

Revision to the National Planning Framework

Public Consultation - July to September 2024

Submission from Port of Waterford Company

Introduction

Port of Waterford Company welcomes the opportunity to respond to the Public Consultation on the Draft First Revision to the National Planning Framework.

Since its publication in 2018, we view the National Planning Framework as a positive document with laudable priorities, particularly in relation to regional growth and development and investment in strategic infrastructure.

The Port notes the National Planning Framework's recognition *that "Ireland's ports are key infrastructural assets and perform an indispensable role in facilitating the movement of both people and goods"*.

The strategic importance of Ireland's ports *"cannot be overstated"*. That importance will increase further, with our determination as a country to transition to a low carbon society - ports are recognised as a key enabler of Ireland's ambitions for the offshore renewable energy sector.

Per the proposed South Coast Designated Marine Area Plan, there will be offshore renewable infrastructure in the Celtic Sea. New facilities at Port of Waterford will facilitate the installation and servicing of offshore wind energy projects.

Economic and societal benefits are expected for the Waterford City Region.

Accordingly, Port of Waterford recommends the inclusion of a new Key Future Growth Enable for Waterford to be **"Maximise employment and other opportunities expected from offshore wind farm installations on the near coast"**

Commenting more generally, it is important to stress the positive role that Port of Waterford currently plays for the Waterford City Region by handling imports of raw material for important industries in the Region like agriculture and the export of value add finished goods from exporters in the Region via its Container Terminal.

A number of industries and businesses have established themselves in the Port Enterprise Area to take advantage of the Port facilities and the excellent road connectivity into Belview.

It is likely that there will be further expansion into the Port Enterprise Area and IDA Industrial Estate arising (1) the development of ORE in the Celtic Sea and of a Transactional ORE Port at Belview, (2) the potential to use Belview as a base for green energy manufacture as energy from offshore windfarms will come ashore close to the Port at Belview and (3) the plans to develop the city of Waterford in the Belview – Ferrybank direction.

The Port of Waterford at Belview is a Tier 2 Port. It is important to consider the strong contribution to the South East Region that Belview Port when considered alongside the other Tier 2 port in the region at Rosslare to create economic success for the wider South East Region and also as a Port Combination to relieve congestion at Tier 1 Ports

1.0 Port of Waterford

The Port of Waterford Company hold and operate Belview Port in County Kilkenny.

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 international trade moves by sea.

Port of Waterford is an infrastructural asset of national importance. This is recognised through its designation as a Port of National Significance (Tier 2) within the terms of the National Ports Policy. It is also designated as a Comprehensive Port on the Ten-T Network.

Belview Port is the centre of operations within Port of Waterford and is Ireland's closest multi-modal port to Europe. It is located within 2 hours of the major cities and 70% of the population of Ireland.

1.1 Service Areas

The Port of Waterford service areas include:

Bulk and Other Cargos - Providing bulk cargo handling services for dry and break-bulk cargoes has been a mainstay of the Port's offering for decades utilising vital experience and modern equipment from our two long established licenced stevedores

Unitised Logistics – A twice weekly Rotterdam service supported by the Port's own stevedoring team provides unitised transport to and from Ireland. The service is well used by businesses located in the South East of Ireland and those located in areas serviced by the rail connection into the Port.



Energy – In recent years, Port of Waterford has emerged as a handling port in support of some of our Ireland’s leading onshore windfarms. The Port is recognised as a leading handling Port for onshore windfarm and other energy components. In line with Ireland’s plan for extensive offshore wind installations the Port has ambitious plans to participate in this exciting opportunity.

Circular Economy – Playing a significant role in the transition towards a circular economy – with lands / facilities reserved for such activities e.g. Waste Processing and Production of Alternate Fuels and Metal Storage for Recycling.

Storage – The Port Company and Port Stakeholders offer a variety of property related opportunities from modern office facilities through to warehouse and open storage.

1.2 Key Features

Strategic Location – Ideally located to support regional economy and agricultural bases of the South East of Ireland offering good connectivity between this part of Ireland and Europe. The Port is also located close the South Coast Designated Maritime Area (SC-DMAP) for Ireland’s Celtic Sea and the expected development of Offshore Renewable Energy (ORE) in this area.



