



NPF Submissions,  
Forward Planning Section,  
Department of Housing, Planning,  
Community and Local Government,  
Custom House,  
Dublin D01 W6X0

10<sup>th</sup> November, 2017.

**RE: NATIONAL PLANNING FRAMEWORK (NPF)**

Dear Minister,

Attached is submission on behalf of Kilkenny County Council in response to the draft NPF Framework document. The Plan provides an opportunity to put in place new National and Regional Development Strategies that will provide for better balanced growth in the country over the next 20 years.

Kilkenny County Council welcomes the fact that:

- ❖ the Plan will be given legislative support within the planning system,
- ❖ it will reflect a whole of Government approach, and
- ❖ it will be supported by a rolling National Investment Plan.

The linking of the National Investment Plan to the NPF places an even greater onus on us to get the Plan right.

This submission outlines a number of concerns and issues that we believe need to be addressed before the NPF Framework is finalised. We have taken the approach in our submission to respond to each of the National Policy Objectives contained in the NPF set out in tabular format [see attached Appendix 2]. The concerns and issues raised may be summarised as follows:

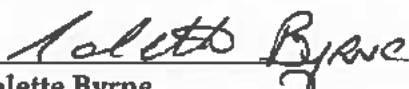
- the NPF process must articulate a clear, strategic and ambitious vision for NUTs III regions such as the South East. A vision which utilises the potential of the region and one which will drive future growth and investment. We consider that the South East can be identified and branded in the NPF as Ireland's Gateway to Europe, working in support of, and helping to relieve development pressure on the Greater Dublin Area. While the NPF picks up on this opportunity, it is not reflected in the National Policy Objectives, this needs to be addressed in the final Plan.
- the proposed population growth figures do not support a real commitment to Regional development. They will not result in any material change in the proportionate distribution of population across Regions, and will not therefore provide for alternative development options and relieve pressure on infrastructure in Dublin. If the NPF is serious about Regional Development, then there needs to be greater targeted population growth for the Regions outside of Dublin. The other Regions in turn will need a strong hierarchy of attractive functioning urban centres to help provide a credible counter balance. The NPF merely refers to the 5 main cities. The spectrum of towns below the level of the 5 main cities ranging from 1,500 in population upwards is far too broad. The South East Region is a case in point and Kilkenny's strategic location and its role and function within this Region needs to be acknowledged. Kilkenny City is of sufficient scale and quality to complement the role of

Waterford City as the main driver of regional growth and investment in the South East Waterford City Region. The NPF needs to provide a role for regional urban centres of scale, such as Kilkenny City which has a population of 15,000 or more, and that have good infrastructure and capacity to grow in a planned and sustainable manner [See Appendix 1].

- We note reference to the fact that accessibility to the north-west of Ireland will be improved. We have no issue with this but we consider that it is equally imperative that connectivity to the South East Region is just as important and should be provided for by way of an additional National Policy Objective in the NPF. The South East is underperforming (e.g. it has the second highest rate of unemployment in the state and the highest rate of youth unemployment.) The local authorities in the South East are proactively collaborating on a wide range of fronts to try address this situation, including through the South East Action Plan for Jobs. The 5 local authorities have agreed a joint regional submission [See Appendix 3]. The Regional Action Plans for Jobs (APJs) should be aligned with the National Policy Objectives of the NPF. And the strategic plans of enterprise agencies such as the IDA and Enterprise Ireland in turn need to reflect and align with the National Policy Objectives of the NPF. This would be consistent with the whole of Government approach.
- While it is accepted that it would be difficult for the NPF to make reference to specific infrastructure projects, we consider that the NPF should at the very least set out the criteria which will guide major infrastructure investment in the future. In particular, the National Investment Plan needs to prioritise critical infrastructure that will help improve the connectivity and attractiveness of underperforming regions, such as the South East, so that they can maximise their full economic potential. Appendix 1 gives indicative investment required in Kilkenny.
- It is impractical to prescribe an arbitrary growth target of 15% across the full spectrum of towns. This could constrain development in some urban areas such as Kilkenny City, it would be better that the NPF provide for an evidence based approach to population growth in core strategies. Our concern is that when the NPF is signed into law there will be little or no flexibility for local authorities at local level to provide for balanced growth within their core strategies. Kilkenny City has significant growth potential, which can be delivered in a sustainable manner, it is connected by train and motorway to Dublin and Waterford and constraining the growth of Kilkenny would be illogical.
- There is not sufficient clarity provided in the NPF Document on the Metropolitan Area Strategic Plans and their role in the development of City Regions. Further clarity is required on the intended governance structure, accountability and reporting arrangements of same at local, regional and national level, including with the elected members and the role of the Department and the Regional Assembly. The process for the preparation and approval of the MASP's also needs to be detailed, including timelines for completion/adoption. We are concerned that as the intention is for the MASP's to be part of the Regional Spatial and Economic Strategies (which in turn are to be underpinned by legislation), proposals outlined in the MASP's (e.g. in relation to governance of the metropolitan areas) may not therefore require approval of the Oireachtas. It is critical that this issue is clarified for the people of Kilkenny in general and of South Kilkenny in particular.

