



Waterford Metropolitan Area Transport Strategy

Report on Public Consultation on Draft Strategy

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Contents

1	Introduction	3
1.1	Consultation Process	3
1.2	Summary of Submissions	3
1.3	Structure of Public Consultation Report	4
1.4	Conclusion	4
2	Main Issues and Responses	5
2.1	Strategy – General	5
2.2	Land Use	5
2.3	Walking	5
2.4	Cycling	6
2.5	Bus	6
2.6	Rail	7
2.7	Roads	7
2.8	Parking	8
2.9	Freight	8
2.10	Supporting Measures	8
2.11	Environment/Emissions	9
2.12	Summary	9
3	Issues, Responses and Revisions	10
4	Response to EPA submission following public display of the Draft Strategy	83

1 Introduction

1.1 Consultation Process

The *Draft Waterford Metropolitan Area Transport Strategy* (WMATS) was published on 1st June 2022. Public Consultation took place over a six-week period, running from 1st June to 12th July 2022. During that period, the public were invited to make submissions on the content of the Draft Strategy through a dedicated consultation web portal, by e-mail or by hard copy.

Two public consultation events were held in the Tower Hotel, Waterford, on the 15th and 16th June, where members of the project team were available to discuss the Strategy proposals and to answer queries from the attendees. These events were advertised in local and national media, and on the NTA website and social media accounts. In total, over 70 people attended these events over the two days.

The Draft Strategy and the associated *Draft Strategic Environmental Assessment (SEA)* and *Draft Appropriate Assessment Natura Impact Statement (AA NIS)* were placed on display in the NTA head office in Dublin, in fulfilment of the NTA's statutory obligations regarding the environmental assessment processes. The environmental documents were also available for review at the public consultation events in the Tower Hotel. The Draft Strategy and related documents were also placed on display during the consultation period in the head office of Waterford City & County Council and in the Kilkenny Library in Ferrybank.

A full set of documents was available for consultation on the WMATS web portal for the duration of the consultation period. The set comprised:

- Draft Waterford Metropolitan Area Transport Strategy
- Draft WMATS – Irish language version
- Draft WMATS – Executive Summary
- Draft WMATS – Easy To Read version
- Draft WMATS – Accessible version
- Baseline Report
- Demand Analysis Report
- Transport Options Report
- Supporting Measures Report
- Transport Modelling Assessment Report
- Draft Strategic Environmental Assessment Report
- Draft Strategic Environmental Assessment Report – Appendix II NTS
- Draft Appropriate Assessment – Natura Impact Statement

1.2 Summary of Submissions

61 submissions were received through the consultation portal. Five submissions were received via e-mail, and two submissions were received in hard copy. Additional comments were also received by e-mail from members of the Strategy Steering Group, which included Waterford City & County Council, Kilkenny County Council, the Southern Regional Assembly and Transport Infrastructure Ireland.

All submissions were reviewed in detail by the project team. The observations and recommendations were categorised to assist in the review process, and a number of changes were made to the Draft Strategy on foot of the submissions. The online consultation portal facilitated categorisation of all submissions received via that channel.

1.3 Structure of Public Consultation Report

Section 2 of this report summarises the main issues raised in the public consultation process and the NTA responses to those issues. It is not an exhaustive list of all points raised, but identifies and addresses the main themes that emerged from the consultation.

Section 3 of this report includes the content of each online submission, as categorised by the project team, along with the Responses of the project team and, where applicable, a note of the revisions made to the Strategy arising from the review of submissions. Each submission made through the portal was assigned an automatic number at the time it was submitted. These submission numbers are included in the References column in Table 1, in order to assist consultees to identify the comments made in their submission. In some cases, discrete comments have multiple References. This arose where the same point was made in a number of submissions.

Section 4 includes the response to a submission from the Environmental Protection Agency following public display of the Draft Strategy and its associated environmental assessment documents.

1.4 Conclusion

The final WMATS comprises a comprehensive approach to transport planning in the Waterford Metropolitan Area for the strategy period based on a high level of technical and policy-based analysis, and incorporating feedback from the public consultation process. The NTA and the project team gratefully acknowledge the submissions received on the Draft Strategy.

2 Main Issues and Responses

This section sets out in brief the main issues that were raised in the submissions and the NTA responses to those issues. These are arranged broadly according to the chapter structure in the Strategy. As noted above, a Table setting out the comprehensive list of all points raised, and the related responses and strategy revisions, is included in section 3 of this report.

2.1 Strategy – General

Issues:

A number of respondents queried the scope and extent of the Strategy. It was suggested that WMATS was premature without a transport strategy for the full South-East sub-region and that WMATS should extend to incorporate all towns with a functional relationship with Waterford city, including towns in south Tipperary and Wexford. It was also suggested that the horizon year of 2040 should be either 2050 or 2060, to account for longer-term growth.

NTA Response:

The Strategy horizon year of 2040 was agreed to ensure alignment with Project Ireland 2040 and the National Planning Framework (NPF). The NPF and the Regional Spatial and Economic Strategy (RSES) set the framework for population and employment growth on which WMATS is based. The extent of the Waterford Metropolitan Area (WMA) was set by the RSES and relates also to the Waterford Metropolitan Area Strategic Plan (MASP).

2.2 Land Use

Issues:

The growth of certain areas of the city, in particular the campuses associated with the South-East Technological University (SETU), was highlighted by some consultees as an essential input into the development of the transport measures proposed. Support was also expressed for the principle of Transit-Oriented Development (TOD) as a key measure in the achievement of integrated land use and transport planning, with one submission proposing that TOD should be considered for towns outside the WMA boundary to strengthen the case for rail investment in WMATS.

NTA Response:

The Planning Data Sheets, which were a key input into the assessments carried out using the NTA's South-East Regional Model (SERM), took account of population and employment growth up to 2040. The distribution of this growth was discussed and agreed with the Strategy Steering Group, which included Waterford City & County Council and Kilkenny County Council. This distribution took into consideration key growth locations such as the SETU campuses and the North Quays SDZ lands.

TOD is an important measure in ensuring the alignment of transport planning and land use planning. However, planning for TOD at locations remote from the WMA would undermine the principle of compact growth, which is a key objective of the NPF and RSES. WMATS favours TOD at locations in the WMA where the transport investment proposed by the Strategy can be best exploited.

2.3 Walking

Issues:

While there was general support for the measures proposed for Walking in WMATS, a number of submissions proposed additional links for incorporation into the proposed network. These included

the Waterford Cultural Quarter and the Old Red Iron Rail Bridge. The importance of accessibility was also highlighted, related to both the pedestrian network itself and supporting infrastructure such as wayfinding systems.

NTA Response:

The recommended routes were added to the pedestrian network maps and the route list in the Strategy, while the text on Wayfinding in Section 6.6.5 was amended to refer to the need to ensure its utility for the full spectrum of pedestrians.

2.4 Cycling

Issues:

While cycling generated a significant number of comments and recommendations, many at quite a detailed level, there was a high degree of general support for the proposed measures. Suggestions related to bike sharing schemes included the need for shelters for the docking stations and introducing dockless bike sharing to complement the current station-based model. Full segregation of cycle tracks and more detail on two-way cycle track design was also requested, while issues with maintenance of existing infrastructure and the enforcement of car parking on cycle tracks were highlighted as concerns. A number of proposals for additional routes in the proposed network were received. Finally, the mode share for cycling in the horizon year was queried, and it was recommended that more ambitious targets should be set out.

NTA Response:

The text in section 7.7.2 was revised to include reference to examining the potential for dockless bike share, as part of the wider monitoring of the performance of the bike share scheme that was launched in 2022. Cycle infrastructure will be designed in accordance with the NTA's National Cycle Manual (NCM), which sets out guidance on when full segregation of tracks is required. The NCM also provides guidance on the design of two-way tracks, although the type of facility deployed on each network route is a matter for consideration at the scheme planning and design stage.

All route proposals were incorporated into the revised cycle network, including city centre routes in the Waterford Cultural Quarter and additional inter-urban routes to serve Mooncoin, Kilmacow and Cheekpoint. New measures related to Maintenance of Cycle Infrastructure and Enforcement of Road Traffic Laws were added to the chapter.

The mode share stated in the Strategy is an output from the NTA's SERM, but the Strategy sets higher mode share targets, noting that the implementation of the full range of strategy measures will support these higher targets. The targets will also be reconsidered as part of the strategy review process every 6 years.

2.5 Bus

Issues:

While a number of recommendations were received relating to the bus proposals, the majority of these were already addressed in the Draft Strategy. These included the need for bus lanes to be continuous and connected, and for the proposed network to serve all passenger demand including demand for cross-city/orbital movement. Specific comments on bus routeings in the city centre were also received, along with support for the range of ancillary measures proposed, including Real Time Passenger Information and improved shelters and signage.

NTA Response:

Minor revisions were made to the bus network proposals, including extending a route to Kilmeaden. However, the proposed WMATS bus network is indicative only, and the recommendations submitted would generally be best addressed through the BusConnects network planning, which will examine in more detail the WMATS proposed routes. This network planning is scheduled to commence in 2023.

2.6 Rail

Issues:

Rail generated the highest number of responses for any category, although there was considerable overlap between the submissions on the issues raised. These focused on the modelling methodology used in the assessment of rail, the rolling stock used in that assessment, and the lack of assessment of rail in the context of the wider South-East sub-region. The lack of light rail proposals or examination of commuter/suburban rail was also queried. Some submissions also requested that the closed rail line to Rosslare should be included in the Study Area map.

NTA Response:

The potential for commuter rail was assessed in the modelling carried out in support of the Strategy. This modelling used the South East Regional Model (SERM), which considered transport demand from the wider South-East region, i.e. beyond the boundary of the WMA. The rolling stock used in this assessment was designed to ensure that the Idealised Scenario provided sufficient capacity to accommodate all identified demand, and did not influence any Cost-Benefit Analysis for rail in the WMA or the South East more generally. The demand analysis identified that a bus-based public transport network would be sufficient to cater for all future demand within the WMA and from the wider South-East area. It should also be noted that the All-Island Strategic Rail Review (AISRR), which is underway, is considering a number of the recommendations received, and the Strategy proposes to incorporate the recommendations of the AISRR on its completion.

The Study Area map was revised to include the line previously omitted.

2.7 Roads

Issues:

Some submissions were strongly opposed to the inclusion of new road schemes, ranging from quite localised road proposals to opposition to all new road schemes. The removal of the toll on the Thomas Francis Meagher Bridge (N25) was also requested, as toll avoidance was perceived to contribute to city centre congestion. There was support for the development of a new downstream river crossing as a means to alleviate traffic congestion, and a proposal for a new measure related to lower speed limits in urban areas.

NTA Response:

The limited number of road schemes set out in the Strategy were derived from the National Development Plan as committed schemes, or proposed where there would be benefits to public transport and active travel. One road link, at the western end of Knockhouse Road, was removed as it was not considered a key proposal and may have given rise to additional traffic on unsuitable roads. The removal of the N25 toll would have significant financial consequences for the exchequer, and is a matter for national government rather than a metropolitan area transport strategy. The Strategy proposes to examine the need for an additional downstream crossing in the latter stages, in line with the termination date of the PPP contract for the N25 in 2036.

A new measure on Speed Limits was added to the Road chapter.

2.8 Parking

Issues:

The limited number of Park & Ride (P&R) proposals was queried by a number of consultees, who felt that a network of P&R would be required to facilitate mode shift to public transport. Some businesses raised concerns about the impact of the proposed parking measures on their operational needs, including the collection and delivery of post. A number of submissions highlighted the need for enforcement of regulations related to parking on footpaths, which has a significant impact on all pedestrians but most importantly on those with mobility impairments, wheelchair users and people with buggies.

NTA Response:

The NTA's Park & Ride Development Office (PRDO) carried out a separate assessment of the need for strategic Park & Ride sites to serve the WMA. This assessment identified one site, on the Newrath Road, for early P&R development, served by the proposed bus network. The need for additional P&R facilities will be examined as part of the 6-year strategy review cycle. The needs of all businesses will be considered in the development of the proposed Delivery & Servicing Strategy, while taking account of the emissions reduction targets set out in the Climate Action Plan.

A new measure on the Enforcement of Road Traffic Laws was added to the Strategy.

2.9 Freight

Issues:

Reservations were expressed regarding the examination of rail freight for the WMA, and further work in this regard was recommended. As with the observations on Parking noted above, some businesses raised concerns about the impact of HGV restrictions, road space reallocation for sustainable transport, and the proposed Delivery & Servicing Strategy on their current operations.

NTA Response:

Freight is responsible for a significant contribution to transport emissions. While the strategy supports Irish Rail in the implementation of the Rail Freight 2040 Strategy, specific measures in this regard await the recommendation of the AISRR, which is considering this matter. The Strategy will also consider the needs of all businesses in the development of freight management measures, and will balance these needs against the requirement to reduce emissions from the transport sector.

2.10 Supporting Measures

Issues:

Reservations were expressed regarding Autonomous Vehicles and their potential to add to car congestion in a city. While there was support for measures related to Electric Vehicles, it was recommended to consider off-street charging infrastructure in addition to on-street, to free up road space for alternative uses. A new measure was proposed related to Micro-mobility. There was general support for the technology measures proposed, such as Mobility as a Service (MaaS) and Intelligent Transport Systems (ITS), but closer liaison with industry and academia was suggested to maximise the potential of these measures. Regarding the built environment, an additional measure was suggested related to road space reallocation.

NTA Response:

The Strategy position on AVs and EVs was broadly supported, but reference to off-street EV charging was added on foot of this recommendation. A new measure on examining the potential of micro-mobility was also added, which acknowledges its potential while awaiting the publication of legislation. A new measure on Road Space Reallocation was also included.

2.11 Environment/Emissions

Issues:

Examination of a wider range of biofuels, including fuels from waste streams, was recommended, and concerns were raised regarding the impact of increased fuel prices without providing realistic alternatives to the private car. Some submissions called for more ambitious emissions reduction targets to be included in the Strategy, and proposed measures such as a carbon-neutral city centre to support this goal.

NTA Response:

Alternative fuels are a matter for national government, and the NTA will ensure that the Strategy takes account of the findings and recommendations of the Renewable Fuels for Transport consultation. The Strategy notes that the implementation of the full suite of measures proposed will not achieve the full emissions reduction targets set by the Climate Action Plan, and that further work is required, including the preparation of a Demand Management study following Strategy adoption. This study will address proposals such as a carbon-neutral city centre.

2.12 Summary

This section provides an overview of some of the key issues that were included in public submissions. It is not intended to be exhaustive, and omission of other recommendations from this section does not imply that they are of a lower quality or lesser value to the project team. As noted, the full list of points raised in public submissions is available in section 3 below.

3 Issues, Responses and Revisions

Table 1 – Full list of all points by Category

Issue	Statement	References	Category	Topic	Response	Change
Category: Strategy - General						
<i>Topic: Opposition</i>						
Opposition to draft strategy - traffic impact	Traffic restrictions will inhibit the growth of Waterford city and negatively impact on inward investment.	NTA-C8-3	Strategy - General	Opposition	A shift to sustainable travel is a matter of national policy and there is ample evidence that sustainable transport use supports economic activity without the negative impacts associated with high levels of private car use.	No change.
<i>Topic: Process</i>						
Risk Assessment / SWOT Analysis	We believe there needs to be a fully integrated approach to the implementation of all new transport strategies and a full risk assessment and SWOT analysis carried out to ensure one policy is not introduced to the detriment of another.	NTA-C8-34	Strategy - General	Process	WMATS represents an integrated approach to the development of sustainable transport and active travel schemes, and a range of supporting measures including Behavioural Change. As such, the schemes and policies are complementary rather than contradictory. However, the optioneering at scheme planning and design stages will take further account of the need for complementarity and the achievement of the Strategy objectives.	No change.
<i>Topic: References</i>						
SETU name	We request that, throughout the document, including in the maps, diagrams and image (pg 45), “Waterford Institute of Technology” is replaced with “South East Technological University” and “WIT” with “SETU”. We note that the footprint of SETU in the city (campuses on Cork Rd, IDA Industrial Estate, College St, O’Connell St, and in Carriganore) is not represented fully in all diagrams and this should be corrected.	NTA-C8-36	Strategy - General	References	Request noted.	Waterford Institute of Technology' replaced with 'South East Technological University' and 'WIT' with 'SETU' throughout the document, and maps updated.
<i>Topic: Scope</i>						
Full regional strategy required	We do not believe that the WMATS can be implemented in the absence of a full transport strategy for the South-East region.	NTA-C8-34	Strategy - General	Scope	WMA has been assessed in the context of wider demand as provided for in the NTA South-East Regional Model. Regional connectivity has been considered. The RSES does address the wider context and has informed the preparation of WMATS.	No change.

Prematurity of WMATS	We would also like to stress our belief that the WMATS is premature in its adoption until a wider “Transport Strategy for the South East of Ireland” and “National Rail Transport Strategy” have been published, as we believe these two additional strategies will have a major influence on any transport strategy for the Waterford Metropolitan Area.	NTA-C8-34	Strategy - General	Scope	Internal WMA movement and external trips have limited interaction. The Strategy acknowledges the critical role of the All Island Strategic Rail Review, and will incorporate the outputs of the AISRR relevant to the study area.	No change.
Relationship between WMA and Tipp towns	The Core Strategy Map from the Tipp Co Co Development Plan shows the transport demands of the towns of Carrick on Suir, Clonmel, Cahir, Tipperary and Limerick Junction and their relationship with Waterford. Tipperary County Council requests that consideration and analysis be undertaken of the transport demands of these towns to Waterford, and of how the WMATS can support same.	NTA-C8-31	Strategy - General	Scope	WMA has been assessed in the context of wider demand as provided for in the NTA South-East Regional Model. Regional connectivity has been considered. The RSES does address the wider context and has informed the prep of WMATS.	No change.
Waterford-Limerick Revitalisation Network	Tipperary County Council requests that the WMATS identify how it can support the principle of the Waterford-Limerick Revitalisation network in terms of enabling sustainable travel. Clonmel is located on the Limerick to Waterford Transport and Economic Network, is a Key Town and is identified for significant population growth in the RSES and the Tipperary County Development Plan 2022 – 2028. Having consideration to this, the relationship between Clonmel and the WMATS in terms of traffic demand and the nature of traffic movements must be a key consideration in the WMATS.	NTA-C8-31	Strategy - General	Scope	WMA has been assessed in the context of wider demand as provided for in the NTA South-East Regional Model. Regional connectivity has been considered. The RSES does address the wider context and has informed the prep of WMATS. The Strategy acknowledges the critical role of the All Island Strategic Rail Review, and will incorporate the outputs of the AISRR relevant to the study area.	No change.
<i>Topic: Scope</i>						
Responsibility for MASP area	Efforts should be made at National Governmental level for Waterford Council to assume jurisdiction over the entire WMATS designated area.	NTA-C8-51	Strategy - General	Scope	This is an administrative matter beyond the scope of a transport strategy. The NTA will work with both Kilkenny County Council and Waterford City and County Council in the implementation of the Strategy.	No change.
Horizon year	WMATS horizon year should be 2050 or 2060 (or beyond)	NTA-C8-58	Strategy - General	Scope	The horizon year aligns with the National Planning Framework and wider Project Ireland 2040, and WMATS has been prepared based on the forecasts contained in the NPF.	No change.
<i>Topic: Stakeholders</i>						

Tipp Co Co request	Tipperary County Council requests to be formally added as a Stakeholder for the remaining stages of the WMATS, and all future revisions of same.	NTA-C8-31	Strategy - General	Stakeholders	The Southern Regional Assembly is a member of the Strategy Steering Group and represents the wider area. Notwithstanding this, the NTA remains available to meet with all relevant stakeholders as required.	No change.
<i>Topic: Support</i>						
Full support for WMATS	Strongly support the detail and ambition of the proposed Waterford Metropolitan Area transport strategy.	NTA-C8-59	Strategy - General	Support	Support noted.	No change.
Support - balance environment with socio-economic needs	The general business community is supportive of a Transport Strategy that will respect the intent of a greener, safer environment for all, but it must also balance the socio-economic needs of Waterford City and its environs, while providing a fully integrated transport strategy that supports a vibrant, easy to access, thriving, welcoming city.	NTA-C8-34	Strategy - General	Support	Support noted.	No change.
Support for sustainable transport	Tesco welcomes the proposed investment in public transport, active travel and the urban environment of the Metropolitan Area. It is considered that this Draft Transport Strategy could greatly improve the way in which the Metropolitan Area functions from an economic, social, and environmental perspective.	NTA-C8-38	Strategy - General	Support	Support noted.	No change.
General support	General support for Strategy, but noting that implementation (by all parties) and enforcement will be key to success.	NTA-C8-46	Strategy - General	Support	Support noted.	No change.
Category: Ch 1 Introduction						
<i>Topic: Current Challenges</i>						
Public Transport Provision	p.6 Current Challenges: The section Public Transport Provision does not mention the lack of rail services to the WMA, or the fact that currently no services arrive into the city before 9:40am. Add: bullet points referencing the rail system.	NTA-C8-52	Ch 1 Introduction	Current Challenges	Recommendation noted.	Text amended as proposed.
Category: Ch 2 Policy Context						
<i>Topic: National Level Policy</i>						
Climate Action Plan 2021	p.11 Climate Action Plan 2021 add: Expanding rail services and infrastructure in, and around, major urban centres (Climate Action Plan, Section 15.3.1, p.148)	NTA-C8-52	Ch 2 Policy Context	National Level Policy	Recommendation noted.	Text amended as proposed.
<i>Topic: Regional Level Policy</i>						

RSES	p.13 Regional Spatial and Economic Strategy for the Southern Region (RSES) add: Waterford MASP Policy Objective 7	NTA-C8-52	Ch 2 Policy Context	Regional Level Policy	Recommendation noted.	Waterford MASP Policy Objective 7 now included.
Category: Policy						
<i>Topic: New Objective</i>						
Vehicle km reduction target	I would like to see an additional target of 20% reduction in car kilometres driven. The Climate Action Plan (2021) outlines a target of 10% reduction of remaining ICE trips, as does the National Sustainable Mobility Policy which indicates a target of a 10% reduction in ICE trips by 2030. Waterford City itself has a Decarbonisation Plan with a timeline of 2040.	NTA-C8-60	Policy	New Objective	While the Strategy has been developed in accordance with the CAP and NSMP policy objectives, it is not constrained by them and could exceed these targets.	No change.
<i>Topic: Supporting Assessment</i>						
Disability Impact Assessment	There is no evidence in documentation provided that a Disability Impact Assessment has been undertaken as part of this project. For reference, the Department of Justice provides Guidelines on How to Conduct a Disability Impact Assessment. We want to make clear that there is an obligatory requirement to conduct a Disability Impact Assessment of all substantive proposals as stipulated in The Cabinet Handbook.	NTA-C8-29	Policy	Supporting Assessment	An Equality Impact Assessment (EqIA) has been prepared as part of the Strategy development. This addresses discrimination under the nine grounds set out in the relevant legislation, including Disability.	No change.
<i>Topic: Universal Design</i>						
Universal Design	Support for Universal Design being embedded in strategy. It is vital that a universal design approach is taken to the designing public transport services, in order to ensure that public transport delivered serves all of the public and will continue to provide functional and fit for purpose services into the future.	NTA-C8-29	Policy	Universal Design	Measure BUS9 Fully Accessible Fleet and Measure WALK9 Accessibility for All support the adoption of Universal Design principles.	No change.
Accessible fleet	All public transport vehicles, including private buses, trains and taxis, should be fully accessible.	NTA-C8-34	Policy	Universal Design	The Strategy sets out measures to ensure the accessibility of transport infrastructure, fleet and the public realm.	No change.
Support	Ibec supports initiatives to make the city more accessible for all residents and commuters, including persons with disabilities, mobility impairments and the elderly.	NTA-C8-40	Policy	Universal Design	Support noted.	No change.
Category: Ch 3 Study Area & Transport Context						
<i>Topic: Current Transport Provision</i>						

Rail Network	p.21 Rail Network add: a note regarding the inadequacy of the current rail schedule to provide a commuter use.	NTA-C8-52	Ch 3 Study Area & Transport Context	Current Transport Provision	Recommendation noted.	Text amended as proposed.
<i>Topic: Map</i>						
Map revision	p.23 Study Area and Existing Transport Network add: the remainder of the Rosslare-Waterford railway line within the map.	NTA-C8-52	Ch 3 Study Area & Transport Context	Map	Recommendation noted.	Map revised as proposed.
Category: Land Use						
<i>Topic: Population forecast</i>						
SETU Campus Growth	The significant increase in student population will place more demands on the transport network in Waterford and needs consideration in the MATS. The development of the WMA transport infrastructure will need to take account of this considerable growth, the necessity of linking campuses to the city centre as well as to residential areas where students are accommodated. Considerable potential exists within the student population for increased walking and cycling numbers. The expansion of SETU's footprint on Cork Road will create a large-scale university campus that needs to be acknowledged in city planning. Linking Cork Road activity with SETU's research and innovation campus in Carriganore is also vital, as will be continued support for the development of transport links to the university's other campuses in Carlow and Wexford.	NTA-C8-40	Land Use	Population forecast	The 2040 planning sheet takes account of population growth and distribution in all areas of the WMA including SETU campuses.	No change.
SETU Growth	Significant increase in student population (+6% by 2030) and associated staff numbers will place more demands on the transport network in Waterford and the South East region and needs consideration in the MATS.	NTA-C8-36	Land Use	Population forecast	The 2040 planning sheet takes account of population growth and distribution in all areas of the WMA including SETU campuses.	No change.

