31th March, 2017

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

Re: National Planning Framework

Dear Sirs,

I am enclosing for your attention the submission of Kilkenny County Council to National Planning Framework. This is a hard copy of the submission which was sent by email to npf@housing.gov.ie at 10.39 am Friday 31st March.

I would be grateful if you could acknowledge receipt of the submission.
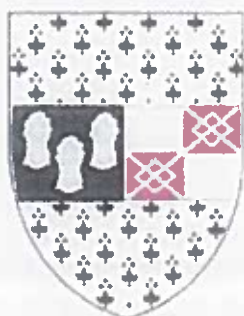
Yours sincerely,

Denis Malone
Senior Planner
Kilkenny County Council

Kilkenny County Council Submission to the NPF

Ireland
2040
Our Plan
NATIONAL PLANNING FRAMEWORK

Kilkenny County Council

30th March 2017

Contents

Executive Summary

This submission reaffirms the regional goal of a united South East Waterford City Region, anchored by Waterford City, and supported by the City of Kilkenny, along with the urban centres of Carlow, Wexford and Clonmel.

The submission outlines that Kilkenny's position, at the heart of the South East Planning Area, combined with its economic and tourism/cultural based assets, endow it with a unique position to allow it to maximise its contribution to Waterford's Gateway role, and to the entire region. Kilkenny has significant capacity to deliver sustainable growth. The Abbey Creative Quarter in the city centre has the potential to deliver 60,000sqm of mixed use residential and employment use. The two planned neighbourhoods of Loughmacask and the Western Environs in Kilkenny City (both within the overall concept of the compact 10 minute city) have capacity for circa 4,800 homes to accommodate circa 12,500 people. In addition the established neighbourhood of Ferrybank, as an urban area in the south of the county has significant capacity for population growth in the region of 12,600 with improved services now supported by LIHAF funding. The Belview Port area, with its wealth of existing industry and employment, has significant existing capacity for expansion, with 190 hectares of land zoned for development. The County's District Towns of Callan, Castlecomer, Graiguenamanagh and Thomastown, along with its smaller towns and villages, contain significant growth potential in areas such as agriculture, food, energy and tourism. These towns, with established communities have the capacity for planned population growth. The NPF must ensure that the necessary investment in critical infrastructure will be planned for, to enable this potential to be realised.

The importance of regional co-operation has long been acknowledged by Kilkenny County Council, and the Council now calls for enhanced measures in this regard. The most pertinent example of regional co-operation is the Joint Submission to the NPF on behalf of the five local authorities of the South East Planning Area. That submission called for the establishment of a regional implementation group for the South East Planning Area to co-ordinate high level cross boundary issues and ensure delivery of NPF and RSES objectives. This submission supports that proposal, and goes further in proposing practical measures to improve strategic planning and service delivery for the greater Waterford area. These measures include a review of PLUTS, a joint Retail Strategy, a joint Local Area Plan, and a Service Delivery Plan. Changes to county boundaries are divisive and unnecessary and the Council believes regional co-operation, through enhanced regional structures, is the way forward. The NPF now offers the opportunity to enshrine the principles of collaboration in Government strategic planning policy.

Key points

Regional development requires regional co-operation

- This submission reaffirms the Joint Submission to the NPF on behalf of the five local authorities of the South East Planning Area.
- A united South East Waterford City Region will be anchored by Waterford City, and supported by the City of Kilkenny, along with the urban centres of Carlow, Wexford and Clonmel.
- The region's track record in collaboration is a strong base on which to build future initiatives (e.g. Three Sisters bid for the European Capital of Culture, the South East Action Plan for Jobs, joint regional initiatives on tourism, and Waterford Regional Airport and the Regional Greenways Office).
- Joint submission calls for the establishment of a regional implementation group – this is imperative.
- Practical measures are proposed here; a review of PLUTS, a joint Retail Strategy, a joint Local Area Plan, and a Service Delivery Plan. It is recommended that existing legislative mechanisms and practices such as Section 85 Agreements and shared service models be utilised fully to ensure cross-local authority working arrangements take place with cost apportionment to be agreed.
- Changes to county boundaries are divisive and unnecessary – local and regional co-operation is the way forward. Discussions are already underway between local authorities to establish a regional office for strategic policy development and implementation.

Kilkenny has the capacity for sustainable growth

- Abbey Creative Quarter (city centre) has the potential to deliver 60,000sqm of mixed use residential and employment use.
- The City's future expansion areas of Loughmacask and the Western Environs have capacity for circa 4,800 homes, 12,500 people, within the overall concept of the compact 10 minute city.
- The Ferrybank area, as a suburb of Waterford, can deliver a sustainable neighbourhood to complement the growth of the Gateway. The PLUTs provided for an additional 12,400 people, or 42% of the overall growth envisaged in the PLUTs, to be located in that neighbourhood of Ferrybank.
- Kilkenny's District Towns of Callan, Castlecomer, Graiguenamanagh and Thomastown, along with the smaller towns and villages, have huge growth potential in areas such as agriculture, food, energy and tourism. Well established and serviced

communities in these rural towns have the capacity for significant population growth best utilising planned land use and place making principles.

- The NPF must ensure that the necessary investment in critical infrastructure, including fibre broadband, for these areas will be planned for, to enable these opportunities to be realised.

Kilkenny's **economic** strengths and **potential can propel** the **City Region**

- The Belview Port area, in close proximity to Waterford, with its wealth of existing industry and employment, has significant existing capacity for expansion; 190 hectares are zoned for development.
- Abbey Creative Quarter can cater for the current growth areas of financial development, design and animation.
- City Business parks also have capacity for sustainable employment growth, within a short distance of new homes.
- Kilkenny's tourism attractions continue to grow (e.g. Medieval Mile Museum), as a Hero site within Ireland's Ancient East, this can be a potential game changer for Kilkenny and the South East Waterford City Region, attracting further tourist revenue and boosting job creation.

Kilkenny is perfectly positioned to **activate development** of **SEWCR**

- Quality of life in Kilkenny is renowned; environmental and heritage resources plus our tourism success have yielded dividends in terms of attracting both public and private sector investment.
- Sense of place and identity is a matter of county pride; our festivals, sporting culture, character of built environment all contribute.
- Success is evident in statistics; growth of population is exceeding the national average.
- Kilkenny's accessibility is second to none; on national motorway and rail networks with links to an international seaport, adjacent to two Institutes of Technology and situated in a strategic location at heart of SEPA, between Carlow and Waterford.
- Kilkenny contains the critical mass and has the distance from Dublin to be capable of being successful in sustaining itself in employment terms, not to repeat mistakes of commuter-driven development
- **NPF should acknowledge the capacity and ability of Kilkenny to contribute as a critical regional driver.**

1 Introduction

Kilkenny County Council (KCC) welcomes the opportunity to make a submission to the National Planning Framework.

KCC recognises that the NPF is a high level national strategic document dealing with the shaping of the country over the next 20 years and from which other more detailed plans such as the Regional Spatial and Economic Strategies, County Development Plans and Local Area Plans will take their lead.

The local authority has therefore focused on strategic issues in Kilkenny that it considers are:

- Of national and regional significance,
- Strategic in nature,
- Of a spatial or placed based focus.

In addition Kilkenny County Council has also come together with the four other local authorities within the South East Planning Area and collaborated in the preparation of a joint submission on behalf of the 5 local authorities for the South East Waterford City Region (Waterford, Wexford, Carlow, Kilkenny and Tipperary).

For the South East Waterford City Region (SEWCR) to be competitive on a national scale, Kilkenny must achieve its potential and support the development of the region and Waterford City.

The Minister has signalled that as part of the NPF process he intends to deal with the recommendation of the **Report of the Waterford Boundary Review Committee** and in that context, Kilkenny County Council has addressed this issue in separate correspondence submitted to the Minister, a copy of that correspondence is attached at Appendix 1 for information purposes.

2   Kilkenny in the Regional Context

Kilkenny is located in the Southern Region Assembly area and is part of the South East Planning Area (SEPA). It has a population of 99,118 according to the preliminary results of the 2016 Census. It is bounded by the other four local authorities within the SEPA which are Waterford, Carlow Wexford and Tipperary. Its location at the centre of the 5 counties is unique. Kilkenny is a rural county with the two largest urban centres being Kilkenny City with approximately 26,560 people and Ferrybank/Belview with a population of approximately 5,500 people. To set the context to consider the appropriate development of Kilkenny to 2040, it is appropriate to consider the existing and emergent strengths of the county.

2.1   Agriculture:

Kilkenny is a highly productive agricultural part of Ireland and is the home of Glanbia's global HQ. It has substantial resources in dairying cattle and cereal production. Both farmers and agri-businesses have invested significant amounts of money in recent years and are well positioned to increase both food production and innovation in the agri-tech sector.

2.2   Tourism:

Kilkenny has also developed a highly successful tourism industry based on the heritage of the city and the heritage and scenic attractions of the other towns and rural parts of the county. The tourism sector has benefited from the county's improved accessibility to Dublin through national road connections (M9 / M8) and improved rail connections.

