



Denis Malone,
Senior Planner,
Planning Department,
Kilkenny County Council,
County Hall,
John Street,
Kilkenny.

3ú Lúnasa, 2017.

A Chara,

RE: Draft Ferrybank Belview Local Area Plan 2017
SRA Ref. No. 17/029

Further to your correspondence of 8th June, 2017 the Southern Regional Assembly sets out below its observations on Draft Ferrybank Belview Local Area Plan 2017.

Strategic Context for the Draft Local Area Plan:-

The Regional Assembly welcomes the publication of the Draft Local Area Plan for Ferrybank Belview, which has an important role to play in the overall strategic planning framework for the Waterford Gateway. Waterford PLUTS 2004 – 2020 set out objectives to build critical mass and to re-enforce and develop the role of Waterford as the economic driver of the South-East. These objectives, now part of the South-East Regional Planning Guidelines 2010 – 2022 (SERPG), set the context for the Draft Local Area Plan for Ferrybank Belview.

Having regard to the SERPG, the Regional Assembly considers that there are 6 key strategic issues relating to the area covered by the Draft Plan.

- (1) The role of the Draft Ferrybank- Belview Plan area in the growth of the Waterford Gateway in support of SERPG population targets.
- (2) Integration of the plan area with Waterford City Centre and the North Quays
- (3) Development of the Port of Waterford at Belview as a working port and as a strategic industrial development site.
- (4) Development of sustainable travel options including public transport and policies to support and facilitate improved access to the City Centre, North Quays and the wider urban area, by walking, cycling and public transport.
- (5) Development of a Joint Retail Strategy to cover the Waterford City area.
- (6) Protection of the River Suir as a designated European Site and sustainable development of the river and the associated network of green spaces/green infrastructure in the plan area, for recreational and amenity purposes



(1) The role of the Draft Ferrybank- Belview Plan area in the growth of the Waterford Gateway in support of SERPG population targets.

The SERPG set an overall population target for the Waterford Gateway of 56,500 for 2016 and 62,500 for 2022. These population targets are set out at Table 3.2 of the SERPG.

The breakdown of the population targets across the different component parts of the Waterford Gateway are set out at Appendix 1 of the SERPG as follows:–

SERPG Population Targets	2016	2022
Gateway area in Waterford City	51,000	55,000
Gateway area in Waterford Environs (Co. Kilkenny)	5,000	6,500
Gateway area in (former) Waterford County Council area	500	1,000
Total RPG population target	56,500	62,500

The 2016 Census saw the population of the area considered to be the 'Waterford suburbs in Co. Kilkenny' increase from 4,811 in 2011 to 5,246 in 2016. This compares to the RPG population target (which is a minimum target for Gateways) for an additional population of 5,000 for the area for 2016.

The approach taken in the Draft LAP is to cater for a population increase of 1,254 to 2022 to reach the RPG Population target for the Plan Area of 6,500 and to extrapolate this figure forward to 2023 for the full 6 year plan period. In order to achieve the projected population target the Core Strategy proposes an indicative figure of 886 dwelling units with a requirement for zoned land of 31ha proposed.

The Draft LAP has, therefore, incorporated the SERPG/County Development Plan¹ population targets into the Core Strategy. The Core Strategy is supported by a Development Strategy to consolidate growth in the Core Urban Area with a sequential approach to development outwards from the core urban area, with undeveloped land closest to the core area and to public transport routes to be given preference. Inherent in the development strategy and in the strategic vision² for the area is the development of community and social infrastructure and services in tandem with the growth in population and new development.

¹ Kilkenny County Development Plan 2014 – 2020, which incorporated SERPG population targets.

² 'To ensure that the people of Waterford City Environs in Co. Kilkenny enjoy a good quality of life with a high standard of education, excellent employment prospects and easy access to a full range of social, economic and cultural services. This will be achieved through integrated planning and co-operation with Waterford City Council, all other authorities in the region, and other agencies, ensuring that Waterford and its environs can compete internationally and maximise its potential as a gateway city serving the entire South-East region' Vision for the Waterford, Chapter 3 of the Kilkenny County Development Plan 2014 – 2020



When taken together with the principles outlined in the Development Strategy, the proposed Core Strategy provision for dwelling unit numbers and proposed land use zoning is considered reasonable and would be consistent, as far as is practicable, with the SERPG.