SETU Growth - revised text	<p>Following wording suggested for inclusion in revised WMATS:</p> <p>'Waterford as a University City</p> <p>'The RSES acknowledges the importance of the development of a high-performing, large-scale university in the South East for the economic, social and cultural future of the city and the region. With the creation of South East Technological University (SETU), Waterford can now claim to be a University City. This label recognises the impact on the city of a student population which, in the course of the Transport Strategy, is likely to grow considerably. SETU targets an increase of 6% in its student population by 2030 with an associated increase also in staff numbers. The development of the WMA transport infrastructure will need to take account of this very considerable growth, the necessity of linking campuses to the city centre as well as to residential areas where students are accommodated, and the need to facilitate the particular functions of SETU as they relate to engagement with industry partners and others.</p> <p>'The expansion of SETU's footprint on the Cork Rd will create a very large-scale university campus that needs to be acknowledged in city planning. It is also critical that public transport connectivity to SETU's Carriganore Campus is provided for. This campus is not only a significant sports and health amenity for the university student and staff population, essential to their well-being and quality of life, but also a vital city and regional asset connected to the Greenway. Also the campus through its research and incubation activities, has a concentration of students, staff and small enterprises, an area primed for further growth and expansion. As SETU is a multi-campus university it is also vital that the strategy will support wider regional connectivity and the continued development of the public transport links to the university's other campuses in Carlow and Wexford.'</p>	NTA-C8-36	Land Use	Population forecast	Recommendation noted.	Text amended as proposed.
Topic: Transport & Land Use Integration						

Align land use decisions with transport infra improvements	The WMATS must provide the opportunity to integrate new mixed-use development at appropriate densities with high-capacity public transport infrastructure in conjunction with more attractive walking and cycling networks and public realm improvements. Improvements to the public transport and active travel network in the WMA, must be underpinned by appropriate land use decisions at local authority level that maximise opportunities for sustainable travel and direct future development to existing or planned higher capacity public transport corridors.	NTA-C8-40	Land Use	Transport & Land Use Integration	The integration of land use planning with transport investment is a core principle of WMATS and has informed the preparation of the Strategy.	No change.
TOD	Ibec welcomes the Strategy's proposed Transit-Orientated Development (TOD) principles. For the delivery of compact growth in the WMA to be successful, we need to have efficient, reliable, and safe transport in the area that is linked with the idea of transport-oriented future development. Effective land use policy is necessary to reduce the need to travel and deliver the population densities required for viable public transport services. This must be addressed with transport-oriented-development at the core of planning, ensuring that transport links and options support the planning and development we need to support a modal shift towards sustainable travel.	NTA-C8-40	Land Use	Transport & Land Use Integration	Support noted.	No change.
TOD Support	I welcome, in particular, the acknowledgement that a priority focus is Transit-Oriented Development - optimising land-use through mixed use development around existing and potential transit infrastructural nodes. I would like to see that this Transit-oriented Development (ToD) priority is considered as part of the assessment of the potential of rail, in particular. The current modelling does not take into account the approach of Transit-Oriented Development in targeted redevelopment around transit nodes - not only in Waterford City and within the Metropolitan Area of this Transport Strategy - but in large settlements area along the route - Clonmel, Cahir, Carrick-on-Suir.	NTA-C8-60	Land Use	Transport & Land Use Integration	The preparation of the Strategy has been informed by national and regional policy, a core aspect of which is Consolidated Growth. While the Strategy supports the principle of TOD, such development must be in appropriate locations. TOD in settlements outside the WMA risks undermining this national policy set out in the National Planning Framework.	No change.
Category: Walking						
<i>Topic: Pedestrian routes</i>						

Strategic walking routes- Prioritise delivery and ensure high quality	There should be clear, unambiguous signage associated with all strategic walking routes and clear physical demarcation of these routes that ensures they are prioritised above other traffic. Applies in particular to walking routes serving SETU campus.	NTA-C8-36	Walking	Pedestrian routes	The need for signage must be balanced with the need to minimise street clutter. The Strategy proposes a Walkable Neighbourhood Map and the development of a Wayfinding Strategy (Measure WALK8).	No change.
Proposed pedestrian routes	Propose two additional pedestrian routes: - Waterford Cultural Quarter (Mary Street - O'Connell Street, between Suir Street and Gladstone Street, and all perpendicular side streets along the length of the WCQ) - From Ballybricken to WCQ via St Patrick's Terrace, Barker St and the two stepped terraces, to create pedestrian link from city centre parking to the amenities, venues and services in the WCQ.	NTA-C8-19	Walking	Pedestrian routes	Recommendation noted.	Proposed routes now included in the list of Strategic Walking Routes in Chapter 6. - Waterford Cultural Quarter (Mary Street - O'Connell Street, between Suir Street and Gladstone Street, and all perpendicular side streets along the length of the WCQ) - From Ballybricken to WCQ via St Patrick's Terrace, Barker St and the two stepped terraces, to create pedestrian link from city centre parking to the amenities, venues and services in the WCQ.
Support	Ibec supports the proposals to upgrade strategic walking routes within the WMA, to connect residential areas to key areas of employment and third-level education in Waterford City Centre and suburbs, and to provide a high-quality cycle network within the Metropolitan Towns.	NTA-C8-40	Walking	Pedestrian routes	Support noted.	No change.
Accessible crossings	The NDA would stress that as part of this strategy pedestrian crossings are designed with accessibility in mind and that pedestrian crossings are controlled and include traffic calming measures which protect pedestrians not just from vehicles but also from cyclists.	NTA-C8-29	Walking	Pedestrian routes	Measure WALK6 addresses Accessibility for All and the principles of Universal Design. The separation of pedestrians and cyclists is a key aspect of the National Cycle Manual (Measure CYCLING2), which acknowledges that shared facilities are disliked by both pedestrians and cyclists.	No change.
<i>Topic: Route proposal</i>						
Red Iron Bridge	Request to bring Red Iron Rail Bridge back into use as e.g. a walkway.	NTA-C8-51	Walking	Route proposal	Recommendation noted.	Red Iron Bridge added to list of Strategic Walking Routes in Chapter 6.
<i>Topic: Walkability Audits</i>						
Walkability Audits	Support for use of Walkability Audits as key tool in the achievement of Steady state maintenance of footpaths, Improved footpaths, Improved junctions, Crossing times, Crossing Points, Accessibility for All,	NTA-C8-29	Walking	Walkability Audits	Support noted.	No change.

	Local Amenity Routes, Wayfinding and Permeability.					
<i>Topic: Wayfinding</i>						
Accessible information	Wayfinding systems must be accessible to all, including those with visual impairments.	NTA-C8-14	Walking	Wayfinding	Recommendation noted. This will be addressed in the development of the Wayfinding Strategy (Measure WALK12).	Text on Wayfinding in Section 6.6.5 now amended to refer to the need to ensure its utility for the full spectrum of pedestrians.
Category: Public Realm						
<i>Topic: Drainage</i>						
Urban design and water management	Water Sensitive Urban Design (WSUD) and Sustainable Urban Drainage Systems (SUDS) should be provided for in the design of urban streets, through adequate road space reallocation.	NTA-C8-44	Public Realm	Drainage	These are scheme-level recommendations that will be considered in the planning and design of the discrete schemes by the implementing agencies.	No change.
Category: Cycling						
<i>Topic: Bike Share</i>						
Sheltered stands	Proposal that docking stations should provide shelter for parked bikes.	NTA-C8-47	Cycling	Bike Share	Bike share docking stations do not generally provide shelters, and the scheme is designed to be IP55-compliant. However, this can be considered by the Active Travel section of the NTA on a case-by-case basis.	No change.
Bike Share expansion	Support for expansion of bike share scheme, with proposed additional stations at the following locations: North of the Suir near the ferrybank shopping centre at the train station (hopefully a station located at the north Quays) if not plunket station or near the rockshire road junction with the R711 Abbey Park South of the Suir Dunmore Road area near ballinakill or the Riverside cottage Six cross roads area SETU Arena Williamstown Road area Gracedieu area	NTA-C8-22	Cycling	Bike Share	Support and proposed locations noted. Future locations will be considered as part of any future scheme expansion.	No change.
Bike share electrification	Proposal to use e-bikes as part of Bike Share offer in city	NTA-C8-22	Cycling	Bike Share	Already addressed in Measure CYCLING5.	No change.
Dockless bike share	Proposal to use dockless technology as part of bike share scheme offer.	NTA-C8-22	Cycling	Bike Share	Noted.	Section 7.2.2 amended to include reference to dockless options.
<i>Topic: Bike Share</i>						

Dockless bike share	Dockless bike share can deliver the station density required (500m recommended) more easily than schemes based on fixed docking stations, and GPS-based docking is also cheaper to implement.	NTA-C8-18	Cycling	Bike Share	Noted.	Section 7.2.2 amended to include reference to dockless options.
Bike Share Expansion	Ibec supports the proposed expansion of the Bicycle Sharing Scheme (BSS) as part of this strategy. Plans to facilitate, promote and invest in supporting infrastructure such as dockless bikes in areas outside the City Centre and inner suburban areas where the Waterford Bicycle Sharing Scheme is unlikely to be feasible in the short to medium term.	NTA-C8-40	Cycling	Bike Share	Support noted.	No change.
<i>Topic: Cycle Infrastructure</i>						
Roundabout design for cycling	Ensure that all existing roundabouts are redesigned to provide safe cycle routes.	NTA-C8-20	Cycling	Cycle Infrastructure	Cycle infrastructure will be designed in accordance with the guidance in the National Cycle Manual (Measure CYCLING2), which includes a range of options for cycle-friendly roundabouts.	No change.
Two-way tracks	Two-way cycle lanes should be designed and delivered to enable social cycling and to ensure that the network is as inclusive as possible for people who use non-standard cycles, like hand cycles and trikes, and accommodate families cycling together.	NTA-C8-60	Cycling	Cycle Infrastructure	Cycle infrastructure will be designed in accordance with the guidance in the National Cycle Manual (Measure CYCLING2), which addresses the needs of all categories of cyclists, including those using non-standard cycles. Specific infrastructure type will be considered on a scheme-by-scheme basis, but there is no presumption in the Strategy or the NCM in favour of two-way cycle tracks, although they are an option.	No change.
Infrastructure characteristics	Request for cycle infrastructure that is Coherent, Continuous and Connected, and segregated from pedestrians.	NTA-C8-54	Cycling	Cycle Infrastructure	Noted. This accords with the definition of a Cycle Network in the National Cycle Manual.	No change.
Two-way cycle tracks	Support for two-way cycle tracks, rather than one-way on each side of the road.	NTA-C8-30	Cycling	Cycle Infrastructure	Specific infrastructure type will be considered on a scheme-by-scheme basis, but there is no presumption in the Strategy or the NCM in favour of two-way cycle tracks, although they are an option.	No change.
Segregated infrastructure	Request that cycle infrastructure and footpaths should be segregated from each other, i.e. opposed to shared facilities.	NTA-C8-47	Cycling	Cycle Infrastructure	This accords with the position set out in the NCM re shared facilities, which offer a reduced Quality of Service for both pedestrians and cyclists.	No change.
Segregation	Support for improvements to the cycle network, but request that facilities should be segregated to preclude illegal parking etc.	NTA-C8-50	Cycling	Cycle Infrastructure	Segregation of cycle infrastructure is informed by the Integration and Segregation guidance in the NCM.	New Measure SM17 re Enforcement of Road Traffic Laws now added.

Segregated tracks	Request for cycle tracks to be segregated by reflective bollards/barriers.	NTA-C8-32	Cycling	Cycle Infrastructure	This is a matter of detailed design of each cycling scheme. A range of segregation options exists, including bollards.	No change.
Design standards	No shared bus-bikes lanes. Consistent application of segregated cycle lanes on primary roads. (Some of the WMATS graphics show bikes sharing bus lanes on primary roads (Rice bridge). Clear consistent standards in the implementation of segregated bike lanes on primary and secondary routes.	NTA-C8-33	Cycling	Cycle Infrastructure	Shared bus-bike lanes remain an option in the NCM, with clear criteria for their use. Primary routes will, in general, be segregated from vehicular traffic, except where traffic volumes are low. NCM provides details on this matter.	No change.
Maintenance	Requirement for maintenance regime for cycle tracks	NTA-C8-32	Cycling	Cycle Infrastructure	Noted.	New Measure CYCLING3 re Maintenance of cycle infrastructure now added.
Maintenance	Maintenance of cycle infrastructure required	NTA-C8-10	Cycling	Cycle Infrastructure	Noted.	New Measure CYCLING3 re Maintenance of cycle infrastructure now added.
Enforcement of cycle tracks	Enforcement of car parking in cycle tracks required	NTA-C8-32	Cycling	Cycle Infrastructure	Noted.	New Measure SM17 re Enforcement of Road Traffic Laws now added.
Infrastructure design	Support for the use of the National Cycle Manual in the design of schemes; request that all roundabouts in the WMA to be assessed for cycling safety and a SMART implementation plan be defined to revise them based on the Dutch Style junction design.	NTA-C8-33	Cycling	Cycle Infrastructure	NCM support noted. NCM includes a range of options for cycle-friendly roundabouts.	No change.
Infrastructure design and drainage	Some drains in cycle lanes are below the level of the paths and create obstacles that we do not need or appreciate.	NTA-C8-32	Cycling	Cycle Infrastructure	This is a matter of detailed design of each cycling scheme. NCM contains guidance on drainage requirements in cycle scheme development.	No change.
Design of segregated tracks	High kerbs are a nightmare when cycling because if you hit one with the pedal then you fall off.	NTA-C8-32	Cycling	Cycle Infrastructure	The National Cycle Manual (Measure CYCLING2) sets out guidance on the design of cycle infrastructure, including such matters as cycle-friendly kerbs.	No change.
Maintenance	Existing infrastructure is often badly designed and not maintained	NTA-C8-32	Cycling	Cycle Infrastructure	Noted.	New Measure CYCLING3 re Maintenance of cycle infrastructure now added.
Segregation	Support for cycle infrastructure segregated from pedestrians and remote from vehicular traffic.	NTA-C8-1	Cycling	Cycle Infrastructure	Segregation of cycle infrastructure is informed by the Integration and Segregation guidance in the NCM.	No change.

Supporting infrastructure	Provide e-bike charging and toilets on all new cycle routes	NTA-C8-32	Cycling	Cycle Infrastructure	Such infrastructure is not required on the urban cycle network. E-bike charging will be considered in the development of mobility hubs and large-scale public bike parking facilities. TII's cycle route design standards, which address inter-urban and greenway development, set out relevant ancillary infrastructure requirements.	No change.
Supporting infrastructure	Erect signs alerting motorists the cyclists are present in the area and need space to cycle safely. Develop a system of "Near Misses" where encounters with cars etc these can be recorded.	NTA-C8-32	Cycling	Cycle Infrastructure	Such signage is already provided for in the DoT's Traffic Signs Manual. 'Near misses' are already addressed by minimum overtaking distance requirements and existing reporting mechanisms suffice to address this proposal.	No change.
Design process	Designers should be required to cycle the area prior to producing scheme designs	NTA-C8-32	Cycling	Cycle Infrastructure	Such matters are addressed in tender specifications for route design and development, and further discussed in the NCM.	No change.

Accessible and inclusive cycle infrastructure	<p>With regards to on-track cycle markings to alert cyclists to yield for upcoming crosswalks and the use of markings at crosswalks we strongly recommend the use of zebra marking at crosswalks</p> <p>The NTA should also consider design guidance in CYCLOPS, Manchester on page 7 which provides Guiding Principles for Protected Junctions regarding where there might be some junctions where traffic lights for cyclists would be necessary.</p> <p>The NDA is pleased to see an acknowledgement of the need to design cycle tracks for non-standard cycle users. In designing inclusive cycle tracks the NTA might find the Inclusive Cycling Guide useful. Consideration should be given to cyclists who are disabled as well as non-disabled users who use non-standard cycles to ensure that the cycle way and the bus stop crossing are suitable for them. It may also be of use to consult the London Cycling Design Standards which details some kinds of adapted cycles and provides guidance on designing cycle tracks which will accommodate a range of cycles. Of the utmost importance in this regard is consultation with a wide range of cyclists, in particular with disabled cyclists, older cyclists, people who use cargo bikes/bike trailers, as well as with a wide range of pedestrians about any proposed cycle track upgrades.</p>	NTA-C8-29	Cycling	Cycle Infrastructure	<p>Details regarding cycle infrastructure are addressed in the NCM (Measure CYCLING2), which provides for all categories of cyclist including those using non-standard cycles. The NCM has been revised and consultation on the content, including representative groups, will follow its drafting.</p> <p>Consultation on specific schemes is a matter for the Sponsoring Agencies responsible for scheme delivery (generally local authorities).</p>	No change.
<i>Topic: Cycle Network</i>						
Implementation and Monitoring	Lack of any action plan which outlines implementation targets and measures of success (KPIs) for the achievement of these figures. It does not tell us what will be delivered, when. Without this WMATS is only an aspirational vision.	NTA-C8-33	Cycling	Cycle Network	WMATS sets the framework for an accessible, high quality and integrated transport network. Further detail on implementation of the cycle network and bus network will follow Strategy adoption. A high level phasing plan is included in Chapter 15 Monitoring and Implementation.	No change.
Greenway in North West	Support for proposed greenway in north west of the metropolitan area adjacent to Limetree Global lands	NTA-C8-35	Cycling	Cycle Network	Support noted.	No change.

Implementation	We recommend that the best practice direct consultation with relevant communities concerned by road space reallocation or road development is undertaken prior to the development of specific plans for the commencement of the part 8 planning process. This should not be left through the filter of the Transport Special Policy Committee. This is essential in delivering successful sustainable travel infrastructure.	NTA-C8-33	Cycling	Cycle Network	Consultation on transport schemes is a matter for the Sponsoring Agencies. The NTA supports early engagement with all stakeholders including representative groups.	No change.
<i>Topic: Cycle Network</i>						
Sustainable Transport Bridge	Support for Sustainable Transport Bridge as key element in city cycle network	NTA-C8-22	Cycling	Cycle Network	Noted. The Strategy supports the development of this bridge, which as received a funding allocation from the NTA Active Travel section.	No change.
Implementation	It is essential that detail is given on how two-way, segregated cycle lanes and bus lanes are to be provided on the primary and secondary routes identified. While we appreciate that specific plans will be drawn up for each route separately, without any indication of the broad plans for priority implementation and routes, or the methodology to be used to deliver 'high quality infrastructure' and the 'cycle network' is not possible to understand what this practically means. As it is not clear from the WMATS document, what will be implemented when, the detailed plan must include specific details on what will be implemented when. Targeted primary-, radial routes and inter-country routes that are already well utilised (e.g.: Waterford to Tramore, Dunmore and the Copper coast route) are important to address firstly to get as many people as possible onto the bike.	NTA-C8-33	Cycling	Cycle Network	Further detail on implementation of the cycle network will follow Strategy adoption. A high level phasing plan is included in Chapter 15 Monitoring and Implementation. WMATS does not presume that two-way cycle tracks will be the default infrastructure type deployed. Each scheme will be assessed on a case-by-case basis, and may propose two-way infrastructure where appropriate.	No change.
Network development	Further consultation required on cycle network so that the ageing population have an input in to developing of safe cycleways.	NTA-C8-14	Cycling	Cycle Network	Further consultation will take place on each scheme as the network is implemented.	No change.
Traffic network planning for cycling	One-way traffic being applied in narrower streets to allow safer footpath use and cycling.	NTA-C8-33	Cycling	Cycle Network	One-way traffic can encourage higher vehicle speeds and increase general traffic levels, and is not generally deemed to accord with sustainable transport objectives. Where safety issues are identified, tailored solutions that support the Strategy objectives will be identified.	No change.
Support	Support for proposed cycle network.	NTA-C8-34	Cycling	Cycle Network	Support noted.	No change.

Supporting measures	Ensure land use zoning facilitates ancillary development along proposed cycle routes, e.g. bike hire, refreshments.	NTA-C8-34	Cycling	Cycle Network	Such infrastructure is not required on the urban cycle network. TII's cycle route design standards, which address inter-urban and greenway development, set out relevant ancillary infrastructure requirements. Such matters will be considered at the scheme development stage.	No change.
Route proposal	New coastal green/blueway on the south bank of the River Suir connecting Waterford city to Cheekpoint- details below. 'Blue walk way/cycle lanes connecting the Waterford Quays / Waterpark Pumping Station to Cheekpoint thereby providing an alternative level and scenic connection for walkers and cyclists. Much of the path is already in place - Maypark Lane to Powerscourt, modification the river dykes at Ballinakill and the Glenn Lane to the Rookery at Cheekpoint.'	NTA-C8-51	Cycling	Cycle Network	A greenway on the south bank of the Suir is included in the proposed cycle network, as far as Blenheim Heights. Continuing this greenway to Cheekpoint was considered, but primarily due to environmental sensitivities along the river corridor, as well as low anticipated demand, it was not included in the final draft network. This will be kept under review as part of the 6-year review cycle.	No change.
Cycling on Dunmore Road	A proper safe cycle lane should be provided along the full length of the Dunmore Road, from passage cross to the city centre	NTA-C8-11	Cycling	Cycle Network	This alignment is included in the proposed network.	No change.
Continuity	Cycle network should be continuous and legible.	NTA-C8-32	Cycling	Cycle Network	Continuous and legible are key characteristics of good cycle infrastructure, as set out in the NCM, which will guide the design of the WMA cycle network.	No change.
Route along O'Connell Street	Include O'Connell Street in the city cycle network	NTA-C8-19	Cycling	Cycle Network	The Primary east-west route on the south side of the Suir will remain the quays, but a parallel route can be added to O'Connell Street. Given the low traffic volumes and lack of through-routes for traffic, a Feeder route would suffice. This would align with the WCCC ambitions to regenerate O'Connell Street.	O'Connell Street and related side streets added as Feeder routes.
SETU links	Need to develop active travel links between discrete SETU campus locations.	NTA-C8-34	Cycling	Cycle Network	The draft cycle network sets out links that would serve to connect the various SETU locations within the city.	No change.
Cycle route SETU West to city centre	Proposed cycle route between the SETU West Campus along the Deise Greenway to Hanover Street and Great George's Street	NTA-C8-19	Cycling	Cycle Network	The draft cycle network sets out links that would address this proposal.	No change.