Festivals and events are an inherent and significant part of Kilkenny's ability to attract visitors year after year. There are a number of well-established festivals which enhance the tourism offering, including the *Cat Laughs Comedy Festival, Kilkenomics, Kilkenny Arts Festival, Savour Kilkenny* food festival which showcases the produce of local food producers, and our new Christmas festival, *Yulefest.*

2.3   Heritage and Built Environment:

Kilkenny has invested heavily in the protection and development of its historic built environment and has ensured that the cultural heritage of its city and towns have been maintained and promoted. The recent addition of the Medieval Mile Museum, of national scale and standard, illustrates the importance of development as well as conservation to make our built environment a living space while respecting its medieval heritage. It is essential that development planning into the future supports the protection of nationally and internationally significant areas of Architectural Conservation. The Medieval Mile in Kilkenny is such a space and will require investment and support in land use and planning frameworks.

2.4   Financial Services:

The environmental and heritage resources of the county plus its tourism success and general quality of life have yielded dividends in terms of attracting both public and private sector investment such as the M9 motorway, the Central Access Scheme, Medieval Mile Museum and Abbey Creative Quarter Joint Venture company (ISIF), Mooncoin Regional Water Supply Scheme, Taxback, Glanbia, Statestreet, etc. This has resulted in Kilkenny City attracting significant levels of financial services such as Taxback.com Banking 365, VHI, Statestreet.

2.5   Home of National Organisations:

Kilkenny is home to the national headquarters for a number of state agencies such as The National Heritage Council of Ireland, The Patents Office, The Design and Craft Council of Ireland and a regional office of the HSA. It also has a Court Service with many High Court sittings.

2.6   Design and Craft:

The well established history and reputation of Kilkenny as a creative cultural centre has been reinforced with the establishment of the national headquarters of the Design and Craft Council of Ireland in the City along with plans to develop a design and craft and innovation centre. The success of Kilkenny based animation studio Cartoon Saloon on the world stage, together with its plans to expand in international partnership to establish Lighthouse Studios, has placed Kilkenny on the cusp of significant development as a European and international centre of animation.

2.7   Ferrybank /Belview Port:

In south County Kilkenny, investment in the Belview port and industrial zone over the last twenty years has resulted in an area of significant economic development potential for Kilkenny and the South East Waterford City Region. A clear economic social and physical relationship has deepened between south Kilkenny, Waterford City and the Port of Waterford.

Glanbia's recent investment of €150m in an ingredients production plant together with planning permissions for further expansion will identify the area as a food production zone of international scale. Progress in developing and promoting this employment zone over many years is now realising dividends. This progress through well established working relationships and long term strategic planning now needs to be supported to ensure that the full potential of the national asset of Belview port and the regional asset of the adjacent industrial zone is realised in the next 10 to 20 years.

Significant population growth has occurred in the Ferrybank area and significant public and private investment has been secured for the Belview port and strategic employment area. Kilkenny has supported the growth of Waterford City through its adoption of the 2004 PLUTS and its implementation at local level through the Kilkenny County Development Plan

and the Ferrybank/Belview Local Area Plan. The northern bank of the river Suir has shown significant growth in population increasing by 8.9% in the period 2011 – 2016 compared to 3.7% for the state and 3.9% for County Kilkenny as a whole over the same period.

Development in all of these areas will determine what Kilkenny will look like in 20 years time and we must plan to ensure that the full potential of these opportunities are met by delivering suitable infrastructure, housing and amenities to support the developments in financial services, agricultural innovation, design and animation already underway.

2.8   Opeertunities:

While much progress has been made in Kilkenny in recent years to create a vibrant and innovative City and county attracting people to make their homes and companies to set up and build their businesses there is no doubt that:

- improving economic conditions,
- proximity to an overheated Dublin City and
- improved connectivity throughout the region,

will result in more opportunities for Kilkenny to diversify economically and to grow in demographic and spatial terms. It is essential that the necessary conditions and investments required to support this growth be recognised and provided to allow Kilkenny maximise its contribution to the South East Waterford City Region and nationally.

3   Kilkenny's Regional Vision

The five local authorities within the SEWCR have formed the following vision for the region:

> *"To maximise the potential of South East Waterford City Region as a Smart, Safe, Inclusive, Innovative location, serving Ireland and linking to Europe while embracing its cultural heritage and natural environment"*

Source: Joint Submission on behalf of Waterford, Wexford, Carlow, Kilkeny & Tipperary to the NPF

THe SEWCR will be anchored by the City of Waterford, Belview Port, Rosslare Port, Waterford Airport, the third level institutes together with the urban areas of Carlow, Clonmel, Wexford and Kilkenny City and their rural hinterlands.

This will mean a city region which is a viable counterbalance to Dublin, with Waterford City as the City of the South East Waterford City Region (SEWCR) doubling in size across both counties, in accordance with the a revised and adopted PLUTS and which reads as one City, where all citizens can access services in their neighbourhoods.

The detailed submission with executive summary by the five constituent local authorities of the South East Planning Area sets out the vision for Ireland and the SEWCR with appropriate levers and actions required. The executive summary of the regional submission is attached in Appendix 2 of this document for reference purposes.

It is the view of Kilkenny County Council that with support from the Regional Assembly and appropriate statutory backing, the establishment of a regional implementation group for the South East Planning Area to coordinate high level cross boundary issues can ensure the delivery of NPF and RSES objectives through local partnerships/structures and alliances.

Taking the wider regional objectives on board this submission shows how Kilkenny County Council has the capacity to deliver for itself and the Region in the achievement of these objectives. To realise the agreed Regional objectives of the SEWCR all parts of the Region must make the best use of their assets to build a more sustainable future. Planning will help to create high quality, diverse and sustainable places that promote healthier lifestyles and attract investment. Each county within the Region must identify its best assets and the requirements to maximise their contribution in the medium to longterm. Some objectives will require collaboration between all or some of the local authorities in the Region. There are long established gaps in performance between regions nationally and long standing obstacles to collaboration across organisations and sectors. To close the gap between our best and worst performing regions, and to maximise meaningful collaboration, we will need to find new solutions that reflect the distinctive character of all our places and best serve our citizens. To play its part Kilkenny must clearly identify its best assets and capacity to

deliver regional and national objectives. The NPF must then play its part in providing the conditions required to ensure that Kilkenny and the Region reaches its full potential.

4   County Kilkenny's Capacity to Deliver

4.1   Kilkenny City

Kilkenny is a centre with a substantial population base, a highly successful tourism sector, improving accessibility due to a location on the national road and rail networks with links to an international seaport, two Institutes of Technology and a strategic location between Dublin and Waterford.

Kilkenny also has substantial capacity for development and is a centre with both the critical mass and distance from Dublin to be capable of being successful in sustaining itself in employment terms, thereby resisting the tendency towards commuter driven development.

There is capacity in land and services in Kilkenny city for planned sequential economic and social growth appropriate to the needs of the county and region. The Abbey Creative Quarter in the city centre is currently under development with planned commercial, residential and public realm potential. Other employment growth can be facilitated in a number of business parks throughout the county and in the industrial growth zone of Belview Port where the agri-food sector is enjoying a period of growth and expansion.

4.2   Planned Neighbourhoods

Together with the creation of optimal conditions for economic development in the county we must provide homes and sustainable neighbourhoods for people to live in. Kilkenny is a compact city based on 4 neighbourhoods around a mixed use city centre.

Two planned neighbourhoods remain to be developed with an ultimate capacity to cater for circa 12,500 additional people in approximately 4,800 housing units. Of these the Western Environs is the largest with approximately 3,000 housing units planned.
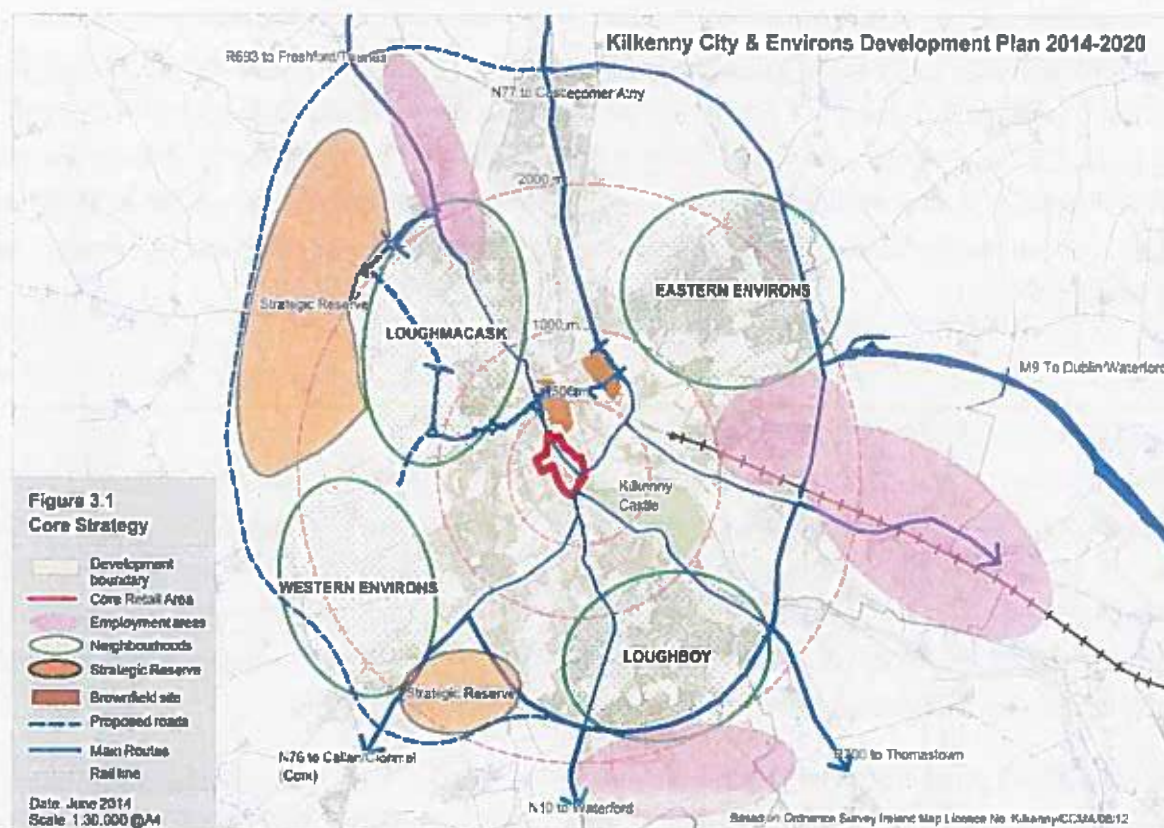
Figure 1 Core Strategy Kilkenny City