We respectfully request that the issues and concerns raised in this submission are given due consideration before the National Planning Framework is finalised. We look forward to your response.

Yours sincerely,

  
Colette Byrne  
Chief executive

# Kilkenny County Council Submission to the NPF



## The Potential of Kilkenny

Kilkenny City is a large urban area in Irish terms with an historical city past. The 2016 Census indicates that it had a population c26,500, placing it as the 6th most populated settlement in the state when the five cities are excluded. During the last intercensal period Kilkenny city's population grew by 8.8%, which was the 3rd highest. Only Balbriggan and Portlaoise exceeded that growth rate. At this rate of growth, Kilkenny City is on target to meet its projected minimum population target under the National Spatial Strategy 2004 - 2022. Outside of the Eastern and Midlands Region, Kilkenny City is the most populated settlement in 2016.

Kilkenny is a well planned compact city with a structure based on the central medieval town supported by 4 planned neighbourhoods, with sufficient capacity to deliver housing and jobs in a sustainable manner, striking an equitable balance between urban/brownfield areas and Greenfield development.

A strong Kilkenny with appropriate underpinning at national and regional level will support the development of the South East Waterford City Region and thereby contribute to effective regional development. Kilkenny with the right support at National and Regional level will act as a regional growth driver for its surrounding catchment and the wider region whilst supporting Waterford city as the regional capital. Kilkenny has good accessibility with connections to the M9 and M8 motorways. It has good train connections being located on the Waterford - Dublin mainline railway with connections in both directions every 2 hours. There are also daily bus connections linking Dublin, Waterford and Cork to Kilkenny.

Kilkenny City is of sufficient scale and quality to complement the role of Waterford City as the main driver of regional growth and investment in the South East. The following developments, recently completed, underway or planned demonstrate the capacity of Kilkenny City for further sustainable growth:

- Part 1 of the Kilkenny Central Access Scheme has been completed. This includes a new access road from the Castelcomer road via a bridge over the river Nore to Dean Street. Phase 2 of the Central Access Scheme will link the Kilmanagh road to Waterbarracks at an estimated cost of €7 million. Phase 3 of the Central Access scheme will comprise a road connection the Freshford road through Loughmacask to phase 2 at an estimated cost of €8.7million.
- The extension of the Northern ring Road across the river Nore, connecting the ring road from the Castlecomer Road roundabout to the Freshford Road remains a priority and will cost an estimated €15.3 million.
- The Abbey Quarter in the city centre has the potential to deliver 60,000sqm of mixed use residential and employment use. A Masterplan for the 6 hectare site of the Abbey Quarter has been prepared and includes:
  - A new linear park on the banks of the River Nore;
  - New public square at St Francis Abbey - 21/2 acres;
  - Potential for a new third level campus and research and development facilities which could accommodate a campus for the planned multi-campus Technological University of the South East (TUSE.)
  - Upwards of 30,000 square metres of advance office space that will help attract much needed FDI.
  - Housing and retail are included in the Master Plan.

An urban design development code is at an advanced stage of preparation which will be used as a guidance document for development proposals within the masterplan area.

The redevelopment of the site is being progressed in part through a partnership between Kilkenny County Council and Ireland's Strategic Investment Fund (ISIF). This partnership is the first of its kind in the country and phase 1 of the development involving the re-development of an existing brewhouse building of circa 6,000 square metres will commence by Q2 2018. Planning consent has already been obtained through the Part 8 process for this re-development.