Support	Development and completion of the Cycle Networks in line with the delivery of BusConnects Waterford bus priority measures; including completion of Inter-urban and Greenway Cycle Networks will significantly enhance the WMA cycling offer and culture, improve sustainable travel and reduce congestion.	NTA-C8-40	Cycling	Cycle Network	Support noted.	No change.
Route proposal	Active travel walkway from Cheekpoint to Passage East should be fully separated from the road- final 300m at the southern end approaching Passage East is on-road, which reduces its attractiveness.	NTA-C8-51	Cycling	Cycle Network	This is a scheme level consideration that would be best addressed at the local level.	No change.
Park & Cycle	Consider using SETU West Campus as parking to serve commuters cycling onwards to the city centre	NTA-C8-19	Cycling	Cycle Network	The NTA understands that this arrangement is already informally in place. Permission would be required to formalise it, but could be considered as part of the development of local Park & Stride facilities.	Measure PARK2 amended to refer also to Park & Cycle facilities, rather than Park & Stride only.
Link to Suir Blueway	Tipperary County Council would highlight that a feasibility study (Tipperary County Council and Tobin Consulting Engineers) is currently underway to determine the feasibility and optimum route to link the Suir Blueway Tipperary (Carrick on Suir) with the Waterford Greenway (at Kilmeadan). This link is further supported by the current draft of Transport Infrastructure Ireland's (TII) National Cycling Network. Tipperary County Council would request that this potential regional cycling/walking route, be identified and supported as a key part of the WMATS.	NTA-C8-31	Cycling	Cycle Network	While the Strategy supports the development of a Greenway network, Kilmeaden is outside the WMA boundary and this proposal is therefore beyond the scope of this Strategy. It is, however, included in the draft CycleConnects network.	No change.
<i>Topic: Cycle Parking</i>						
Sheltered parking	Proposal that bike parking should be sheltered.	NTA-C8-47	Cycling	Cycle Parking	This proposal is addressed by Measures CYCLING6 and CYCLING7. The design of cycle parking, including the potential requirement for shelters, is addressed in the NCM.	No change.
Secure parking	Request for secure cycle parking in city centre (owner access only); particularly important given the rise in e-bike ownership	NTA-C8-50	Cycling	Cycle Parking	This proposal is addressed by Measure CYCLING6.	No change.
Revise Measure	Bicycle parking: Measure cycling 6 omitted an important description of bike parking: "secure".	NTA-C8-33	Cycling	Cycle Parking	Noted.	Sections 7.2.3 and 7.2.4 now revised to include 'secure'.

Support for secure, public cycle parking	Considerably enhanced investment is required in bicycle parking facilities throughout the city. It is our experience that students and staff will not cycle if they cannot park safely and securely.	NTA-C8-36	Cycling	Cycle Parking	This proposal is addressed by Measures CYCLING6 and CYCLING7.	No change.
E-bikes	Secure cages, some with recharging facilities and CCTV, are required at public transport hubs and in the city centre to support the use of e-bikes.	NTA-C8-1	Cycling	Cycle Parking	This proposal is addressed by Measure CYCLING7.	No change.
O'Connell Street cycle parking	Provide adequate cycle parking on O'Connell Street to encourage arrival by sustainable transport	NTA-C8-19	Cycling	Cycle Parking	This proposal is addressed by Measure CYCLING6.	No change.
<i>Topic: Cycling & public transport</i>						
Cycling and rail interface	Increased bike capacity on all train routes, nationally. Secure bike parking at train stations. TFI city bike stations at the train station	NTA-C8-33	Cycling	Cycling & public transport	Carriage of cycles on trains is a matter for Iarnród Éireann and the Dept of Transport. Cycle parking at stations is addressed by Measures CYCLING6 and CYCLING7. Additional bike share stations are addressed by Measure CYCLING4.	No change.
Bikes on trains	The Trains used for a commuter rail service should be appropriately sized with storage space for bikes.	NTA-C8-24	Cycling	Cycling & public transport	Commuter rail is not proposed in the Strategy. Carriage of cycles on inter-city trains is permitted.	No change.
Improve regional inter-connectedness	We would like to see more focus within this strategy towards active travel infrastructure that allows interconnectedness at the regional level & to include as part of this strategy that cycling infrastructure connected with other urban areas via other modes of transport (i.e. rail). There is a dismissive approach to the overall value that rail can provide to the connectedness of urban centres and that there seems to be no strategy to include rail in the overall plan to connect active travel users between urban centres.	NTA-C8-54	Cycling	Cycling & public transport	Regional inter-connectedness is provided for by rail and bus, and major stations and stops will be served by the proposed cycle network.	No change.
<i>Topic: Cycling - Other</i>						
Motorist awareness of cyclists	Is there any segment in the Motorists Licence system where cyclists are addressed ?	NTA-C8-32	Cycling	Cycling - Other	This relates to driving licences/tests and is a matter for the Dept of Transport.	No change.

Proposed amendments	<p>We support the following alterations and comments to the draft Strategy:</p> <ul style="list-style-type: none"> • No shared bus-bikes lanes. Consistent application of segregated cycle lanes on primary roads. (Some of the WMATS graphics show bikes sharing bus lanes on primary roads (Rice bridge). • Clear consistent standards in the implementation of segregated bike lanes on primary and secondary routes. • One-way traffic being applied in narrower streets to allow safer footpath use and cycling. • TFI City Bike Station to be located at the railway station. (revise MEASURE CYCLING3 to include stakeholders and local authorities) • Removal of the proposed: Rosslare Greenway connecting Rosslare to Waterford City Centre along or adjacent to the north of the River Suir unless language from the Waterford MASP is added, namely: Retention of the mothballed rail link from Waterford to Rosslare is vital for the future development of Rosslare Europort. Any proposals for a Greenway along this route should be configured to allow future use of the rail link. 	NTA-C8-52	Cycling	Cycling - Other	<p>The design of cycle routes will be undertaken in accordance with the guidance in the NCM (Measure CYCLING2).</p> <p>One-way traffic can encourage higher vehicle speeds and increase general traffic levels, and is not generally deemed to accord with sustainable transport objectives. Where safety issues are identified, tailored solutions that support the Strategy objectives will be identified.</p> <p>The locations of additional bike share stations will be addressed as part of any future scheme expansion (covered by Measure CYCLING4).</p> <p>The design of the Rosslare Greenway will take account of the future use of the rail line.</p>	No change.
Cyclist behaviour	Erect signs for cyclists advising them of their responsibilities as road users.	NTA-C8-32	Cycling	Cycling - Other	The Strategy aims to reduce street clutter, including unnecessary signage. It is incumbent on all road users, including cyclists, to be familiar with their responsibilities as road users.	No change.
<i>Topic: End of Trip facilities</i>						
Destination showers/lockers	In some cases, additional showering and locker facilities are required at destination, a not insignificant consideration.	NTA-C8-36	Cycling	End of Trip facilities	This proposal is addressed by Measure CYCLING8 End of Trip Facilities.	No change.
<i>Topic: Maintenance</i>						
Improved maintenance	Cycle facilities are poorly maintained, particularly surfaces and adjacent growth/landscaping	NTA-C8-50	Cycling	Maintenance	Noted.	New Measure CYCLING3 re Maintenance of cycle infrastructure now added.
Year-round utility	Maintenanace regime for cycle infrastructure required, particularly to ensure that it is usable all year.	NTA-C8-48	Cycling	Maintenance	Noted.	New Measure CYCLING3 re Maintenance of cycle infrastructure now added.
<i>Topic: Mode Share</i>						

Proposed mode share	Short term (to 2028 - aligns with WCCC CDP): 7% Medium term (to 2034): 14% Long term (to 2040): 21%	NTA-C8-33	Cycling	Mode Share	The cycle mode share set out in the Strategy is not an upper limit, and may be higher following the implementation of additional demand management measures required to meet climate change emissions targets. This figure will be reviewed as part of the 6-year WMATS review cycle.	No change.
Ambitious cycle mode share target	The inclusion of a strategic target of a cycling modal share by 2030 is welcomed. However I would like to see increased ambition here also. This transport strategy will run until 2040 and during that time urban population growth will occur and increased population density will be designed for.	NTA-C8-60	Cycling	Mode Share	The cycle mode share set out in the Strategy is not an upper limit, and may be higher following the implementation of additional demand management measures required to meet climate change emissions targets. The cycle mode share in the Strategy takes account of the population growth to 2040.	No change.
More ambition	The modal share target for cycling of 10 - 15% aimed for by NTA, in conjunction with the local authorities, is welcome, but it is not sufficiently ambitious, and the interventions modelled needs to achieve adequate modal shift to reach the necessary carbon emissions reduction targets, as indicated in the Draft Transport Strategy. I would like to see a general public modal share for cycling of at least 30% in 2040, and that Key Performance Indicator be monitored with a breakdown by demographics - for school children, for older people, for people with disabilities.	NTA-C8-60	Cycling	Mode Share	The cycle mode share set out in the Strategy is not an upper limit, and may be higher following the implementation of additional demand management measures required to meet climate change emissions targets. Chapter 15 Monitoring and Implementation states that 'The NTA will support the local authorities in undertaking periodic monitoring of transport trends and patterns.' The precise nature of this monitoring will be agreed with the local authorities following the adoption of the Strategy.	No change.
Consistency between WMATS and CDP	Lack of consistency between the WMATS modal share increase figures up to 2040 and the City and County Development Plan 2021, figures on p.131 of the development plan (vol. 1). As WMATS is to be incorporated into the development plan, it is essential that the development plan figures are increased to match the WMATS ambition.	NTA-C8-33	Cycling	Mode Share	The NTA will work with the two local authorities to deliver the sustainable travel mode share set out in WMATS.	No change.
Category: Buses						
<i>Topic: Bus - Other</i>						

Issues facing bus services	Recent growth in bus passenger numbers cannot disguise the difficult operating environment for public transport services that currently exists and that will hinder future growth in usage including: Traffic Congestion o Approaches to the city & city centre o Suburban & City Centre pinch points Lack of sufficient Bus Priority measures o Bus Lanes & Traffic Signal Priority Sub optimal road network	NTA-C8-42	Buses	Bus - Other	Noted. The implementation of the proposed bus network, including the bus corridors and bus priority measures, is intended to address the issues identified.	No change.
Proposed amendments	Add: an additional measure ensuring (where feasible) integration of timetables between the rail network and buses in the Metropolitan Area. Add: Additional Measure to add connectivity to Waterford Airport to the railway station via bus if and when regular flights resume at the airport.	NTA-C8-52	Buses	Bus - Other	The development of BusConnects Waterford, following the adoption of the Strategy, will consider the integration of bus timetables with rail services. While the Airport is outside the WMA boundary, the proposed bus network is intended to serve the Airport and bus frequency can be revised in the event of changes to activity at the Airport.	No change.
<i>Topic: Bus Fleet</i>						
Accessibility	Bus fleet must be fully accessible.	NTA-C8-14	Buses	Bus Fleet	Fully Accessible Fleet is addressed in Measure BUS9.	No change.
Carriage of bikes	Proposal to provide racks on the front of buses to carry bikes.	NTA-C8-14	Buses	Bus Fleet	This proposal has been assessed previously by the NTA and was found not to be appropriate for a metropolitan area bus service due to potential delays to services. Cycle parking at bus stops and a city bike share scheme provide adequate cycle-bus integration.	No change.
<i>Topic: Bus infrastructure</i>						
Bus lane extent	Bus lanes are only effective if they are a considerable length; if we are to provide bus lanes they need to be of considerable length otherwise we are only implementing them for the sake of it and they would be best served as cycle lanes as opposed bus lanes.	NTA-C8-30	Buses	Bus infrastructure	Measure BUS2 supports the delivery of bus corridors, and measure BUS3 addresses the need to provide bus priority to support the efficient operation of bus services.	No change.
<i>Topic: Bus Network</i>						

Serve all demand	Routes servicing key educational and employment centres, such as University Hospital Waterford, SETU Waterford Campus, and Waterford IDA, are essential. It will be important to consult with employers and educational institutions to identify precisely what services are required, particularly where workers may be starting/finishing shifts outside the route service times.	NTA-C8-40	Buses	Bus Network	The proposed bus network was developed on the basis of serving key destinations such as employment and educational nodes. Further development under the BusConnects programme will consider these matters in more detail.	No change.
Impact of bus lanes on traffic capacity - need to demonstrate effectiveness in advance	We believe bus corridors cannot be introduced on the main arteries of Waterford City e.g Rice Bridge, Dunmore Road, The Quay, until other supporting strategies, e.g. bus and train routes, have been introduced and have been observed as working. We believe considerable chaos will be caused to the city if as proposed Rice Bridge is brought back to two lanes for car traffic. The bridge is struggling to cope with four lanes, two lanes in and out. Similarly with the Dunmore Rd and Ferrybank access and egress to the city, these roads should be not turned into bus corridors prematurely without alternatives being clearly modelled and proven.	NTA-C8-34	Buses	Bus Network	<p>This submission proposes that bus (and train) routes should be observed to be working before the measures that would enable them to work have been implemented. The logic of this position is not clear.</p> <p>As stated in Section 8.3, 'the maximum benefit of the investment in increased bus capacity and services will only be achieved if it is accompanied by the necessary level of bus priority. A failure to do so will result in a less than optimum level of service for customers in terms of speed and reliability, and will require more buses to deliver a given level of service as they will be delayed in general traffic. It will also result in poorer value for money and potentially undermine the economic case for continuing investment in the bus service in the Waterford Metropolitan Area.'</p> <p>An improved public transport and active travel offer in the WMA will support a shift to those modes for short and medium distance trips, reducing the pressure on the road network from the private car.</p>	No change.

Full support for bus proposals	<p>We totally support the view that the bus network will remain the workhorse of the public transport network due to its flexibility and ability to adapt to changing travel patterns.</p> <p>While the current bus network has delivered significant growth it needs to grow and adapt to the changing needs of the metropolitan area, we fully support the Bus Connects concept and the following core proposals:</p> <p>A core network (84km) that will operate cross city at high frequencies</p> <p>A radial bus network (7km) that will support & complement the core high frequency cross city network</p> <p>An orbital network (9km) that will facilitate trips outside the city centre and will support the core network</p> <p>Development of key interchange locations – Over 1,500 passengers interchanging between Cross City, Radial and Orbital bus services in the AM peak hour</p> <p>Development of a strategic Park & Ride Site</p> <p>Supporting measures</p> <ul style="list-style-type: none"> o Enhanced bus priority – Over 63km of additional bus lanes o Enhanced Smart Ticketing o Transition to zero carbon fleet o Connectivity to other modes o Enhanced bus stop infrastructure including shelters & RTPI information <p>Continued enhancement of the regional bus network & Local Link services</p>	NTA-C8-42	Buses	Bus Network	Support noted.	No change.
Network coverage	Improve transport service from east (Dunmore East, Passage East and surrounding areas) and south (Tramore) to link in with the proposed orbital bus routes.	NTA-C8-14	Buses	Bus Network	The proposed bus network includes radial services connection to the settlements identified, and these will provide for interchange with the proposed orbital service.	No change.
More Orbital routes	Support for bus network, but notable that the proposed bus network has not changed from one where all routes lead to the city centre. There is insufficient orbital provision connecting places where most people live, e.g., Dunmore Rd., Williamstown Rd., Kilcohan, Ferrybank, and villages in South Kilkenny, to places where most people work (e.g., hospital, SETU, industrial estate).	NTA-C8-33	Buses	Bus Network	A dedicated orbital service is proposed, and other services will provide for partial orbital movement. Where direct orbital movement is not provided for in the proposed bus network, interchange on a single fare will cater for this demand.	No change.
Buses on Dunmore Road	A regular "Transport for Ireland" bus service should be provided along the Dunmore Road	NTA-C8-11	Buses	Bus Network	The proposed bus network includes a service connecting the city centre to Dunmore Road and Dunmore East.	No change.

Outbound commuting	Bus network and services must cater for workers travelling to employment sites on the urban periphery (not just those commuting 'inbound' to the city centre).	NTA-C8-34	Buses	Bus Network	The proposed bus network was developed on the basis of serving key destinations such as employment and educational nodes. Further development under the BusConnects programme will consider these matters in more detail.	No change.
Buses on N25 bridge	Request that Thomas Francis Meagher bridge (N25 bridge) be incorporated into the public transport routes, to provide new, quicker option to workplaces from South Kilkenny to the Industrial Estate, SETU, the hospital and Tramore. This would also alleviate traffic in the city centre.	NTA-C8-33	Buses	Bus Network	The proposed bus network, in tandem with dedicated bus corridors and other bus priority measures, is intended to provide reliable and frequent bus services connecting all settlements to key employment nodes. Network assessment did not identify the N25 bridge as a key link for a bus service.	No change.
Commuting from adjacent counties	Bus network should provide connections from settlements in adjacent counties to the employment destinations on the urban periphery of Waterford.	NTA-C8-34	Buses	Bus Network	The NTA's Connecting Ireland programme, which is supported by Measure BUS4, provides for such connections.	No change.
Rural bus services	We would like to see structured, sequential plans to integrate bus services to county villages and towns be impacted by the strategy; frequency should complement working and studying times.	NTA-C8-33	Buses	Bus Network	The NTA's Connecting Ireland programme, which is supported by Measure BUS4, and Local Link programme, which is supported by Measure BUS5, provide for such connections.	No change.
<i>Topic: Bus Network</i>						
Late night services	Late night bus routes should be provided to major periphery urban areas and towns e.g Tramore, Dunmore, Dungarvan.	NTA-C8-34	Buses	Bus Network	Measure Bus13 states that the NTA will monitor demand for late night and 24-hour services.	No change.
Support	The implementation of the Bus Connects proposals should be accelerated, including the urgent transition to electric or hydrogen powered vehicles.	NTA-C8-36	Buses	Bus Network	Chapter 15 Monitoring and Implementation states that 'the NTA will commence the preparation of the BusConnects Waterford programme immediately and will publish concept details of potential bus corridors and new routes for public consultation and development within two years of WMATS' finalisation.' The Climate Action Plan identifies that Waterford will have the first fully zero emissions bus fleet by 2030.	No change.

Support	Adequate investment in bus services must remain a priority throughout the period of the WMATS, to provide a high frequency public transport network that is reliable and that guarantees connectivity to all parts of the city. BusConnects Waterford will be a key pillar in the move to a sustainable transport network for the WMA. The implementation of the BusConnects programme is critical to meet current and growing demand for bus services across the WMA.	NTA-C8-40	Buses	Bus Network	It is the intention of the NTA to implement the BusConnects Waterford programme immediately following adoption of the Strategy.	No change.
Buses serving station	Support for bus connection linking Plunkett Station to city centre and to orbital bus route.	NTA-C8-14	Buses	Bus Network	Support noted.	No change.
Hours of operation	Proposed new routes #5 and #6 to have full late night services over 7 days per week including bank holidays.	NTA-C8-14	Buses	Bus Network	Measure Bus13 states that the NTA will monitor demand for late night and 24-hour services.	No change.
Use of Penrose Lane	Reconsider Penrose Lane as bus route - considered unsuitable for bus use due to width, residential community and safety issues.	NTA-C8-19	Buses	Bus Network	This will be considered in detail in the development of the BusConnects Waterford programme following adoption of the Strategy. Where identified alignments are not deemed feasible, alternative routes that meet the objectives identified will be considered.	No change.
Buses in North West	Support for bus proposals for Mullinabro and Newrath	NTA-C8-35	Buses	Bus Network	Support noted.	No change.
<i>Topic: Bus stops</i>						
Supporting bus infra	The proposed upgrade of bus stop and shelter provision will be vital, particularly those that do not currently provide shelter / seating or have designated pedestrian links to them. In addition, the provision of Real Time Passenger Information, along with smart ticketing would contribute greatly to the experience of commuters.	NTA-C8-40	Buses	Bus stops	Measure BUS10 provides for New Stops and Shelters. Measure BUS11 provides for RTPI. Measure SM24 provides for Smart Ticketing.	No change.
Bus stop upgrades	We want WMATS to mandate bus timetables as a minimum requirement at all bus stops and assess all stops for their potential to add bus shelters and real-time electronic information.	NTA-C8-33	Buses	Bus stops	Measure BUS10 provides for New Stops and Shelters. Measure BUS11 provides for RTPI. Timetables will be provided as part of all new stop/shelter works.	No change.
<i>Topic: Coach Management</i>						

Coach Management Strategy	Waterford City, Tramore, Dunmore East and the wider South-East region have a strong tourism and experience economy sector. For many visitors, both international and indigenous, coaches are the chosen mode of travel. The proposed development of an integrated coach management strategy is timely and necessary.	NTA-C8-40	Buses	Coach Management	Support noted.	No change.
<i>Topic: Regional bus</i>						
Regional bus links between WMA and Tipp	No reference is made to the Waterford – Limerick Revitalisation Network and the Towns in Tipperary that will have a direct relationship with the Waterford MATS, in particular Clonmel and Carrick on Suir. Tipperary County Council therefore request that the potential demands in terms of bus transport from these towns and the broader network should be considered in the WMATS.	NTA-C8-31	Buses	Regional bus	Assessment for the horizon year of 2040 took account of demand at the regional level, including Carrick and Clonmel, and the NTA's South-East Regional Model (SERM) was used in the future year modelling.	No change.
Metro area connectivity	Proposed measures aimed at improving local and regional bus connectivity, ensuring towns and villages of the WMA are well served by public transport are vital to increase public transport connectivity between Waterford city and metropolitan area and the surrounding towns, villages and rural areas.	NTA-C8-40	Buses	Regional bus	Noted. As set out in the Strategy, the NTA's Connecting Ireland programme, which is supported by Measure BUS4, and Local Link programme, which is supported by Measure BUS5, provide for local and regional bus connectivity to towns and villages in the WMA.	No change.
Category: Rail						
<i>Topic: All-Island Strategic Rail Review</i>						
All-Island Strategic Rail Review	The views of the WMA need to express the critical nature of rail transport in the future of WMA rather than simply standing idly by waiting for the ARUP consultation report possibly taking a negative view towards rail in Waterford.	NTA-C8-8	Rail	All-Island Strategic Rail Review	The Demand Analysis carried out for the WMA did not identify rail for significant movement within the WMA. External movement between other major settlements and the WMA is most appropriately dealt with through the AISRR process. The Strategy identifies the interface between the AISRR and the WMA and includes Measures that address this recommendation.	No change.
<i>Topic: Electrification</i>						

More ambition required	The electrification of the rail network will be one of the key features of a low carbon transport system. Development and delivery of electrification should form part of a long-term strategy to de-carbonise the heavy rail network. While the proposed electrification of the rail network is mentioned, greater ambition is needed in this area, as part of a journey towards the full electrification of the national rail network. It is critical that the NTA remains proactive and informed on emerging developments in vehicle electrification and alternative fuel use to deliver efficient transport services across the WMA.	NTA-C8-40	Rail	Electrification	This is being considered in the All Island Strategic Rail Review. At a general level, the NTA is pursuing a strategy of decarbonising public transport.	No change.
<i>Topic: Inter-city rail</i>						
Wexford-Waterford	Proposal to improve rail connection (including carriage of bikes) between Wexford and Waterford, for both commuters and leisure/recreational/tourist users.	NTA-C8-54	Rail	Inter-city rail	Proposal noted. However, demand identified during strategy preparation did not warrant a rail-based solution for this route, i.e. bus-based public transport is sufficient to cater for demand, including leisure/tourism demand, but this will be kept under review.	No change.
Additional references	Tipperary County Council requests that references are incorporated in the subsequent WMATS document, in particular the Strategic Freight Terminal at Limerick Junction (Rail Freight 2040 Strategy) and the need for improvements to be made to the Limerick Junction to Waterford Line (Iarnród Éireann Strategy 2027 [2021]).	NTA-C8-31	Rail	Inter-city rail	Request noted.	References included in Rail section, but noting that they are outside the boundary of the WMA.
High-speed link to Dublin	Support for a dedicated high-speed rail return route to Dublin as part of this submission, to serve both inter-city and commuter passenger traffic.	NTA-C8-34	Rail	Inter-city rail	This is being considered in the All Island Strategic Rail Review.	No change.
Proposals for improvements to inter-city services	Increased frequency of Waterford to Dublin line, including consideration of early commuting and late-night trains Increased frequency and speed of services on the Limerick-Waterford route Assessing the feasibility of re-opening the Cork to Waterford rail line	NTA-C8-33	Rail	Inter-city rail	These are matters for consideration in the All Island Strategic Rail Review.	No change.