Recently announced funding through the LIHAF under Rebuilding Ireland, supporting the provision of the required infrastructure to develop this neighbourhood, will in the short to medium term, unlock infrastructural blockages for up to 800 houses in the Western Environs planned neighbourhood to the west of the city (See Figure 1). The Dept of Education have committed to the development of two schools in the Western Environs area in the next two to three years, planning permissions are in place for large portions of the lands involved with pre-planning enquiries ongoing in relation to the balance. The development of this neighbourhood is imminent and will be required to support the place-making objectives of Kilkenny City and county by underpinning economic, social and cultural landuse requirements.

The further development of the Loughmacask neighbourhood to the north of the Western Environs can ensure that neighbourhoods develop in the city context in a sustainable model of compact urban living, supporting the vibrant city centre while creating new communities and neighbourhoods.

These two planned neighbourhoods will provide sustainable integrated communities all within the concept of a compact 10 minute city[1] with a vibrant city centre.

To fully develop the two neighbourhoods, the completion of the Kilkenny City ring road (with approved EIS) and the central access scheme will be required. Ongoing investment in water treatment and waste water infrastructure will also be required to deliver required development. It is essential that the clearly identified development objectives of these two planned neighbourhoods be supported with co-ordinated multi-agency investment and strategic planning.

4.3   The Abbey Creative Quarter

The 6.5 ha (16 acre) Abbey Creative Quarter, located in the heart of Kilkenny City, has advanced since the agreement to purchase in 2012 to a stage where planning permission exists for 8,700m2 of office/commercial space in two buildings and a 70 unit housing development is at an advanced stage of design. Further detailed planning in the areas of urban design, archaeological testing and detailed infrastructural design including energy efficiency is ongoing advancing the development potential of the area.

In total there is potential within the development blocks (1 to 14) to deliver 60,000 m^2 of mixed use residential and employment uses in the sectors of agricultural technology, animation, design and craft, financial services retailing and for a campus for the Technical University for South East (See Figure 2).

Kilkenny City has the capacity to continue its development as a compact city through its urban renewal development and planned neighbourhood expansion which anticipates the needs of the community and is making provision for those needs. The City can be a driver of growth for the surrounding rural area and the region.

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[1] The concept of the ten minute city is that residents of the city can access the local services they require such as shops, schools, or local parks within a 10 minute cycle or walk from their homes. Kilkenny City & Environs Development Plan 2014 - 2020

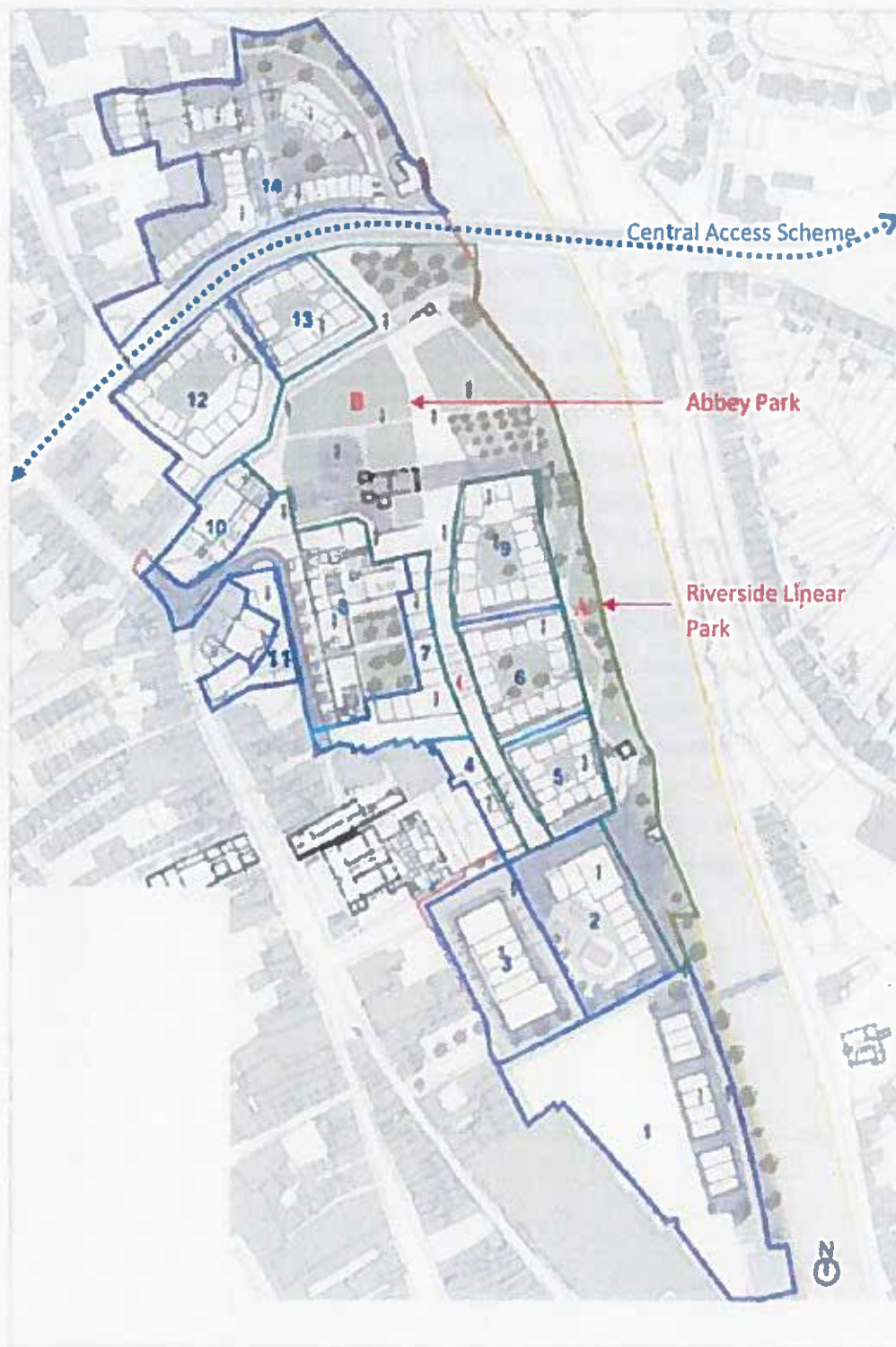Abbey Creative Quarter Map (Urban blocks numbered 1-14)

Figure 2 Abbey Creative Quarter

4.4 Ferrybank / Belview Port Area:

The Ferrybank Local Area Plan has been prepared to reflect the growth strategy outlined under the PLUTs 2004. This neighbourhood can accommodate significant planned population growth. Under the PLUTs it is envisaged that an additional 12,400 people will make their homes in the Ferrybank neighbourhood. There are currently 240 hectares of lands available for potential development.

Belview Port and industrial zone is a port of national significance. The port and its strategic development zone has a total of 190ha of undeveloped land (See Figure 3 below) for port and port related services and industry. The area is highly accessible from the motorway and national road network (M9, N24, N25 & New Ross bypass (N11)). The existing rail line confirms the national and regional significance of this asset.