- The development of a Precision Agriculture Centre of Excellence (PACE) led by the Waterford Institute of Technology (WIT) and developed in conjunction with other regional partners, including Kilkenny County Council and Glanbia. PACE will be an innovation centre, focused on supporting emerging ICT technologies to accelerate the growth of Ireland's agri industry and propel the development of a new ICT-AGRI industry, with potential to become a leading exporter of agri. technology solutions to the rest of the world. PACE will establish the South-East as an international leader in precision agriculture.
- The development of a National Design Innovation Hub (NDIH). The NDIH will be a dedicated centre of excellence for design-led thinking & design innovation and will position the South East as the destination for design. Partners include Kilkenny County Council, the Design & Crafts Council of Ireland (DCCoI), and IT Carlow.
- Separately from the Abbey Quarter area Kilkenny County Council is developing an Arts and Culture Quarter in the City - estimated cost €10m on the east of the River Nore. Phase 1 will see the former Evans' Home, redeveloped as a new home for Butler Gallery and plans for a new state of the art City Library are being progressed.

From pursuing sustainable planning policies over the longer term Kilkenny has delivered on the ambitious targets of the National Spatial Strategy and can with the right investment now deliver on the ambitions of the National Planning Framework. The evidence to support this is in the development of the neighbourhoods in Kilkenny City. The western environs neighbourhood is planned to accommodate approximately 3,000 households in the longer term. It has secured €6m in LIHAF funding to front load essential infrastructure and the Department of Education and Skills has committed to the development of 2 new schools in the neighbourhood by 2020. Tender documents for the LIHAF infrastructure are being completed and the tendering process will commence before the end of Q4 2017.

In addition, the Belview Strategic Development Area is of national importance and its investment needs must be supported by the NDF and National Innovation Plan. As a Tier 2 port, Belview, which specialises in roll on roll off freight, is a significant asset to the economy of the south East and in particular Kilkenny and Waterford. Belview Port is one of the two prime strategic investment locations in Kilkenny, the second being Kilkenny City. Kilkenny County Council developed Belview in partnership with the Port of Waterford Company, Waterford Chamber, IDA and major employers. The main companies located in Belview include Glanbia Ingredients Ireland Ltd, Smartply, Target Fertilizers, StoreAll, and Suir Shipping. Glanbia Ingredients Ireland Ltd opened a €180 million food & infant formula facility on IDA lands at Belview in 2015. This facility is already being further extended by means of a further major investment from Glanbia. Furthermore an additional 27 hectares of land for commercial/industrial use has recently been zoned adjacent to the current IDA holding of 26.7Ha where the new Glanbia Plant is located, bringing the total IDA lands to 53.7Ha.

# Kilkenny County Council Submission to the Draft NPF



[Pick the date]



and the stronger regions in the state. For example, according to the latest CSO National Household Quarterly Survey (NQHS) for Q2 2017, the South East has the second highest unemployment rate in the country at 8.3%, which is 2% higher than the national average. Kilkenny County Council considers that a major contributory factor in this underperformance is the fact that the South East is not securing a proportionate share of Foreign Direct Investment (FDI). The IDA target to increase the number of IDA investments in the South East by 30-40 per cent by the end of 2019 (compared to the 2010-2014 period) is the same target provided for in all of the NUTS III regions outside of Dublin. This target therefore will not be sufficient to close the gap in FDI employment between the South East and the rest of the country. The NPF National Policy Objectives therefore need to provide greater ambition for the underperforming regions like the South East to help them realise their full potential. The strategic plans of enterprise agencies such as the IDA in turn need to reflect and align with the National Policy Objectives of the NPF. The IDA strategic plan (2015-2019) states that to win investments in the future “will require greater co-operation, collaboration and integration to develop and present the strongest possible proposition” for regions. The 5 local authorities in the South East region have acknowledged this and are collaborating and resourcing the development of a new branding and marketing strategy, which will act as a ‘call to action’ to unify the region to work together to attract more: entrepreneurs; talented people; visitors; and in particular - inward investment to the South East. The South East will need to secure adequate funding under the proposed 10-year National Investment Plan towards critical infrastructure (e.g. to improve connectivity) that will in turn help improve the attractiveness of the region and maximise its full economic potential, that will in turn help the region provide a serious counter balance to Dublin and the Eastern Region.