Inter-city rail proposal	Limerick bound intercity trains need to have an increase in speed and frequency and trains go straight to Limerick and Galway without the need of terminating at Limerick Junction. Limerick Junction also needs to be rebuilt so that Waterford-Limerick Trains do not require the complex manoeuvre of reversing back into the station.	NTA-C8-24	Rail	Inter-city rail	These are matters for consideration in the All Island Strategic Rail Review.	No change.
Cork-Waterford	Proposal to improve rail connection (including carriage of bikes) between Cork (including settlements in east Cork such as Glounthane, Carrigtwohill, Midleton and Youghal) and Waterford, for both commuters and leisure/recreational/tourist users.	NTA-C8-54	Rail	Inter-city rail	These are matters for consideration in the All Island Strategic Rail Review.	No change.
<i>Topic: Interchange</i>						
Cycle-Rail integration	Ebikes allow for much greater cyclable distance and this impacts on the potential catchment areas of both bus and rail. A connected multi-modal transport system, particularly for bike-rail-bike, should form a core part of the National Transport Strategy for Waterford considering its success in other jurisdictions - sheltered bike parking at train stations, secure and visible bike parking through Waterford City and towns, and including integrated ticketing between rail and bike share schemes.	NTA-C8-60	Rail	Interchange	WMATS sets the framework for a connected multi-modal transport system, and integration of cycling with public transport stations and stops is a key element of the Strategy. Integrated ticketing for public transport and active travel is under separate consideration by the NTA.	No change.
Multi-modal rail interchange	Integration of rail with other transport modes is necessary in order for rail to become a more viable and attractive alternative to road transport. The MATS should maximise opportunities for transfer between rail and regional and local bus services. It must also prioritise appropriate transport user infrastructure when considering service end users such as safety, proximity to bus terminals, taxi ranks, pedestrian pathways etc to enhance passenger experience for rail travel.	NTA-C8-40	Rail	Interchange	Multi-modal integration is a key element of the Strategy, and is supported by a range of Measures and proposals including cycle parking at the rail station, and bus routes serving the rail station.	No change.
<i>Topic: Passenger rail</i>						

Commuter rail assessment	As AISRR doesn't address commuter rail, WMATS should have examined this in detail, in particular by means of appropriate rolling stock.	NTA-C8-23, NTA-C8-28, NTA-C8-39, NTA-C8-49, NTA-C8-53, NTA-C8-55, NTA-C8-52, NTA-C8-41	Rail	Passenger rail	<p>The potential for commuter rail was assessed in the modelling carried out in support of the Strategy. This modelling used the South East Regional Model (SERM), which considered transport demand from the wider South East region, i.e. beyond the boundary of the WMA.</p> <p>The rolling stock used in this assessment was designed to ensure that the Idealised Scenario provided sufficient capacity to accommodate all identified demand, and did not influence any Cost-Benefit Analysis for rail in the WMA or the South East more generally.</p> <p>The demand analysis identified that a bus-based public transport network would be sufficient to cater for all future demand within the WMA and from the wider South East area.</p>	No change.
Commuter rail	<p>To completely disregard the provision of a local, metropolitan rail service, as the plan does, is a complete dereliction of duty. Any rationale for this that quotes low estimates of use of any potential service fails to understand the concept of induced demand and the countless examples of rail projects that perform well above expectations upon delivery.</p> <p>Carrick-on-Suir lies approximately 25km west of Waterford City and, although it may be outside the scope of this study, it offers a potential location for a metro rail service to extend to. We know there is significant influx of people from Carrick to Waterford for school, work and college, why not offer a regular and frequent service between the two locations?</p> <p>I would implore the decision makers behind this strategy to take climate change seriously, to take their positions seriously and to set the bar for Waterford higher by inserting a proposal to create a metro rail service.</p>	NTA-C8-25	Rail	Passenger rail	<p>The potential for commuter rail was assessed in the modelling carried out in support of the Strategy. This modelling used the South East Regional Model (SERM), which considered transport demand from the wider South East region, i.e. beyond the boundary of the WMA.</p> <p>The demand analysis identified that a bus-based public transport network would be sufficient to cater for all future demand within the WMA and from the wider South East area.</p>	No change.

Waterford to Rosslare and Limerick	The Rosslare Waterford rail line was closed a decade or so ago. It's reopening has been called for in various regional policies and strategies. This upgraded rail line should have a direct connection to Wexford Town. With appropriate time table and journey times it will continue to Limerick City, servicing the many towns along the corridor. This strategic rail asset is vital to Waterford and the southern region into the future.	NTA-C8-41	Rail	Passenger rail	<p>The demand for travel between south Wexford and Waterford, and between Limerick and Waterford, was assessed in the modelling carried out in support of the Strategy. This modelling used the South East Regional Model (SERM), which considered transport demand from the wider South East region, i.e. beyond the boundary of the WMA.</p> <p>The demand analysis identified that a bus-based public transport network would be sufficient to cater for all future demand within the WMA and from the wider South East area.</p> <p>Travel demand between Wexford and Limerick is within the remit of the All Island Strategic Rail Review.</p>	No change.
Passenger rail	The ambition outlined for future rail in the draft WMATS document is limited. Proper and efficient rail timetables can link Waterford to the main town in the SE by train and offer alternative sustainable transport that is responsive to the demands of passengers.	NTA-C8-8	Rail	Passenger rail	<p>The potential for commuter rail was assessed in the modelling carried out in support of the Strategy. This modelling used the South East Regional Model (SERM), which considered transport demand from the wider South East region, i.e. beyond the boundary of the WMA.</p> <p>The demand analysis identified that a bus-based public transport network would be sufficient to cater for all future demand within the WMA and from the wider South East area.</p>	No change.
Improved rail connections	Request for improved rail connections from Wellingtonbridge to Thurles, Rosslare and Waterford.	NTA-C8-56	Rail	Passenger rail	<p>The potential for commuter rail was assessed in the modelling carried out in support of the Strategy. This modelling used the South East Regional Model (SERM), which considered transport demand from the wider South East region, i.e. beyond the boundary of the WMA.</p> <p>The demand analysis identified that a bus-based public transport network would be sufficient to cater for all future demand within the WMA and from the wider South East area.</p>	No change.

Commuter Rail	The NTA and Irish Rail must commission a full feasibility study of commuter rail services using appropriate rolling stock on the Kilkenny -Waterford, Clonmel- Waterford, and Wexford- Rosslare- Waterford rail corridors and use the study for an integrated rail network.	NTA-C8-41	Rail	Passenger rail	<p>The potential for commuter rail was assessed in the modelling carried out in support of the Strategy. This modelling used the South East Regional Model (SERM), which considered transport demand from the wider South East region, i.e. beyond the boundary of the WMA.</p> <p>The rolling stock used in this assessment was designed to ensure that the Idealised Scenario provided sufficient capacity to accommodate all identified demand, and did not influence any Cost-Benefit Analysis for rail in the WMA or the South East more generally.</p> <p>The demand analysis identified that a bus-based public transport network would be sufficient to cater for all future demand within the WMA and from the wider South East area.</p>	No change.
Passenger rail	Rail connectivity with adequate timetables can be a concrete action towards reducing private car short trips. The service available in/out of Waterford does not meet the requirements of commuter travel to the city and as a result rail commuting is less attractive. The existing rail network around Waterford to the north, east and west can be part of this solution with schedules and reliability that actually meet the demands of the working public. This type of regional rail service between towns in the southeast towards the main city reinforces compact growth and connectivity on existing transport corridors rather than endlessly building motorways that simply drive motor traffic into cities.	NTA-C8-8	Rail	Passenger rail	<p>The potential for commuter rail was assessed in the modelling carried out in support of the Strategy. This modelling used the South East Regional Model (SERM), which considered transport demand from the wider South East region, i.e. beyond the boundary of the WMA.</p> <p>The demand analysis identified that a bus-based public transport network would be sufficient to cater for all future demand within the WMA and from the wider South East area.</p> <p>The Strategy does not propose or endorse endlessly building motorways.</p>	No change.

New Stations	The NTA in conjunction with Irish Rail should investigate the development of new rail stations at.. Fiddown, Newrath/ Park and Ride, and Belview/ Ferrybank development lands. Other stations will be considered where development patterns support such provision.	NTA-C8-41	Rail	Passenger rail	<p>The potential for commuter rail was assessed in the modelling carried out in support of the Strategy. This modelling used the South East Regional Model (SERM), which considered transport demand from the wider South East region, i.e. beyond the boundary of the WMA.</p> <p>The demand analysis identified that a bus-based public transport network would be sufficient to cater for all future demand within the WMA and from the wider South East area.</p>	No change.
Regional commuting	The role of heavy rail, particularly for commuters outside the WMA boundary, has not been adequately assessed.	NTA-C8-28	Rail	Passenger rail	<p>The potential for commuter rail was assessed in the modelling carried out in support of the Strategy. This modelling used the South East Regional Model (SERM), which considered transport demand from the wider South East region, i.e. beyond the boundary of the WMA.</p> <p>The demand analysis identified that a bus-based public transport network would be sufficient to cater for all future demand within the WMA and from the wider South East area.</p>	No change.
Commuter rail	Waterford is served by a number of rail lines which could be used to deliver a regional rail service in the South East, giving workers who currently drive between Clonmel, Carrick-on-Suir, Kilkenny and Waterford City on a regular basis an alternative to car use. I would like to see the potential for such a service properly investigated.	NTA-C8-48	Rail	Passenger rail	<p>The potential for commuter rail was assessed in the modelling carried out in support of the Strategy. This modelling used the South East Regional Model (SERM), which considered transport demand from the wider South East region, i.e. beyond the boundary of the WMA.</p> <p>The demand analysis identified that a bus-based public transport network would be sufficient to cater for all future demand within the WMA and from the wider South East area.</p>	No change.
Topic: Passenger rail						

Rail network Southern Region	Support for rail connection from Cork to Rosslare via Waterford, including provision for carriage of bikes on board.	NTA-C8-15	Rail	Passenger rail	<p>The demand for travel between south Wexford and Waterford, and between other parts of the Southern Region and Waterford, was assessed in the modelling carried out in support of the Strategy. This modelling used the South East Regional Model (SERM), which considered transport demand from the wider South East region, i.e. beyond the boundary of the WMA.</p> <p>The demand analysis identified that a bus-based public transport network would be sufficient to cater for all future demand within the WMA and from the wider South East area.</p> <p>Travel demand between Cork and Rosslare is within the remit of the All Island Strategic Rail Review.</p>	No change.
Commuter rail assessment	As AISRR doesn't address commuter rail, WMATS should have examined this in detail, in particular by means of appropriate rolling stock.	NTA-C8-23, NTA-C8-28, NTA-C8-39, NTA-C8-49, NTA-C8-53, NTA-C8-55, NTA-C8-52, NTA-C8-41	Rail	Passenger rail	<p>The potential for commuter rail was assessed in the modelling carried out in support of the Strategy. This modelling used the South East Regional Model (SERM), which considered transport demand from the wider South East region, i.e. beyond the boundary of the WMA.</p> <p>The rolling stock used in this assessment was designed to ensure that the Idealised Scenario provided sufficient capacity to accommodate all identified demand, and did not influence any Cost-Benefit Analysis for rail in the WMA or the South East more generally.</p> <p>The demand analysis identified that a bus-based public transport network would be sufficient to cater for all future demand within the WMA and from the wider South East area.</p>	No change.

WMATS premature before AISRR is complete	rail transportation for passengers to the South-East needs further consideration as part of the wider rail transport strategy. Implementation of WMATS in the absence of the completion of a wider strategic review of rail services to the region is premature.	NTA-C8-34	Rail	Passenger rail	<p>The potential for commuter rail was assessed in the modelling carried out in support of the Strategy. This modelling used the South East Regional Model (SERM), which considered transport demand from the wider South East region, i.e. beyond the boundary of the WMA.</p> <p>The demand analysis identified that a bus-based public transport network would be sufficient to cater for all future demand within the WMA and from the wider South East area.</p> <p>The All Island Strategic Rail Review is considering rail at the regional level, and WMATS will support its conclusions and recommendations as they relate to the WMA.</p>	No change.
High Speed rail	High speed rail or even hyper loop network should be invested in for Waterford and Cork connection service to Dublin.	NTA-C8-13	Rail	Passenger rail	These matters would be within the remit of the All Island Strategic Rail Review rather than a sub-regional transport strategy. WMATS will support the outcomes of the AISRR.	No change.
Commuter services	Improve services to serve commuters across the Southern Region- timetables, fares and frequency.	NTA-C8-13	Rail	Passenger rail	Demand assessment identified that investment in a bus-based public transport system would address transport demand in the WMA and South East region. Demand in the full southern region is beyond the scope of WMATS.	No change.
Proposals for additional rail services	<p>WMAS should definitely reinstate both the Waterford-New Ross railway and the Waterford-Wexford railway as part of a Waterford Commuter Railway. Closed Stations on the Wexford, New Ross, Limerick and Dublin railways should be reopened as part of a commuter railway; these include Wellingtonbridge, Campile, Mullinavat and Fiddown.</p> <p>A commuter service should also not intervene with Intercity trains to Dublin and Limerick.</p>	NTA-C8-24	Rail	Passenger rail	<p>The potential for commuter rail was assessed in the modelling carried out in support of the Strategy. This modelling used the South East Regional Model (SERM), which considered transport demand from the wider South East region, i.e. beyond the boundary of the WMA.</p> <p>The demand analysis identified that a bus-based public transport network would be sufficient to cater for all future demand within the WMA and from the wider South East area.</p>	No change.

Commuter rail	Although I acknowledge the need to wait for the All Ireland Strategic Rail Review, I would like to see additional assessment of the potential for rail, looking at better connectivity from Waterford to the Wexford and Enniscorthy Line, including at stations serving Bridgetown, Campile, Wellington Bridge, Ramsgrange and looking at better Waterford to Limerick rail services, servicing Clonmel, Carrick-on-Suir and Cahir - recognising that these urban settlements are ideally poised for Transit-oriented Development.	NTA-C8-60	Rail	Passenger rail	<p>The potential for commuter rail was assessed in the modelling carried out in support of the Strategy. This modelling used the South East Regional Model (SERM), which considered transport demand from the wider South East region, i.e. beyond the boundary of the WMA.</p> <p>The demand analysis identified that a bus-based public transport network would be sufficient to cater for all future demand within the WMA and from the wider South East area.</p>	No change.
Commuter rail	There is no consideration of the potential of short-hop, commuter services to/from Mooncoin, Carrick, or Kilkenny, or Mullinavat and Ballyhale, for example, using smaller trains.	NTA-C8-33	Rail	Passenger rail	<p>The potential for commuter rail was assessed in the modelling carried out in support of the Strategy. This modelling used the South East Regional Model (SERM), which considered transport demand from the wider South East region, i.e. beyond the boundary of the WMA.</p> <p>The rolling stock used in this assessment was designed to ensure that the Idealised Scenario provided sufficient capacity to accommodate all identified demand, and did not influence any Cost-Benefit Analysis for rail in the WMA or the South East more generally.</p> <p>The demand analysis identified that a bus-based public transport network would be sufficient to cater for all future demand within the WMA and from the wider South East area.</p>	No change.

Limerick - Clonmel - Waterford - South Wexford	Support for reopening of Rosslare to Waterford line (as part of South Wexford to Limerick via Waterford and Clonmel line) for commuter service- see submission for detail.	NTA-C8-58	Rail	Passenger rail	<p>The potential for commuter rail was assessed in the modelling carried out in support of the Strategy. This modelling used the South East Regional Model (SERM), which considered transport demand from the wider South East region, i.e. beyond the boundary of the WMA.</p> <p>The demand analysis identified that a bus-based public transport network would be sufficient to cater for all future demand within the WMA and from the wider South East area.</p>	No change.
Commuter rail	A modest Limerick-Waterford-Wexford service (initially two hourly) supplemented by early morning short-haul commuter services from places such as Clonmel, Carrick on Suir, Kilkenny, Campile or Wellington Bridge would deliver significant transformation and provide a basis on which to build usage. Consideration should also be given to re-opening Kilsheelin and Fiddown stations.	NTA-C8-37	Rail	Passenger rail	<p>The potential for commuter rail was assessed in the modelling carried out in support of the Strategy. This modelling used the South East Regional Model (SERM), which considered transport demand from the wider South East region, i.e. beyond the boundary of the WMA.</p> <p>The demand analysis identified that a bus-based public transport network would be sufficient to cater for all future demand within the WMA and from the wider South East area.</p> <p>Inter-city rail is being considered in the All Island Strategic Rail Review.</p>	No change.
Links to Rosslare, Carlow & Kilkenny	Reinstatement of the Waterford to Rosslare service in parallel with the ongoing development of the Greenway is required as soon as possible. A faster more frequent rail service on the Dublin line, specifically to Carlow and Kilkenny, is also essential for the future development of SETU, the City and the wider South East region.	NTA-C8-36	Rail	Passenger rail	<p>The potential for commuter rail was assessed in the modelling carried out in support of the Strategy. This modelling used the South East Regional Model (SERM), which considered transport demand from the wider South East region, i.e. beyond the boundary of the WMA.</p> <p>The demand analysis identified that a bus-based public transport network would be sufficient to cater for all future demand within the WMA and from the wider South East area.</p> <p>Inter-city rail is being considered in the All Island Strategic Rail Review.</p>	No change.

Proposals for commuter rail services	Re-opening the Waterford-Rosslare line to passengers, including, adding a new station at Belview - Waterford port Open new (and disused) stations on the Clonmel to Waterford route (e.g.: Mooncoin, Fiddown) to service the regions on the line in a frequent commuter service Addition of a commuter station at Newrath, to tie-in with the (only) planned Park & Ride, planned for Newrath	NTA-C8-33	Rail	Passenger rail	The potential for commuter rail was assessed in the modelling carried out in support of the Strategy. This modelling used the South East Regional Model (SERM), which considered transport demand from the wider South East region, i.e. beyond the boundary of the WMA. The demand analysis identified that a bus-based public transport network would be sufficient to cater for all future demand within the WMA and from the wider South East area.	No change.
<i>Topic: Port access by rail</i>						
Regional Rail Freight	How does WMATS support the rail dimension of the regional freight strategy (as proposed in the RSES and Climate Action Plan), in what way? Actively supporting the reopening of the Rosslare-Waterford railway or lobbying for Waterford/Rosslare to be included as Tier 1 ports in the TEN T planning or recommending improved capacity on the Waterford Limerick railway to connect to west of Ireland would epitomise actual support, otherwise draft WMATS is ambiguous on rail freight policy in WMA.	NTA-C8-8	Rail	Port access by rail	WMATS recommends reserving the Waterford-Rosslare rail line, pending the completion of the AISRR. The recommendations of the AISRR as they relate to freight, the Waterford-Rosslare line and the Waterford-Limerick line will be incorporated into WMATS on its completion. Port status is not a matter for a metropolitan area transport strategy.	
Port access by rail - Belview and Rosslare	An enhanced and reopened railway to Belview to extend the rail freight capacity and to the Europort to reinstate the vital rail link should be an objective of WMATS.	NTA-C8-8	Rail	Port access by rail	This is being assessed in the AISRR, the recommendations of which will be incorporated into WMATS on its completion.	No change.
<i>Topic: Rail - Other</i>						
Tipperary stations	Reference is further made to Clonmel and Limerick Junction in Tipperary, however, the rail stations at Carrick on Suir, Cahir and Tipperary town are not referenced. It is respectfully suggested that the Waterford-Limerick Revitalisation Network and its settlements be referenced under Section 09 Rail.	NTA-C8-31	Rail	Rail - Other	Suggestion noted.	References to Tipperary towns added to Rail section, noting that they are outside the boundary of the WMA.