The area is serviced with gas, water and waste water services with significant existing capacity for expansion. Recent developments there include Glanbia's ingredients (€150m investment), SEED Technology and a further expansion by Glanbia for an extension to the existing milk powder processing plant. Kilkenny County Council is continuously working in partnership with the Port of Waterford company in developing planning for the port and developing joint venture proposals. While plans are advanced for necessary improvements to the N29 route servicing the lands, delivery of these improvements will be essential to the realisation of the full potential of the area for all the stakeholders involved including the Port of Waterford, Kilkenny Co Co, Waterford City and Co Council, IDA, Glanbia, Smartply and others. We must identify and consider the needs of all stakeholders in the development of long term strategic land use planning.
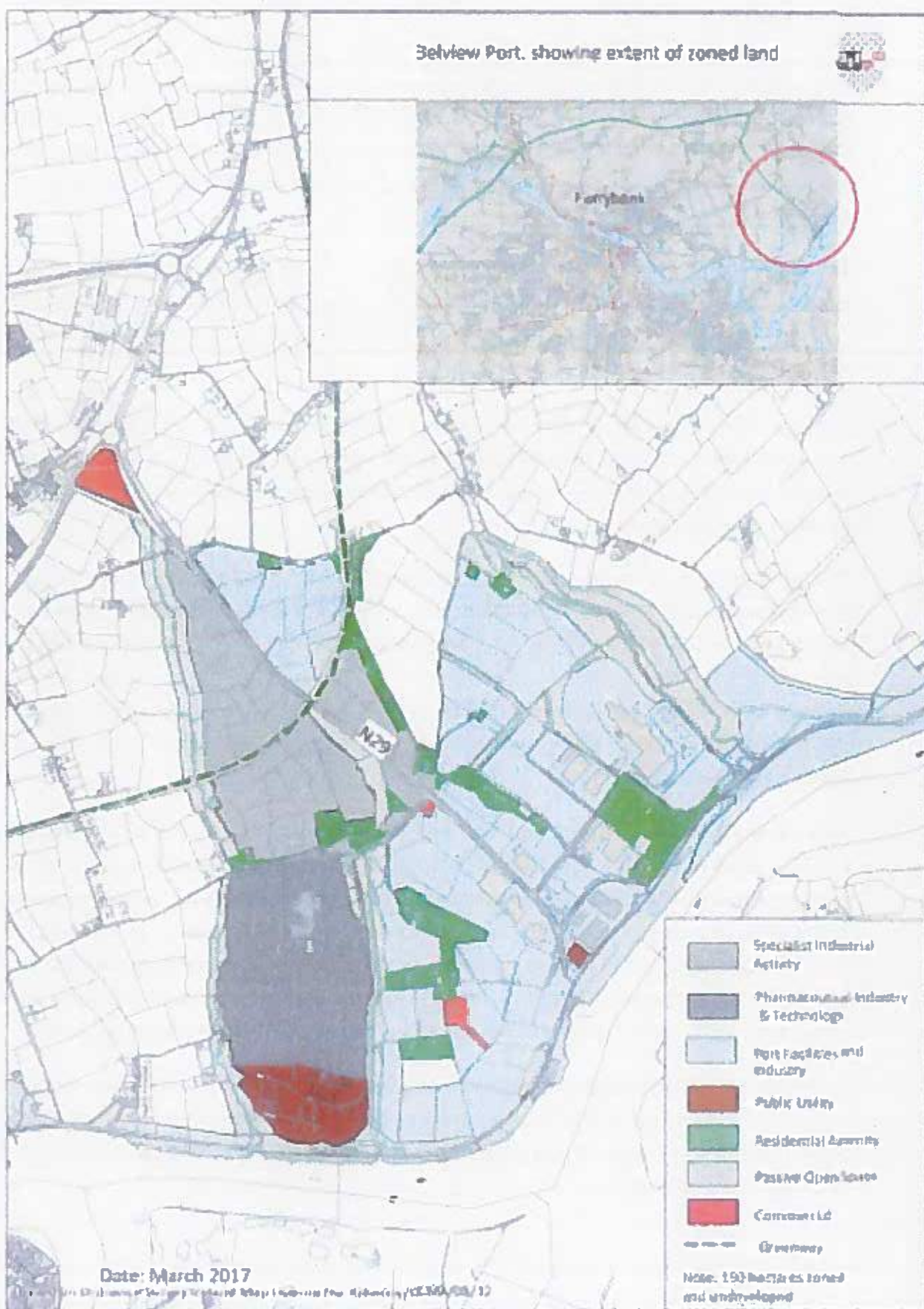
Figure 3 Belview zoning

4.5 Tourism

Tourism is one of Ireland's most important economic sectors and has significant potential to play a further role in Ireland's economic renewal. Fáilte Ireland's brand proposition Ireland's Ancient East (IAE) is a potential game changer for Kilkenny and the South East Waterford City Region. Kilkenny will continue to be a Hero site within IAE, and intends to exploit the opportunities presented by a major marketing and branding campaign for IAE which is entirely consistent with Kilkenny's history and heritage.

Tourism is a critical economic driver in Kilkenny, playing a key role in job creation; supporting the rural economy; supporting small community businesses; showcasing local cultural heritage values; valuing the integrity of our biodiversity; and enhancing community resilience and celebrating local pride in place.

Recent, Council supported, developments at Castlecomer Discovery Park have shown the way in designing activities which attract visitors, whilst making best use of local assets, and making far sighted investment decisions. Similar opportunities exist at Woodstock in Inistioge in south Kilkenny.

The development of a regional greenway extending from Rosslare to Dublin is a major strategic objective. This project will deliver an international tourism product, revitalise rural areas and provide a sustainable asset to promote well-being throughout the region. This project, part constructed, part at planning and part at design stage, is being advanced through a collaborative approach in a Regional Greenways project office resourced at present by three local authorities to strategically plan and deliver an interconnected regional greenway network.

Kilkenny County Council has prepared Tourism Strategy and Action Plan for the period 2017 to 2022, to drive a sustainable tourism industry in Kilkenny for the next 5 years. As part of our strategy we will be co-ordinating international tourism marketing across the counties in the SEWCR to promote the South-East as a special destination as part of Ireland's Ancient East. Kilkenny believes that tourism can be at the forefront in supporting national, regional and local development delivering strong spatial development and place-making with associated economic dividends for Kilkenny and the South East Waterford City Region.

Kilkenny, through the targeted expansion of its tourism offer and its Hero site status under Ireland's Ancient East brand and other Regional Tourism initiatives will play its role in supporting national regional and local development, delivering strong place making in both urban and rural locations.

4.6   Towns, Villages and Rural Areas

Rural Ireland is facing challenges as it continues to change from its more traditional association with agriculture[2]. Kilkenny has a high proportion of its population living in rural areas. According to the 2011 Census 62.9% of the county's population live in rural areas. The key issue to be addressed in the context of Rural Ireland is the repurposing of towns and villages consequent on the redirection of their market function and challenges to their employment base due to technological change. Our towns and villages have new challenges to face given revisions to motorway networks, reduced use of rivers for commercial purposes and other major changes. We need to be creative in the development of new propositions for our rural communities.

The improvements to Ireland's road network (motorways) and further planned road improvements, improved international air connectivity to and from the regions, and the advent of the Digital Economy all offer new opportunities for rural Ireland to play its part in the modern, progressive and dynamic Ireland of the 21st Century.

In line with Government Policy under the recently announced *"Realising Our Rural Potential Action Plan for Rural Development"*, Kilkenny County Council will seek to:

- Support sustainable communities in rural areas

- Support enterprise and employment in rural areas

- Foster culture and creativity in the county

- Maximise rural transport and the recreation potential of the county

- Improve rural infrastructure and connectivity

This will be done through sustainable growth of communities as a key asset within the county. The appropriate growth of our county towns is required to sustain those communities into the future. We need to best utilise existing infrastructure and ensure the sustainable management of land as a resource by effectively utilising existing land use patterns rather than creating new ones.

Through the actions in the Local Economic and Community Plan and the South East Action Plan for Jobs and working in partnership with the Kilkenny Leader company, Kilkenny County Council will:

- Create economic opportunities in towns, villages, rural areas by targeting the primary production industries of agriculture and food, energy, tourism, and the creation of added-value enterprises associated with these industries, including small & medium enterprises such as artisan food producers.

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[2] Commission for the Economic Development of Rural Areas (CEDRA, 2014)

- Building on the unique and distinctive assets of heritage, culture and landscape.

- Through active land management, reduce dereliction and under-utilisation of buildings, promote and support the re-use of obsolete buildings and sites for residential purposes in villages, towns and rural areas.

The District towns of Callan, Castlecomer, Graiguenamanagh and Thomastown have existing social and physical infrastructure which will allow them to sustain their existing communities and grow to an appropriate scale.

We will need integrated environmental initiatives to maximise the contribution of our valuable asset of a rural countryside. Supported initiatives in biodiversity and renewable energy solutions can offer renewed purpose to remote rural location. Our rural areas have a particular role to play in building Ireland's resilience to climate change and capacity to reach carbon reduction targets. Solar power is an emerging source of renewable energy and like all energy schemes should only be considered where it forms part of a plan which complies in full with Ireland's obligations under the Aarhaus convention.

The towns, villages, and rural areas of the county are a significant resource with growth potential in areas such as agriculture and food, energy, and tourism etc. making them resilient to change. Connectivity and access to suitable broadband services are central to the creation of a sustainable proposition for rural living into the future. We can strengthen links between people and the land in new ways, supporting quality of life objectives, as well as agricultural food production requirements.

Our District towns of Callan, Castlecomer, Graiguenamanagh and Thomastown and the smaller villages and rural areas in the county are existing communities and neighbourhoods with schools, shops, services and established land use patterns that need to be supported to appropriate levels ensuring that those communities sustain themselves and thrive.

5 The Regional Structure

Kilkenny County Council is of the view that business as usual is not an option for the region if the ambitious targets suggested are to be achieved by 2040.

As the Regional Assemblies will be preparing the Regional Spatial and Economic Strategies following on from the NPF, an implementation structure needs to be established to ensure delivery of actions. This is a Strategic Action suggested in the combined SEWCR submission[3].

It is the proposal of Kilkenny County Council that a Project Delivery group be established similar to the structure currently delivering under the South East Action Plan for Jobs.

The purpose of the Regional group would be to provide horizontal coordination and implementation of the objectives of the NPF and the RSES.

