

15th June 2018

Development Plan Submissions – Issues Paper
Planning Section
Kilkenny County Council,
County Hall,
John Street,
Kilkenny R95 A39T

BY EMAIL to:- ourplan@kilkennycoco.ie

Dear Sir/Madam,

RE: KILKENNY COUNTY DEVELOPMENT PLAN – ISSUES PAPER SUBMISSION

The preparation of the Kilkenny County Development Plan (CDP) represents an opportunity to identify effective policies for the proper planning and sustainable development of County Kilkenny.

Port of Waterford Company (PoW) welcomes this opportunity to comment on the first stage of the CDP review process, as provided by the Issues Paper, published in April 2018.

Summary of Key Points for inclusion in the County Development Plan

The Port of Waterford requests that a number of points are considered for inclusion in the Kilkenny County Development 2020-2026. It is our view that policies in the Kilkenny County Development Plan 2020-2026 should;

1. Recognise the Port of Waterford as a Port of National Significance that will assume added importance as the terms of Brexit fully emerge and support the delivery of improvement to Port capacity;
2. Align with the emerging Port of Waterford Masterplan 2019 – 2044;
3. a) Recognise settlement hierarchy and Belview's location in the Waterford gateway, and provide detailed policies that will enable the growth of Belview Port as an economic and employment zone;
b) Consider the potential for Belview to accommodate a limited amount of commercial space and for Marine point to act as an enterprise hub for emerging industries. Emerging CDP policy could consider the possibility of greater flexibility for commercial uses under the port related zoning;
4. Include development objectives identifying existing infrastructure deficits and future requirements; and
5. Recognise the potential of rail freight to deliver economic and environmental benefits;

1. CDP Policy to support the Delivery of Improvements to Port Capacity

As emphasised by the National Planning Framework, Ireland's ports play an important role in facilitating economic growth and are critical infrastructure for international trade. Over 90% of our international trade moves by sea.

Port of Waterford is the fifth largest of the State commercial port companies in terms of total tonnage handled and its base at Belview is an infrastructural asset of national importance. It is designated as a Port of National Significance (Tier 2) within the terms of the National Port's Policy. Tier 2 Ports have clear demonstrable potential to handle higher volumes of unitised traffic and have existing transport links to serve a wider, national marketplace beyond their immediate region. Together with Tier 1 ports, they will lead the response in meeting Ireland's future port capacity requirements. A National Port Capacity study is currently underway which will assess the capacity within the Irish port system to meet present and future demand. The findings of this study will inform any future review of the national ports policy.

Belview Port is one of **Ireland's closest multi-modal ports to Europe**. It is located within 2 hours of the major cities and 70% of the population of Ireland. With a significant portion of Ireland's trade with mainland Europe transiting as road freight through the UK, Brexit is likely to provide the Belview with an opportunity to increase its load on load off (LoLo) throughput and offer a viable alternative to the UK landbridge for exports to and imports from mainland Europe. The South-East ports including PoW, Rosslare Port and New Ross Port can present a coordinated approach and a range of possible solutions to some of the challenges presented by Brexit.

The Port of Waterford is also designated as a Comprehensive Port on the Ten-T Network. The Trans-European Transport Network (TEN-T) is an EU transport policy directed towards the development of a network of roads, railway lines, inland waterways, maritime shipping routes, ports, airports and rail-road terminals. 'Motorways of the Sea' which is the maritime pillar of the TEN-T policy supports further cohesion between member states, removal of bottle necks and implementation of critical port infrastructure and intermodal links, both sea side and land side. It will provide opportunities to access funding under the Connecting Europe Facility (CEF).

Identifying and securing Port future capacity improvements as part of the County Development Plan is timely in light of likely significant changes to the trading environment. It is also consistent with EU and National policy as stated in the recently published National Planning Framework (NPF). National Policy Objective (40) of the NPF requires planning authorities to:

'Ensure that the strategic development requirements of Tier 1 and Tier 2 Ports, ports of regional significance and smaller harbours are addressed as part of Regional Spatial and Economic Strategies, metropolitan area and city/county development plans, to ensure the effective growth and sustainable development of the city regions and regional and rural areas.'

Recommendation: In line with NPF policy and having regard to the emerging Port Masterplan, the Kilkenny CDP should identify policies that support Belview Port in meeting its share of Ireland's future capacity requirements and responding to the changing trading and logistics environment arising from Brexit, further projected growth in our population and agricultural activity, the capacity constraints being experienced elsewhere, particularly in Dublin and our need to utilise more environmentally sustainable routes to market.

2. Aligning the Port of Waterford Masterplan 2019- 2044

Over the next five years, POWC's Corporate Business Plan 2017-2021 forecasts a doubling of container throughput and significant growth in bulk tonnage throughput. Growth beyond 2021 will require increased capacity and significant investment in ancillary infrastructure.

This additional port capacity must be delivered in a timely and coordinated manner. The Port of Waterford is preparing a 25 year masterplan to identify the infrastructure required to deliver this capacity. This masterplan will include both shore and marine based proposals, with the marine based elements focusing primarily on improving navigational access to the Port, reducing dredging requirements and improving shore side berthing provisions and facilities. It is the Port's intention that the masterplan will be finalised during Q1 2019.