(2) Integration of the plan area with Waterford City Centre and the North Quays.

The designation of the North Quays as a Strategic Development Zone (SDZ) provides an opportunity for the regeneration of the North Quays to create a sustainable and innovative Area which can improve the connectivity of Ferrybank and the wider plan area to the City Centre. It is noted that the Draft LAP addresses this issue in section 1.9 – Strategic Context – including Objective 1D: ‘to maximise the connectivity between Ferrybank Belview and the North Quays SDZ and to take account of the impacts of the planning scheme when full details are available.’

It is considered that Objective 1D contained within the Draft LAP and other supporting statements would be consistent, as far as is practicable, with SERPG Strategic Goal B2 ‘to support the development and growth of the Gateway’ and the statement on Urban Regeneration at Section 4.2 – Regional Gateway.

(3) Development of the Port of Waterford at Belview as a working port and as a strategic industrial development site.

The SERPG identify the Port of Waterford at Belview as one of three Strategic Industrial Development Sites targeted for growth in Waterford along with the statement on development of the capacity of Port of Waterford at Section 4.2 – Regional Gateway. In SERPG Section 5, Planning Policy Objective 5.16 states: ‘*Planning authorities whose functional areas include the larger commercial ports should consider the need to develop Local Area Plans for the ports through which their development can be coordinated. In this regard, future Development Plan policy should identify and reserve key strategic sites for the further development of the ports. All such projects and Local Area Plans will be required to comply with the principles of sustainable development and to be assessed in accordance with Article 6 of the Habitats Directive.*’

The Draft LAP includes an overarching statement in support of port activities and specific Objectives (5A to 5H) for the Belview Industrial Area, including objectives for specific road improvements to improve access to the port and would be consistent, as far as is practicable, with the SERPG.

(4) Development of sustainable travel options including public transport and policies to support and facilitate improved access to the City Centre, North Quays and wider urban area by walking, cycling and public transport.

SERPG Strategic Goal C seeks ‘to progress towards an accessible region with efficient and fully integrated transport system with specific policies to ‘improve public transport and connectivity’ (Strategic Goal C1) and secure ‘the future balanced development of Waterford



City through enhanced additional connectivity by means of development of a downstream river crossing'. (Strategic Goal C7)

Since the adoption of the SERPG in 2010, Waterford has benefited from the implementation of new 'Green Routes' to make greater provision for buses and cyclists on the roads. The Draft LAP includes specific transport objectives to extend the existing Green Routes from Belview to the North Quays and the City - LAP Objective 10A.

Other key objectives in the Draft LAP at section 10.8 include provision for Park and Ride facilities in tandem with the Green Route, additional cycle lanes and new linking and relief roads. Section 10.7.1 also provides for the provision of an additional Downstream Crossing to provide a link to the south bank of the River Suir in the vicinity of Maypark or Ardkeen, which would serve to create greater connectivity between lands to the North and South of the Suir, improve access to University Hospital Waterford and ease congestion on the existing crossing. The policies and objectives outlined would assist in the realisation of several SERPG objectives relating to transportation and Smarter Travel and would be consistent, as far as is practicable, with the SERPG.

(5) Development of a Joint Retail Strategy to cover the Waterford City area.

The development of a Joint Retail Strategy to cover the Waterford City area is a pressing issue. The SERPG adopted in 2010 included objective PPO 4.12 which sought to 'encourage the preparation of a Joint Retail Strategy for Waterford and its environs, in accordance with the Retail Planning Guidelines issued by the DoEHLG'. The Retail Planning Guidelines published in 2012 states that 'Joint or Multi-Authority Retail Strategies must be prepared' for urban areas identified in the Guidelines and Table 1 on page 22 identifies Waterford and Counties Kilkenny, Tipperary and Wexford as the planning authorities which should participate in the preparation of a Joint Retail Strategy.