This Regional group should be made up of a core steering committee with sectoral expertise sourced and brought in on a task or project specific basis as appropriate. This structure should facilitate full Regional collaboration or bi-lateral project-based working relationships between counties as appropriate. The value in developing cross-county working relationships as well as Regional scale ones is important.

Sustainable working relationships for collaboration need to be developed over time. Such a structure as proposed would require cross government departmental buy-in, together with a strong policy/statutory backing which would coordinate both strategic policy development and implementation across local authorities, government agencies and wider public policy levels in support of the NPF.

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[3] National Planning Framework: The South East Waterford City Region Joint Submission p9

6   The Way Forward

Most citizens have an instinctive understanding of their own sense of identity and belonging. In the Irish context, the county clearly remains a strong source of local identity and affiliation. Successive reports on local government reform have emphasised the county structure (alongside cities) as the primary unit of local government in Ireland. The 2008 Green Paper on Local Government reform suggested that "the county basis of local government in Ireland remains sacrosanct"[4]. In relation to boundary changes, it noted the *"particular emotional affinity to county boundaries"* and that *"proposals to alter county administrative boundaries [are] politically divisive, highly emotive, and difficult to resolve and lead to significant public resistance"*:

Kilkenny County Council proposes that a system of formal cooperation, with statutory backing knowledge sharing and contracting, building on previous practice, is a worthwhile, efficient and cost effective alternative to a divisive and damaging boundary change. The development of increasing cross-county working relationships can deliver a more cohesive region.

We need to deal with "Real world" issues in a co-ordinated cross local authority manner with wider public policy areas and implemented objectives on a cross local authority basis within the Regional Assembly structure.

6.1   Structured Cooperation

Kilkenny County Council proposes that the process of planned and structured cooperation between the two local authorities for the future planning and delivery of services in the greater Waterford area be immediately accelerated to advance the delivery of a structured model of effective governance.

There are a number of key shared strategic areas that would need to be delivered in a joint manner as follows:-

- *A review of PLUTS* for the greater Waterford area containing a unified vision and including the issue of additional river crossings and a framework for implementation of its recommendations.
- *A joint retail strategy* for the South East Waterford City Region. That a joint retail strategy be commenced immediately, led by WCCC as required by the Retail Planning Guidelines 2012 and 2002.

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[4] Department of the Environment, Heritage and Local Government, *Green Paper on Local Government: Stronger Local Democracy – Options for Change*, Dublin: Stationery Office (2008, p. 30).

- *A joint Local Area Plan* for the greater Waterford City area/the Area of Interest, as outlined in the report of the Waterford boundary Review Committee, built on an agreed and shared vision for Waterford City[5]
- Arrangements for *efficient and effective Development Management* across the administrative boundary including use of Section 85 and 86 of the Planning Acts
- *A Service Delivery Plan.* A comprehensive review of service delivery of all local authority services and functions within the greater Waterford Area (PLUTS boundary) should be carried out to identify opportunities to maximise efficiency, effectiveness and coherence of service delivery to the communities and businesses. This report to lead to the delivery of a comprehensive Service Delivery Plan to be implemented jointly through formal agreements between both local authorities.

Building on existing cooperation at political and executive level, an agreed structure for formal and informal cooperation will be required to deliver these shared strategic objectives. The following arrangements are already in place and can be used to greater effect to deliver desired outcomes:

- Existing legislation

Greater use of agreements, such as under section 85 or section 86 of the Local Government Act 2001, between Kilkenny and Waterford would allow for the provision of shared services for Waterford city on both banks of the Suir so these services could be provided in an integrated manner. The use of these sections could provide an opportunity to develop innovative governance structures across county boundaries that link local authorities and other organisations horizontally. Additionally, the use of these or other forms of structured cooperation would have no impact on community identity and cohesion.

- Service delivery

Service level agreements, which are referred to in the *Action Programme for Effective Local Government, Putting People First,* can be formulated to achieve consistent delivery of day-to-day services such as street cleaning and the presentation of the public realm, similar to the current arrangements for the provision of Fire Services. These arrangements can provide benefits for the communities in overlapping districts and have evolved due to the good working relationship that has existed between counties. This type of arrangement ensures seamless delivery of service. There should be no difference to the standard of the public realm as you go through administrative boundaries. There is scope for the further development of shared services across the Region.

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[5] This is allowed for under Section 9(3)(a) of the Planning and Development Acts

We can make greater use of Local Government legislation to yield results and provide firm foundations for robust and practical working relationships. A proposed working structure for the delivery and implementation of a coordinated approach to local government service delivery is currently being developed.

- **Oversight**

Oversight on implementation of strategic objectives through Regional Assembly by measuring compliance against implementation of Regional Spatial and Economic Strategies and NPF would be an essential element of any structure for Regional cooperation.

7 Conclusion

This submission has focused on the strategic issues facing Kilkenny and the South East Waterford City Region. Local leadership plays an important role in driving regional development, from the planning and delivery of critical infrastructures and the development of concentrated and well planned urban development to the facilitation of enterprise development through stimulating networking, agency collaboration and targeted regional initiatives.
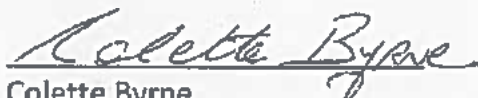
From the NPF the following overarching goals should be achieved for the SEWCR :

- A region of critical mass with a strong Waterford City of 100,000 people.
- Strong supporting City of Kilkenny and Urban areas of Carlow, Wexford and Clonmel
- The Technological University of the South East delivered
- A region that offers an alternative choice for location of development and is complementary to Dublin.
- A region that is a driver of economic growth in the National context.

The successful development of the South East Waterford City Region of which Kilkenny City & County is an integral part will be facilitated by effective working relationships, co-ordination and partnership. Changes to county boundaries are divisive and are not required to ensure that the City Region develops to its full potential.

This submission has outlined Kilkenny's capacity to deliver economic development and sustainable communities for the Region. It has also outlined real proposals to develop new ways of working on a cross – local authority basis within the Regional Assembly structure which can, with legislative support, deliver cooperation and implementation of objectives.

Kilkenny and the SEWCR have the potential to shape Ireland's development to 2040 and with the right supports can do so.

Colette Byrne
Chief Executive

Appendix 1

15th March, 2017

Simon Coveney, TD
Minister for Housing, Planning, Community and Local Government,
Department of Housing
Planning and Local Government
Kildare Street
Dublin 2

Re: Waterford Boundary Review Committee Report

Dear Minister Coveney,

I am enclosing for your information a detailed letter from the elected members of Kilkenny County Council with regard to the recommendation of the Waterford Boundary Review Committee Report.

The letter sets out existing collaboration, structures, current service delivery and co-operation between Kilkenny and Waterford within the "area of interest" referred to in the Report. It also clearly sets out how to progress the region, with Waterford City as the Regional City to best serve the citizens of Waterford, Kilkenny and the wider South East Region.

Attached to the letter is the response of the elected members having regard to specific statements, observations and views formed by the Committee in making its' recommendation. The report, in Kilkenny's view, is somewhat inconsistent with the other Boundary Review Reports, sometimes subjective and in no way representative of the coherent working relationship that exists between the elected members of Kilkenny, Waterford and the wider Local Authorities within the South East Region.

At the request of the members, this letter is also being submitted to your Department in the context of the National Planning Framework. Your press release of 8th February recognised the "fundamental issues of county and cultural identity, economic and social factors" and stated that the Boundary Report will be considered in the context of the NPF 2040.

The elected members strongly contend continued partnership, co-operation, formal structures with Ministerial direction as recommended in other reports will best deliver the development of Waterford City for the benefit of all citizens of the South East Region.

Yours sincerely,

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Tim Butler

Director of Services, Corporate, HR, Transportation and Water.

15th March, 2017

Simon Coveney, TD
Minister for Housing, Planning, Community and Local Government,
Department of Housing
Planning and Local Government
Kildare Street
Dublin 2

Re: Report of the Waterford Boundary Review Committee.

Dear Minister,

We the elected members of Kilkenny County Council have reviewed all of the Boundary Committee reports and respectfully request that you consider our views when making your decision on how to proceed in this matter.

The process of the Waterford Boundary Review has been both emotive and divisive and as public representatives we are compelled to impress upon you the potential damage that will be caused by the pursuance of the recommended boundary alteration. At a time when Government Policy, through the emerging NPF, is to build the Regions, with a particular emphasis on City regions, it is now more important than ever that the South East Waterford City Region (SEWCR) acts as a **"united voice"** for the development of our region. The challenge for the South East, led by Waterford City, is that we are by far the smallest planning region within the larger Southern region and more importantly Waterford City is the smallest Regional City. Whilst all of the local authorities in the South East, as confirmed by the Boundary Committee, share the same ambition for Waterford City, all of the local authorities in the Region must work together to support Waterford City in its role as the Gateway City for our region.

There are many examples that we in the region are working well together, including;

- The Three Sisters Capital of Culture Bid
- Regional Greenways office
- Funding of staff to co-ordinate the delivery of government policy through the SEAPJs
- Joint Tourism budget for marketing the Region.

We ask that you help us to continue this work and support the South East Waterford City Region to play its full role in the economic recovery and to act as a credible counter balance to Dublin, being the closest City Region to Dublin.

