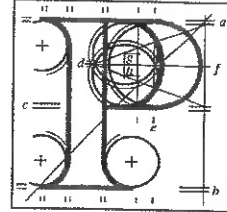


Our Case Number: ABP-311746-21



An
Bord
Pleanála

Kilkenny County Council Planning Department
County Hall
John Street
Kilkenny
R95 A39T

Date: 13 December 2021

Re: Waterford City Public Infrastructure Project - Flood Defences West. Development of c.1.1km of flood protection measures.
Townland of Mountmisery, Co. Waterford and the townland of Newrath in both Co. Kilkenny and Co. Waterford.

Dear Sir / Madam,

An Bord Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

Please note that the proposed development shall not be carried out unless the Board has approved it with or without modifications.

If you have any queries in relation to the matter please contact the undersigned officer of the Board. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Sarah Caulfield
Executive Officer
Direct Line: 01-8737287

AA02

Teil	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902



Comhairle Chontae Chill Chainnigh

Halla an Chontae Sraid Eoin Cill Chainnigh

Pobail agus Áiteanna Inbhuanaithe a Chruthú

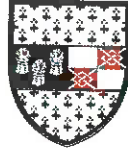
Kilkenny County Council

County Hall John Street Kilkenny

Creating Sustainable Communities and Places

Kilkenny

Comhairle Chontae Chill Chainnigh Kilkenny County Council



AN BORD PLEANÁLA	
LDG-	<u>046528-21</u>
ABP-	<u>311746-21</u>
06 DEC 2021	
Fee: €	_____ Type: _____
Time: _____	By: <u>post</u>

REFERRAL: IR584

DUE DATE: 03/12/2021

SUBJECT: Waterford City Public Infrastructure Project - Flood Defences West

An Bord Pleanála
64 Marlborough Street,
Dublin 1,
D01V902

A Chara,

I refer to letter and details in relation to above received on the 26th October 2021.

Kilkenny County Council is in support the proposed Flood Defences West Project having regard to National, Regional and Local Authority policy for the area.

The Kilkenny Planning Authority wish to make the following observations:-

1. The Ferrybank Belview Local Area Plan 2017 should be used for policy guidance in relation to local planning, development objectives and environmental protection. Appendix 1 Strategic Environmental Assessment of the plan specifically refers to Strategic Flood Risk Assessment for the Ferrybank and Belview Area and should be considered in terms of potential impacts of the project within the functional area of County Kilkenny.

2. The EIAR refers to the SDZ as a separate project and states that *"It is considered that the scale of the works (Flood Defence West) and implementation of effective environmental control measures will avoid all likely significant effects on environmental parameters. There is no potential for cumulative*

impacts arising in combination with any other plans or projects and therefore no potential for in-combination effects on environmental parameters”.

Consequently, it is unclear if the cumulative or in-combination effects (of any) of the proposed Waterford Flood Defences West (As indicated within the EIA Report) and the proposed SDZ flood defences have been taken into consideration under the relevant EIAR parameters. The potential flooding impact upstream and downstream of these defences during the Operational Phase within the functional area of Kilkenny County Council and foreshore is of potential concern, including but not limited to impacts on existing habitats. Ideally the pre and post defence flood situation should be modelled and considered within the EIAR for both projects. In terms of a zone of influence this area is identified in the NIS.

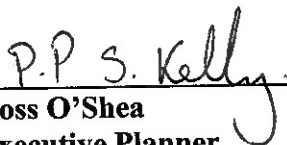
However, it is acknowledged that potential downstream flooding may be more coastal as opposed fluvial and there is no perceptible change in predicted flow velocities upstream and down stream as results of the Flood Defence West project on its own, as indicated with the Hydrodynamic Simulation in the EIAR.

3. Within the proposed new surface water drainage system, consideration should be given to a sealed attenuation storage if possible prior to discharge to the River Suir, where this can be facilitated as part of the project. Alternatively, an assimilation capacity assessment exercise may be undertaken for the River Suir for any proposed new discharges versus current discharge and having regard to water quality.

4. Noise and vibration limits for the construction phase should be set having regard to Chapter 12 of the EIAR and appropriate monitoring locations agreed. However, natural screening, existing ground levels and landforms will mitigate the impacts on receptors within the functional area of Kilkenny County Council. Appropriate time limits should be set for hours of work during the week and at weekends.

5. Air Quality limits based on Chapter 13, Table 13.1 should be set for the project at appropriate monitoring levels to be agreed. However, within the functional area of Kilkenny County Council the air quality impacts of the project are expected to be minimal or imperceptible.

Mise le meas,


Ross O'Shea
Executive Planner