Port Details – Accessible in most weather conditions offering uncongested berths, flexible use and excellent availability.

Lift Capability - Significant experience of planning and executing complex heavy lift operations up to 150 tonnes with heavy lift partners located in the area

ISPS Compliant – Fully International Ship and Port Security Code (ISPS) compliant facilities with state of the art security systems and operations to ensure the safety of our clients assets at all times.

Operations – 24/7

2.0 Policy Context

2.1 National Planning Framework, 2019

The National Planning Framework “Ireland 2040 Our Plan” (NPF) is the Government’s high level strategic plan for shaping the future growth and development of the State to the year 2040. The NPF provides guidance on how and where future development of Ireland will take place. This framework seeks to define where we live and where we work. It provides a future roadmap for transportation objectives. To ensure that sustainable infrastructure exists for the populations through to 2040, transport and planning must work in tandem with each other, providing guidance for sustainable living, working and commuting.

The NPF outlines that with a “network of large towns, the southeast has capacity for improved growth, but has not had a focus sufficient in scale to drive the sustained development of the region as a whole. Regional opportunities to leverage growth include national and international connectivity, especially via Ports proximate to continental Europe, such as Belview and Rosslare-Europort, strengthening HEIs and further balanced employment and housing development in key settlements and county towns”

Ireland 2040 includes both a vision and strategy which is underpinned by a series of National Policy Objectives.

Examples are:

National Policy Objective 40: *“Ensure that the strategic development requirements of Tier 1 and Tier 2 ports of regional significance and smaller harbours are addressed as part of Regional Spatial and Economic Strategies, metropolitan area city/county development plans, to ensure the effective growth and sustainable development of the city regions and regional and rural areas”*

National Policy Objective 5: *“Develop cities and towns of sufficient scale and quality to compete internationally and be drivers of national and regional growth, investment and prosperity”*

National Policy Objective 6: *“Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets that can accommodate changing roles and*

functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area”

In terms of the principal elements of the strategy, the NPF supports ambitious growth targets to enable all four cities of Cork, Limerick, Galway and Waterford to each grow by at least 50% to 2040 and to enhance their significant potential to become cities of scale. This means enabling our cities to grow by more than twice as much to 2040 as they did over the 25 years to 2018.

2.2 Draft First Revision to the National Planning Framework, July 2024

A Draft First Revision of the National Planning Framework was published for consultation on 10 July 2024. The Framework is revised and updated to take account of changes that have occurred since it was published in 2018 and to build on the framework that is already in place.

In the period between 2022 and 2040 it is expected that there will be roughly an extra one million people living in our country. The NPF will manage the growth by continuing to focus on achieving balanced growth targeting the five cities (Dublin, Cork, Limerick, Galway and Waterford) for 50% of overall national growth between them.

In relation to the South East, the Draft Revision to the NPF highlights regional opportunities to leverage growth including national and international connectivity, especially via ports proximate to continental Europe, such as Belview Port and Rosslare–Europort.

National Policy Objective 40 as identified by NPF (2019) will be superseded by National Policy Objective 51 and 52 which will put greater emphasis on facilitating the ORE sector within the context of Port development.

It is draft National Policy objective 51 to

*“Ensure that the strategic development requirements of Tier 1 and Tier 2 Ports, ports of regional significance, State Fishing Harbours and smaller harbours are addressed as part of Regional Spatial and Economic Strategies, and plans at local level to ensure the effective growth and sustainable development of the city regions and regional and rural areas, including, where appropriate **infrastructure to effectively support the development and maintenance of offshore renewable electricity generating developments**”*

It is draft National Policy Objective 52 to

*“Support the sustainable delivery of port and harbour **infrastructure to facilitate the development, maintenance and operation of offshore renewable electricity generating developments**”*

2.3 National Marine Planning Framework (NMPF), 2021

The NMPF supports the strategic development of ports in line with approved master/strategic plans, and further supports investment in the land based and coastal infrastructure that necessary to establish and maintain an indigenous ORE sector.