The SEWCR has many priorities;

- Reducing unemployment to within 1% of the National Average,
- A multi-campus University of the South East,
- Improved Health Services,
- The development of Waterford Airport,
- Further development of our Ports,
- Development of the SDZ in Waterford City and the smaller scale urban sites of Trinity Wharf in Wexford and the Abbey Creative Quarter in Kilkenny which are prime for economic development of scale.

As the body elected to represent the people of Kilkenny we are more determined than ever to deliver economic, social and cultural development for our County and Region. We in Kilkenny have prioritised the development of homes, jobs, schools and amenities for our communities. We plan to maximise the potential of the Local Infrastructure Housing Activation Fund (LIHAF) to deliver a new neighbourhood of 3,000 homes in Kilkenny City, the regeneration of towns and villages in keeping with the Action Plan for Rural Ireland and the Town and Village and CLAR programmes. We have a significant programme for investment in our tourism product to act as a "Hero Site" in Irelands Ancient East. Kilkenny County Council is ambitious and innovative in its endeavors to deliver for the people of Kilkenny and the Region and our record in this regard should be acknowledged.

With a firm commitment to pro-active service delivery and to acting in the best interests of the citizens we represent, we strongly recommend that a new programme of **structured co-operation be initiated between ourselves and Waterford to develop innovative and robust structures to deliver the strategic plans required for the development of the South East Waterford City Region.**

1. Strategic Collaboration

We adopted the PLUTs in 2004 which provided for Waterford City to almost double in size on both sides of the River Suir. We are currently working with Waterford to revise the PLUTs which will coincide with the period of the NPF, 2020 to 2040. A revised PLUTs is acknowledged as being essential by the Boundary committee and we would much prefer to be moving forward with the preparation of same in a good healthy partnership with Waterford, which will in our view be difficult to achieve if the boundary change is to proceed. Your support in putting the preparation and the delivery of the PLUTs on a statutory footing is in our view the way forward.

This approach is consistent with the *Economic Strategy for Waterford City and County*, dated May 2013 produced for Waterford local authorities by DKM Economic Consultants, Colliers International and Brady Shipman Martin. The recommendation of that independently produced report for the promotion of a Waterford Metropolitan Area was *"a Waterford City*

Area, managed on a collaborative basis by the unified local authorities of Waterford City and County Councils and Kilkenny County Council, would aim to position Waterford City as the principal economic and urban driver for Waterford and the south-east." This is an ambition shared by the local authorities in the region. The report further recommended that *"Section 9(7) of the 2000 Planning and Development Act be used to deliver a Metropolitan Area Action Plan which would seek to establish coherent policies for the entire area, respected by both Kilkenny and Waterford Councils. Using Section 9(7) Waterford and Kilkenny County Councils could request the Minister to drive this coordination, in order to have it recognised at national level."* This is consistent with the recommendations of Athlone, Carlow and Drogheda Boundary Committee reports. We look forward to working with Waterford to deliver for our region.

2. Using Existing Legislation for cross boundary working

We request that you give both local authorities the opportunity and support to make greater use of existing legal mechanisms such as Section 85 and 86 Agreements under the Local Government Act 2001 in respect of development control, enforcement requirements and housing functions.

3. Service Delivery

Service Level Agreements can also in our view be formulated to achieve the consistent delivery of day-to-day services including street cleaning and presentation of the public realm. Where necessary one authority could provide the service and recoup the cost. This is similar to the current arrangement for the provision of Fire Services in the area of interest. Both local authorities utilise such mechanisms already and have the skills and experience to develop and implement new ones. This will ensure Waterford City "reads as one" regardless of Boundary location.

4. The Way Forward

It is our view that the people of Waterford and Kilkenny would be best served through the formulation of new models for cooperation and collaboration based on all of the mechanisms outlined above as a worthwhile and cost effective alternative to a divisive and damaging boundary change. We propose that such a model be developed in conjunction with your Department with its formulation, development and implementation overseen and monitored, if required, by Department officials.

We propose that Waterford and Kilkenny local authorities be required, working together and reporting to your Department, to produce within 6 months the following;

- A full review of the Waterford PLUTs, including the issue of additional river crossings, together with a framework for implementation and delivery, with clearly stated responsibilities and timelines for delivery.

- A Joint Retail Strategy for the South East Waterford City Region.
- A report detailing the results of a comprehensive review of service delivery of all local authority services and functions within the Waterford Metropolitan Area including the Area of Interest located in County Kilkenny immediately adjacent to the North Quays of the River Suir. The purpose of this report being to identify means to maximising efficiency, effectiveness and coherence of service delivery to the communities and citizens of Waterford, Ferrybank and Kilkenny. This report to lead to the delivery of a comprehensive Service Delivery Plan to be implemented jointly through formal agreements between both local authorities.
- An agreed structure to oversee the processes required.

As elected representatives we feel that such mechanisms supporting the development of cooperation and collaboration are preferable and more worthwhile than divisive boundary alteration. Our proposal will result in real improvements for the delivery of services to citizens and for the development of strategic plans to secure the supported development of our Regional City, Waterford. Mechanisms exist or can be developed to create, encourage or require closer working relationships in the interests of the citizens of the affected area, counties Waterford and Kilkenny and the South East Region. The report states that both local authorities share strategic objectives and vision for Waterford City and the Region. This is stated in Section 5.2 of the report at page 41 as follows "**Indeed, it is clearly evident that they share a vision, in common with their partner local authorities in the South East Region, for that region as a whole. In that vision the primacy of Waterford City and the key aspiration for its development and success is widely shared within the region.**" The policies and plans adopted by Kilkenny County Council all support this vision and we currently work closely on other initiatives with a regional focus. This can form the basis of a more targeted work programme in the public interest.

A costly and damaging boundary change could set a worrying precedent for other areas experiencing urban expansion across county boundaries and will require an unanticipated restructuring of Kilkennys recently formed Municipal Districts. Overall a boundary change will have negative impacts on individuals, communities and counties without delivering any practical benefits for citizens in either local authority area. The Committee accepts that there are little or no savings or efficiencies to be gained by a boundary review "**It is the Committees view that there is very limited, if any, scope for delivery of further efficiencies in day-to-day service delivery costs through a range of reconfiguration of boundaries that it has examined.**" Page5.

A positive endorsement of closer collaborative structures together with a measurable programme of service and strategic plan delivery would represent a far more beneficial outcome and we request that this is considered as an alternative to a boundary change as proposed.

We are committed to the achievement of the best outcome from this process for the people of Kilkenny and Waterford. We do and will work in partnership with Waterford. However, we cannot allow the negative and unjustified comments in the report relating to Kilkenny County Council to remain unchallenged. The attached document outlines in detail the areas of concern to us. We request that these comments be taken into account in your consideration of the report and are for the purpose of setting the record straight.

Our vision for the South East Waterford City Region (SEWCR) 2040 sees

A City region that is a viable counterbalance to Dublin, with Waterford City as the City of the South East Waterford City Region (SEWCR) doubling in size across both counties, in accordance with the adopted PLUTs, which "reads" as one City, where all citizens can access services in their neighbourhood.

To successfully deliver this vision the SEWCR needs significant state support and capital investment.

Yours sincerely,

_____ PTO

Elected Members of Kilkenny County Council

Kilkenny County Council having reviewed the report of the Waterford Boundary Committee published February 2017 is compelled to make the following observations in relation to its content;

Section 1 Executive Summary:

The terms of reference of the committee required recommendations with respect to the Metropolitan District of Waterford only with no regard for the impact on Kilkenny. The process is inequitable in this regard.

The report acknowledges "the high level of collaborative engagement between local authorities in the delivery of day-to-day services" however the report throughout questions the prospect of further collaboration even though it is established that it is ongoing and working well. The report then makes a significant leap to conclude "that there are inherent rivalries too significant to render such arrangements practicable" without providing any evidence.

The summary of the Committees recommendations at section A of the Executive Summary refers to "provision for the expansion of that area to cater for the forecast population and economic growth of the regional centre." Submissions made by both Kilkenny and Waterford local authorities as part of the review process stated clearly that adequate zoned lands are available at present to cater for the projected growth of Waterford as the Regional Gateway. **In the submission made by Waterford as part of the boundary review process it states that the land zoned in Waterford at present "is more than adequate to service the requirements of the whole of Waterford City (i.e. to grow) and it should be noted that all of the lands are serviced".** PLUTs provides for Waterford City to double in size across both Counties. There are zoned lands within the existing Waterford administrative area and can facilitate up to 27,000 additional people. Given that population growth in the area over the last two census periods averaged approximately 1,000 people over 5 years or circa 200 per year there is no doubt that lands are available to meet the growth potential of Waterford City. The development of the North Quays or Waterford SDZ is a major element of the development of Waterford City. The development of this site has not in any way been impeded by the position of the county boundary and will not in any way be assisted by its relocation. Other geographical and economic issues have resulted in its lack of development to-date and will determine whether it takes place in the future. These impediments are documented by the Committee Page 36 &37.

Section B presents as reasonable the proposal to redefine the county boundary along "electoral area boundaries that follow the line of an existing stream". This misrepresents the real impact of such a proposal which in effect would split two parishes and a number of landholdings merely moving the issues it proposes to resolve to a new location. Such a proposal illustrates a real lack of local knowledge and respect for the communities affected.

