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LECP Chief Officer
Economic Development Unit
Kilkenny County Council
County Hall,
John Street,
Kilkenny.

20th November, 2015

RE: Draft Kilkenny Local Economic and Community Plan and List of

A Chara

I refer to your correspondence of 3rd November, 2015 and subsequent notice of the consultation period on the latest Draft of the Local Economic and Community Plan (LECP) for Co. Kilkenny. The Southern Regional Assembly welcomes the invitation to provide further comment on the LECP process at this stage.

The comments contained in this Report will focus primarily on alignment with the DECLG Circular LG 1/2015 AL 1/2015 – Guidelines on Local Economic and Community Plans issued DECLG (21st January, 2015) and Circular LG 06/2015 AL 04/2015 – Guidance Note on Local Economic and Community Plans issued DECLG (17th July, 2015).

LECP Structure & Process

The Regional Assembly notes the comprehensive nature of the LECP documents, consisting of the list of detailed community actions, list of details economic actions and the latest draft of the Integrated LECP. It is noted that the draft LECP documents have been developed through a process of public consultation, stakeholder engagement, analysis and policy formulation to develop High Level Goals, Objectives and Actions. The Draft LECP documents are supported by a strong evidence base which draws on a wide range of relevant databases.

Policy Context

The Regional Assembly notes that the Draft LECP documents have been prepared having regard to EU, National, Regional and Local policy frameworks as follows.

(a) National Policy

The integration of EU and National Policy into the LECP provides an important context for the overall document with headline targets (themes) from the EU2020 Strategy and National



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Reform Programme evident in the High Level Goals and Objectives formulated in the documents.

The LECP documents also draw upon the National Spatial Strategy (NSS) and Smarter Travel policies in setting the policy context and direction for the High Level Goals and objectives. While the Government have indicated that the NSS will be superseded by a new National Planning Framework (NPF), it should be noted that until the NSS is replaced by the new NPF, the NSS and the classification of settlements under the NSS will remain and any references to the 'former NSS' should be amended.

(b) Regional Policy

The draft LECP documents make reference to the *Regional Planning Guidelines for South – East Region 2010 – 2022* so as to indicate consistency with the Regional Planning Guidelines (RPG). In this regard, specific references in the draft LECP documents to the Strategic Goals and Vision or other specific RPG planning policy objectives as appropriate would assist in demonstrating consistency with the RPG. A suggested format for demonstrating consistency with either RPG or Development Plan policy is included in paragraph (c) below. It is noted that at page 43 and elsewhere in the Draft LECP documents there are references to deficits in infrastructure in Kilkenny and the wider region. It may be useful for the documents to make reference to the Critical Enabling Investment Priorities contained at Section 10.1.1 of the RPGs for the South-East Strategic Planning Area.

Reference might also be made to the *Atlantic Gateways Initiative – Corridor Development Framework* for the Limerick – Waterford strategic linking corridor and the benefits of this corridor to the southern part of the County located around the Waterford Gateway.

It is also noted that the Plan has drawn upon the CEDRA report and on the *Regional Action Plan for Jobs* for the South-East NUTS III areas in the preparation for the Draft LECP. The identification of and/or inclusion of specific actions in the LECP from the relevant *Regional Action Plan for Jobs* would assist in the implementation of actions at local level.

(c) Development Plan Policy

In terms of the requirement for the Draft LECP to be consistent with the Development Plans/ Core Strategies in Kilkenny, it is evident that high level Goals and objectives relate in a general way to the objectives contained in the two Development Plans. In relation to the *Kilkenny and Environs Development Plan 2014 – 2020*, the objectives for the Abbey Creative Quarter/Smithwick's Brewery site as a driver for growth are highlighted and the significance of this development site is acknowledged. Where it is stated in the Draft LECP documents at section 4.2, page 40 that 'the Action Plan has been proofed for consistency with the Kilkenny County Development Plan 2014 – 2020', it would be helpful if the details of proofing against





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the *Kilkenny County Development Plan 2014 – 2020* and the *Kilkenny and Environs Development Plan 2014 – 2020* could be provided so as to assist in demonstrating consistency of the draft LECP documents with the two Development Plans.