Under Ports, Harbours and Shipping, the stated objectives of the NMPF are to:

- *Safeguard the operation of **ports as key actors in the economic wellbeing of the State** through the provision of safe and sustainable marine transport*
- *Sustainable development of the ports sector and full realisation of the National Ports Policy with a view to providing adequate capacity to meet present and future demand, and to adapt to the consequences of climate change”*

2.4 Climate Action Plan (2024)

The purpose of the Climate Action Plan is to lay out a roadmap of actions which will ultimately lead us to meeting our national climate objective of pursuing and achieving, by no later than the end of the year 2050, the transition to a climate resilient, biodiversity rich, environmentally sustainable and climate neutral economy. It aligns with the legally binding economy-wide carbon budgets and sectoral emissions ceilings that were agreed by Government in July 2022. Central to this plan is the need to accelerate Renewable Energy Generation.

The Port welcomes the NPF recognition of “*the accelerated rollout of onshore wind energy and solar development*”

2.5 National Ports Policy, 2013

The National Ports Policy provides the overarching policy framework for the governance and future development of Ireland’s state port network. The responsiveness and competitiveness of Ireland's maritime transport industry are underpinned by the National Ports Policy 2013. It has helped foster competition between ports and created relatively low barriers to entry for shipping companies seeking to enter the Irish market. The National Ports Policy is a vital component in ensuring Ireland’s international connectivity in an environmentally, economically, and socially sustainable manner.

A review of the National Ports Policy commenced in 2023, with the closing date for pre-draft submission on the 15th of January 2024. The review will consist of a two-part consultation process, with the objective to present a new draft policy to the Government in 2025.

As outlined in the issues paper on the review of the National Ports Policy the following factors need to be considered to harness the resources and to protect the future of our Ports:

1. Sustainability - On a global scale, sustainability is one of the key trends impacting Ports. Climate adaptation planning and increased investment will be essential to enhance the resilience and continued operations of the port network.
2. Blue & Green Economy - Ports are also important hubs for the Blue Economy (all economic activities related to oceans, seas and coasts) and are critical strategic partners in enabling the greening of our energy supplies. By acting as facilitators for the development of offshore renewable energy (ORE), ports have a pivotal role in the evolution of more sustainable energy sources such as wind and green hydrogen. Ports, therefore, must have the necessary infrastructure to allow them to grasp this opportunity.
3. Circular Economy - Given their business ecosystems, ports also have a role in developing the emerging circular economy and benefiting from the new logistics and industrial activities this could attract.
4. Alternative Fuels Infrastructure Regulation - Under the Alternative Fuels Infrastructure Regulation, ports on the Trans-European Transport Network (TEN-T network) will be obliged to provide shoreside electricity for visiting vessels and bunkering facilities for alternate fuel provision by 2030. It also stipulates that if clear market demand is evident, refuelling points for liquefied methane at maritime ports of the TEN-T core network should be available by 2025.
5. Offshore Renewable Energy - It has long been recognised that ports play a crucial facilitating role in developing ORE. The ORE industry will be regionally dispersed with the initial fixed bottom installations expected along the east and south coasts while the west will largely serve floating installations. The sector will be served by those ports which can provide the infrastructure and natural advantage to support ORE development.

Ireland will potentially need to build, on a phased basis, around four to five standard ORE port facilities (Marshalling & Assembly ports and Construction Support ports) over the next 25–30 years. In addition, ports will be required for ORE operation and maintenance activities.

2.6 Powering Prosperity Ireland's Offshore Wind Industrial Strategy, 2024

Powering Prosperity Ireland's Offshore Wind Industrial Strategy (Department of Enterprise, Trade and Employment, March 2024) identifies the scale of the opportunity with respect to ORE with Ireland's target to generate 37GW of ORE by 2050.

Powering Prosperity: Ireland's Offshore Wind Industrial Strategy sets out measures to enable companies in Ireland to play a major role in the development of Irish projects.

Supply chain opportunities such as Electrical engineering for installation of onshore and offshore, substations; Marine engineering; Haulage transportation on land and sea; electrical and mechanical repairs; synthetic rope and mooring line manufacturing, and vessel and port facilities. Zoning/Policy for such activities should be reflected in the Local Area Plan.