Although, the Port Masterplan is not subject to formal approval or adoption by any local, regional or national authority it is mindful that securing implementation of key projects and proposals will require statutory support at the regional, county and local level. Policy alignment between the Port Masterplan and CDP is therefore critical. Although not mandatory, the Port intends to carry out Strategic Environmental Assessment of the Masterplan to ensure that any potential significant effects on the environment are identified, avoided and/or mitigated. Ultimately, this approach will allow the masterplan to be aligned more fully with the statutory plans including the Kilkenny County Development Plan, which will also undergo SEA, but in this case as a legal requirement.

Recommendation: To enable growth in Port capacity, the Port of Waterford seeks county development plan policies that

- Are aligned with the provisions and where appropriate adopts proposals of the emerging port masterplan.
- support the development of the necessary infrastructure; and
- Acknowledge the potential of the Port of Waterford to act as a driver for growth in the south-east.

3. Belview as an Economic and Commercial Hub

PoW is the fifth largest of the State commercial port companies in terms of total tonnage handled. The port offers both LoLo (lift-on lift-off) and bulk services and enjoys excellent connectivity with its customer base in the surrounding catchment via the national road and rail networks.

The Belview area comprises the Port of Waterford Company, port related activities and a larger strategic industrial and employment development area. The Port offices are based in the Marine Point building, located east of the N29.

In terms of regional economic growth, the RSES for the Southern region identifies key targets for the Southern Region including the creation of 220,000 new jobs to support the corresponding population targets. With the population of Waterford City and Suburbs to increase by 30,000 people, jobs must also increase to minimise unsustainable commuting patterns.

The CDP Issues paper states that County Kilkenny is well positioned to support sustainable economic growth through the following key opportunities.

- The Ferrybank area; with the potential to deliver significant sustainable growth in the context of the targets set for Waterford City in the National Planning Framework.
- The Belview Port area; in close proximity to Waterford, with its strong industry and employment base, has significant existing capacity for expansion; 190 hectares are zoned for development as a strategic employment location.

The CDP Issues Paper clearly recognises Belview as an area with capacity for industrial and employment expansion. The recently adopted Ferrybank-Belview Local Area Plan 2017 is consistent with this approach and recognises the importance of the Belview Industrial area in the national, regional and local context. The LAP zones the area around Belview Port as ‘Port Facilities and Industry’. The objective of this zoning is ‘to allow for the further development and expansion of port facilities and associated industries, to assist in the economic development of the wider area, whilst not encouraging leakage of uses which would be more appropriately located in the existing urban centres of Waterford City and Ferrybank.’ Although acknowledging the need to protect the viability of Waterford City and Ferrybank, a limited amount of commercial office space at Belview would help to create a more vibrant employment area. This greater flexibility in permitted uses would also take into account existing infrastructure that is already in place.

Recommendation:

1. Recognise the settlement hierarchy and Belview’s location in the Waterford gateway.
2. Provide detailed policies in the CDP that will enable the growth of Belview Port as an economic and employment zone;
3. Consider the potential for Belview to accommodate greater flexibility in permitted uses and for some commercial space to be permitted at Marine Point. This would act as an enterprise hub for new industries. Emerging policy might suggest a limited removal of the restriction on commercial uses under the port related zoning.

4. Development Objectives in relation to Infrastructure Requirements

Expansion of Belview Port will be supported by the provision of ancillary facilities such as truck parking and storage as well as new infrastructure relating to the provision of fresh water, fire water, foul water treatment, power and broadband which are all required. Improvements to the N29 as identified in the Ferrybank-Belview Local Area Plan 2017 must also be implemented during the lifetime of the CDP.

Recommendation: the County Development Plan should include development objectives which identify infrastructure deficits in the Belview area as well as actions to ensure delivery and funding of improvements. Detailed CDP objectives should be included to ensure that the required infrastructure, including improvements to the N29 in particular, are delivered early in the lifetime of the Plan. Advancing proposals to detailed design stage and securing the relevant consents is also likely to open up funding opportunities under CEF and ‘Motorways of the Sea’.

5. Recognise the Potential of Rail Freight


The port is served by the Limerick/Waterford and Dublin/Waterford rail line. The line enters onto the Belview quays allowing containers to be transferred direct from train to ship by the gantry cranes. PoW has consistently invested in and supported the development of the rail

freight network in Ireland as a critical component in its strategy to grow its freight handling business but also to help develop a genuinely sustainable national freight distribution network that is fully aligned with the government policy.

Recommendation: Port of Waterford seeks the inclusion of County Development Plan policies that refer to the importance of rail freight and its potential to deliver both economic and environmental benefits to a wider area, particularly to the West/North West of the country.

Port of Waterford welcomes the opportunity to offer its views on the emerging County Development Plan and, as a key stakeholder, looks forward to working with Kilkenny County Council on this matter.

Yours sincerely,



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