



Comhairle Cathrach & Contae Phort Láirge
Waterford City & County Council

The Secretary,
An Bord Pleanála,
64 Marlborough Street,
Dublin 1.

22nd of October 2021

**Re: Waterford City and County Council
Waterford City Public Infrastructure Project- Flood Defences West**

Dear Sir/ Madam,

The enclosed application relates to proposed flood defence works along the northern bank of the River Suir in the townland of Mountmisery in County Waterford and the townland of Newrath in both Counties Kilkenny and Waterford.

The site is currently used for rail freight traffic and commuter services running from Dublin to Waterford. However, the existing flood protection measures are no longer effective in protecting the Irish Rail infrastructure and the adjacent North Quays opportunity site, from flooding.

A visual inspection of the existing masonry quay wall, which was carried out in August 2018 by Roughan & O'Donovan, revealed that large sections of the existing quay wall are of inadequate height and condition and are below the design flood level of 4.0mOD, rendering it ineffective at protecting Iarnród Éireann lands and associated rail infrastructure against flooding. Flood waters frequently affect the railway infrastructure with subsequent impacts on both rail freight and commuter services. The photograph on the following page illustrates the extent of flooding within Plunkett Station in October 2020. This shows the passenger rail line completely flooded almost to platform level (height of 0.915m).



The OPWs “The Planning System and Flood Risk Management - Guidelines for Planning Authorities” (2009) states that new “essential infrastructure, such as primary transport” (e.g., railways) are classified as ‘highly vulnerable developments’. The Guidelines further state that ‘highly vulnerable developments’ should be protected in the 1 in 1,000-year flood event, including an allowance for climate change. Plunkett Station, the future SDZ Transportation Hub and the railway line between these points can be considered as “essential infrastructure” and can be classified as a “highly vulnerable development”. Therefore, it is essential that this infrastructure is protected into the future against extreme flood events (1 in 1,000 year flood event), while also future proofing against increases in flood levels due to climate change.

The need for protection of the existing infrastructure and to build resilience against climate change induced flood events is outlined at national, regional, and local planning policy. The development of flood defence measures will enable future development of the Waterford North Quays in a sustainable manner as well as preserving the existing rail infrastructure in proximity of Plunkett Station. The proposed development will also facilitate the upgrade of rail infrastructure proposed as part of the separately approved SDZ Transportation Hub.

The objectives of the Flood Defences West are as follows:

- a) To protect the existing and future rail infrastructure in the vicinity of Plunkett Station and the proposed Transport Hub from fluvial and tidal flooding.
- b) To future proof rail commuter services arriving to and departing from Waterford City and maintaining Inter-city sustainable public transport links.
- c) To prevent disruption to traffic in the vicinity of Rice Bridge from future flood events.
- d) To support the growth of Waterford City in a sustainable manner by protecting lands on the northern bank of the River Suir from flood related impacts.
- e) To support Waterford City in building its resilience against flooding induced by climate change.

The proposed *Flood Defences West* will form a continuation of the *Flood Defences East* which received planning approval as part of the SDZ Transportation Hub.

The Waterford City Development Plan 2013 – 2019 (as extended) locates Plunkett Station within Flood Zone A due to its susceptibility to both fluvial and tidal flooding. Flooding within the City is predicted to become more frequent and severe due to climate change. One of the core strategy objectives of the Development Plan (OBJ 2.1.10) is *“to require new development to account for known and anticipated climate change impacts including flood risk”*.

The proposed flood defence measures have been specifically designed to protect Plunkett Station and the railway tracks west of the train station from future flooding by incorporating the projected effects of climate change into its design. In addition, the proposed works will support further strategic development of the City in the North Quays area as set out in the approved North Quays SDZ Planning Scheme 2018.

The planning authority contends the proposed development supports national, regional, and local policies by seeking to protect existing critical strategic transportation infrastructure. In addition, this project will also support the sustainable growth of Waterford City on the north side of River Suir and will support the City in building its resilience against flooding induced by climate change.

Waterford City and County Council therefore requests that An Bord Pleanála give favourable consideration to this piece of critical enabling infrastructure which has been given broad support by both planning authorities (Kilkenny and Waterford) as well as C oras Iompair  ireann, Iarnr od  ireann, the NTA and the Department of Housing, Local Government and Heritage.

Yours sincerely,



Michael Quinn
Director of Services
Economic Development and Planning