2.7 Policy Statement on the Facilitation of Offshore Renewable Energy by Commercial Ports in Ireland, 2021

The policy statement identifies that a multiport approach will be required to address the needs of the ORE industry and that ORE developments will typically require both large-scale port infrastructure for project deployment and smaller-scale port facilities to provide ongoing operation and maintenance (O&M) services and additional supply chain services necessary for offshore wind project developments.

2.8 The South Coast Designated Maritime Area Plan (DMAP) Proposal

The South Coast Designated Maritime Area Plan (SC-DMAP), published in May 2024, puts forward an initial 'proposed' geographical area within which future ORE development may take place.

The draft SC-DMAP identifies four Maritime Areas (See Figure 2) for proposed future deployments of both grid connected and non-grid connected ORE. Development within Maritime Area A will aim to deploy by 2030 or as soon as feasible thereafter, subject to all necessary project level assessments and consents, further subsequent programmes of deployment will take place within Maritime Areas B, C and D area over an approximate ten-year period.

Policy Objectives for Ports and Harbours (PH) - PH 1 states that:

The SC-DMAP supports, in accordance with national policy, the alignment of terrestrial planning with marine planning at regional and local level to provide for the sustainable development of port infrastructure that enables the development of ORE within the SC-DMAP area. This support is subject to the carrying out of the requisite statutory environmental assessments at plan and project level (which may include SEA, EIA and/or AA) and the outcome of planning and / or licensing processes as relevant.

In relation to Ports and Harbours, it states that

The accelerated deployment of ORE and the achievement of Government's wider renewable energy and decarbonisation objectives will be enabled by the timely development of appropriate national and regional port infrastructure.

Therefore, alongside the outcome of offshore wind auctions, the SC-DMAP will establish a stable commercial environment for investments in port development by providing a transparent pipeline of proposed future fixed offshore wind projects.