**National Policy Objective 2a: Population and jobs growth will generally be aligned to occur within the same functional area, whether a city or town catchment or all or part of one or more adjoining local authority area(s), on a coordinated basis through the Regional Spatial and Economic Strategy (RSES) and City and County Development processes.**

Kilkenny County Council concurs with this objective. However, as outlined in the response to National Policy Objective 1c above, Kilkenny County Council considers that the strategic plans of enterprise agencies such as the IDA and Enterprise Ireland need to reflect and align with the NPF Framework, so that underperforming NUTS III regions such as the South East can be given the focus required to improve performance and reach their full potential.

<ul style="list-style-type: none"> <li>• expedite the roll out of the National Broadband Plan to ensure that all parts of the region can access high speed broadband. Broadband connectivity is not only of critical importance for attracting investment, facilitating economic growth and stimulating innovation - it is fast becoming a necessity of everyday life.</li> <li>• Investment in Regional Parts - Belview &amp; Rosslare.</li> </ul>	<p>An agreed joint submission to the first phase consultation process for the NPF (in March 2017) was made by the 5 local authorities of the South East Region. The submission articulated a strategic vision for the South East Waterford City Region, as a focus for concentrated investment and growth at a level which can contribute towards national development and economic competitiveness.</p> <p>The development of the South East Region as a region of scale that can exert critical mass leverage at an international level is not reflected in the Draft NPF. The South East Waterford City Region is made up of strong urban areas, all working together for the benefit of the South East. Waterford City, Clonmel, Wexford, Kilkenny City and Carlow come together as a City Region which is not only closest to Dublin, but is also closest to mainland Europe and Britain, which will have major implications for the region as a result of Brexit. The 5 Local Authorities, working in collaboration, have the vision, ambition, capacity, statutory remit, governance and proven track record to coordinate and drive the delivery of the strategic aims as set out in the NPF. The South East has the potential to be developed into a nationally significant economic, social and sustainable location, achieving balanced regional development, creating sustainable communities and increasing the quality of life for all who live, work and visit the region.</p> <p>The NPF must articulate a clear, strategic and ambitious vision for the South east. A vision which utilises the potential of the region and one which will drive future growth and investment. The South East can be identified and branded in the NPF as Ireland's Gateway to Europe, working in support of, and helping to relieve development pressure on the Greater Dublin Area. While the NPF picks up on this opportunity, it is not reflected in the national policy objectives.</p>
<p><b>Proposed New National policy Objective for the South East to assist the under-performing South East Region to achieve its full potential.</b> This should align with the Regional Action Plan for Jobs target to reduce the unemployment rate of the region to within 1% of the National Average 2020 and that the jobs profile will reflect that of the national average.</p>	<p><b>National Policy Objective 3a: Deliver at least 40% of all new homes nationally, within the built-up envelope of existing urban settlements.</b></p>
<p>Kilkenny County Council concurs with this objective and recommends that there needs to be a link between this objective and the job creation targets (e.g. set out in national policy objective 10). Housing provision should in general follow the provision of employment locations.</p>	



