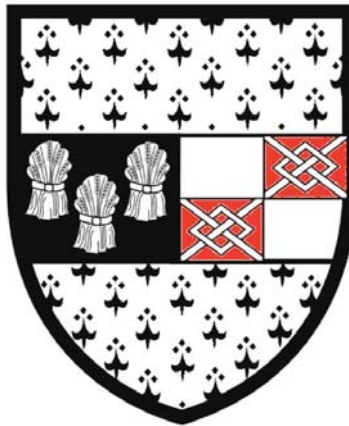Submission by

KILKENNY COUNTY COUNCIL

To

Draft Regional Spatial & Economic Strategy

For the Southern Region

Date : 8th March 2019

Introduction

Kilkenny County Council welcomes the publication of the Draft Regional Spatial and Economic Strategy for the Southern Assembly area. The document is comprehensive in its detail and the Council wishes to acknowledge elements of previous submissions by this Council and joint submissions by the Council's of the South East Planning area (i.e. Kilkenny, Waterford, Wexford Carlow and Tipperary), which have been taken into account in the preparation of the draft document.

There are elements where additional and/or alternative text would be of benefit and would help to bring clarity for local authorities in formulating their development plans and local area plans in implementing the strategy at local level. These are dealt with in detail in the sections below.

Key Towns

The selection of Key Towns in the settlement hierarchy is based on an evidence-based approach, but this evidence is not sufficiently detailed. The evidence behind such critical decisions, such as designating Key Towns, should besufficiently detailed to justify such a broad range of settlements being designated as "Key Towns."

The term Key Towns does not appear in the NPF document, nor in the Implementation Roadmap for the NPF. A consistency in terminology between the NPF and RSES is important as it aides interpretation and implementation.

More importantly, the range of towns in terms of economic activity, population scale, service providedand attributes is considered much too broad and there should be a further refinement of the settlement typology.

Significant urban areas in the region,such as Kilkenny City,should be considered as "growth enablers" that are self - sustaining regional drivers. This would allow significant settlements such as Kilkenny City, Carlow, Clonmel and Wexford to be set in the context that reflects their economic and planning function within the region, and which sets them apart from other settlements within the hierarchy. It is recommended that these significant urban areas should be recognised by way of a new tier of Key Town in the RSES, and accordingly it is recommended that this new tier be defined as those towns with a population of in excess of 15,000 people.

Kilkenny City

The attributes for key towns in table 3.2 of the draft does not reflect the true role of Kilkenny City as a significant regional driver with significant potential for further growth.

The Council suggest that the profile of Kilkenny City provided on page 58 of the Draft RSES be amended as outlined below to reflect its status within the region (Please note that the full text is taken from the draft document with additions shown in red and proposed deletions with ~~strike through):~~

"Kilkenny City had a recorded population in 2016 of 26,512 and is the 4th largest ~~settlement~~urban area in the Southern Region. The City is~~in~~ a ~~central~~ pivotal location within the South-East Strategic Planning Area, ~~with good~~and its proximity and excellent road and rail links to Dublin and Waterford~~and the elsewhere~~endow it with a unique opportunity to maximise its contribution to the region. Kilkenny City is the ~~8th~~4th largest employment base in the Southern Region with a daytime working population of 13,738. Kilkenny City is home to the headquarters for the Heritage Council and the Design & Craft Council of Ireland.The City is internationally renowned as an historic mediaeval city with major tourist attractions and is also a popular conference location. TheCity is also an important regional centre for arts and culture including high profile annual festivals."[1]

Attributes[2]

- Kilkenny's central location within the South-East Strategic Planning Area with good road and rail links to Dublin and ~~the elsewhere~~Waterford City;
- As the 8th largest employment centre in the state, Kilkenny has demonstrated a strong performance in Agri-Business, Finance and Tourism/Hospitality sectors.
- Regional Centre for Healthcare with St. Luke's Hospital and Aut Even Hospital serving a wide area of the region
- Growing Regional Centre for Higher Education and Research with ~~St. Kieran's College (part of Maynooth University),~~the potential development of the Multi-Campus Technological University of the South-East (TUSE).
- The City is a 'Hero site' within the FailteIreland's branding of Ireland's Ancient East. The 'Medieval Mile' package which brings together Public Realm improvements linking Kilkenny Castle to St Canice's Cathedral and other significant attractions in between, such as ~~tourist Parade to Irishtown.~~the Medieval Mile Museum, the new Butler Gallery, the Smithwick's Experience and Rothe House.
- Track Record in Urban Regeneration and compact growth in the City including development of ~~Master Plan for~~ the Abbey Quarter – the former Smithwick's Brewery site.
- International Connectivity. Direct access routes to the Ports of Waterford and Rosslare & Dublin & Waterford Airports.
- Recreational Assets of the River Nore walking route and development of other walking and cycling routes around the City.

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[1] The full text is taken from the document with additions shown in red and proposed deletions with ~~strike through~~
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- Quality of life in Kilkenny City is renowned as evidenced in its population growth which has exceeds the national average over the period 2006 – 2016.
- City Bus scheme will be operating by Q3 2019.