Where possible, the link between High level Goals and objectives to specific planning policy objectives in the Regional Planning Guidelines and County Development Plan should be clearly stated so as to highlight the consistency of the LECP with this wider policy context.

An annex table, such as the example below would assist in documenting policy consistency with the RPG, CDP and other relevant policies and could be beneficial and informative, either as an appendix or within the LECP text, as appropriate.

#	High Level Goal/Objective	RPG	CDP/Other Strategy
xx	to support rural transport initiatives in the County that complement existing public and private transport services	PPO 5.5 Regional Bus Services PPO 5.6 Rural Transport.	i.e. Smarter Travel

Other Observations on the document:

- In terms of the LECP process, the LECP documents would benefit from a summary of the outcomes from the public consultation meetings, Focus Groups and bilateral meetings held with stakeholders to illustrate the input into policy formulation and as part of the evidence base.
- The Regional Assembly notes that a comprehensive SCOT (Strengths/Constraint/Opportunities/Threats) has been prepared which identifies key issues in the County and makes a strong contribution to the development of the Goals and Objectives.
- It is considered that actions contained in the draft LECP documents are practical and specific. However, further consideration of the time-bound element (i.e. deadlines instead of a timeframe) and inclusion of steps for delivery would assist in future implementation, monitoring and review of the LECP.



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- (d) The importance of South Kilkenny as part of the Waterford Gateway is evident in Goals relating to Belview Port and the importance of the relationship to WIT and it is clear that the relationship to the Waterford Gateway is a strong one with 50% of all commuters leaving the County identifying Waterford as their destination. It would seem that there may be scope for potential added value in actions focussed on Kilkenny's part in Waterford as the regional Gateway and economic driver of the region. The elaboration of Kilkenny's role as part of the Waterford Gateway could be integrated into some existing Objectives and Goals along with consideration of joint actions with Waterford City and County Council. Such actions could contribute to beneficial outcomes for both Local Authorities with potential collaborative actions, for example, in relation to sustainable transport modes or provision of educations, skills and training, which could prove to be more effective as collaborative actions and achieve better outcomes for both Kilkenny and Waterford Local Authorities in relation to the communities of Ferrybank and South Kilkenny.
- (e) Is there scope for Action No. A35 of Goal 6 to be more focussed to develop specific actions for sustainable travel to address the high level of commuting from Kilkenny to Waterford as highlighted in the discussion around Access and Communications infrastructure?
- (f) In preparing the final draft of the LECP, consideration could be given to the inclusion of graphics and maps to illustrate Co. Kilkenny in its regional context.

Integration/Co-ordination

The Regional Assembly notes that an integrated and targeted approach to addressing social, community and economic issues has been identified in Action A18 under Goal 2 to develop a social enterprise strategy. Other actions which can extend across economic and community elements of the plan would be strongly supported.

Implementation & Monitoring

Section 9 of the Draft LECP sets out the arrangements for implementation and monitoring of the LECP setting out the specific roles of the SPC for Economic Development, Enterprise and tourism for economic actions. The section envisages that monitoring will also take place at a regional level and the Regional Assembly looks forward to working with Kilkenny County Council in developing the appropriate structures to enable regional co-operation, monitoring and effective implementation of the LECP.

SEA/AA

In relation to Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA), the submission received states that the SEA and AA assessments are currently being prepared. In this





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regard, Kilkenny County Council, as competent authority in respect of the SEA and Habitats Directives should ensure that the integration of the environmental assessments/screenings with the proposed plan satisfies their obligations under the SEA and Habitats Directives.

Conclusion

This submission has been prepared in a spirit of co-operation, to assist in the finalisation of the LECP for Kilkenny and the Regional Assembly requests that full consideration is given to the comments as set out above in respect of several aspects the Draft LECP. Overall, the Regional Assembly considers that the latest draft LECP and list of detailed economic and community actions submitted on 3/11/2015 indicate a strong evidence base which has a logical flow into High Level Goals and Objectives, which would appear to be well founded.

Please do not hesitate to contact the Regional Assembly to discuss any of the matters raised in this submission.

Is mise le meas

Stephen Blair,
Director