<p><b>National Policy Objective 7: Strengthen all levels of Ireland's urban structure, with a particular focus on:</b></p> <ul style="list-style-type: none"> <li>• Our Capital, Dublin.</li> <li>• The four Cities of Cork, Limerick, Galway and Waterford.</li> <li>• Large towns (&gt;10,000 population) located outside the five city regions and particularly in the northern and western region.</li> <li>• Small towns (&lt;10,000 population) located outside the five city regions in conjunction with their surrounding rural areas</li> </ul>	<p>Kilkenny County Council concurs with this objective subject to appropriate changes as outlined in National Policy Objective 6 above and in accordance with National Policy Objective 64.</p>
<p><b>National Policy Objective 7a: To achieve sustainable national growth in urban and rural areas, a National Smart Growth initiative will be put in place to support development and to leverage both public and private investment, as part of the ten year capital investment plan.</b></p>	<p>Kilkenny County Council welcomes this objective. In particular, Kilkenny County Council envisages that the National Smart Growth Initiative will assist the regeneration of key strategic and multi-purpose sites being developed by local authorities in the South East. These include the North Quays Strategic Development Zone in Waterford; the Abbey Quarter, Kilkenny; Trinity Wharf, Wexford; and Kichham Barracks, Clonmel. Each of these sites includes plans to provide advance office space and associated services (e.g. water, broadband, etc.) and public realm infrastructure to improve the attractiveness of these sites as critical components of the redevelopment plans. There is a lack of high quality 'Advanced Office Space' that can be marketed by the IDA as part of their overall package for the South East. This is a major impediment in attracting FDI to the region. While the IDA plans to develop 2 further Advance Technology Buildings (ATBs) in the region is very much welcome, these will not be adequate on their own to attract and provide for the scale of FDI the region requires. Kilkenny County Council welcomes the "Smart Growth fund" proposed in the Framework document, especially if it can be utilised for the purposes of supporting the provision of advance office space, services (e.g. water, broadband, etc.) and public realm on these strategic sites.</p>
<p><b>National Policy Objective 8: Ensure that the targeted pattern of population growth of Ireland's cities and large towns to 2040 is proportionate, in accordance with the targets set out in Table 3.1.</b></p>	<p>In addition to the concerns outlined at national policy objective 1b above, Kilkenny County Council considers that the projected population growth rate for Waterford City (as the main driver of the South East Waterford City region) is not sufficient to bolster its role as the main economic driver for the region, in particular to help close the gap that exists between the South East and the rest of the state. Indeed, the targeted pattern of city population growth as projected in Table 3.1 does not provide for a radical shift in the spread of population and employment over the next 20 years. And the knock-on effect will also be to curtail the development of the other main urban centres in the South East, such as Kilkenny City.</p>

the development of infill and brownfield lands in the most sustainable economic and environmental manner possible.

**Section 4: Planning for Diverse Rural Places**

**Kilkenny County Council Response**

**National Policy Objective 13:** Protect and promote the quality, character and distinctiveness of the Irish landscape, the sense of place and culture that make Ireland’s rural areas authentic and attractive as places to live, work and visit. The Action Plan for Rural Development up to and including 2021 supports this objective and thereafter a review of the Action Plan for Rural Development is to be undertaken to ensure alignment and consistency with the National Policy Objectives of this Framework.

Kilkenny County Council concurs with this objective.

**National Policy Objective 14:** Ensure that the targeted population growth of Ireland’s small towns and rural areas to 2040 is proportionate, at a targeted average rate of 15% in each Regional Assembly area, to be applied regionally through the Regional Spatial and Economic Strategy process and locally through County Development Plans.

Kilkenny County Council considers that this average rate of growth is arbitrary and could constrain development in towns in the underperforming regions (such as the South East) in particular. It is impractical to prescribe growth targets across the full spectrum of towns – “one size does not fit all.” It would be better that the NPF provide for an evidence based approach to population growth in towns.

**National Policy Objective 15:** Target the reversal of rural decline in the core of small towns and villages through sustainable targeted measures that address vacancy and deliver sustainable reuse and regeneration outcomes.

Kilkenny County Council concurs with this objective. The low take-up of incentive schemes such as the ‘Buy and Renew’ and ‘Repair and Lease’ initiatives suggests that additional measures/powers will need to be introduced (e.g. additional powers through the Vacant Sites Levy) to encourage more owners of vacant properties to return vacant homes back into productive use. Many of the smaller villages have a deficiency in water services throughout the country and the investment

