

15th March 2017

NPF Submissions
Forward Planning Section
Department of Housing, Planning, Community and Local Government
Custom House
Dublin 1, D01 W6X0
npf@housing.gov.ie

Our Ref: 501.00227.00001
Your Ref: Ireland 2040: Our Plan – Issues and Choices Paper

Dear Sir/ Madam,

RE: *Ireland 2040: Our Plan – National Planning Framework: Issues and Choices*

SLR Consulting on behalf of the Port of Waterford Company (POWC) welcomes this opportunity to comment on the first stage of the process of drafting a National Planning Framework (NPF), as provided by the Issues and Choices Consultation Paper published in February 2017.

The preparation of the NPF represents a major opportunity to develop effective evidence based policy which can address many of the fundamental issues which will affect this country over the next 20 years.

As a policy adopted by Government, it must also form a means of co-ordinating activity across Government departments and state bodies, by setting out clear spatial development strategies which can be used to make efficient use of state assets as well as planning and allocating finance for infrastructure development and capital investment.

The POWC is the Commercial State Company with responsibility for the operation and development of the Port of Waterford under the Harbours' Acts. The Port of Waterford base at Belview is an infrastructural asset of national importance and this is recognised through its designation as a Port of National Significance (Tier 2) within the terms of the National Port's Policy. It is also designated as a Comprehensive Port on the Ten-T Network.

Belview Port is the centre of operations within the Port of Waterford. Located on the south east coast it is the closest multi-modal port to Europe. The Port handles substantial vessels with ships drafts of up to 9.5 metres and lengths of up to 200 metres and has excellent inland connectivity with direct access to the M9 and active rail freight connections. In terms of throughput, Belview Port currently handles over 1 million tonnes of bulk products (mainly agri-related) together with another 100k+ tonnes of break bulk (mainly timber and steel). The Port also operates in the Container/Lo-Lo sector handling 40k TEU annually.

In addition to Belview Port, the POWC also owns a substantial land bank on the north and south quays in Waterford City. Although these areas currently accommodate a variety of uses including car parking, civic events and docking of cruise vessels, due to their central location within Waterford City they have significant future potential in the context of City's prospects for future urban development and regeneration.



Figure 1 Port Development Zone

A summary of the Port's key points in relation to 'Ireland 2040: Our Plan – National Planning Framework: Issues and Choices' are provided in the sections below insofar as they relate to matters that:-

- Are of national significance
- Are strategic in nature
- Have a 'spatial' place based focus

In summary, the Port of Waterford is seeking the inclusion of policies that;

- Are supportive of maintaining and enhancing the role of the port;
- Recognise the potential of rail freight in reducing congestion, carbon emission and improving air quality;
- Are based on further analysis in relation to the impact of Brexit on key sectors;
- Repopulate and regenerate city centres inclusive of Waterford; and
- Are deliverable at a local level with appropriate decision making structures in place.

Maintaining and Enhancing the Role of the Port Of Waterford

As previously stated, the Port of Waterford is an infrastructural asset of national importance and this is recognised through its designation as a Port of National Significance (Tier 2) within the terms of the National Port's Policy and is a Comprehensive Port on the Ten-T Network.

The South East Regional Planning Guidelines 2010-2022 also states that Belview Port is a significant access point to the region and it is of regional and national importance for import and export trade. The Guidelines further promote the potential that exists at Belview for the development of an industrial park of regional and national importance that should be exploited by developing it as a flagship location for regional industrial development initiatives.

The objectives and ambitions of the Port of Waterford for the next five years to 2020 are set out in the Port of Waterford's Corporate Business Plan 2016-2020. This plan identifies Port activity and profitability which is forecast to grow significantly over this period and the ground work and resources required for the next phase of the Port's development.

Based on the analysis undertaken as part of the Corporate Business Plan, the POWC has identified that growth beyond 2020 will require increased capacity and associated infrastructure development. The preparation of a Port masterplan is currently underway and this will identify the type and extent of development required.

To enable this growth, the Port of Waterford will require supportive policies within the NPF and appropriate decision making mechanisms, including the dovetailing of planning and foreshore licencing consent procedures. Supportive policies within the NPF must also be carried through and be consistent with the national marine spatial plan.



