support high density development/ regeneration.

Insert an additional point, before c.:

Investment in sustainable transport infrastructure and public transport services.

<u>Under Point c.</u> It is an objective to support the following sustainable transport priorities in the Limerick Shannon Metropolitan Area subject *to the completion of the LSMATS and* to the outcome of the environmental assessment ... .

<u>Under Point c.</u> (before second bullet point): Create a new point, d., introduced by **Other transport** measures for consideration, across the wider Mid-West area, may include the following:

#### **Draft Waterford Metropolitan Area Strategic Plan**

#### 1.4 Waterford – A Metropolitan Area at Work

Second paragraph, insert the following change:

Delete the first sentence.

Second sentence – The large With a daytime working population of 24,375 in 2016, is reflected in the Waterford city and suburbs area has a jobs to workers labour force ratio of 1.2.

# 1.6 The Waterford Metropolitan Area and the Wider Region

<u>Point d.</u> Provide capacity and alternative locations/ choices for to the Greater Dublin Area in a connected city region, which would ease development pressure and congestion in the GDA.

# 2.2 Guiding Principles for the Waterford MASP

<u>Third bullet point</u> – Integration of Land Use and Transportation Planning supporting movement by sustainable transport means providing for the sustainable expansion of the City, on a consolidated basis and enabling the achievement of the Metropolitan Area's targeted population growth and strategic economic development objectives.

#### 3.1 Future Growth Enablers ...

<u>Comment</u> - For transport-related future growth enablers, it is recommended that the transport investment priorities listed on pages 7 and 8 of the NTA's pre-draft submission are included, as presented.

<u>Fourth bullet point</u> - ... the development of supporting public transport <del>and</del> infrastructure **and** services.

## 4.0 Integrated Land Use and Transportation

<u>First paragraph</u> - ... managed effectively through a strategic approach based on **an** Integrated **approach to** land use and transport<del>ation</del> planning, **facilitated and informed by the preparation of a transport strategy for the Metropolitan Area**.

#### 4.1 Sustainable Mobility and ...

Add the following, to the end of page 285 – This, and other preceding transport studies will be succeed by the preparation of a transport strategy for the Metropolitan Area.

At the top of page 286, insert the following - The metropolitan area transport strategy will inform investment in transport infrastructure and public transport services for the period of the MASP, and beyond. Improvements to transport and communications infrastructure ...

#### Waterford MASP Objective 5

Comment - This should be under Section 3.1.

## 4.2 Improved Regional Connectivity ...

First paragraph - ... requires improved connectivity to Dublin, and to the other ...

<u>Second paragraph</u> – Improvements to the N25 corridor <del>towards Cork</del>, *linking Waterford with Cork* and *Rosslare Europort;* and *improvements to the* N24 corridor and rail *line linking Waterford to Limerick*, will strengthen links ...

<u>Third paragraph</u> – <u>Improvements to road and rail infrastructure and services along the route to Limerick / Shannon *This* will also strengthen the South Tipperary ...</u>

<u>Fourth paragraph</u> - ... sustainable economic development of the Waterford Metropolitan Area and the **wider South East** region through the <u>efficient</u> **more optimal** use of existing transport infrastructure.

<u>Fifth paragraph</u> - ... key international gateway for <del>passengers and freight</del> **people and goods** to the Waterford Metropolitan Area. ... Rosslare – Waterford Rail Line will **could** form part of the support infrastructure ...

# Waterford MASP Policy Objective 6: Sustainable Transportation

Comment - This should be under Section 4.1.

Comment - In listing the proposed measures, avoid unnecessary duplication with section 4.1.

<u>Point a.</u> ... Waterford Metropolitan Area <u>Strategic</u> Transport Strategy (WMATS) ... it is an objective **of the WMATS** to <u>ensure</u> investment <del>and for the</del> implementation of its recommendations <del>the Waterford Metropolitan Area Strategic Transport Strategy</del>. ... subject to the outcome of **the WMATS** environment assessment and the planning process ... .

Before the list of bullet points, insert the following:

The following measures have been identified, for consideration, in the preparation of the WMATS:

# Waterford MASP Policy Objective 7: Regional Connectivity

<u>Second paragraph</u> - ... subject to the outcome of *the WMATS*, environment assessments ... Fourth bullet point - ... other locations throughout the South-East <del>Waterford City</del> Region.

#### 5.1 Develop a vibrant urban centre ...

<u>Page 290</u> – **Subject to the completion of the WMATS**, the City Centre should become more Accessible through: ...