Infrastructural Requirements should include all of the following:[3]

i. Priority Transport Infrastructure for Kilkenny - enhanced rail services and improved line speeds;

ii. Improved accessibility to the Port of Waterford Belview and Rosslare Europort by road and rail to serve as a viable alternative to Dublin Port. The Port of Waterford has excellent connectivity and has the capacity to handle significantly more container volume. The RSES seeks the development of the Port of Waterford as a major international Gateway and this is welcome. RPO 137 seeks the achievement of Tier 1 status for the Port of Waterford. A regional freight strategy should promote insofar as practical the utilisation of Tier 1 and Tier 2 Ports outside of Dublin to deal with regional freight requirements, thereby reducing the reliance on Dublin Port.

iii. Investment to support city centre regeneration including development of the Abbey Quarter(c16 acre site in the heart of Kilkenny City that includes: a new urban quarter to complement the existing medieval city centre; capacity for almost 60,000m2 of mixed use residential, commercial, retail, education and civic space; new public realm and landscaped spaces such as a new 3 acre public square at St. Francis Abbey.) Kilkenny County Council has formed a partnership with Ireland's Strategic Investment Fund (ISIF) for the development of the Abbey Quarter;

iv. Completion of approved infrastructure under LIHAF for the Western Environs Neighbourhood along with 2 new secondary schools;

v. Masterplanning of a second new neighbourhood in the City at Loughmacask;

vi. Completion of the northern extension of the ring road from the N77 Castlecomerrd across the river Nore to the R693 Freshford Rd;

vii. Water Infrastructure: The upgrading of water supply infrastructure and additional investment in waste water infrastructure to support the economic development and anticipated growth of Kilkenny;

viii. Continued investment in higher education including development of the Multi-Campus TUSE. Kilkenny City is of sufficient scale, has the transport connectivity and associated support infrastructure and services to accommodate some of the additional student capacity that will be provided by the TUSE;

ix. Investment in smarter travel projects in support of the Compact '10 minute city' concept.

x. Upgrade of the regional road the R693 from Kilkenny City to the J4 on the M8 at Urlingford to National Road status and improve the road alignment in its entirety.

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[3] The full text is taken from the document with additions shown in red and proposed deletions with ~~strike through~~

Waterford- Dublin M9 Economic Corridor

In the context of MASP Objective 2c and RPO 22a which seek to establish a connection to the Dublin – Belfast corridor with a view to an extended East coast corridor from Rosslare to Larne and having regard to the tier 2 port at Belview, Waterford City as one of the 5 cities and capital of the South East Planning Area and to provide capacity and alternative locations/choices for the greater Dublin area[4] and to further promote economic growth it is the view of Kilkenny County Council that a further economic corridor should be established along the Waterford-Kilkenny – Carlow – Dublin M9 urban route.

In the Case of Carlow there should be an aspiration/objective to ensure that there is a joint urban area plan by the relevant Local Authorities (cfEastern&Midland RSES p31)as Carlow straddles the Southern Region and the Eastern and Midlands Region.

It is recommended that the following Regional Planning Objective be included :

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[4]Draft Regional Spatial and Economic Strategy for the Southern Region p280.

RPO 40

Waterford – Dublin M9 Economic Corridor(WDEC)

It is an objective to develop the Waterford - Dublin Economic Corridor (WDEC) initiative, incorporating Carlow and Kilkenny, as a driver for enterprise growth, investment and attracting entrepreneurial skills and talent to the rural catchments as an economic complement to the role of metropolitan areas and larger urban centres on the WDEC.

Strategic Residential Lands

- o Waterford MASP identifies an allocation of 850 units for the Ferrybank area's future growth allocation. This figure is taken from the existing Ferrybank/Belview LAP which predates the NPF and the RSES and should not be seen as a limit or as the necessary spatial distribution.
- o In order for Waterford City to grow in a concentric manner the population distribution north and south of the River needs to be reflective of the concentric concept and the compact growth scenario set out in the NPF. The growth structure in the context of the concentric city and the proposed growth of Waterford under the NPF has not been set out in the MASP.
- o It is not clear whether Kilkenny's population allocation is to be used to bolster the Ferrybank Area or whether a separate allocation will be made from the Waterford MASP. This could severely impact figures for the rest of Kilkenny City and County.
- o The Waterford PLUTS while it does contain much of the strategic infrastructure required needs to be urgently reviewed in the context of NPF targets and the proposed new road bridge linking the north and south quays (at Reginald's Tower)
- o There is no joint implementation structure proposed/agreed to coordinate delivery in the MASP area.

The capacity of lands in the Ferrybank area needs to be reviewed in the context of the NPF and the forthcoming Waterford City and County Development Plan and the concept of concentric development of Waterford City. References to strategic residential lands should acknowledge this.

South East

The Southern Region is too extensive and diverse (covering over 40% of the geographic area of the state) and the South East gets insufficient recognition as a region with its own identity and needs, with :

- o SE unemployment at end of Q3 2018 was 8.6% as compared to national average of 6%
- o Potential to develop clusters, including Financial Services /IT/ Pharma/Medtech/ Agri-food and act as Brexit pressure valve for Dublin not recognised.

It is recommended that sub-regional fora be established within the Southern Regional Assembly Area aligned with the Regional Planning Areas. This will provide a more cohesive and effective mechanism to ensure that challenges at sub-regional level are addressed and opportunities are maximised. Coordination between the Eastern and Midlands and the Southern RSES is also important especially along cross boundary issues e.g. Carlow straddles both regions.

Rural Housing

Ministerial Guidance on implications for Rural Housing arising from the NPF is urgently needed given that AnBordPleanala has already used the NPF's NPO 19 to refuse planning permission for a rural house. (Ref. ABP 302042-18)

The Council looks forward to the finalisation of the Regional Spatial and Economic Strategic.