Proposed amendments	<p>As mentioned, a fundamental redraft of the rail section is necessary.</p> <p>Paragraph 2: after Limerick, Galway and Waterford rail corridors. ADD: There is a rail line from Waterford to Rosslare which had services suspended in 2010.</p> <p>A paragraph should be added in the introduction noting the specific provisions for rail mentioned in the RSES.</p> <p>Intercity Service</p> <p>Add language from the RSES and Waterford Development Plan regarding rail here, specifically sections regarding the Rosslare line.</p> <p>ADD: COMMUTER SERVICE SECTION</p> <p>As noted elsewhere.</p> <p>Plunkett Station</p> <p>The mention of some city bus services servicing the station is misleading. Most city bus services do not, therefore opportunities for interchange are severely limited. Please revise the text here.</p>	NTA-C8-52	Rail	Rail - Other	<p>Recommendations noted.</p> <p>The Strategy supports the relocation of the train station to the North Quays SDZ, which will provide opportunities for interchange with city bus services via the new Sustainable Transport Bridge.</p> <p>The Strategy and its supporting documents, in particular the Modelling Report, provides sufficient text on commuter rail- no change to this section.</p>	<p>Following revisions made:</p> <p>Paragraph 2: after Limerick, Galway and Waterford rail corridors, added text on Waterford to Rosslare which had services suspended in 2010.</p> <p>Text added in the introduction noting the specific provisions for rail mentioned in the RSES.</p> <p>Intercity Service:</p> <p>References to RSES and Waterford Development Plan regarding rail added, specifically sections regarding the Rosslare line.</p>
Topic: Rail Measures						

Proposed additional rail measures	<p>WATERFORD COMMUTER RAIL NETWORK The NTA and Irish Rail will commission a full feasibility study of commuter rail services using appropriate rolling stock on the Kilkenny-Waterford, Clonmel-Waterford, and Wexford/Rosslare-Waterford rail corridors and use this study to develop a Phase 1 & Phase 2 Rail Network Strategy.</p> <p>WATERFORD RAIL INFRASTRUCTURE Examine the feasibility of increasing capacity on the rail network in the Waterford Metro Area including additional tracks where necessary to facilitate improved national and regional connectivity and improve service frequency in line with increased demand.</p> <p>RAIL BASED PARK AND RIDE Investigate the potential for Park & Ride Facilities where the road network meets rail services, particularly an integrated Park and Ride with the proposed Bus Park and Ride at Newrath.</p> <p>NEW RAIL STATIONS The NTA, in conjunction with Irish Rail, will investigate the development of new rail stations at Fiddown, Newrath Park & Ride, and Belview/Ferrybank Development Lands. Other stations will be considered where development patterns support such provision.</p>	NTA-C8-23, NTA-C8-28, NTA-C8-39, NTA-C8-49, NTA-C8-53, NTA-C8-54, NTA-C8-55, NTA-C8-52	Rail	Rail Measures	<p>The potential for commuter rail was assessed in the modelling carried out in support of the Strategy. This modelling used the South East Regional Model (SERM), which considered transport demand from the wider South East region, i.e. beyond the boundary of the WMA.</p> <p>The demand analysis identified that a bus-based public transport network would be sufficient to cater for all future demand within the WMA and from the wider South East area.</p>	No change.
Topic: Rail modelling						

Flawed modelling assumptions	<p>Decisions made within the Transport Options and Network Development Report ensure that Commuter Rail would never be considered a viable option, prejudicing the later modelling against the mode and ensuring that road-based transport is prioritised- modeling has been artificially constrained to prevent this option from being adequately explored.</p> <ul style="list-style-type: none"> - Use of smaller trains in model runs would give higher occupancy rates. - Insufficient examination of TOD at all stations. - Insufficient account taken of cumulative benefits of commuter rail improvements for freight and inter-city services. - Did not assess route to Wexford. - Did not account for impacts on private car usage of road newtork improvements for bus. 	NTA-C8-16	Rail	Rail modelling	<p>Higher occupancy rates of smaller trains would not change the overall level of demand for public transport, which arose from an Idealised Public Transport demand assesment. The demand is best served by a bus-based public transport system.</p> <p>Compact Growth is a critical National Strategic Outcome as set out in the National Planning Framework. TOD in settlements on the periphery of or outside the WMA would run counter to this national policy.</p> <p>Wexford is included in the South East Regional Model, which was used in the preparation of the Strategy.</p> <p>Mode shift from car arising from road space reallocation to sustainable transport is embedded in the modelling methodology used in the Strategy preparation.</p>	No change.
Extent of assessment	The NTA's Sector System used for origin-destination analysis does not include Rosslare Eurport or Strand as a key trip generator. The key trip generator in the south of County Wexford is in fact Wexford Town (population 20,118 in 2016) and not the villages of Rosslare. Any rail service utilising the Wexford/Rosslare to Waterford line needs to have Wexford as the origin/destination, not Rosslare Europort, preferably with the direct Felthouse Junction curve restored, bypassing Rosslare Strand.	NTA-C8-52	Rail	Rail modelling	Wexford is included in the South East Regional Model, which was used in the preparation of the Strategy.	No change.
Carriage type	Query re carriage type used in rail modelling and impacts on capacity assessment	NTA-C8-58	Rail	Rail modelling	The rolling stock used in this assessment was designed to ensure that the Idealised Scenario provided sufficient capacity to accommodate all identified demand, and did not influence any Cost-Benefit Analysis for rail in the WMA or the South East more generally.	No change.

Commuter rail modelling	Any Transport Strategy must include commuter rail. WMAS does not deliver on this very well. The rolling stock used in the analysis are too big for a commuter service, with trains with a capacity greater than the DART or Cork Commuter Services. WMAS should instead use a smaller, more appropriate sized train in their analysis.	NTA-C8-24, NTA-C8-52	Rail	Rail modelling	The rolling stock used in this assessment was designed to ensure that the Idealised Scenario provided sufficient capacity to accommodate all identified demand, and did not influence any Cost-Benefit Analysis for rail in the WMA or the South East more generally.	No change.
Further modelling required	The Transport Modelling Assessment Report does not seem to take into account the changing landscape in Travel Patterns following the COVID-19 particularly in the area of remote working, the impact of recent reduction in public transport fares on passenger rail numbers, nor does it factor in the aforementioned objective of Transit-oriented Development in urban settlements along our rail lines.	NTA-C8-60	Rail	Rail modelling	The NTA's modelling suite, including the South East Regional Model (SERM) that was the basis of the assessment in WMATS, has been calibrated to take account of the impacts of COVID. Compact Growth is a critical National Strategic Outcome as set out in the National Planning Framework. TOD in settlements on the periphery of or outside the WMA would run counter to this national policy.	No change.
<i>Topic: Rail network map</i>						
Rail map amendments	Ensure that the rail line to Rosslare & Wexford is shown as continuing on each map and not stopping at Belview. The rail track is still there and maintained be Iarnód Éireann.	NTA-C8-23, NTA-C8-28, NTA-C8-39, NTA-C8-49, NTA-C8-53, NTA-C8-54, NTA-C8-55	Rail	Rail network map	Suggestion noted.	Study Area map amended to include closed rail line to Rosslare
Map revisions	All maps should include the extant rail line to Rosslare shown within the map area. Maps showing future networks should show the relocation of Plunkett Railway Station to the Integrated Transport Hub.	NTA-C8-52	Rail	Rail network map	Suggestions noted. Station relocation is supported by WMATS, but has not yet occurred.	Study Area map amended to include closed rail line to Rosslare
Rail network map	The draft WMATS map, p23, “study area and existing transport network” is inaccurate in that the Rosslare railway line is shown as ending at Belview port when in fact this railway extends eastwards all the way to Rosslare and is an existing part of national rail corridors and used by a train as recently as 2021.	NTA-C8-8	Rail	Rail network map	Suggestion noted.	Study Area map amended to include closed rail line to Rosslare
<i>Topic: Rail Policy</i>						

Reference to NSMP and MASP	Rail section doesn't include references to the National Sustainable Mobility Policy (e.g. that the Policy will support Safe and Green Mobility by Improving rail infrastructure in the five cities (p.5), and Goal 3 (p.35) aims to expand the capacity and availability of sustainable mobility in our five cities. This will be done through improved walking, cycling, bus and rail infrastructure) and the Waterford MASP Policy Objective 7 (Regional Connectivity).	NTA-C8-23, NTA-C8-28, NTA-C8-39, NTA-C8-49, NTA-C8-53, NTA-C8-54, NTA-C8-55, NTA-C8-52, NTA-C8-41	Rail	Rail Policy	Noted.	Rail section amended to include proposed references to NSMP and MASP PO 7
<i>Topic: Station relocation</i>						
Design of relocated station	Relocated rail station should accommodate inter-city, commuter and freight trains, and the design of the station building should provide for seamless transition between modes, or between train and external environment- no stairs or lifts.	NTA-C8-24	Rail	Station relocation	The design of the station building and environs, and the services it is proposed to serve, are a matter for the SDZ Planning Scheme following confirmation of the station relocation.	No change.
<i>Topic: Station relocation</i>						
Support	The measure in the draft MATS for Plunkett Station to be relocated to within the North Quays SDZ to better connect the station to Waterford City Centre, via the new sustainable transport bridge is essential. The relocation of the train station into the centre of the site, will support the creation of a modern transportation hub and interchange within the North Quays.	NTA-C8-40	Rail	Station relocation	Support noted. The Strategy supports the station relocation.	No change.
Support	The relocation of the Plunkett Station to the North Quays will improve connectivity and access with the City Centre.	NTA-C8-60	Rail	Station relocation	Support noted. The Strategy supports the station relocation.	No change.
Category: Light Rail						
<i>Topic: Light rail proposal</i>						
Sustainable Transport Bridge and Suir Valley Railway	Provide light tram connection from North Quays SDZ transport hub to the city centre, and potentially link it to the Suir Valley Railway providing connection from settlements along the Suir to the city centre and SDZ lands.	NTA-C8-34	Light Rail	Light rail proposal	Light rail was considered in the Strategy development, but was not warranted by demand. The shuttle bus on the sustainable transport bridge will connect the SDZ lands to the city centre and will interchange with the proposed bus network.	No change.
Light rail serving airport and station	Electric tram system should be implemented for cities outside Dublin with connection to train station and airports in region.	NTA-C8-13	Light Rail	Light rail proposal	Light rail was considered in the Strategy development, but was not warranted by demand. The Airport will be served by the bus network, and frequency may be increased in line with increased airport activity (passenger and staff).	No change.
Category: Public Transport - General						
<i>Topic: Fares</i>						

Fare review	Encouraging the use of multiple transport options in one journey through a potential 'Multi-Modal Fare Structure' will be important, so too will a subscription-based service. Both fare structures target different segments of the market, one for regular users and one for ad-hoc, both would encourage more people to use public transport. It would provide an opportunity to create simplicity and consistency across the network regardless of the route or mode taken. Such systems operate effectively throughout most EU countries already. Any fare structure review should be done in full consultation with operators. Finally, enhanced use of mobile technologies for fare payment would provide further incentives to public transport an attractive choice for users.	NTA-C8-40	Public Transport - General	Fares	Recommendation noted. This will be addressed in detail in the fares review supported by Measure SM25.	No change.
<i>Topic: Hours of Operation</i>						
Late Night services	The transport network should support late night transport, servicing the public as they commute for work or leisure throughout the day and night. The experience and night-time economy would benefit from public transport options for early starts and late finishes seven days a week. A transport network that reflects the shift patterns of industry, improves accessibility across the region and can improve the vibrancy of the city centre. Service schedules should reflect the economic activity of the area and should be designed accordingly. The WMA transport network must be viewed as safe and secure at all times of the day. The extension of operating hours on public transport services particularly during night-time hours must incorporate adequate security provisions. The security and safety concerns of passengers must be taken into account.	NTA-C8-40	Public Transport - General	Hours of Operation	Measure BUS13 addresses this proposal. Frequency will be increased to meet demand where appropriate, including all day (and night) demand.	No change.
<i>Topic: Regional connectivity</i>						

Links to SETU Carlow & Kilkenny	It is critical for SETU, as a multi-campus university, that there are enhanced public transport options available not only within Waterford city but also with regional centres, especially Carlow and Wexford where there are already SETU campuses. Enhanced public transport options will offer university management and staff as well as students sustainable options to travel between campuses as well as support regional integration and region-based planning and thinking.	NTA-C8-36	Public Transport - General	Regional connectivity	While the Strategy takes account of transport demand at the regional level, its purpose is to set out a framework for transport investment within the WMA. Enhanced public transport serving Carlow and Wexford is a matter for the wider region beyond the WMA.	No change.
Category: Sustainable Transport - General						
<i>Topic: Road User Hierarchy</i>						
Allocation of road space	We need to define our road users differently; public transport, private transport (including commercial), personal transport, and pedestrian. Four groups of users looking for space rather than two or three. Public transport speaks for itself, bus lanes, including PSVs. Private transport obviously is the biggest category, requiring access to all corners of the city Personal transport might be a different way to look at some users; cyclists have always been there, but now we have e-bikes which brings a demographic into the arena that may have previously been absent. These bikes require less effort and are a little faster, which makes them more useful and encourages more people to cycle to work etc.. E-scooters (stand-up and sit-down) are becoming more and more popular and may prove to be the cheap and chosen method of transport for the younger generation for quite a number of years. They're quite fast and some users can be a little ignorant of safe use on the roads. A suggested response would be to create a safer space for their effective use, rather than a knee jerk limitation of their use. I've seen other transport being used around the city which could also fall into this category, e.g. single or double wheeled segways. Lastly we have pedestrians, of course. However, in that space we can now add the ever increasing use of mobility scooters which help people with mobility restrictions to get out an about in the city. Private cars (and car tax) will always be the main users of our roads, and we certainly have limited space in this proud	NTA-C8-61	Sustainable Transport - General	Road User Hierarchy	Recommendation noted.	New Measure SM6 related to Road User Hierarchy included.

	old city of Waterford. I do believe we need to future proof our city, and I'm sure it would be very difficult to retrofit our roads once the die is cast. Hopefully the expansion of personal transport as a viable cohort of users on the roads would meet with favourable consideration for future use of the roads in Waterford City					
<i>Topic: Sustainable Transport Bridge</i>						
Support	Support for new Sustainable Transport Bridge	NTA-C8-2	Sustainable Transport - General	Sustainable Transport Bridge	Support noted.	No change.
<i>Topic: Sustainable Transport Bridge</i>						
Support	In order to enhance Waterford's function as a regional city and permit continued growth, an additional river crossing is required. The new River Suir Transport Bridge will provide a new sustainable transport link between the North Quays and South Quays, promoting the further development of Waterford City and facilitating the development of the North Quays Strategic Development Zone lands.	NTA-C8-40	Sustainable Transport - General	Sustainable Transport Bridge	Support noted.	No change.
Support	Support for Sustainable Transport Bridge, in particular as it would improve interchange between bus and rail, which is difficult at existing Plunkett Station location	NTA-C8-58	Sustainable Transport - General	Sustainable Transport Bridge	Support noted.	No change.
Category: Roads						
<i>Topic: Car Mode Share</i>						

More ambitious reduction required	Of particular concern is the modelled output for private car modal share by 2040, with 56% general modal share in 2040 and a 50% modal share at AM peak mode share. Given that the modelling outputs are in the context of population growth, the reduction in private car modal share needs to be far more ambitious.	NTA-C8-60	Roads	Car Mode Share	Modelled outputs are not targets and Climate Modelling work in Chapter 14 sets out that further work, including a Demand Management study, is required to complement the Strategy. It is intended that the Strategy in combination with the other measures carried out at the regional and national level will further reduce car mode share and will achieve the stated emissions reduction targets set by national policy.	No change.
<i>Topic: Downstream Crossing</i>						
Tower Bridge landing south bank	Proposal for layout of Tower Bridge on south bank of River Suir to enhance setting of Reginald's Tower	NTA-C8-4	Roads	Downstream Crossing	Tower Bridge not proposed in Strategy.	No change.
Suir tunnel and road loop	Proposal for tunnel under River Suir instead of new bridge(s)	NTA-C8-5	Roads	Downstream Crossing	Options for additional cross-river connectivity, including the potential for a tunnel, will be considered in the context of the project development in the 2030s.	No change.
Supporting visual material	Supporting visual material	NTA-C8-6	Roads	Downstream Crossing	Noted.	No change.
Support	A further river crossing mentioned in the draft strategy, downstream of the site of the proposed sustainable bridge to complete the orbital road network, would link development areas to the north of the Suir to those on the south. It is considered that the proposed crossing would play an important role in the future economic growth with improved journey times and the reduction in congestion.	NTA-C8-40	Roads	Downstream Crossing	Support noted.	No change.
<i>Topic: Local junction issue</i>						
Traffic lights for Dominick Place-Gracedieu Road junction	Request for traffic lights at junction of Dominick Place and Gracedieu Road, on the basis of pedestrian safety and local vehicular safety and access issues.	NTA-C8-21	Roads	Local junction issue	This is a local traffic management issue, which would be most appropriately addressed at the local level.	No change.

Port Access	It is noted that the ‘Proposed Road Network 2040’ diagram includes measures within the Port area on the N29, specifically a roundabout junction. It is the port’s position that no specific proposals for the N29 should be included without due regards to the Port’s Masterplan and suitable evidence-based studies to ensure that the local improvements proposed are in accordance with the Port’s medium and long-term aspirations. Proposed access arrangements must also align with the review of the Ferrybank-Belview Local Area Plan 2017 and future zoning arrangements contained therein. We understand that the review of this plan is due to commence in the next 6 months.	NTA-C8-45	Roads	Local junction issue	While the Ferrybank-Belview LAP review is a matter for the local authority, the NTA will contribute to the process. Roads proposals that affect Belview Port will take account of the relevant plans including the Port Masterplan. Measure ROAD2 addresses strategic traffic, including Port traffic.	No change.
<i>Topic: New Roads</i>						
Defer new road schemes	The construction and planning of new roads in the current climate crisis should be discouraged and any analysis delayed until significant improvements have been made to public, sustainable, and active travel in the Waterford area. Perhaps the proposed benefits could be achieved through an re analysis of tolling on the Thomas Francis Meagher Bridge.	NTA-C8-52	Roads	New Roads	The Strategy preparation has been informed by NIFTI, which includes Modal and Intervention Hierarchies that align with this recommendation. Measure ROAD1 sets out the Principles of Road Development and addresses this proposal. Additional Demand Management has been allowed for in the Strategy (ref. Climate Action chapter), which will determine the precise nature of these Measures.	No change.
Opposed to all new road schemes	Request a commitment in the revised WMATS to commit to build no new roads for motorised traffic before a sizeable proportion (60%) of all the WMATS plans have been implemented and objectively measured and assessed.	NTA-C8-33	Roads	New Roads	The Strategy preparation has been informed by NIFTI, which includes a Modal Hierarchy that aligns with this recommendation. However, where new roads can contribute to sustainable transport objectives, they will be considered.	No change.
Ferrybank Relief Road	Support for proposed Ferrybank Relief Road which would serve the Limetree Global lands	NTA-C8-35	Roads	New Roads	Support noted.	No change.
<i>Topic: Public realm/Amenity space</i>						
Park proposal	Public open space proposal on site of southern landing of Downstream Crossing (should Downstream Crossing not proceed)	NTA-C8-9	Roads	Public realm/Amenity space	Proposal noted. The Strategy does not preclude such proposals, but this level of assessment is more appropriately dealt with through a future Local Transport Plan.	No change.
<i>Topic: Road pricing</i>						

Road pricing	Road pricing such as charges by weight on HGVs is an issue that is not mentioned in the WMATS, though is an important EU future policy, when most people will own low emission vehicles, impacting taxes on motoring which will be in decline.	NTA-C8-8	Roads	Road pricing	Road pricing is not within the remit of the NTA. However, it would be considered under future Demand Management assessment. Impacts on goods movement will be considered in line with proposed Freight strategy.	No change.
<i>Topic: Road proposal</i>						
Spring Garden Alley access	Proposal for new street connecting Spring Garden Alley to Parnell Street (on site of current Apple Market car park), to facilitate full pedestrianisation of the Apple Market and improve access to Spring Garden Alley for residents.	NTA-C8-57	Roads	Road proposal	This is a local traffic management issue, which would be most appropriately addressed at the local level.	No change.
Knockhouse Road extension	Opposed to connecting Knockhouse Road to the R710 roundabout - not in accordance with provisions of late-1990s AAP.	NTA-C8-17	Roads	Road proposal	Opposition noted. Connection has been reviewed in light of the finalised WCCC CDP.	Proposed link removed from road network - Map and Text.
New crossing and P&R	P&R site at Passage Cross (proposed in this submission) should align with the proposed Downstream crossing linking to the R710.	NTA-C8-51	Roads	Road proposal	The Strategy includes proposals for local Park & Ride / Park & Stride, which will be developed following adoption of the Strategy. The identification of suitable locations will be undertaken as part of the scoping and planning process.	No change.
<i>Topic: Speed limits</i>						
30 km/h urban speed limit	WMATS does not address any target for reducing traffic speeds in the city. We want to see an implementation timeframe for reducing speed limits to 30 km/hour inside the outer ring road.	NTA-C8-33	Roads	Speed limits	Recommendation noted.	New Measure ROAD7 re Speed Limits now included
<i>Topic: Strategic Road Network</i>						
N24 text	The text on the N24 on p.61 of the draft WMATS is acknowledged and supported by Tipperary County Council as it relates to the N24 project. However, Tipperary would like to clarify that the current N24 Waterford to Cahir Project “takes precedence from” – n24waterford2cahir.ie - July 2022 the above 4 named previous studies but critically the section being now considered is the entire length from the M8 – (Junction 8) to the Southern Terminal of M9, and so Tipperary would request the wording be altered to reflect this.	NTA-C8-31	Roads	Strategic Road Network	Proposed text revision noted.	Text revised in line with proposal.

Port Access	<p>The Port’s future development and expansion proposals over the period to 2040 will rely to a large extent upon road-based transport. It is, therefore, of paramount importance that the N29, and thereafter N25, must continue to satisfactorily function as part of the strategic route network from a capacity and safety point of view.</p> <p>The capacity studies undertaken with respect to the future functioning and operation of this road as part of the strategic route network model clearly determine that the do-nothing option, without the upgrading required, will result in the N25, and hence N29, failing to adequately and appropriately accommodate the future traffic generation of the area, including that contained within the Port’s masterplan for the future.</p> <p>On this basis, the need to upgrade the Strategic Route network must clearly be identified in the Measures as set out above and the findings of the N25 Waterford to Glenmore – Cost Benefit Analysis Report and supporting traffic modelling statements, and associated impact on the N29 junction, must form an integral part of the strategy to enable the future functioning of the strategic route network.</p>	NTA-C8-45	Roads	Strategic Road Network	The Strategy supports the upgrade of the N25, which is included in the NDP, and Measure ROAD2 addresses strategic traffic, including Port traffic.	No change.
Proposed text revision	<p>Tipperary would also wish to highlight that page 22 of the Draft WMATS currently states “The WMA is served by an existing well-developed road network – including N24 – Waterford Limerick”. Tipperary respectfully requests the words “well-developed” be changed as this Road Network clearly needs improvement as highlighted by RSES, Tipperary’s County Development Plan and the Draft WMATS on page 61.</p>	NTA-C8-31	Roads	Strategic Road Network	Proposed text revision noted.	Revise text in line with proposal.