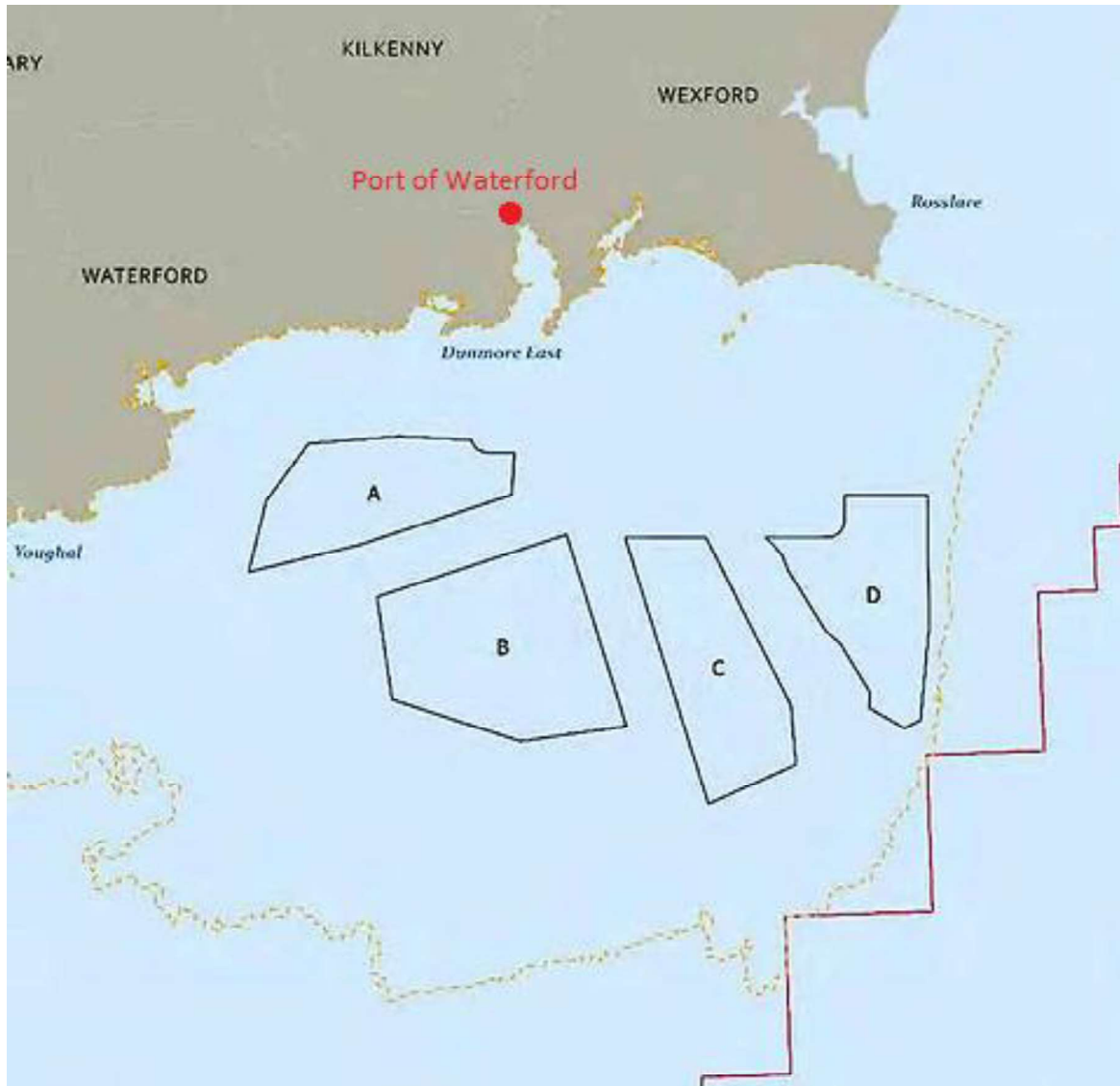


Figure 2 Maritime Areas A to D proposed for offshore wind development in the SC-DMAP

2.9 Regional Spatial and Economic Strategy (RSES) for the Southern Region

The RSES provides a long-term, strategic development framework for the future physical, economic and social development of the Southern Region and includes Metropolitan Area Strategic Plans (MASPs) to guide the future development of the Region's three main cities and metropolitan areas – Cork, Limerick-Shannon and Waterford. The Strategy covers the period of 2020-2026.

The RSES sets out a vision for the Southern Region to:

- Nurture all our places to realise their full potential.
- Protect, and enhance our environment.
- Successfully combat climate change.
- Achieve economic prosperity and improved quality of life for all our citizens.
- Accommodate expanded growth and development in suitable locations.
- Make the Southern Region one of Europe's most creative, innovative, greenest and liveable regions.

The RSES identifies the need to build critical mass in Waterford City to deliver sustainable growth and employment. The development of a **concentric city** will be supported by transport investment to create a liveable, connecting city.

2.10 Key takeaways from Sections 2.1 to 2.9 are:

NPF 2019

- Regional opportunities to leverage growth include national and regional connectivity especially via Ports
- Support ambitious growth targets to enable cities ...Waterford to grow by at least 50% to 2040

Draft NPF 2024

- ...growth ...continuing to focus in achieving balanced growth targeting the five cities ...Waterford
- Highlight regional opportunities to leverage growth including national and international connectivity via Ports
- ...infrastructure to effectively support the development and maintenance of offshore renewable electricity generating developments

NMPF 2021

- Safeguard the operation of ports as key actors in the economic well-being of the State
- Development of ports sector with a view to providing adequate capacity to meet present and future demand.

National Ports Policy 2013

- Recognition that ports play a crucial facilitating role in developing ORE

SC-DMAP Proposal

- Supports alignment of terrestrial planning with marine planning
- Accelerated deployment of ORE will be enabled by the timely development of appropriate national and regional port infrastructure.

RSES

- Identifies the need to build critical mass in Waterford City
- Development of a concentric city will be supported by transport investment to create a liveable, connected city.

3. Potential

Bulk volumes (primarily raw materials) for the agricultural sector continues to grow. The Port works closely with Stakeholders in this space to ensure that Port developments closely match their plans for sustainable growth.

The Container Terminal is currently under-utilised meaning it is possible for additional volume to be handled at Port of Waterford with moderate investment in handling equipment but importantly without the need for an extensive building programme.

This is an important consideration given the likelihood of Dublin Port reaching capacity around 2040 and the opportunity for a transport emissions reduction for companies in the South East of Ireland who are moving containers to / from Rotterdam – the Port has calculated a 27% carbon saving for such movements when Waterford is used instead of Dublin Port.

The Port is determined to use its facilities to maximise impact within the Port itself but more importantly for the regional businesses that it does and could serve.