Section C recognises that Kilkenny County Council has long employed a regional strategic approach to the area as evidenced in its "significant strategic focus on this area". The investment and long term strategic commitment made by Kilkenny County Council to the development of Belview Port industrial zone as a regional asset is acknowledged here. This work over more than twenty years took place in collaboration with the Port of Waterford, IDA, Waterford City Council and many other stakeholders and should be taken as evidence of close strategic partnership working in practice.

However the report subsequently calls into question the ability of that same organisation to focus on strategic regional objectives in collaboration with Waterford LA without any evidence.

Section F estimates the number of people impacted by the proposed boundary change as 4,500 based on 2011 census information, we estimate the figure of people to be affected by the recommended boundary change to be 5,500, based on 2016 census figures. The report also mentions the requirement that "it would be necessary to reconfigure all of the Municipal Districts within county Kilkenny". This impact was not envisaged in the terms of reference of the review process. The people of Kilkenny have not been afforded any opportunity to comment on such an outcome. Should a boundary change be progressed a new process of public consultation would be required to allow the people of Kilkenny have their say in relation to this process. Without that the process is inequitable and undemocratic. It cannot be accepted that such a process will in any way support the growth of the Waterford Metropolitan District and is therefore an unacceptable and unnecessary outcome of the proposed boundary change. The disproportionate detrimental impact on the medium term development of Kilkenny cannot be justified or accepted.

Chapter 1 - Introduction

Page 10 of the report states that the various boundary committees agreed to "utilize a standard approach". Having reviewed the reports in relation to Carlow, Athlone and Drogheda the elected members of Kilkenny County Council consider that there is evidence of consistency between these three reports, but the Waterford report reflects no consistency with the approach taken in the other three.

Section 1.5 references the "appropriate consideration of all submissions received." There is no evidence that the large number of submissions from people against this review were taken into account. The elected members of Kilkenny County Council are outraged at the lack of consideration given to more than 19,000 submissions that people took the time to make. The Drogheda report states that "in considering the options identified by the Committee, it was clear that retaining the existing boundary would mean that the voice of a majority of the population who responded would be recognised. It would also give the recently instituted Municipal Districts time to develop their potential". This shows a shocking inconsistency between reports where circa 500 submissions in the Drogheda case

merited such a comment and more than 19,000 in the Waterford case did not. Similarly the need to alter Municipal Districts in Kilkenny was given no consideration in comparison to the Drogheda report. These two issues illustrate that the people of Kilkenny have not received equal treatment to those in other administrative areas as part of this process.

Such an inconsistent approach sets a worrying precedent for other areas around the country where county boundaries interact with growing urban areas. Use of existing legislation and new structures of collaboration are required to overcome such issues not adversarial boundary review processes.

Chapter 3 - Submissions

This chapter deals with consultation and in the opinion of this Council seeks to undermine the credibility or merit of the submissions made by categorising them as "individually drafted" or "identical or near-identical wording and format".

The fact that citizens took the time and felt the need to sign a submission regardless of format should be recognised. The fact that 19,096 submissions were made in opposition to a boundary change has not been adequately acknowledged in this report.

Page 21 of the report refers to "a perception that there is a lack of public support within Waterford for a boundary change". This report is required to be evidence based. The evidence provided by only twenty nine submissions in support of a boundary review and only two hundred and ninety nine submissions from residents in Waterford clearly demonstrates a lack of public support in Waterford for a boundary change – 90% of submissions from the Waterford area were against any change to Boundary.

Chapter 4 - Setting the Context

In setting the context in this portion of the report it rightly identifies the real challenges to development on Waterfords North Quays and beyond as an active part of the Waterford Metropolitan Area. Those being

- the historical profile of Waterford as a walled city,
- the width and strength of the river Suir,
- lack of connectivity to the City Centre with only one bridge,
- traditional heavy/industrial land uses on the north quays,
- lack of large scale infrastructural investment and the lack of delivery of the national gateway activation fund. The need for additional river crossings is identified as a barrier to the coherent development of the Waterford Metropolitan Area on both sides of the river. A boundary change will not make the area any more accessible to the City and will not in any way increase or decrease the likelihood of delivery of additional river crossings.

Section 4.1 ends stating that Waterford would be strengthened if development on both sides of the river bank were to emerge. The northern riverbank, or North Quays SDZ, is

within the Waterford administrative area at present and has not developed. The location of the county boundary has not in any way impacted on the development of this area. Kilkenny County Council is actively assisting and supporting all proposals for additional river crossings to assist with the development of the North Quays.

Section 4.2 points out that "The suburban area around Ferrybank has developed rapidly in the last decade". We believe that this establishes that the current boundary has not hindered development in the area. We believe that it is inaccurate to state that the presence of the current boundary has negatively impacted on the development of the Metropolitan Area on the northern riverbank.

Section 4.3.2 refers to Waterford's performance as a Gateway. Both local authorities in their submissions provided evidence to support the fact that projected population growth can be facilitated within the PLUTs area. There is no evidence that the below target performance of Waterford City as a regional Gateway can be attributed in whole or part to the current county boundary with Kilkenny. The PLUTs allowed for Waterford City to almost double in size. The committee give many reasons for the lack of growth to the North side of the River Suir.

Kilkenny County Council supports fully the development of Waterford City as our regional Gateway and this is acknowledged by the Committee who found no evidence that our policy's undermined in anyway Waterford status as the Gateway City for the South East.

Reference is made to Putting People First at section 4.3.3. The full content of this section deals with the merger of Waterford and City and County Councils. This is not comparable to a county boundary change in anyway. The merger sought to deliver identified operational efficiencies which it is accepted cannot be achieved as part of this proposed boundary alteration. The comparison to the Waterford merger is not appropriate as a justification for a boundary alteration. In fact the merger report made no reference to the Boundary, or the need for same to change.

In fact Putting People First is referenced in the Drogheda boundary review report, in particular paragraph 6.4.2, outlining how hinterlands should be dealt with within county boundaries and supports the establishment of working arrangements to ensure that county boundaries remain intact. This is the approach recommended in the Limerick Merger Report in relation to the area of Limerick City in Co Clare.

Section 4.4.2 deals with the implementation of the PLUTs which has not happened as envisaged. Kilkenny County Council is clear in its submission that requests for the establishment of implementation structures were not acted upon by Waterford as the lead authority. In our view any structures requiring cross boundary implementation must be underpinned with statutory mechanisms to ensure delivery. Without this, implementation can be neglected for financial or other reasons causing unforeseen outcomes such as a

boundary review. Kilkenny County Council requests that the Minister requires clear timelines for the establishment of the required structures to implement the PLUTs and to have his department take a monitoring role to assist that process and deliver the revision and subsequent implementation of the PLUTs. An Economic Strategy for Waterford City and County commissioned by the Waterford City and County local authorities and prepared by DKM Economic Consultants, Colliers International and Brady Shipman Martin examined the question of promotion of the Waterford Metropolitan Area under Section 3.4 of their report and did not mention a boundary review. This report recommended that "A Waterford City Area, managed on a collaborative basis by the unified local authorities of Waterford City and County Councils and Kilkenny County Council, would aim to position Waterford City as the principal economic and urban driver for Waterford and the South East". This report also referenced Section 9(7) of the 2000 Planning Act which could be used to deliver a Metropolitan Area Joint Plan seeking to establish coherent policies for the entire area, respected by both Kilkenny and Waterford Councils; "The Minister may require 2 or more planning authorities to co-ordinate the development plans for their areas generally or in respect of specific matters and in a manner specified by the Minister."

This report concluded in section 3.3 that "using Section 9(7) Waterford and Kilkenny County Councils could request the Minister to drive this coordination, in order to have it recognised at national level." We agree with this approach and request that the Minister use Section 9(7) as outlined to achieve the required outcomes rather than support a hurtful, divisive and costly boundary alteration.

Section 4.4.3 of the report deals with the scale and designation of the Ferrybank District Centre and finishes with the statement that "the dispute between the Waterford and Kilkenny Councils highlights the absence of an agreed retail planning strategy for Waterford and its environs". Kilkenny County Council strongly rejects that there is a dispute in this instance. Waterford made a submission in relation to the Ferrybank development as part of the statutory planning process requesting conditions be attached to the grant of planning permission. Waterford Council made no appeal to the planning decision of Kilkenny County Council. This planning decision was in line with national, regional and local guidance and compliant with all statutory planning procedures and is not in dispute. It is our view that the report wrongly seeks to imply that planning decisions, correctly made by Kilkenny County Council, in relation to the Ferrybank Centre are now in dispute. This position is unacceptable. The Department has never given any direction on any planning matter in Kilkenny.

Section 4.5 recounts historical boundary review requests and states "it is the view of the Committee that such proposals may well have had an adverse impact on the relationship between elected members in the two local authorities .... and may have detracted from successful implementation of the PLUTs". Such a "view" is without evidence or foundation and is strongly rejected by the elected members of Kilkenny County Council who enjoy a co-

operative working relationship with elected members from Waterford, Wexford and Tipperary evidenced by ongoing regular meetings at Municipal District level with all three counties. Such statements are damaging to the reputation and integrity of the elected members of Kilkenny County Council and should be removed from the public record. This position is again stated on page 41 of the report "it would appear that petitions by former Waterford City Councils to extend the boundary did not contribute towards harmonious relationships between neighbouring local authorities". The language and tone of the report repeatedly implies that Kilkenny County Council have in some way obstructed progress on strategic matters. This is untrue, without evidence and strongly rejected by Kilkenny County Council. Such inference and innuendo misrepresent the situation and render this report inaccurate and unreliable. Evidence of strategic collaboration on the Ferrybank/Belview LAP, the South East Action Plan for Jobs, the Three Sister Capital of Culture bid, the Regional Greenways Project Office and the Regional Cultural Strategy amongst others can be provided to refute such claims as presented.