N24 and N25 support	The N25 is an important national road and is identified as part of the TEN-T Comprehensive Network. It is also identified as a strategic corridor in the Southern RSES and is an important inter-urban transport corridor between Waterford and Cork and gives access to regional and international markets. Equally the N24 strategic corridor is an important link to and from the city. The N25 (Waterford to Glenmore) and the N24 (Waterford to Cahir to Limerick Junction) projects will strengthen links and develop economic synergies across the Southern Region, supporting the role of the three Cities a strong counterbalance to the Greater Dublin Area.	NTA-C8-40	Roads	Strategic Road Network	The Strategy supports the upgrade of the N24 and N25, which are included in the NDP, and Measure ROAD2 addresses strategic traffic, including Port traffic.	No change.
<i>Topic: Street design</i>						
Ramp removal	Ramps: get rid of them all and add road pinch-points that are narrow and direct focused, careful driving. Ramps tend to irritate drivers, who often speed-up between them. They are a nuisance for cyclists.	NTA-C8-33	Roads	Street design	The Strategy does not preclude such measures, but the detail is more appropriately addressed at the local level.	No change.
<i>Topic: Toll removal</i>						
Toll removal	Request for an objective cost-benefit analysis of the tolling on TFM (N25) bridge.	NTA-C8-33	Roads	Toll removal	The Strategy does not preclude such matters and acknowledges that further Demand Management measures will be required to achieve Climate Action targets. As part of this future work, measures such as Tolling will be considered.	No change.
N25 toll	Support for removal of toll on N25	NTA-C8-2	Roads	Toll removal	The Strategy does not preclude such matters and acknowledges that further Demand Management measures will be required to achieve Climate Action targets. As part of this future work, measures such as Tolling will be considered.	No change.
Bypass tolls	Ring roads bypassing city centres should not be tolled	NTA-C8-10	Roads	Toll removal	The Strategy does not preclude such matters and acknowledges that further Demand Management measures will be required to achieve Climate Action targets. As part of this future work, measures such as Tolling will be considered.	No change.
<i>Topic: Tolls</i>						

Rice Bridge toll	Request for cost-benefit analysis of tolling on Rice bridge for personal motorised vehicles (PMVs), with multiple and single occupancy.	NTA-C8-33	Roads	Tolls	The Strategy does not preclude such matters and acknowledges that further Demand Management measures will be required to achieve Climate Action targets. As part of this future work, measures such as Tolling will be considered.	No change.
Category: Parking						
<i>Topic: Enforcement</i>						
Parking on footpaths and cycle tracks	No tolerance for on-pavement and on-cycle route parking implementation via on-the-spot fines that are a true deterrent.	NTA-C8-33	Parking	Enforcement	The NTA supports the enforcement of road traffic laws and notes their critical role in increasing the rate of walking and cycling in the WMA.	New Measure SM17 re Enforcement of Road Traffic Laws now added.
<i>Topic: On-street parking</i>						
Reduce quantum of on-street parking	Request for a plan to reduce on-street parking spaces in city to enable permeation by pedestrians and cyclist, to improve the living quality in the urban realm.	NTA-C8-33	Parking	On-street parking	The Strategy states that 'A gradual reduction in on-street parking levels in urban centres... will be required, in order to prioritise the other kerbside uses', but no specific Measure is included.	New Measure PARK4 on Parking Management now included.
One-way streets	Targets on implementation one-way streets, to tackle on street parking, and increase permeability and road safety	NTA-C8-33	Parking	On-street parking	One-way traffic can encourage higher vehicle speeds and increase general traffic levels, and is not generally deemed to accord with sustainable transport objectives. Where safety issues are identified, tailored solutions that support the Strategy objectives will be identified.	No change.
Interim parking plan needed	WMATS is providing a phased approach to alternative modes of transport for cars. However, in the interim, the city needs to develop a car parking strategy that works over the short, medium and long term. There is currently a shortage of carparking spaces in Waterford City. Carparking spaces have been removed from the South Quays. It is not clear how these spaces are to be replaced in the short term (3-4 years) in the absence of development on the North Quays. Waterford Chamber fully supports the aspirations of making the city a greener built environment, however, this cannot be to the detriment of a vibrant successfully trading city.	NTA-C8-34	Parking	On-street parking	Growth in walking, cycling and public transport use in the WMA will reduce the demand for destination parking. The Strategy sets out a range of proposals related to both on- and off-street parking, but no specific Measure.	New Measure PARK4 on Parking Management now included.

Impact of parking controls	Measures aimed at reducing on-street parking over the lifetime of the strategy from areas of the city, should not negatively impact upon business costs, activity or last mile delivery for businesses located nearby and loading and unloading facilities, at a time when many are attempting to recover from the financial impact of the pandemic.	NTA-C8-40	Parking	On-street parking	Growth in walking, cycling and public transport use in the WMA will reduce the demand for destination parking. The Strategy sets out a range of proposals related to both on- and off-street parking, but no specific Measure. Provision for loading and deliveries is addressed by Measure FREIGHT4 Delivery & Servicing Strategy, and these uses will be protected where required.	New Measure PARK4 on Parking Management now included.
<i>Topic: Park & Ride</i>						
P&R Newrath	Support for proposed P&R site at Grannagh/Newrath	NTA-C8-35	Parking	Park & Ride	Support noted.	No change.
Additional P&R sites	Propose additional P&R sites at: - Dunmore Road Area, to take traffic from the Dunmore Road, Passage East and Dunmore areas; and - around the Butlerstown area on the Outer Ring Road to take traffic approaching from the Ballyduff, Kilmacthomas and Dungarvan areas.	NTA-C8-34	Parking	Park & Ride	The Park & Ride study carried out in support of the Strategy preparation identified one site at Newrath/Grannagh for a strategic P&R facility. Local Park & Ride/Park & Stride/Park & Cycle sites will be identified following Strategy adoption, as set out in Measure PARK2.	No change.
Additional P&R sites required	There is a disappointing lack of enthusiasm in the MATS for the development of Park and Ride facilities, with the exception of one on in Ferrybank; it would be imagined that the commissioning of such sites could be an immediately impactful action on car usage in the city. SETU will continue to make available parking facilities on the West Campus-Carriganore to facilitate park and ride but significantly enhanced public transport and cycling infrastructure is required truly to incentivise this option.	NTA-C8-36	Parking	Park & Ride	The Park & Ride study carried out in support of the Strategy preparation identified one site at Newrath/Grannagh for a strategic P&R facility. Local Park & Ride/Park & Stride/Park & Cycle sites will be identified following Strategy adoption, as set out in Measure PARK2, and may include the formalisation of the use of the SETU West campus, which is currently used informally.	No change.
Support	Support for P&R at Grannagh/Newrath as it would serve vehicular traffic on the N24.	NTA-C8-31	Parking	Park & Ride	Support noted.	No change.
Additional P&R sites	Proposal for additional P&R sites on the Cork Road and at Passage Cross/Ballygunner	NTA-C8-51	Parking	Park & Ride	The Park & Ride study carried out in support of the Strategy preparation identified one site at Newrath/Grannagh for a strategic P&R facility. Local Park & Ride/Park & Stride/Park & Cycle sites will be identified following Strategy adoption, as set out in Measure PARK2.	No change.

Rail-based P&R	The potential for Park and Ride Facilities where the road network meets rail services, particularly an integrated P& R with the proposed, Bus Park and Ride at Newrath, should also be investigated.	NTA-C8-41	Parking	Park & Ride	The Park & Ride study carried out in support of the Strategy preparation identified one site at Newrath/Grannagh for a strategic P&R facility. Local Park & Ride/Park & Stride/Park & Cycle sites will be identified following Strategy adoption, as set out in Measure PARK2.	No change.
Additional P&R proposals	Provide significantly more park and ride on strategic access points to the WMA at: Carriganore, Tramore Rd (junction with outer ring road), Dunmore Rd (Knockboy or Passage Cross). Collaborate with Kilkenny County Council on new P&Rs at Slieverue or at a new Belview Port commuter train station.	NTA-C8-33	Parking	Park & Ride	The Park & Ride study carried out in support of the Strategy preparation identified one site at Newrath/Grannagh for a strategic P&R facility. Local Park & Ride/Park & Stride/Park & Cycle sites will be identified following Strategy adoption, as set out in Measure PARK2.	No change.
Support Newrath P&R	Delivery of the Park and Ride at Newrath Road should be a short-term measure in the WMATS lifetime. The strategy timeframe schedules the 'Review and Delivery of potential additional Park & Ride Sites' to take place between 2028-2040 (i.e., a medium to long-term measure). This ought instead to be a short-term measure, in order to ensure a network of high-capacity strategic Park and Ride facilities outside of the main approach roads to the city, to cater for all commuters, that would otherwise be inclined to use car for the entirety of the journey to the city.	NTA-C8-40	Parking	Park & Ride	Recommendation noted. Additional P&R sites will remain a medium/long term measure, dependent on further analysis and the 6-year review of WMATS.	Delivery of proposed P&R at Newrath/Grannagh revised to commence in the short term.
Proposed Park & Ride sites	Support for P&R at Grannagh/Newrath Road. Proposal for additional P&R Carrickpherish (bus route terminus). All P&R should have EV charging points, cycle parking and passenger welfare facilities.	NTA-C8-14	Parking	Park & Ride	The Park & Ride study carried out in support of the Strategy preparation identified one site at Newrath/Grannagh for a strategic P&R facility. Local Park & Ride/Park & Stride sites will be identified following Strategy adoption, as set out in Measure PARK2.	Measure PARK1 amended to refer to EV charging points, cycle parking and passenger welfare facilities.

Additional P&R sites	In addition to the proposed new Park and Ride site at Newrath Road, additional sites should be considered at strategic locations on the periphery of Waterford City within the WMA including in the south, to widen the catchment and maximise the use of the proposed public transport network. Park and Ride facilities and mobility hubs have the potential to alter people's behaviour and incorporate a more sustainable transport option into a portion of their journey. Integration of the Park and Ride facilities with planned capacity upgrades or services enhancements and enabling infrastructure such as bus priority measures and vital ancillary services must be in place to enable the success of Park and Ride.	NTA-C8-40	Parking	Park & Ride	The Park & Ride study carried out in support of the Strategy preparation identified one site at Newrath/Grannagh for a strategic P&R facility. Local Park & Ride/Park & Stride sites will be identified following Strategy adoption, as set out in Measure PARK2.	No change.
<i>Topic: Parking for car users with disabilities</i>						
Need to provide for car users with disabilities	The NDA notes that in the draft strategy it is stated that there should generally be no car parking requirement for new developments in or near the centres of the five cities and a significantly reduced requirements in the inner suburbs. The NDA would stress that spaces for car users with disabilities close to amenities/walking routes/ town centres are necessary to ensure that active travel options are accessible for all and would strongly recommend parking provision for car users with disabilities be protected and even expanded depending on need.	NTA-C8-29	Parking	Parking for car users with disabilities	Recommendation noted.	Sections 11.3.1 Parking for New Development, 11.3.2 On-street Parking, and 11.3.3 Off-street Parking all now include specific reference to the need to 'Ensure that adequate parking for car users with disabilities is provided.'
<i>Topic: Retail parking</i>						
Customer parking at stores	It is important to understand the requirements of convenience retail stores, particularly regarding car and bicycle parking requirements.	NTA-C8-38	Parking	Retail parking	Cycle parking is addressed in Measures CYCLING5 and CYCLING6. Car parking will be addressed by the development of a Parking Management Strategy that will address all parking requirements in detail.	Include new Measure related to the development of a Parking Management Strategy.

Opposition to maximum parking standards	Our Client would query whether the introduction of maximum car parking standards for all new Development Plans may result in an under provision of car parking spaces at certain locations, particularly where an established quantum of retail & convenience space is provided with higher order footfall demand i.e. district/neighbourhood centres. The introduction of the proposed parking standards may have negative impacts on the local road network including traffic overspill, double parking and congestion, as a result of increased customer demand and established vehicular journeys. It is considered that sufficient parking needs should be provided in order to avoid space searching or car queuing, which may also cause congestion on primary and arterial routes.	NTA-C8-38	Parking	Retail parking	Improvements to the walking, cycling and public transport environments will reduce demand for car parking. Parking overspill will be addressed by a Parking Management Strategy and the enforcement of road traffic laws.	New Measure PARK4 on Parking Management now included. New Measure SM17 re Enforcement of Road Traffic Laws now added.
Parking charges at out-of-town retail centres	Tesco has a policy of providing car parking spaces at their stores that are accessible and free of charge to their customers to promote linked trips which are sustainable. It is considered that it is not practical or feasible for consumers undertaking weekly convenience shopping, which can weigh up to 35kg, to use public transport. The private car is, therefore, necessary for such trips and charging for parking spaces in private retail developments cannot be justified. Draft parking charges should not be imposed on retail developments as a sufficient and detailed justification for such a move has not been provided in the Strategy as referred to. As such, we respectfully request that such parking objectives are not included in the adopted Transport Strategy.	NTA-C8-38	Parking	Retail parking	The development of a Parking Management Strategy will address the full spectrum of parking requirements. However, parking charges are a proven demand management measure that address discretionary car use, and charges are likely to be set at rates that are not prohibitive in the context of larger shopping trips.	New Measure PARK4 on Parking Management now included.
<i>Topic: School parking</i>						
No Parking zones	Address school parking chaos by implementing no-parking zones within 500 metres of schools gates, to direct parents to alternative, sustainable ways of travel to school.	NTA-C8-33	Parking	School parking	This will be addressed in the development of School Travel Strategies (Measure SM11).	No change.
Category: Freight						
<i>Topic: Construction & Logistics Centres</i>						

Support	The draft WMATS suggests the need for the development of Construction and Logistics Centres (CLCs) given the scale of growth projected in the WMA. They are becoming a norm in European cities and are key components in supply chain efficiency. The proposed 'Strategy for Sustainable Freight Distribution' for the WMA must consider the potential of CLCs and the opportunity they present to streamline the distribution process in the last mile and optimise times and costs for companies.	NTA-C8-40	Freight	Construction & Logistics Centres	Support noted.	No change.
<i>Topic: Delivery & Servicing</i>						
Last Mile delivery proposal	Support for Urban Consolidation Centres and an Urban Freight Delivery Plan (rather than just Feasibility Studies), permitting only smaller, non-motorised or smaller, lighter, electric vehicles for delivery and servicing.	NTA-C8-60	Freight	Delivery & Servicing	Support noted. Details of UFD Plan will be considered in the project scoping.	No change.
Multi-agency approach	The WMATS identifies various options aimed at managing the growing demand in delivery and servicing including micro consolidation centres within Waterford city. Micro-consolidation centres are useful for managing supply chains in a more sustainable way and for reducing the presence of heavy vehicles in the city centre. Effective public-private partnerships can support the expanded operation of micro-consolidation hubs that are serviced via e-vans, e-cycles, and e-walkers. The Transport Strategy needs to support co-operation between local authorities and logistics companies to enable the implementation of innovative and sustainable modes of delivery within the city centre.	NTA-C8-40	Freight	Delivery & Servicing	Noted.	No change.
Servicing retail stores	It is important that the Draft Transport Strategy does not restrict retailers' ability to adequately service their stores. Tesco is supportive of the proposals to prioritise sustainable transport modes; however, it would be imperative that retail premises can still be accessed and serviced in a manner that will not become unsustainable, resulting in safety issues, or have knock-on impacts for customers.	NTA-C8-38	Freight	Delivery & Servicing	The needs of retail and other commercial premises will be considered in the development of all sustainable transport schemes.	No change.

HGV restrictions (FREIGHT1)	<p>As set out in Section 12: Freight, Delivery and Servicing of the Draft Transport Strategy, the below measure is proposed:</p> <p>“Measure FREIGHT1 – HGV Management: Consideration will be given to identifying specific HGV routes and / or time restrictions for deliveries, to improve the efficiency of while minimising the impact of HGV movements.”</p> <p>Tesco supports transport improvement schemes and encourages sustainable modes of transport, from customer and staff journeys to HGV deliveries. However, deliveries, and in particular early morning deliveries, are an important aspect of the central distribution system and must be protected. Such deliveries not only ensure consistent product quality and availability, but also reduce the number of delivery trucks on the road network at peak times, when traffic congestion is at its highest. In order to accrue all the benefits of the central distribution system, from product availability to a reduction in the number of delivery vehicles on the roads, restrictions on deliveries must be avoided. Additionally, adequate loading bay facilities and access routes should be maintained to ensure the commercial viability of retail premises. A failure to accommodate deliveries could have a detrimental impact on retail and commercial premises.</p> <p>It is imperative that the NTA considers the operational impacts of the above proposed measure in restricting deliveries during certain times and along specific routes.</p>	NTA-C8-38	Freight	Delivery & Servicing	<p>The mechanisms and measures for servicing goods movement must accord with the principles and objectives of the Strategy and the Climate Action Plan. It is envisaged that these will evolve over time and the most appropriate means of servicing these sites will be identified in the development of a Delivery & Servicing strategy.</p>	<p>Change text to include reference to this change:</p> <p>'It is envisaged that these will evolve over time and the most appropriate means of servicing these sites will be identified in the development of a Delivery & Servicing strategy.'</p>
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Opposition to proposals re non-motorised delivery vehicles	<p>Request to re-consider the operational impacts of the objectives below, as the volumes of deliveries and the size of the delivery vehicle depend entirely on the amount of trade and the size of a specific store due to this it is not feasible or possible for larger stores around Waterford City and town centres to deliver their goods with smaller vehicles.</p> <ul style="list-style-type: none"> • “Examination of the case for urban or micro consolidation centres within Waterford City to reduce the number of last-mile trips being made by motorised vehicles; • Examination of the feasibility of using smaller and non-motorised vehicles for delivery and servicing to reduce noise and air pollution and enable more street space to be given to pedestrians and cyclists.” 	NTA-C8-38	Freight	Delivery & Servicing	The mechanisms and measures for servicing goods movement must accord with the principles and objectives of the Strategy and the Climate Action Plan. It is envisaged that these will evolve over time and the most appropriate means of servicing these sites, taking account of operational requirements, will be identified in the development of a Delivery & Servicing strategy.	No change.
Protect operation of postal services	As such, the introduction of pedestrianisation, parking standards, and car free zones may significantly impact on the smooth operation of the postal service. It is, therefore, requested that the NTA safeguard the accessibility of postal facilities across the Metropolitan Area.	NTA-C8-43	Freight	Delivery & Servicing	The mechanisms and measures for servicing goods movement must accord with the principles and objectives of the Strategy and the Climate Action Plan. The proposed Delivery & Servicing strategy will take account of the needs of postal services re collection and delivery.	No change.
Consider operational requirements of An Post in proposed schemes	It is requested that the NTA have consideration for HGV movements and the operational requirements associated with the postal service. It is important that 24-hour access for deliveries and collections are maintained at all postal facilities and will not be impacted or limited by the introduction of any restrictive measures including HGV bans, road alterations such as the narrowing of carriageways, the introduction of raised tables or other traffic calming/public realm measures on the surrounding streets or regulating delivery times. It is imperative that vehicles of this scale can continue to access the An Post facilities in a safe and efficient manner and that flexible delivery times, as exist, are not impacted. It is also highlighted that 24-hour access for deliveries and collections at all postal facilities is always a requirement, and this will include both during the construction of any measures/works introduced as part of the Draft Strategy and post completion of any such works.	NTA-C8-43	Freight	Delivery & Servicing	The mechanisms and measures for servicing goods movement must accord with the principles and objectives of the Strategy and the Climate Action Plan. The proposed Delivery & Servicing strategy will take account of the needs of postal services re collection and delivery, and the needs of retail and other commercial premises will be considered in the development of all sustainable transport schemes.	No change.

<i>Topic: Freight Strategies</i>						
Support	Support for a 'Strategy for Sustainable Freight Distribution' and a 'Regional Freight Strategy'.	NTA-C8-40	Freight	Freight Strategies	Support noted.	No change.
<i>Topic: HGV restrictions</i>						
Reporting app	In relation to HGV Management I would request that a similar approach to Dublin City be taken where citizens can use an app to report HGVs with 5+ axles which are not permitted to enter restricted areas of Waterford City and that the exclusion zone for HGVs be expanded.	NTA-C8-60	Freight	HGV restrictions	HGV Exclusion Zone will be considered in the development of a Delivery & Servicing Strategy, and the Strategy already includes proposals for designated HGV routes. A HGV reporting app will be considered as part of the HGV Management Measure (FREIGHT1).	No change.
Impact of HGV restrictions on business operations	The WMATS highlights that the central area of Waterford City is unsuitable for heavy goods traffic and HGVs. Identifying specific HGV routes and / or time restrictions for deliveries, can impact supply chains and the delivery of goods that are subject to tight timeframes. Limiting road access for lorries could also prove counterproductive as substituting their use with smaller vehicles with less capacity can add to congestion across the WMA.	NTA-C8-40	Freight	HGV restrictions	Noted. Will be considered in detail in the development of a HGV Management plan and a Delivery & Servicing Strategy.	No change.
HGVs and city centre	We propose: HGVs and five axle lorries are not allowed to use Rice bridge Alternative smaller vehicles to these, need to be identified and specified for entry into the city inside the Outer Ring Road A park and collect system can be used for HGVs and five axle lorries, to unload to businesses within those limits.	NTA-C8-33	Freight	HGV restrictions	Noted. Will be considered in detail in the development of a HGV Management plan and a Delivery & Servicing Strategy.	No change.
<i>Topic: Rail freight</i>						
Rail link Foynes to Rosslare	Tipperary would highlight that an objective of the current Limerick Shannon Metropolitan Area Transport Strategy (LSMATS), on page 74 is "to reinstate the single-track Limerick to Foynes line to provide a 'freight only' service". There is consequently the potential to connect Foynes Port to Rosslare Europort.	NTA-C8-31	Freight	Rail freight	Wider opportunities for such links will be addressed in the AISRR. While the Strategy does not preclude such links, the scale of consideration is beyond the scope of the Strategy.	No change.
Waterford-Rosslare line	Rail Freight offers huge potential in the decarbonisation of our transport system and the reinstatement of the Rosslare to Waterford Rail Line should be prioritised within the Transport Strategy.	NTA-C8-60	Freight	Rail freight	The Strategy recommends reserving this line pending the finalisation of the AISRR. The Strategy will be updated to reflect the recommendations of the AISRR and Rail Freight 2040 Strategy in due course.	No change.