	<p>Kilkenny County Council considers that the objective of “demonstrable economic need” does not seem to take account of the social aspects of rural demand, such as rural association and family ties, which, even within the areas under urban influence, are cited in applications as the main drivers for housing in the countryside. Clear guidance as to the implementation of this objective should follow.</p> <p>Kilkenny County Council concurs with this objective but queries whether this then becomes a mandatory document in relation to the number of dwellings that can be provided for over the period of the NPF.</p> <p>Kilkenny County Council concurs with this objective.</p> <p>Kilkenny County Council concurs with this objective. Kilkenny County Council is a key stakeholder along with the Waterford Institute of Technology (WIT), Glanbia, Alltech and Capita in the development of a precision agriculture centre of excellence (PACE), which will provide innovation services to agricultural companies and high potential start-ups (HPSUs) nationally.</p>
<p>(&gt;10,000) towns determined locally.</p>	<p><b>National Policy Objective 18b:</b> In rural areas under urban influence, to facilitate the provision of single housing in the countryside based on the core consideration of demonstrable economic need to live in a rural area and relevant siting criteria for rural housing in statutory guidelines and plans.</p> <p><b>National Policy Objective 19:</b> Project need for single housing in the countryside through the local Housing Need Demand Assessment (HNDA) tool and county development plan core strategy processes.</p> <p><b>National Policy Objective 20:</b> Enhance the competitiveness of rural areas by supporting innovation in rural economic development and enterprise through the sustainable diversification of the rural economy into new sectors and in particular those with a low or zero carbon output.</p> <p><b>National Policy Objective 21:</b> Facilitate the development of the rural economy through supporting a sustainable and economically efficient agricultural and food sector, together with forestry, fishing and aquaculture and diversification into alternative on-farm and off-farm activities, while at the same time noting the importance of maintaining and protecting the natural landscape and built heritage which are vital to rural tourism.</p>

<p>Kilkenny County Council work closely with Kilkenny Recreations and Sports Partnership to support people and communities with low levels of activity to access activities that can improve their health &amp; wellbeing.</p>	<p><b>National Policy Objective 27:</b> Manage the efficient use of water and wastewater resources in a sustainable way that delivers an adequate supply of safe public drinking water to citizens, supports economic growth and preserves our environment.</p>	<p>Kilkenny County Council concurs with this objective. To support this Kilkenny County Council shall work collaboratively with Irish Water within the context of the Service Level Agreement on the delivery of Water Services Functions in its functional area. However, there needs to be a better understanding of how Irish water will support economic development outside the main urban centres, so that the latter do not continue to grow disproportionately and disadvantage smaller towns in the under-performing regions.</p>
<p><b>National Policy Objective 28:</b> Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by integrating physical activity facilities for all ages, particularly prioritising walking and cycling accessibility to both existing and proposed future development, in all settlements.</p>	<p>Kilkenny County Council concurs with this objective.</p>	<p>Kilkenny County Council concurs with this objective.</p>
<p><b>National Policy Objective 29:</b> Local planning, housing, transport/accessibility and leisure policies will be developed with a focus on meeting the needs and opportunities of an ageing population along with the inclusion of specific projections supported by clear proposals in respect of ageing communities as part of the core strategy of city and county development plans.</p>	<p>Kilkenny County Council concurs with this objective. The Council proactively supports a range of agreed Age Friendly Network initiatives and Programmes.</p>	<p>Kilkenny County Council concurs with this objective. The Council proactively supports a range of agreed Age Friendly Network initiatives and Programmes.</p>
<p><b>National Policy Objective 30:</b> Plan for a more diverse and socially inclusive society that targets equality of opportunity and a better quality of life to all citizens, through improved integration and greater accessibility in the delivery of sustainable communities and the provision of associated services.</p>	<p>Kilkenny County Council concurs with this objective but requests that sustainable community services be defined and include capacity building programmes, maintenance and management support particularly in relation to community led facilities.</p>	<p>Kilkenny County Council concurs with this objective but requests that sustainable community services be defined and include capacity building programmes, maintenance and management support particularly in relation to community led facilities.</p>

<p><b>National Policy Objective 35:</b> Implement measures to reduce vacancy and to progressively target the reduction of the national housing vacancy rate to 5% by 2040 (currently 9.15%).</p>	<p>Kilkenny County Council concurs with this objective. As per the response to national policy objective 15, the low take-up of incentive schemes such as the 'Buy and Renew' and 'Repair and Lease' initiatives suggests that additional measures/ powers will need to be introduced (e.g. additional powers through the Vacant Sites Levy) to encourage more owners of vacant properties to return vacant homes back into productive use.</p>
<p><b>National Policy Objective 36:</b> Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time.</p>	<p>Kilkenny County Council concurs with this objective.</p>
<p><b>National Policy Objective 37:</b> Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.</p>	<p>Kilkenny County Council concurs with this objective.</p>
<p><b>National Policy Objective 38:</b> New statutory guidelines, supported by wider methodologies and data sources, will be put in place under Section 28 of the Planning Act to improve the evidence base, effectiveness and consistency of the planning process for housing provision at regional, metropolitan and local authority levels. This will be supported by the provision of standardised requirements by regulation for the recording of planning and housing data by the local authorities in order to provide a consistent and robust evidence base for housing policy formulation.</p>	<p>Kilkenny County Council concurs with this objective.</p>