The Draft LAP addresses the issue of Retail at Section 4.3 and includes Objective 4B 'to engage with other relevant Local Authorities within the region in the preparation of a Joint Retail Strategy for the greater Waterford City area'.

The Regional Assembly notes that there is no Joint Retail Strategy in place on foot of the requirements for such a strategy to be prepared in both the SERPG and in the Retail Planning Guidelines. The Regional Assembly would, therefore, encourage the early implementation of Objective 4B in the Draft LAP, i.e. the commencement of preparation of a Joint Retail Strategy in co-operation with other relevant Local Authorities.

(6) Protection of the River Suir as a designated European Site and sustainable development of the river and the associated network of green spaces/green infrastructure in the plan area for recreational and amenity purposes

The extensive shoreline along the River Suir is a significant natural asset to the Ferrybank Belview area, as well as being the location for the Strategic Regional Asset of the Port of Waterford and associated industrial lands at Belview.



The SERPG set out important objectives for the protection of natural heritage and states under PPO 8.1 that *'Planning Authorities should develop policies that identify clearly: Environmental and Heritage resources that are to be maintained, conserved and enhanced and integrated into any development proposals involving these sites...''the means by which potential impacts on environmental resources are to be avoided or mitigated'* and PPO 8.6 states – inter alia - *'Ensure that development does not have a significant adverse impact, incapable of satisfactory mitigation, on plant, animal and bird species and habitats protected by law and that developments affecting Natura 2000 sites are assessed in compliance with Article 6 of the Habitats Directive'*.

In Section 7.2 and 7.3, the Draft LAP describes the unique environmental character and value of the natural heritage of the Plan area and the potential of the green infrastructure network. In this regard, it is noted that the Draft Plan includes objectives to protect the natural heritage including the European sites – the Lower River Suir cSAC (Site Code 002137) and the River Barrow and River Nore cSAC (Site Code 002162). The Draft LAP also provides for policies to support and encourage recreation and tourism opportunities represented by the extensive shore line, the potential to create new walkways by linking existing areas of open space and woodland and the opportunity to develop the abandoned railway line between Waterford and New Ross as a Greenway for cycling and walking.

Strategic Environmental Assessment

It is noted that an Environmental Report (SEA) was carried out to assess the environmental implications of Draft LAP in accordance with the requirement of the SEA Directive 2001/42/EC and the Planning and Development (Strategic Environmental Assessment) (SEA) Regulations 2004 (as amended). It is noted that the SEA Summary of Assessment states that *'the process of SEA and Plan formulation is an iterative one and as such environmental considerations have informed all stages of plan preparation carried out to date in order for the potential for significant adverse effects arising from implementation of the development objectives to be minimised. Therefore, as can be seen, no development objectives are predicted to have a significant adverse impact. However, a number of development objectives are predicted to have an uncertain impact. Mitigation measures to lessen any possible impacts are outlined in Chapter 7 of this report.'* It is also noted that a Strategic Flood Risk Assessment (SFRA) was carried out and is included as Appendix 1 to the SEA Environmental Report. Section 3.1 of the SFRA states that *'This SFRA has fully informed the zoning of the LAP.'*

Habitats Directive Assessment

The Regional Assembly notes that an Appropriate Assessment Screening was undertaken for the proposed LAP and that the AA Screening concluded *'that this Plan (either individually or in combination with other plans or projects) shall not give rise to significant effects on the integrity of any Natura 2000 sites and it can proceed as proposed, without a need for full Appropriate Assessment'*



Conclusion:

The Regional Assembly welcomes the preparation of the Draft Local Area Plan for Ferrybank Belview and considers that the Draft plan has successfully identified and addressed key strategic issues in the context of the location of Ferrybank and Belview within the Waterford City Gateway and its Environs and would be consistent, as far as is practicable, with Planning Policy Objectives contained in the South-East Regional Planning Guidelines 2010 – 2022.

Mise le meas,

**Stephen Blair,
Director, Southern Regional Assembly.**