Rail freight	Support for development of rail freight as an alternative to HGVs (with internal combustion engines), and development of distribution centres, to minimise vehicular movements within the city.	NTA-C8-27	Freight	Rail freight	The Strategy recommends reserving this line pending the finalisation of the AISRR. The Strategy will be updated to reflect the recommendations of the AISRR and Rail Freight 2040 Strategy in due course.	No change.
Support	The WMATS must fully support the implementation of the All-Island Strategic Rail Review and the Rail Freight 2040 Strategy. Commitments outlined in the draft WMATS to support implementation of their proposals and conclusions are encouraging. Over its lifetime, the WMATS must be ambitious in supporting rail freight.	NTA-C8-40	Freight	Rail freight	Support noted.	No change.
Proposed amendments	<p>Whilst the Port welcomes the highlighted role of rail freight in the WMATS the strategy for freight in the WMA should be further developed. Existing infrastructure should be identified on the Study Area and Existing Transport Network map on page 23 of the Draft Transport Strategy. With the imminent review of the Ferrybank-Belview Local Area Plan 2017, we also suggest that provision for future enhancements be identified as part of the WMATS. This could include an area provisionally safeguarded to provide improved facilities and further support for a greater volume of rail freight activity in the future.</p> <p>The Port considers that taking this submission into account, the rail freight strategy overall needs further detail and consideration prior to adoption of the WMATS. Enhancement of infrastructure at sea ports is in line with the core areas of investment highlighted in the Rail Freight 2040 Strategy and provision for this enhancement should not be deferred until the development of a regional freight strategy.</p>	NTA-C8-45	Freight	Rail freight	<p>Further work on rail freight will be considered on completion of the All Island Strategic Rail Review, which is considering this matter in detail. WMATS will incorporate the recommendations of the AISRR on its completion.</p> <p>Road freight will be considered in the proposed HGV Management measure, the Delivery and Servicing Strategy and the Strategy for Sustainable Freight Distribution.</p>	Study Area map has been revised to show rail line to port.
Rail link to port	Waterford is the only city in the country with direct access between a Port and Rail Network, which needs to be recognised nationally in addition to being considered as part of WMATS. The WMATS is premature in its implementation in the absence of the "Rail Freight 2040 Strategy".	NTA-C8-34	Freight	Rail freight	The Rail Freight 2040 Strategy was published in 2021. WMATS support Irish Rail in the implementation of its outcomes (FREIGHT2).	No change.
Topic: TEN-T Ports						

TEN-T Ports	The WMATS needs to pursue this TEN T status for Waterford port (why has Waterford or Rosslare not been included as a Tier 1 port in TEN T) which is so close to mainland Europe and offers the advantage of rail freight handling for the entire island. In addition as Rosslare prepares to upgrade to LoLo handling and is rail connected surely the port will in the future be a rail freight connected port.	NTA-C8-8	Freight	TEN-T Ports	Port status is a matter to be considered at a national policy level, rather than through a metropolitan area transport strategy. The rail freight recommendations are being considered in the All Island Strategic Rail Review.	No change.
Category: Supporting Measures						
<i>Topic: AVs</i>						
Reservations about AVs	There is also the view within a number of other jurisdictions that AVs may simply add to car congestion in a city and not necessarily free up road or kerbside space. The use of beaconisation in the USA, the monetisation of MaaS and ongoing safety issues with AVs and CAM should give us pause for concern, and I welcome the recognition that AVs should not be considered a substitute for walking, cycling and public transport. These are healthy, sustainable modes and must be prioritised.	NTA-C8-60	Supporting Measures	AVs	Support for Measure SM23 noted.	No change.
<i>Topic: Car Sharing</i>						
Sharing private cars	The section on car share schemes include individuals renting out their car as another means of reducing car dependence. This would help in reducing the number of cars in circulation and would help to alleviate the problem of cars sitting outside a house or workplace all day unused but taking up space.	NTA-C8-12	Supporting Measures	Car Sharing	The Strategy prioritises increased mode share for sustainable travel, and additional demand management measures are proposed to reduce private car use in the WMA. Private car sharing would not accord with the WMATS objectives described in Chapter 1 introduction.	No change.
<i>Topic: Demand Management</i>						
More detail required on Demand Management	As acknowledged in the Draft Strategy, the emissions targets will not be met and the shortfall may be achieved with the introduction of Demand Management measures. It would be useful if these Demand Management measures were included as active interventions of the revised Draft Strategy with a clear outline including measurable deliverables, and annual monitoring and evaluation over the course of the strategy's timeline, as to how these strategic and necessary emissions targets can be met.	NTA-C8-60	Supporting Measures	Demand Management	As set out in Chapter 14 Climate Action Management, an additional demand management study will be undertaken following adoption of WMATS. This study is likely to be carried out taking account of the transport strategies for all cities, and will include inputs from policies yet to be agreed at a national level. Inclusion of demand management measures in the final WMATS is therefore not feasible.	No change.
<i>Topic: EVs</i>						

Proposal for off street Urban Centre Electric Charging	Regarding EV Charging Infrastructure, I welcome the measure EV Charge Points (SM17) to undertake a study regarding EV Charge points. However, given the specific point with regard to trialling Dynamic On-Street Parking Models and being able to recoup costs by charging for Electric Vehicles, I would request that the strategy include the design of an off street Urban Centre Electric Charging Plan for each urban settlement within the area of WMATS.	NTA-C8-60	Supporting Measures	EVs	Provision for off-street EV charging will be considered in the development of Park & Ride, Park & Stride and Mobility Hub facilities.	No change.
Charging points - Support	Ibec welcomes the prominence given to the roll out of EV charging points throughout the WMATS.	NTA-C8-40	Supporting Measures	EVs	Support noted.	No change.
<i>Topic: Information signage</i>						
Signage language	Signage about civic responsibility should avoid curt language. Most signs asking people to behave tend to be adverse and slightly threatening. Instead of 'do not's' we suggest a more welcoming approach such as 'thank you for your consideration when cycling in the Cultural Quarter' etc.	NTA-C8-19	Supporting Measures	Information signage	Proposal noted. This is a matter best addressed at the local level.	No change.
<i>Topic: Passenger ferry</i>						
Passenger ferry/river taxi link from port to city centre	There should be some initial discussions with the Port Authorities around the use of river/ferry crossings and or river taxis. This would help to alleviate some of the traffic on the Dunmore Road and the Ferrybank arteries if commuters had a Park & Ride facility and a river taxi alternative to the City Centre.	NTA-C8-34	Supporting Measures	Passenger ferry	Modelling assessments determined that investment in the bus network, cycle network and pedestrian facilities would provide the optimal solution for the movement of people within the WMA. The new sustainable transport bridge will provide for additional crossing movements. The need for further river crossings will be addressed in the latter phases of the Strategy, and ferries will be included in that assesment. WMATS does not preclude the development of private ferry services.	No change.
<i>Topic: Passenger safety</i>						
On-board security	A security policy needs to be published in tandem with a greater push to use public transport. We believe that our public transport system needs to be seen as being safe with a zero-tolerance policy to antisocial behaviour on public transport networks.	NTA-C8-34	Supporting Measures	Passenger safety	The NTA has a range of campaigns and initiatives targeted at passenger safety on public transport. These initiatives have been rolled out at the national rather than the regional level.	No change.
<i>Topic: River transport</i>						

Slipway proposal	There is no mention of river transport / connectivity in the WMASP. Measures are required for access to the river in the City thereby making the river a conduit of added connectivity. This will require a launch and retrieve slipway and berth similar to the infrastructure recently completed at Paddy's Point, Ringaskiddy. The fantastic resource that is our River Suir is not being utilised by the populace for recreational, pleasure, tourism and connectivity purposes due to the lack of basic facilities.	NTA-C8-51	Supporting Measures	River transport	Modelling assessments determined that investment in the bus network, cycle network and pedestrian facilities would provide the optimal solution for the movement of people within the WMA. The new sustainable transport bridge will provide for additional crossing movements. The need for further river crossings will be addressed in the latter phases of the Strategy, and ferries will be included in that assesment. The Strategy does not preclude the development of such facilities for recreational/leisure purposes.	No change.
<i>Topic: School traffic</i>						
Staggered opening times	Further measures, such as staggered opening times, are required for schools due to traffic impacts - propose liaison with Dept of Education.	NTA-C8-34	Supporting Measures	School traffic	The Strategy aims to reduce school-generated car traffic through investment in walking, cycling and public transport. Further measures will be considered in the development of the demand management study proposed. However, such matters are best addressed at the national level in consultation with the Dept of Education.	No change.
School Travel Strategy	Providing cycling-friendly routes to all schools and adequate cycling parking facilities within schools have the potential to alleviate a large proportion of current congestion. A comprehensive School Travel Strategy for the WMA will be crucial.	NTA-C8-40	Supporting Measures	School traffic	Support for School Travel Strategy measure noted.	No change.
Support	The intention to continue the development of the Smarter Travel Workplaces and Campuses Programme, the preparation of a School Travel Strategy, roll-out and expansion of the Safe Routes to School programme, the operation and expansion of the Green-Schools Travel Module; is vital. Effective School Travel Planning can encourage young people to use more sustainable modes of transport, while fostering of a sustainable transport culture from a young age.	NTA-C8-40	Supporting Measures	School traffic	Support for these Measures (SM9, SM11, SM12, SM15) noted.	No change.
<i>Topic: Technological support</i>						

Support for MaaS, ITS and Next Gen Ticketing	Public transport can create an intelligent, connected system around innovative transport technologies like Mobility-as-a-Service (MaaS) and Intelligent Transport Systems (ITS). Measures proposed in the draft Transport Strategy to support these initiatives are encouraged. Together, these innovative technologies can create future mobility ecosystems that provide intelligent, accessible and cost-effective transportation options across the WMA. It is the intention of the NTA to deliver Next Generation Ticketing in the short term in the WMA. Ibec welcomes the measure to introduce smart ticketing across all transport types, allowing customers a quicker, more convenient travel experience. Convenience will play a key role in attracting more frequent use of public and active transport, and this initiative to introduce smart ticketing will play a key part in this.	NTA-C8-40	Supporting Measures	Technological support	Support for Measures SM18 MaaS, SM19 ITS and SM24 Smart Ticketing noted.	No change.
<i>Topic: Technological support</i>						
Role for technology	We suggest technology could make a significant contribution to monitoring transport emissions; developing more efficient and sustainable traffic management, public transport, and public utility provision; ensuring accessibility, security and enhancing the commuter experience; facilitating citizen engagement with climate change-mitigating actions; supporting local government in identifying impactful interventions. The resources of the Walton Institute at SETU and other units within the university are very considerable assets that can support the delivery of this aspect of strategy.	NTA-C8-36	Supporting Measures	Technological support	Recommendations noted. The use of technology is embedded in a number of measures in the Supporting Measures, including new measures added on foot of public consultation. The implementation of the measures contained in WMATS will require engagement with a range of stakeholders, including academic and industry partners.	No change.
<i>Topic: Travel Planning</i>						
Workplace Travel Planning - Support	Ibec welcomes that the NTA is supporting the development of Travel Plans for large-scale employment locations, residential developments, and educational institutions. Travel Plans should ensure that best practice measures are incorporated. The NTA must directly engage with businesses and stakeholders throughout the course of the Plan.	NTA-C8-40	Supporting Measures	Travel Planning	Support for Measure SM10 Travel Plans noted.	No change.
<i>Topic: Urban Design</i>						

Road space reallocation	Reallocation of road space away from private car traffic and surface car parking should be undertaken in order to prioritise walking and cycling. This should include the use of pedestrianisation zones, Low Traffic Neighbourhoods, filtered permeability, and contraflow lanes throughout the city and towns in the area.	NTA-C8-60	Supporting Measures	Urban Design	Recommendations noted. Filtered permeability is supported by Measure WALK14, and contra-flow cycle tracks are likely to form part of the cycle network (Measure CYCLING1). There are a number of references throughout the Strategy related to road space reallocation, and the concept underpins a range of Measures.	New measures now included: WALK13 Pedestrianisation SM5 Low Traffic Neighbourhoods
Support	The NTA's commitment to incorporate a high standard of urban design and placemaking into the planning and design of all major public transport infrastructure schemes and active travel schemes in the WMA is vital. This measure will help create streets and public spaces that have a real sense of place and that better serve the needs of people in the community.	NTA-C8-40	Supporting Measures	Urban Design	Support noted.	No change.
Category: Micro-mobility						
Topic: Infrastructure						
Appropriate place for e-scooters	A decision needs to be made on where electric scooters are to travel and this must be incorporated into future transport infrastructure design.	NTA-C8-47	Micro-mobility	Infrastructure	This decision is a matter for national government and legislation. The NTA will monitor the outcome of this process and incorporate it into the Strategy as appropriate.	New Measure SM26 on Other Emerging Personal Mobility Modes now included, which states that 'The NTA, local authorities and Government will monitor emerging trends in personal mobility and respond accordingly in terms of legislation, regulation and infrastructure design.'
Topic: Policy						
Support	Micro-mobility is a form of transport that has increased with popularity over the last two years and the inclusion of micro-mobility is recommended to reflect the changing travel patterns post-covid, offering a new and greener way of navigating the city.	NTA-C8-40	Micro-mobility	Policy	This decision is a matter for national government and legislation. The NTA will monitor the outcome of this process and incorporate it into the Strategy as appropriate.	New Measure SM26 on Other Emerging Personal Mobility Modes now included, which states that 'The NTA, local authorities and Government will monitor emerging trends in personal mobility and respond accordingly in terms of legislation, regulation and infrastructure design.'
Category: Environment/Emissions						
Topic: Biofuels						

Alternative biofuels	There is clear demand for next generation biofuels (e.g. Hydrotreated Vegetable Oil [HVO] or Hydrotreated Renewable Diesel [HVRD], Compressed Natural Gas [methane/biomethane]) from many sectors and an opportunity to produce these fuels in Ireland using waste streams. However, to avail of these opportunities greater regulatory and investment certainty is needed from Government. Ibec has made a submission to the Department of Transport on the development of a new Renewable Fuels for Transport Policy. This new strategy and related actions must be integrated into the WMATS.	NTA-C8-40	Environment/Emissions	Biofuels	The NTA will await the outcome of the Renewable Fuels for Transport consultation, will ensure that the Strategy takes account of its findings and recommendations, and will, if necessary, amend the Strategy to reflect revised national policy.	No change.
<i>Topic: Carbon neutral city centre</i>						
Carbon neutral city centre	Support for a carbon neutral city centre, by means of Park & Ride development, EV-only policy in city centre, and safe cycle infrastructure.	NTA-C8-27	Environment/Emissions	Carbon neutral city centre	Chapter 14 Climate Action Management sets out the emissions reductions that the Strategy will achieve, but it is noted that further work is required in the area of Demand Management to meet the Climate Action Plan targets. The Strategy does not disaggregate the WMA into separate areas.	No change.
<i>Topic: Climate Proofing</i>						
Climate-proofing of schemes	Given the level of ambition required, I would like to request that each intervention should be climate proofed to ensure the maximum emissions reductions are achieved, and that no intervention should proceed that results in increased carbon emissions.	NTA-C8-60	Environment/Emissions	Climate Proofing	The full WMATS has been developed in accordance with the Climate Action Plan and relevant national policy, and its constituent elements are designed to facilitate the achievement of the emissions reductions outlined in Chapter 14 Climate Action Management, while noting that further work will be required to meet the overall targets. All larger schemes will be subject to Environmental Impact Assessment.	No change.
<i>Topic: Emissions reduction targets</i>						

More ambition re decarbonisation	The draft MATS we regret to say seems strikingly unambitious and lacking urgency when it comes to signalling a plan for carbon emissions, the elimination of car dependency, and the radical pivot needed to meet targets and mitigate climate change. This is despite the strong ambition declared by the city when it comes to carbon neutrality. While the draft MATS goes some way towards addressing these aims, we suggest the language of the Waterford City and County Council, Roadmap to Carbon Neutrality by 2040 (since revised to 2030) — “radical”, “accelerated” — needs also to feature in the MATS more prominently and a greater sense of urgency and ambition should be evident in what is a tone-setting and agenda-framing policy.	NTA-C8-36	Environment/Emissions	Emissions reduction targets	The Strategy sets out ambitious but achievable emissions reduction targets, but does not preclude these targets being exceeded. It is also stated that further Demand Management measures will be required following the adoption of the Strategy to meet the Climate Action Plan emissions reduction targets.	No change.
Revised target	The WMATS should include a carbon emissions reduction target of, at a minimum, the sectoral emissions reduction target for the transport sector (currently indicated to be within the range of 45 - 55%) by end 2025, and will need to align with subsequent sectoral transport emissions targets for the period 2026 - 2030 and for the period 2031 - 2035.	NTA-C8-60	Environment/Emissions	Emissions reduction targets	The Strategy sets out ambitious but achievable emissions reduction targets, but does not preclude these targets being exceeded. It is also stated that further Demand Management measures will be required following the adoption of the Strategy to meet the Climate Action Plan emissions reduction targets.	No change.
Reduction and monitoring	Implementation of the plan consistently will rely on a commitment to measure pollutants and drive to living sustainably. We want to see: Meaningful targets for emissions reductions measured at various points in the WMA area consistently over the period of this plan. These chosen parameters should follow international best practice.	NTA-C8-33	Environment/Emissions	Emissions reduction targets	The Strategy has been developed in accordance with national policy, including targets for emissions reduction. Assessment of the overall emissions has been carried out as part of the Strategic Environmental Assessment (SEA) process, and there is a statutory requirement to monitor the SEA.	No change.

Impact of approaches	Ibec cautions that Approach One “Increased fuel prices” can only be effective if there are practical alternatives and fuel switching/modal shift opportunities. Otherwise, increased fuel costs simply become an added cost burden on consumers without changing behaviour and could threaten economic development. Ibec are more open to approaches 2 and 3. Hydrogen certainly has immense potential and will be a major fuel source for Irelands HGV transport sector. Ibec supports efforts to support its production in Ireland and integration into our gas network. However, cost remain prohibitive, and time spent “waiting for hydrogen” could be “lost time” and other measures and immediate solutions must be considered.	NTA-C8-40	Environment/Emissions	Emissions reduction targets	The text on Approach 1 notes that fuel pricing is a national issue that could only be implemented by national Government. The Strategy sets the framework for the delivery of the 'practical alternatives' and 'modal shift opportunities' noted as being required for Approach 1 to be effective. However, as noted in the Strategy, the precise suite of additional measures to achieve the required emissions reduction targets will be determined through the preparation of a Demand Management study following Strategy adoption.	No change.
Category: Implementation						
<i>Topic: Accessibility</i>						
Accessibility in procurement and design processes	In progressing with this strategy, the design and procurement of certain products and services must comply with EU Directive 2019/882 on the accessibility requirements for procurement of products and services and in particular for information and communications technology to be accessible for people with disabilities (harmonised standard EN 301 549). We also recommend that for all stops and stations you consult the European Standard EN 17210:2021: Accessibility and usability of the built environment which details functional requirements for bus and coach stops.	NTA-C8-29	Implementation	Accessibility	This recommendation relates to the procurement, planning and design of specific transport schemes, and is already embedded in NTA and local authority procedures and practices.	No change.
Accessible information	In addition to standard EN 301 549 regarding information and communications technology we also wish to stress the requirements of public bodies under the Web Accessibility Directive which requires public bodies in Ireland to ensure their websites and mobile apps are accessible to all people, including persons with disabilities. This would include proposed real time passenger information and wayfinding updates as detailed in this draft strategy.	NTA-C8-29	Implementation	Accessibility	This recommendation is addressed in the standard NTA approach to RTPi development and implementation. It will also be addressed in the development of the Wayfinding Strategy (Measure WALK12).	Text on Wayfinding in Section 6.6.5 now amended to refer to the need to ensure its utility for the full spectrum of pedestrians.
<i>Topic: Consultation on schemes</i>						

Improved Consultation process	A programme of citizen participation and engagement is required in support of any of the measures set out in any Transport Strategy. Strengthen the section on Consultation (p.88) with clear commitments to citizen engagement and clear visibility of ongoing participation plans, framed within the quality of life-related outcomes that are evident elsewhere in the MATS and throughout the Southern Region RSES.	NTA-C8-36	Implementation	Consultation on schemes	Recommendation noted. WMATS includes a commitment to consultation with key stakeholders and the wider public, regardless of the statutory requirement for such engagement.	No change.
<i>Topic: Impact</i>						
Impact on businesses and citizens	The two main elements of BusConnects, namely bus priority measures and changes to bus service network, should not negatively impact upon business activity or disturb last-mile delivery for businesses located nearby.	NTA-C8-40	Implementation	Impact	Deliveries to businesses will be addressed in the proposed Delivery & Servicing Strategy (Measure FREIGHT4), and business needs will be considered in the development of BusConnects following the adoption of the Strategy.	No change.
<i>Topic: Monitoring</i>						
Monitoring process and stakeholder involvement	Appropriate monitoring and review mechanisms will be critical to ensure the effectiveness and ongoing development of the WMA Transport Strategy. Engagement with key stakeholders such as SETU, the Department of Education and schools, the business community and an active campaign of citizen participation will be critical for both effective implementation and achieving a significant modal shift to public transport.	NTA-C8-36	Implementation	Monitoring	It is intended to review the Strategy every 6 years. The Strategy notes that Monitoring will be carried out on transport trends, patterns and usage, and there is a statutory requirement to monitor the SEA. Other monitoring related to the Strategy objectives will be considered where this will inform future revisions.	No change.
Data	The success of the WMATS will depend on its delivery. The Transport Strategy must include appropriate monitoring and review mechanisms to ensure the continued development of the region's transport network. The South-East REC acknowledges that WMATS is a live and flexible strategy, intended to be scalable, flexible and future-proofed enough to meet changes in population and employment growth. The implementation of the Transport Strategy must be informed by ongoing consideration of contextual issues and timely data.	NTA-C8-40	Implementation	Monitoring	It is intended to review the Strategy every 6 years. The Strategy notes that Monitoring will be carried out on transport trends, patterns and usage, and there is a statutory requirement to monitor the SEA. Other monitoring related to the Strategy objectives will be considered where this will inform future revisions, but a balance is required in the collection of data, which must serve an identified purpose.	No change.
Bus Network performance	It will be essential to continually monitor the demand for bus services in the WMA throughout the lifetime of the MATS and enhance or amend the service network as appropriate.	NTA-C8-40	Implementation	Monitoring	BusConnects is designed to be flexible and scalable and to respond to changes in transport demand over the Strategy lifetime. This will be considered in the 6-year review cycle for the Strategy.	No change.

Monitoring structure	<p>SMART, meaningful measures for the implemented measures. [This related to request No.1 & 2, above.]</p> <p>Measuring parameters should reflect the current best international practice, e.g.: modal shift in transport, Air Quality Index. [This related to request No.1 & 2, above.]</p> <p>A holistic oversight and management of the implementation of the plan, in tandem with monitoring the measures.</p> <p>Adjusting the plan based on the objective data from on-going measurements, can allow implementation to be adapted, corrected, or optimised.</p>	NTA-C8-33	Implementation	Monitoring	<p>The NTA collects passenger data in collaboration with transport operators, which will demonstrate mode shift. Emissions and Air Quality monitoring is required in the assessment of the effectiveness of the Climate Action Plan.</p> <p>The periodic review of the Strategy allows for its amendment and adjustment based on actual trends observed during its lifetime.</p>	No change.
<i>Topic: Quick wins</i>						
Proposed immediate actions	<p>There is a strong case for immediate action in domains that will lead to a clear improvement of quality of life for residents and visitors where low or no-cost, innovative solutions can be trialled and learned from. We suggest, for instance, lengthening the crossing time for pedestrians at junctions (requiring only an adjustment to the light sequence) and reduced speed limits in the city centre.</p>	NTA-C8-36	Implementation	Quick wins	<p>These proposals are best addressed through the various funding streams managed by the NTA, including Active Travel Investment and Safe Routes to Schools. A transport strategy, by its nature, sets out a more strategic approach to the development of transport networks. Measure WALK5 relates to pedestrian crossing times.</p>	New Measure ROAD7 relates to reduced speed limits.
<i>Topic: Scheme design</i>						
Impact on Irish Water assets	<p>All schemes must take account of their potential impact on Irish Water assets and follow Irish Water's build over/diversion process.</p> <p>No new surface water connections to combined drainage, and support for SUDS approach.</p>	NTA-C8-26	Implementation	Scheme design	<p>Noted. This is a scheme-level consideration that will be addressed in the planning and design of each proposed scheme.</p>	No change.
<i>Topic: Timeline</i>						

Streamline scheme delivery	<p>The success of the Strategy will depend on its delivery at a pace that meets the needs of the WMA. For the WMATS to realise a meaningful improvement in quality of life, it must demonstrate an ambition to reduce capital project delivery timelines. Progress necessitates the urgent removal of barriers to delivery. The delivery of projects essential to WMA must not be unnecessarily held back due to public procurement procedural issues or problems within the planning system. Improving delivery of projects will require consideration of the risks. Public procurement and planning issues are areas requiring specific attention. Red tape not only adds costs to projects, but it can also undermine the viability of a project. Sufficient focus needs to be placed on this area to mitigate project risks, support competitive tendering, and to support faster project delivery.</p> <p>At a time of soaring construction costs, strategic infrastructure projects do not need to be burdened with additional costs and delays due to all too frequent objections that we currently see due to our broken planning system. All efforts should be made by local authorities to call on central government to make the required changes to procurement and planning processes that will allow for radically improved project delivery timelines.</p>	NTA-C8-40	Implementation	Timeline	While the potential delays to the implementation of schemes identified in this statement are largely beyond the scope of the Strategy and the NTA, it is the intention of the NTA to deliver sustainable transport schemes in the earlier phases of the Strategy lifetime, as these projects have been included in the NDP.	No change.
Cycle network delivery	A firm timeline for the delivery of the cycle network is required	NTA-C8-50	Implementation	Timeline	A high-level phasing plan is included in the Strategy. Following adoption, this will be further developed by the NTA Active Travel section in conjunction with the local authorities, which are responsible for scheme delivery. Adequate funding for active travel schemes has been secured for the lifetime of the current government.	No change.
Scheme delivery	With regard to the Phased Implementation, given the timeline of the strategy until 2040, and the significant growth in sales and take-up of e-bikes and e-trikes, it should be feasible to ensure that our Inter-Urban cycle networks, interconnecting with Greenways and intra-urban networks would be included and completed in the Short to Medium Term Phase, and not pushed to the Long Term Phase.	NTA-C8-60	Implementation	Timeline	The NTA's priority for delivery will be schemes that have the greatest potential to effect mode shift in the WMA. Longer distance cycle commuting, while a growing sector, is unlikely to deliver sufficient mode shift, and the Strategy focus on bus for such distances is included in the short- and medium-term timeframe.	No change.