<p><b>National Policy Objective 41:</b> Support the growth and development of the maritime economy, particularly in remote coastal communities and islands</p>	<p>Kilkenny County Council concurs with this objective.</p>
<p><b>National Policy Objective 42:</b> Ensure that the strategic development requirements of Tier 1 and Tier 2 Ports are considered and addressed as part of the Regional Spatial and Economic Strategy (RSES) and that any concurrent or subsequent metropolitan area or city/county development plans and strategic plans for the Tier 1 and Tier 2 ports are aligned to ensure the effective growth and sustainable development of the city regions.</p>	<p>Kilkenny County Council concurs with this objective.</p>
<p><b>National Policy Objective 43a:</b> Ensure that Ireland's coastal resource is managed to sustain its physical character and environmental quality.</p>	<p>Kilkenny County Council concurs with this objective.</p>
<p><b>National Policy Objective 43b:</b> In line with the collective aims of national policy regarding climate adaptation, to address the effects of sea level changes and coastal flooding and erosion and to support the implementation of adaptation responses in vulnerable areas.</p>	<p>Kilkenny County Council concurs with this objective.</p>
<p><b>National Policy Objective 44:</b> Support, within the context of the Offshore Renewable Energy Development Plan (OREDPlan) and its successors, the progressive development of Ireland's offshore renewable energy potential, including domestic and international grid connectivity enhancements.</p>	<p>Kilkenny County Council concurs with this objective.</p>



<p><b>National Policy Objective 50:</b> Develop a stable, innovative and secure digital communications and services infrastructure on an island basis.</p>	<p>Kilkenny County Council concurs with this objective.</p>
<p><b>National Policy Objective 51:</b> Support the coordination and promotion of all-island tourism initiatives through continued cooperation between the relevant tourism agencies and Tourism Ireland.</p>	<p>Kilkenny County Council concurs with this objective.</p>
<p><b>National Policy Objective 52:</b> Ensuring effective management of shared landscapes, heritage, water catchments, habitats, species and trans-boundary issues in relation to environmental policy.</p>	<p>Kilkenny County Council concurs with this objective.</p>
<p><b>National Policy Objective 53:</b> In co-operation with the United Kingdom Government and devolved Governments of Northern Ireland, Scotland and Wales, Ireland will support mutually beneficial development in the areas of spatial and infrastructure planning and other related areas.</p>	<p>Kilkenny County Council concurs with this objective.</p>
<p><b>National Policy Objective 54:</b> That the planning system is responsive to our national environmental challenges and ensures that development occurs within environmental limits having regard to the requirements of all relevant environmental legislation and promotes the sustainable management of our natural capital.</p>	<p>Kilkenny County Council concurs with this objective.</p>
<p><b>National Policy Objective 55:</b> Support the circular and bio economy through greater efficiency in renewable resources and land management and by reducing the rate of land use change from urban sprawl and new development.</p>	<p>Kilkenny County Council concurs with this objective.</p>