The full potential of the Port will be realised when it becomes an active actor in Ireland's developing offshore wind sector. The Port is well placed to support offshore wind farms in the proposed SC-DMAP area.

The Port is fully committed to its bulk and container customers but the current Port facilities are limited in how they can support the offshore wind sector. In order to correct this limitation, the Port has advanced plans for a capital project to extend the Port. The Port has completed its consultation with An Bord Pleanála (ABP) and has completed its Environmental Impact Assessment Report (EIAR) and will lodge its application to ABP as soon as it has received a Marine Area Consent (MAC) from the Marine Area Regulatory Authority (MARA).

The Port believes this berth extension will be a vital piece of infrastructure in a regional, national and international context as it will enable the Port to handle vessels associated with Construction Support and ultimately Operations & Maintenance of a number of

Windfarms in the SC-DMAP area and indeed future DMAPs off the East and South Coasts of Ireland.

The development will provide the *“infrastructure to effectively support the development and maintenance of offshore renewable electricity generating developments”*

RSES requires the *“need to build a critical mass in Waterford city”* and the *“development of a concentric city”*

The concentric city will only be realised by encouraging development into South Kilkenny. Waterford City and County Council has spearheaded this with the development of the North Quays.



This area is well serviced by an excellent road infrastructure. This road infrastructure along with the transport hub at the North Quays development will ensure that a sustainable infrastructure exists for populations through to 2040 and is a good example of *“transport and planning working in tandem with each otherfor sustainable living, working and commuting”*

The North Quay Development will enable the development of residential, retail and cultural buildings, with a significant amount of new public realm, on a brownfield site within an existing urban area, wholly in line with the objectives of the Draft NPF.

The “key challenge for Waterford is to build scale”. “Further development of Waterford would lead to the development of the wider South East which has experienced slower economic recovery that the national averagelinked to the restructuring of traditional industries, together with higher average unemployment rates, lower value job opportunities and less job creation”

The North Quay development is complemented by an already existing Port, Port Enterprise Area and Industrial Estate at the outer edge of the development area to ensure that *“a concentric city will be supported by transport investment to create a liveable, connected city”*.

The Port already provides an export outlet for the region (94% of all containers exported from the LOLO Container Terminal in 2024 were from businesses located in Counties Carlow, Kilkenny, Waterford and Wexford.

Furthermore, the Port supports local businesses and employment that might not otherwise exist.

*“The South East has capacity for improved growth, but has **not had a focus** sufficient in scale to drive the sustained development of the region as a whole. Regional opportunities to leverage growth include national and international connectivity, especially via ports proximate to continental Europe, such as **Belview Port** and Rosslare-Europort”*

ORE could and should be a focus area to drive sustained development of the entire South East.

The planned development of an ORE Energy Terminal consisting of a 250m berth extension and creation of 2 Hectares quay laydown space at Port of Waterford is aligned with the need to deliver critical infrastructure necessary to increase scale of Waterford City Region and will assist to provide non-traditional industries with likely higher value job opportunities and more job creation.

The new infrastructure will be a catalyst for increased economic activity and in collaboration with South East Technological University (SETU) will assist to reverse the brain drain that has blighted the region for decades – young people will be able to receive excellent primary, secondary and third level education in their own locale and be provided with relevant education to participate in innovative new industries that will develop as a result of off shore energy installations off our near coast.

Port of Waterford recommends the inclusion of a new sentence in the list of “Key Future Growth Enablers for Waterford” to say

“Maximise employment and other opportunities expected from offshore wind farm installations on the near coast”

Conclusion

Moving towards maximum utilisation of the current infrastructure at Port of Waterford along with plans to create new infrastructure to enable construction support and maintenance of offshore windfarms in the proposed South Coast D-MAP area will create the stimulus for a “concentric city” growth of Waterford in line with NPF expectations.

The Port will fulfil an important role to provide economic, societal and climate benefits for Waterford City Region and the South East.

Furthermore, development of the Tier 2 Port of Waterford at Belview alongside planned developments at the Tier 2 Port in Rosslare will be a catalyst for economic expansion in the South East Region and will as a port collective play an important national role to relieve congestion at Tier 1 Ports.