Chapter 5 - Consideration of Options

Section 5.2 states that the boundary is irrelevant to people's lives. While the boundary certainly has no impact on service delivery or development in the area the submissions of more than 19,000 people objecting to its alterations proves that it is of value to the majority of people in the affected area and beyond as part of their personal and community identity and cannot be changed.

Section 5.2.2 suggests that services can be provided to people in the area affected from Waterford City Hall due to its proximity. Without additional river crossings to provide connectivity it cannot be claimed that services can be conveniently provided to people in the affected area in this way. The services currently provided at the Ferrybank Area Office and Library by Kilkenny County Council are important to this community and cannot easily be replicated having developed over time with community development support. Waterford indicated in its submission it would close the offices in Ferrybank, the committee view this as retrograde.

Section 5.2.4 of the report makes reference to "cultural DNA" and suggests that "it may obscure rational measures for delivery". This statement is unacceptable, subjective and unsubstantiated. Identity is important and the value placed on it should not be undermined.

This report should be evidence based and not an expression of the view of the Committee with regard to the value of cultural identity or based on speculation as outlined in the extract above.

The Committee reports the observation of sharp differences between the local authorities which it perceives "could be adversarial" The elected members of Kilkenny County Council cannot accept such a statement. Good working relationships prevail between local

authorities regardless of differences of opinion. In the same paragraph the report states that both local authorities "hold and develop a shared ambition for the region, delivering for their collective citizenry". We argue that the differences of opinion which both local authorities have been forced to defend as part of this process has been damaging. Most certainly Kilkenny County Council will passionately represent the views of its citizens who strongly oppose a boundary change and this is at variance with the view presented by Waterford City and County Council. This goes to illustrate the divisive and harmful impact of even the proposal of a boundary alteration.

In section 5.3.1 under Option 1, comparisons are again made between the benefits of the Waterford City and County merger and the proposal to have one local authority with responsibility for the full city area. This comparison if not accepted as a merger within a county does not impact on cultural identity in the same way.

Under section 5.4.1 Option 2, a decision to continue the existing boundary configuration with arrangements for improved inter-authority co-operation is dismissed on the basis that the Committee believed "that there are inherent rivalries too significant to render such arrangements practicable in the medium to long term in a context where a simpler practical alternative is available". We do not accept that there are "inherent rivalries" between the local authorities and our view is evidenced by ongoing collaboration in areas already listed, including, South East Action Plan for Jobs, Regional Cultural Strategy, Greenways Office and others. We dispute that any adversarial exchanges were evidenced as part of this process and reject the finding of the Committee with regard to rivalries". Kilkenny County Council have repeatedly called for increased collaborative structures and will continue to develop new working relationships with regard to tourism, economic development and any matters requiring attention to best serve the people of the South East. Kilkenny County Council is not alone in this view with the independent report commissioned by Waterford local authorities in 2013 "Economic Strategy for Waterford City and County" coming to the same conclusion and outlining mechanisms for joint strategic planning.

Chapter 6 Recommendations / Next Steps

Section 6.2.1 states that the Municipal District structure of Kilkenny would need to be reconfigured which is unacceptable and inequitable without a process of public consultation. Such a requirement would have an injurious affect on Kilkenny in developing its own administrative functions and would result in a negative impact on its overall development in the medium to long term. This cannot be allowed for the perceived benefit of another area. All areas should be supported to reach their potential not one in preference to another.

In conclusion we the elected members of Kilkenny County Council request that the above comments with regard to the contents of the report of the Waterford Boundary Review

Committee be taken into account in your consideration of the report's recommendations. We have demonstrated

- The lack of consistency of sections of this report with other boundary review reports,
- The subjective and disputed nature of some of the language and content used in the report,
- The misrepresentation of Kilkenny County Councils commitment to collaborative working relationships with Waterford and other local authorities in the South East Region.

We reiterate the core message of the submission made by Kilkenny County Council to the Boundary Review Committee that closer more structured working relationships with a regional/national oversight mechanism is the way forward to best deliver the timely development of the Waterford Metropolitan Area. Work is already underway for the revision of the PLUTs and an undertaking has been made by Waterford City and County Council to commence the preparation of a Joint Retail Strategy in accordance with the requirements of the Retail Planning Guidelines.

Kilkenny County Council will steadfastly defend the cultural identity of its citizens and support the views of the 19,096 people and organisations that made submissions opposing a boundary change. This should not be misrepresented as "adversarial" but rather a true expression of political representation and democratic practice.

We strongly recommend that formal structures be put in place between both local authorities to ensure the timely revision and implementation of the PLUTs and the delivery of the Regional Planning Strategy. As we enter a new era of international, national and regional development based on economic recovery we must hold dear our community and county identities and develop new and sustainable ways of working across sectors, boundaries and stakeholders with a positive approach based on mutual respect. We should not place higher importance on the rights and opportunities of some citizens over others, depending on their location. We must work in partnership to ensure that all areas meet their potential.

Appendix 2

Executive Summary Regional Submission

Our Vision for Ireland in 2040.

- A strong and sustainable Dublin as a key driver of international competiveness.
- A series of connected City Regions acting as a counterbalance to Dublin with the appropriate levers to compete.
- A rural Ireland with enhanced connectivity and a repurposing of its towns and villages in the context of urbanisation, globalisation and technological change.
- An appropriate re-distribution of population, away from the Greater Dublin Area, to the regions.

Our Vision for the South East Waterford City Region in 2040.

- A Key Gateway to Europe and counterbalance to Dublin as its nearest City Region neighbour.
- A partner with the Atlantic City and Midland Regions through enhanced physical and virtual connectivity.
- Having a population of over 700,000.
- Sustaining 50,000 additional jobs.
- Having Waterford City as a core economic driver and doubled in population. Having a unique and prosperous urban distribution through the interlinked centres of Waterford City, Wexford, Clonmel, Carlow and Kilkenny City.
- A City Region with GDP and incomes at or above the National average.
- A region with the highest health and well-being indices given the wealth of natural resources and amenity available.

What are the key levers to allow the South East Waterford City Region to fulfil this vision?

A Key Gateway to Europe and Counterbalance to Dublin

- Development of our Ports.
- Sustaining the West East Freight Activity provided by the Ballina to Waterford Rail connection.
- Developing an extended runway at Waterford Airport to deliver regional international connectivity by air.
- Improvement a) in train frequency and b) in travel time through upgrading of the physical infrastructure of the Waterford to Dublin rail line, via Carlow and Kilkenny and the Dublin to Wexford and Rosslare Harbour rail line.

Partnering The Atlantic City Regions

- A motorway replacing the existing N24 and ensuring connection of all the City Regions of Ireland by motorway.
- Improvements to the N80 and N25 to appropriate national primary standard standards.
- Policy incentives to enable greater physical and virtual collaboration between the City Regions.

Sustaining Jobs and Human Capital

- Delivery of a Technological University of The South East with Primary Campuses in Waterford and Carlow and out-reach campuses in Wexford and Kilkenny as a unifying proposition and driver of learning and innovation.
- Ensuring 10,000 of the additional third level places required in the state are delivered by the Technological University of the South East.
- Policy direction to redress the imbalance in FDI investment in the South-East.
- Progressing key strengths in the region in agriculture, food nutrition, life sciences, pharmaceuticals, medical devices, engineering, design and mobile applications.
- Doubling tourism visitor numbers over the life of the plan, under Irelands Ancient East through collaboration and key projects such as Cruise Tourism, Greenways and Munster Vales.
- Delivery of international broadband connectivity via the Great Island connector and of dark fibre connectivity between all of the Cities.
- Development of strategic sites such as the Abbey Creative Quarter and Trinity Wharf.

Doubling Waterford City's Population

- Prioritising the Development of the North Quays.
- Ensuring key enabling infrastructure outlined in the Waterford Planning Land Use and Transportation Strategy for the Greater Waterford area is advanced.
- Ensuring the key role of student and innovation centres in City development is reflected in the make-up of the Technological University of the South-East.

Health and Well-Being

- Ensure that the Health Services are so developed as to ensure a Centre of Excellence in University Hospital Waterford and that services across the Region are appropriate to meet the needs of 700,000 in population.
- Enhanced investment in our natural amenities as a resource for residents and visitors alike.

Rural Ireland

The key issue to be addressed in the context of Rural Ireland is the repurposing of towns and villages consequent on the redirection of their market function and challenges to their employment base due to technological change.

The key elements for the delivery of change should be

- Enhanced provision of broadband connectivity to towns and villages with speeds well in excess of that proposed under the National Broadband Scheme.
- Focused and specific funding of consequence to enable regeneration targeted at community and private sector co-involvement, with the primary targets being the economic and residential functions of our smaller urban centres.
- Co-ordination and/or rationalisation of the multiplicity of existing schemes in the Rural Development area.