National Road Network - Demand Management	Similarly, given the necessary ambition to improve sustainable transport and mobility infrastructure and services, and prioritisation of sustainable modes, along with the reduction in car dependency and forced car ownership, I would like to see the 'ongoing review, monitoring and implementation of National Road network demand management measures' commence within the Short Term Phase.	NTA-C8-60	Implementation	Timeline	The demand management measures will be developed in the short term and monitoring will commence on foot of the completion of this programme.	Commence review, monitoring and implementation of National Road network demand management measures' now included under Road Network - Short-Term.
Road scheme delivery	Intra-urban and regional connectivity must be prioritised, and strategic projects should not get bogged down by the start-stop nature of the planning system. Progress necessitates the urgent removal of barriers to delivery. Accelerated delivery of key infrastructure projects must be a central objective within the Transport Strategy.	NTA-C8-40	Implementation	Timeline	The Strategy is non-statutory and, as such, is not empowered to address resource constraints in the planning system. It is the intention of the NTA to deliver all sustainable transport schemes in the early stages of the Strategy lifetime.	No change.
Prioritise safe cycle infrastructure, esp. between SETU and public transport	There is no clear plan to urgently develop the required safe cycle and scooter lanes, particularly the key corridor from the Train and Bus Stations to the SETU Cork Road Campus.	NTA-C8-36	Implementation	Timeline	A high-level phasing plan is included in the Strategy. Following adoption, this will be further developed by the NTA Active Travel section in conjunction with the local authorities, which are responsible for scheme delivery. Adequate funding for active travel schemes has been secured for the lifetime of the current government.	No change.
Scheme delivery	In order to support the projected growth of the Waterford Metropolitan Area Strategic Plan (MASP) the final strategy should commit to clear and defined delivery dates for the key transport infrastructure. In particular, the timeline for the bus network, which will facilitate the concentric growth of the Metropolitan area, should be clarified.	NTA-C8-35	Implementation	Timeline	It is intended to commence the delivery of BusConnects Waterford immediately following the adoption of the Strategy.	No change.
<i>Topic: Timeline</i>						
BusConnects Timeline	Clearly defined timelines for the delivery of all elements of the BusConnects programme will be critical to give confidence to people and ensure WMA has the capacity to manage growth and meet existing and future city transport needs. Any proposed changes to the existing bus network, both long and short term, should be consulted and communicated with businesses and local communities in a timely and appropriate manner.	NTA-C8-40	Implementation	Timeline	It is the intention of the NTA to commence the planning and design of the BusConnects network immediately following adoption of the Strategy. This process will involve extensive consultation with key stakeholders and the wider public.	No change.

Implementation plan	More detailed Implementation Plan required, and alignment with the WCCC's Climate Neutral and Smart City ambitions,	NTA-C8-36	Implementation	Timeline	The current implementation plan is appropriate to a transport strategy, and will be further developed following the adoption of the Strategy.	No change.
Category: Consultation process						
<i>Topic: Accessibility of Consultation</i>						
Consultation event accessibility	Public consultation events may not be accessible to everyone and we were unable to find information on the website as to how people interested in attending the consultation might be able to access the consultative event who may have a visual impairment, be a wheelchair user or a person requesting ISL interpretation. It would be good practice to provide contact information which would facilitate both written and spoken queries about accessibility and requests for accommodations. In addition, online consultations or information sessions with mechanisms for providing feedback provided may allow those who are unable to travel and/or access the building or who might want to have captioning easily available should be considered in order to ensure the widest possible audience.	NTA-C8-29	Consultation process	Accessibility of Consultation	Recommendations noted. While the public consultation events have passed, these recommendations will be implemented in future consultation events.	No change.
Online material	While easy to read and accessible PDF formats of the draft strategy were published???, no contact details were provided as to how people could request alternative formats of other documents associated with the draft strategy or other formats which might help. As detailed in the Code of Practice on Accessibility of Public Services and Information provided by public bodies, public bodies should have procedures in place for processing requests for accessible formats.	NTA-C8-29	Consultation process	Accessibility of Consultation	Recommendation noted. While the public consultation on the draft Strategy has closed, this recommendation will be implemented in future consultations.	No change.

Recommendations to improve accessibility	List of recommendations, including: - setting up an Advisory Committee for the lifetime of the strategy preparation and to provide input into scheme design - adopting a 'whole journey' approach [pre-journey planning, journey start to end (including travel to and from transport stops), the public transport stop/stations, interchanges, return journey planner, disruptions to service (planned and unplanned), and supporting infrastructure (such as wayfinding, seating, and toilets)] - using the standard 'Design for All – Accessibility following a Design for All approach in products, goods and services – Extending the range of users' - following 'Customer Communications Toolkit for the Public Service - A Universal Design Approach' in all communications	NTA-C8-29	Consultation process	Accessibility of Consultation	<p>An Advisory Committee is not envisaged for input into scheme design. The Strategy Steering Group will be consulted as required, and each scheme will be subject to public consultation in the course of its development and implementation.</p> <p>A 'whole journey' approach has informed the Strategy preparation and the development of the Measures.</p> <p>The Strategy includes measures related to Accessibility and Universal Design.</p> <p>The NTA Communications strategy is guided by statutory obligations regarding the accessibility of all communications processes and materials.</p>	No change.
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4 Response to EPA submission following public display of the Draft Strategy

No.	Submission Text	Response
Submission from the Environmental Protection Agency		
1	<p>We acknowledge your notice, dated 2nd June 2022, in relation to the Draft Waterford Metropolitan Area Transport Strategy (the 'Strategy') and SEA Environmental Report.</p> <p>The EPA is one of the statutory environmental authorities under the SEA Regulations. In our role as an SEA environmental authority, we focus on promoting the full and transparent integration of the findings of the Environmental Assessment into the Strategy and advocating that the key environmental challenges for Ireland are addressed as relevant and appropriate to the Strategy. Our functions as an SEA environmental authority do not include approving or enforcing SEAs or plans.</p> <p>We welcome the opportunity to comment at this stage of the Strategy and SEA process. This submission includes comments/observations on both the Strategy and the SEA Environmental Report to consider. Our comments focus on topics within the EPA's remit and areas of expertise, in particular climate change, air and noise and the inter-relationships between these.</p> <p>We also attach our earlier SEA Scoping submission, dated 27th November 2020, to consider at this time, as relevant and appropriate.</p> <p>Alignment with Other Key Plans and Programmes</p> <p>We welcome that the broader national policy context within which the Strategy is being prepared is clearly presented, including in particular the National Planning Framework – Project Ireland 2040 described in Section 2-Policy Context.</p> <p>The links with the UN Agenda 2030 for Sustainable Development and the related Sustainable Development Goals (SDGs) could also be considered in this section. Reference could be made to the transport-related goals and targets set out in Ireland's National SDG Implementation Plan 2018-2020. This would help to frame the Strategy within the context of the wider sustainable development agenda. There is also merit in including a graphic showing the Strategy in the context of the hierarchy of key related plans and programmes.</p> <p>The National Transport Authority should also ensure that the Strategy aligns with key relevant higher-level plans and programmes and is consistent with the relevant objectives and policy commitments of the National Planning Framework and the Southern Regional Spatial and Economic Strategy.</p>	<p>Noted. The SEA has considered the SEA scoping submission provided earlier in the process by the EPA. The Strategy aligns with key relevant higher-level plans and programmes and is consistent with the relevant objectives and policy commitments of the National Planning Framework and the Southern Regional Spatial and Economic Strategy.</p>
2	<p>Sustainable Transport and Climate Change</p> <p>The scale of the challenges facing Ireland to address the climate emergency are immense. Recent EPA reports show that Ireland will not meet our longer-term targets on reducing greenhouse gas emissions. Our highly fossil fuel dependent transport system results in significant emissions of greenhouse gases and air pollutants. Urgent and accelerated action and investment is needed to decarbonise transport and transition to more sustainable transport modes, as well as to adapt to the effects of climate change.</p> <p>We welcome that the Strategy seeks to support the transition to more sustainable modes of transport within the Waterford Metropolitan Area and this is clearly reflected in the Guiding Principles and the proposed Strategy Outcomes. The Strategy recognises the need for better integrated transport and land-use planning and includes provisions for extensions to public transport, park-and-ride facilities, walking and cycling infrastructure, moving to low emission buses etc. These commitments, while welcome, could be strengthened by including measurable targets and timeframes for delivery (where available), to help drive implementation and inform monitoring over the lifetime of the Strategy.</p> <p>In the context of the need to develop and roll out the infrastructure necessary to support the uptake of electric cars, we welcome the commitment to provide charging points at park-and-ride facilities to support the required increased uptake of electric vehicles while also helping reduce congestion in Waterford.</p>	<p>Noted. WMATS sets the framework for an accessible, high quality and integrated transport network. Further detail on implementation of the cycle network and bus network will follow Strategy adoption. A high-level phasing plan is included in Chapter 15 Monitoring and Implementation.</p>
3	<p>Climate Change Adaptation</p> <p>In planning for transport over a 2040 horizon, the need to adapt to the effects of climate change merits further consideration in the Strategy. The Strategy should consider the requirements of the National Adaptation Framework (DCCAE, 2018), the non-statutory 'Developing Resilience to Climate Change in the Irish Transport Sector' sectoral adaptation plan (DTTAS, 2017) and the statutory Adaptation Plan for Transport Infrastructure as well as the Waterford City and County Council Climate Change Adaptation Strategy. The Strategy should consider the exposure and vulnerability to weather and climate events, and the range of projected scenarios and changes to these scenarios due to climate change. Consideration should also be given to other impacts in addition to flooding. This includes more extreme temperatures, soil erosion/landslides, coastal erosion, etc., which have potential to impact on transport systems. The potential for co-benefits (for example, positive impacts on air quality, biodiversity, noise, etc.) and the potential for mal-adaptation should also be considered.</p>	<p>Noted. As detailed under Section 17 under "Climate Change, Emissions and Energy":</p> <p>"As identified in the SEA Environmental Report that accompanies this Strategy, the Strategy facilitates sustainable mobility and associated positive effects, including those relating to:</p> <ul style="list-style-type: none"> • Reductions in greenhouse gas emissions and associated achievement of legally binding targets;

No.	Submission Text	Response
		<ul style="list-style-type: none"> • Reductions in emissions to air and associated achievement of air quality objectives, thereby contributing towards improvement of air quality and protection of human health; • Reductions in consumption of non-renewable energy sources and achievement of legally binding renewable energy targets; and • Energy security. <p>In implementing the Strategy, the Authority will support relevant provisions contained in the following documents (and any superseding revisions of same): National Energy and Climate Plan (2021); the Waterford Climate Change Adaptation Strategy (2019); the Climate Action Plan (2021); the National Climate Change Adaptation Framework (2018); and the Department of Transport's Climate Change Sectoral Adaptation Plan for Transport Infrastructure (2019), which builds on the 2017 "Adaptation Planning – Developing Resilience to Climate Change in the Irish Transport Sector".</p> <p>Cognisant of the imperative to reduce emissions, the Authority will seek to ensure primacy for transport options that provide for unit reductions in carbon emissions. This can most effectively be done by promoting public transport, walking and cycling, and by actively seeking to reduce car use in circumstances where alternative options are available.</p> <p>During the preparation and/or review of policies and plans relating to climate change, carbon emissions and energy usage, the Authority will seek to integrate Strategy objectives, as appropriate."</p> <p>Furthermore, as detailed under Section 17 under "Other Strategic Environmental Assessment (SEA) Recommendations": "In implementing the Strategy, the Authority will ensure that the measures included in Table 9.2 of the SEA Environmental Report are complied with."</p> <p>Within Table 9.2 of the SEA Environmental Report the following measure is included:</p> <p>"Improve resilience and adaptation to climate change by taking into account issues including the following in the siting and design of projects:</p> <ul style="list-style-type: none"> • Extreme precipitation and risk of high river flows and associated implications including those relating to pluvial and fluvial flooding, bridge scour, soil erosion and landslides; • Sea level rise and storm surge and associated implications including those relating to coastal erosion and coastal/estuarine flooding; and • Extreme temperatures and associated implications including those relating to the operation of transport and ancillary infrastructure and services."

No.	Submission Text	Response
4	<p>Air Pollution and Transport</p> <p>Transport related air quality issues should also be a key consideration in the development of transport infrastructure. The transport sector is one of the largest contributors to particulate matter pollution in urban areas (particularly the diesel vehicle fleet). The human health impacts from particulate matter (PM) and nitrogen oxides (NOx) emissions include cardiovascular disease, lung disease and heart attacks. The Strategy's focus on promoting sustainable modes of transport should contribute to reducing transport-related air pollution within the Waterford Metropolitan Area. In implementing the Strategy, its impacts on air quality should be monitored and evaluated as part of the SEA monitoring.</p> <p>The EPA is currently doubling the national ambient air monitoring network across Ireland, which will provide enhanced real-time air quality information and provide air quality forecasting and modelling. In implementing the Strategy and in subsequent reviews, you should consider available up-to-date relevant ambient air quality data for the Metropolitan Area.</p>	<p>Noted. The most up-to-date environmental data will be used when implementing the Strategy and in subsequent reviews.</p>
5	<p>Noise Pollution</p> <p>Noise pollution is a significant health concern affecting quality of life and wellbeing, and road transport is one of the main sources of environmental noise pollution in Europe. The objectives of EU and Irish noise legislation is "to avoid, prevent or reduce harmful effects on human health and the environment as a whole", and this includes noise nuisance. The assessment and management of noise from the main infrastructural transport sources (roads, rail, and airports) are governed by the Environmental Noise Directive and associated 2006 Environmental Noise Regulations (S.I. 140 of 2006). The World Health Organisation has also published Environmental Noise Guidelines.</p> <p>The Strategy should consider any relevant local authority noise maps and Noise Action Plans over the lifetime of the Strategy. Strategic noise maps are designed to assess noise exposure resulting from major roads, railways and airports. Noise Action Plans are designed to act as a means of managing environmental noise through land use planning, traffic management and control of noise sources. Round 3 noise mapping information is available at https://www.epa.ie/monitoringassessment/noisemapping/.</p> <p>The National Planning Framework recognises the significance of environmental noise and includes National Policy Objective 65 to 'Promote the pro-active management of noise where it is likely to have significant adverse impacts on health and quality of life and support the aims of the Environmental Noise Regulations through national planning guidance and Noise Action Plans.' The EPA supports this commitment for national planning guidance on noise to be prepared.</p> <p>In addressing transport-related noise, the focus should not be just on engineering solutions for road traffic noise, but on creating a preventative and management strategy through the provision of alternative, more environmentally friendly, and a more attractive means of transport in our major urban locations, and for better routing and design of roads in more rural locations.</p> <p>In finalising the Strategy, consider supporting measures to protect any designated quiet areas in open country within or adjacent to the Waterford Metropolitan Area, in collaboration with the local authorities. In 2003, the EPA commissioned a research project to establish baseline data for the identification of quiet areas in rural locations. Quiet Areas, in this research project are defined as "an area in open country, substantially unaffected by anthropogenic noise." A range of minimum distance criteria from man-made noise sources such as urban areas, industry and major road sources were defined, and the report includes recommendations for the identification and control of Quiet Areas. In this regard, we welcome that the Strategy includes consideration of 'quietways' in terms of cycling.</p>	<p>Noted. As detailed under Section 17 under "Other Strategic Environmental Assessment (SEA) Recommendations": "In implementing the Strategy, the Authority will ensure that the measures included in Table 9.2 of the SEA Environmental Report are complied with."</p> <p>Within Table 9.2 of the SEA Environmental Report the following measure is included:</p> <p>"Contribute towards: compliance with air quality legislation; greenhouse gas emission targets; management of noise levels, including taking into account available noise maps and Noise Action Plans (including provisions relating to the preservation of Quiet Areas) and the National Planning Framework National Policy Objective 65 to 'Promote the pro-active management of noise where it is likely to have significant adverse impacts on health and quality of life and support the aims of the Environmental Noise Regulations through national planning guidance and Noise Action Plans'; and reductions in energy usage.."</p>
6	<p>Strategy Implementation, Monitoring and Review</p> <p>We note that the Strategy covers a timeframe out to 2040, with proposals for 5-yearly reviews over this time. We recommend that reviews include reporting on Strategy implementation and progress on achieving the Strategy objectives.</p> <p>The Strategy implementation, monitoring and reporting should be aligned with the environmental monitoring required under the SEA legislation, and as set out in the SEA Environmental Report. This will assist in enabling the environmental performance of the Strategy to be evaluated as part of the periodic reviews.</p>	<p>The NTA intend to report on Strategy implementation and progress on achieving the Strategy objectives as part of the proposed review cycle.</p> <p>The Strategy implementation, monitoring and reporting will be aligned with the environmental monitoring required under the SEA legislation, and as set out in the SEA Environmental Report.</p>
7	<p>Environmental Considerations</p>	<p>These matters are addressed in full in the SEA and AA documents. The suite of documents that supports the main Strategy report, including the</p>

No.	Submission Text	Response
	We note the subsection relating to SEA / AA. In finalising the Strategy, we recommend including a separate chapter on 'Environmental Considerations'. This section could provide summary information on the key environmental sensitivities within the Strategy area. Important elements such as designated sites, existing green (and blue) infrastructure and ecological linkages could be highlighted along with a short summary of the main environmental objectives included to afford these aspects protection.	background studies and all environmental documents, are deemed to be the primary sources to be consulted on such matters, and an Environmental Considerations chapter in the main Strategy may undermine this approach.
8	SEA Mitigation Measures In finalising and implementing the Strategy, all proposed mitigation measures and recommendations arising from the SEA should be fully incorporated and reflected in the various projects arising out of its implementation, as relevant and appropriate.	In finalising and implementing the Strategy, all proposed mitigation measures and recommendations arising from the SEA will be fully incorporated and reflected in the various projects arising out of its implementation, as relevant and appropriate.
9	Future Amendments to the Strategy Future amendments to the Strategy should be screened for likely significant effects, using the same method of assessment applied in the "environmental assessment" of the Strategy.	Noted. Amendments are screened using an appropriate method that aligns with those used in the assessment of the Strategy.
10	SEA Statement – "Information on the Decision" Once the Strategy is adopted, you should prepare an SEA Statement that summarises: <ul style="list-style-type: none"> • How environmental considerations have been integrated into the Strategy; • How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Strategy; • The reasons for choosing the Strategy adopted in the light of other reasonable alternatives dealt with; and, • The measures decided upon to monitor the significant environmental effects of implementation of the Strategy. You should send a copy of the SEA Statement with the above information to any environmental authority consulted during the SEA process. Guidance on preparing SEA Statements is available on the EPA website at the following link: https://www.epa.ie/publications/research/environmental-technologies/research-306-guidance.php	An SEA Statement summarising the relevant information requirements will be prepared following adoption of the Strategy and circulated to the environmental authorities.
11	Appendix I - Specific Comments on the Draft Strategy Strategy Development The graphic showing the appropriate infrastructure to serve demand levels appears to be from 2009. There is merit in reviewing this information in the context of ensuring it reflects the current situation.	NTA is satisfied that this graphic reflects the current situation.
12	Cycling We welcome the extent to which cycling is being incorporated into the Strategy. An important consideration should be to ensure that designated habitats and protected species are afforded the appropriate protection and that the requirements of the Habitats, Birds and EIA Directives, are considered as appropriate and relevant. We acknowledge the inclusion of references to quietways in this chapter also and note the proposal to identify a network of suitable quietways in the short to medium timeframe.	Noted. Such considerations are provided for under Section 17 of the Strategy.
13	Freight, Delivering and Servicing With regards the support for a regional freight strategy, this should also consider the requirements of the SEA and Habitats Directives.	Noted. Requirements relating to the SEA and Habitats Directives are provided for under Section 17 of the Strategy and detailed in the accompanying SEA and AA documents.
14	Supporting Measures We acknowledge the intention in Objective SM1 to develop a series of local transport plans to integrate the Strategy into city and town centres within the metropolitan area. We also welcome the commitment from the NTA and Local Authorities to appoint dedicated walking and cycling officers within each local authority.	Noted.
15	Implementation We acknowledge that the Strategy clearly shows how it will be delivered on a phased and prioritised basis for the various elements.	Noted.
16	Appendix II - Specific Comments on the SEA Environmental Report In Section 4.11 Landscape, we bring to your attention the Regional Seascape Character Assessment Final Report, prepared by the Marine Institute, and is available at: https://emff.marine.ie/blue-growth/project-13-definition-and-classification-ireland%E2%80%99s-seascapes	Noted. Reference will be made to this document in the Final SEA Environmental Report.

No.	Submission Text	Response
17	In Section 7.3 Cumulative Effects, we refer to you the Good Practice Guidance Note on Cumulative Effects Assessment in Strategic Environmental Assessment. (EPA, 2020).	Noted. Reference will be made to this document in the Final SEA Environmental Report.
18	The EPA funded Environmental Sensitivity Mapping webtool, may be a useful resource to also consider in developing and finalising the Strategy. This is available at www.enviromap.ie .	Noted. Reference will be made to this document in the Final SEA Environmental Report.
19	<p>Monitoring Programme</p> <p>We recommend incorporating the SEA-related monitoring into any Strategy implementation monitoring/review proposed over the lifetime of the Strategy, so that the environmental performance of the Strategy can be evaluated. The EPA has published guidance on SEA-related monitoring is available on the EPA website at https://www.epa.ie/pubs/advice/ea/guidanceonseastatementsandmonitoring.html</p> <p>The monitoring programme should be flexible to take account of specific environmental issues and unforeseen adverse impacts should they arise. It should consider and deal with the possibility of cumulative effects. Monitoring of both positive and negative effects of implementing the Strategy should be considered. The monitoring programme should set out the various data sources and responsibilities and should specify the frequency of monitoring for all relevant criteria, where possible.</p> <p>Should the monitoring identify any adverse environmental impacts related to the implementation of the Strategy, appropriate remedial action should be undertaken.</p> <p>The Monitoring Programme should be flexible to take account of specific environmental issues and unforeseen adverse impacts should they arise. It should consider and deal with the possibility of cumulative effects. Monitoring of both positive and negative effects should be considered.</p> <p>If the monitoring identifies adverse impacts during the implementation of the Strategy, the National Transport Authority should ensure that suitable and effective remedial action is taken.</p> <p>Guidance on SEA-related monitoring is available on the EPA website at https://www.epa.ie/pubs/advice/ea/guidanceonseastatementsandmonitoring.html</p>	<p>Noted. The monitoring programme addresses these issues.</p> <p>The Strategy implementation, monitoring and reporting will be aligned with the environmental monitoring required under the SEA legislation, and as set out in the SEA Environmental Report.</p> <p>Reference will be made to the monitoring guidance document in the Final SEA Environmental Report.</p>