<p><b>National Policy Objective 61:</b> Improve air quality and help prevent people being exposed to unacceptable levels of pollution in our urban and rural areas through integrated land use and spatial planning that supports public transport, walking and cycling as more favourable modes of transport to the private car, the promotion of energy efficient buildings and homes, green infrastructure planning and innovative design solutions.</p>	<p>Kilkenny County Council concurs with this objective.</p>
<p><b>National Policy Objective 62:</b> Promote the pro-active management of noise where it would have significant adverse impacts on health and quality of life and support the aims of the Environmental Noise Regulations through national planning guidance and Noise Action Plans.</p>	<p>Kilkenny County Council concurs with this objective.</p>
<p><b>Section 9: Investing in Ireland 2040 - Implementation</b></p>	
<p><b>National Policy Objective 63:</b> Provision will be made for metropolitan area strategic plans to be prepared for the Dublin, Cork, Limerick, Galway and Waterford Metropolitan areas and in the case of Dublin and Cork, to also address the wider city region, by the appropriate authorities in tandem with and as part of the relevant RSES.</p>	<p>Kilkenny County Council considers that there is not sufficient clarity provided on the Metropolitan Area Strategic Plans (MASPs) and their role in the development of City Regions. Further clarity is required on the intended governance structure, accountability and reporting arrangements of same at local, regional and national level, including with the elected members and the role of the Department and the Regional Assembly. The process for the preparation and approval of the MASPs also needs to be detailed, including timelines for completion/adoption. We are concerned that as the intention is for the MASPs to be part of the Regional Spatial and Economic Strategies (which in turn are to be underpinned by legislation), proposals outlined in the MASPs (e.g. in relation to governance of the metropolitan areas) may not therefore require approval of the Oireachtas. It is critical that this issue is clarified for the people of Kilkenny in general and in particular the people of South Kilkenny</p> <p>This will refer to:</p> <ul style="list-style-type: none"> <li>the need for a Regional Project Delivery Group to be structured along the lines of the South East APJ to provide horizontal coordination and implementation of the objectives of the NPF and the RSES. This Project Delivery Group should be made up of sectoral expertise and should facilitate full Regional collaboration or bi-lateral project-based working relationships between counties as</li> </ul>

commute to work, a City region is more than those who commute into it. City regions need a wider definition by the functional inter-relationship with their surrounding areas including achieving critical mass, land use and transportation planning, employment, connectivity and access to educational and health services, green infrastructure, cultural and retail services etc. This will ensure a bespoke approach for each city rather than a one size fits all approach.

Kilkenny County Council would welcome new structures that would:

- Set out appropriate criteria for establishing MASP areas as outlined above.
- Give an opportunity for local authorities in the region to show commitment and leadership.

Once the Waterford MASP area is defined then a structure needs to be put in place that will allow the local authorities relevant to the defined MASP area to show commitment and leadership to create an environment for the strategic issues facing the South East Waterford City Region (SEWCR) to be tackled such as the multi campus TUSE, and intra regional connections. The following would be essential to the governance :

1. The local authorities in the region need to be given the opportunity to show leadership to deliver on the potential of the SEWCR.
2. Other relevant authorities and agencies that make decisions of strategic nature for the MASP area need to commit to the plan. This can be ensured through a whole of Government approach.
3. That local authorities and other agencies provide staff, technical and financial resources to the implementation of the MASP objectives as required.
4. A steering committee with the Chief executives, a number of elected members from the relevant local authorities/ Regional Assembly and a rep from other relevant agencies to oversee implementation.
5. A dedicated team be established with responsibility to progress, implement the strategic objectives and projects and report back to the Steering Group on progress and blockages<sup>1</sup>

<sup>1</sup> The makeup of this will depend on the nature of the strategic objectives identified through the MASP and the RSES

<p>purposes that is unlikely to be serviced within the life of the relevant plan, planning authorities will review the status of such lands</p>	<p><b>National Policy Objective 68:</b> When zoning land for development, planning authorities will apply a specified standardised approach in establishing an order of priority for development of land taking account of proper planning and sustainable development, and in the case of adjoining interdependent landholdings, evidence of landholder commitment to necessary co-operation to release lands for development. Planning authorities will use compulsory purchase powers to facilitate the delivery of enabling infrastructure to prioritised zoned lands, to accommodate planned growth. Infrastructure delivery agencies will focus on the timely delivery of enabling infrastructure to priority zoned lands in order to deliver planned growth and development.</p>	<p>Kilkenny County Council concurs with this objective.</p>
<p><b>National Policy Objective 69:</b> A more effective strategic and centrally managed approach will be taken to realise the development potential of the overall portfolio of state owned and/or influenced lands in the five main cities and potentially other major urban areas as a priority.</p>	<p>Kilkenny County Council concurs with this objective.</p>	<p>Kilkenny County Council concurs with this objective.</p>
<p><b>National Policy Objective 70:</b> Ensure that all plans, projects and activities requiring consent arising from the National Planning Framework are subject to the relevant environmental assessment requirements including SEA, EIA and AA as appropriate.</p>	<p>Kilkenny County Council concurs with this objective.</p>	<p>Kilkenny County Council concurs with this objective.</p>