Figure 2 Containerised cargo is discharged/loaded by using 2 high speed wide-span gantry cranes

Recognise the Potential of Rail Freight

The POWC 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 including;

- Smarter Travel and Climate Change strategies,
- The National Ports Policy,

- The objectives of the Trans European Network for Transport (TEN-T),
- the emerging Department of the Environment National Low Carbon Roadmap, and
- The National Spatial Strategy 2002 (NSS), which identified the need to increase rail freight.

The recently completed Rail Review carried out by the NTA in 2016 also notes the EU commitment¹ to maintaining a dense railway network in all Member States and target of a 50% shift of medium distance freight journeys from road to rail by 2050.

It should be noted that this strong policy focus is at odds with the provisions of Ireland 2040: Our Plan – Issues and Choices paper which is silent on the opportunities and possibilities provided by Ireland's rail freight network.

The NPF and associated SEA should also acknowledge that increasing transportation of freight by rail has the potential to remove considerable numbers of trucks from the road network which would reduce congestion and in turn lead to environmental benefits such as reductions in noise, air pollution and CO₂ emissions. Specifically, in relation to CO₂ emissions, rail is estimated to emit 22.8 grams CO₂ per tonne km vs. 123.1 grams CO₂ per tonne km for road.²

The Port of Waterford is well positioned to respond to future changes in freight distribution, however the NPF must outline a clear policy and programme of supporting measures to define and build the role of the rail freight network nationally.

The emerging NPF should also consider the recommendations of the National Freight Review currently being commissioned by the DTTAS. We expect that this review will identify the opportunities rail freight can deliver from both a commercial and environmental perspective to the Irish economy in the context of increasing economic growth and reducing road congestion.

¹ White paper: Roadmap to a Single European Transport Area -Towards a competitive and resource efficient transport system', European Commission, (2011)

² TERM 2003 27 EEA 31, European Environment Agency, (2003) as referenced by the 2016 Rail Review undertaken by the NTA



Figure 3 the Port of Waterford's Multi-modal Interchange

Brexit Response

Whilst pertinent to border areas in particular, the POWC would welcome further sectoral analysis to develop a wider more proactive policy response to the challenges and opportunities faced by Brexit. Revised analysis addressing potential impacts on the agri-food, fisheries, transport and energy sectors should be presented to illustrate likely scenarios and develop a preferred national policy response in so far as it relates to the scope of the NPF. In this regard it will be particularly important that the NPF prioritises investment in ports to ensure Ireland has adequate infrastructure to cope with new trading arrangements after Brexit. The role and importance of those ports with direct access to the EU should be identified and supported in the NPF as a means of maintaining and enhancing competitiveness.

Repopulate and Regenerate City Centres Inclusive of Waterford

The POWC is actively working in partnership with Waterford City & County Council on seeking and promoting practical and achievable development options for the North Quays in Waterford City. The site was recently designated as a Strategic Development Zone (SDZ).

A core objective of the NPF is to encourage new development in cities. The NPF should include meaningful recommendations to address population decline within urban areas and constraints affecting the development of brownfield sites such as the North Quays.

The North Quays is critical to the development of Waterford city and the wider South East region and should be supported as a project of national and regional significance. A city regeneration fund should also be introduced to enable issues around viability and market demand to be overcome.



Figure 4 View of Waterford South Quays

An efficient and effective regional decision making structure.

It is noted that each of the Regional Assemblies has a leadership role to play in identifying regional policies and coordinating initiatives that support the delivery and implementation of national planning policy. It is also the role of the Regional Assemblies to co-ordinate local authorities to secure shared national and local objectives. This is to be welcomed in locations where strategic planning issues extend across local authority boundaries but the NPF should also consider the need for more locally based decision making structures either at the sub or city regional level. This approach should take into account existing innovative arrangements such as the 'three sisters' cultural collaboration between Kilkenny, Wexford and Waterford.

Strategic transport planning can help regions achieve their potential by identifying transport networks required to serve social and economic development. The POWC would support the need for more formal integration between land use and transport at regional level and support the extension of the approach applied in the Greater Dublin Area (GDA) to other regional assembly areas which would greatly strengthen levels of integration between land use planning and transport planning across the country.

The POWC appreciates the opportunity to give its views on the emerging National Planning Framework and welcomes the consideration of points outlined above.

Yours sincerely
SLR Consulting Limited

Aislinn O'Brien
Associate Planner