



15<sup>th</sup> 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 8<sup>th</sup> 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,

Tim Butler

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

**Department of Housing, Planning,  
Community & Local Government**

**21 MAR 2017**

**Minister's Office**





15<sup>th</sup> March, 2017 Fonamh don Phobal - Caomhnú don Oidhreacht

Serving People – Preserving Heritage

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

Matt Doran Cathaoirleach

John Brennan

Mary Hilda Cavanagh

Pat Fitzpatrick

Michael McCarthy

Pat Millea

Maurice Shortall

Peter Cleere

Michael Doyle

Breda Gardner

David Kennedy

Andrew McGuinness

Patrick O' Neill

David Fitzgerald

Sean Tyrrell

Joe Malone

Patrick McKee

Malcolm Noonan

Eamon Aylward

Tomas Breathnach

Pat Dunphy

Ger Frisby

Fidelis Doherty

Melissa O' Neill

Matt Doran

John Brennan

Mary Hilda Cavanagh

Pat Fitzpatrick

Michael McCarthy

Pat Millea

Maurice Shortall

Peter Cleere

Michael Doyle

Breda Gardner

David Kennedy

Andrew McGuinness

Patrick O' Neill

David Fitzgerald

Sean Tyrrell

Joe Malone

Patrick McKee

Malcolm Noonan

Eamon Aylward

Tomas Breathnach

Pat Dunphy

Ger Frisby

Fidelis Doherty

Melissa O'Neill



*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.



