

SUBMISSION TO NATIONAL PLANNING FRAMEWORK 2040

The primary focus of our submission is on the recommendations of the Waterford Boundary Review Committee which we understand is to be adjudicated on in the context of the National Planning Framework. We strongly disagree with the recommendations and outline below for your consideration the reasons for our view that there is a better, simpler and more practical alternative to an extension of the boundary of Waterford City out into County Kilkenny.

Sense of identity

The Boundary Review Committee correctly stated in its report that the overwhelming basis for opposition was the sense of identity of the people of County Kilkenny. It is of note that submissions came from across the county and not just within the 'area of interest' identified initially by the Boundary Review Committee.

It is impossible to overstate how the possibility of an extension of the Waterford boundary into County Kilkenny has exercised and energised people from north, south, east and west of County Kilkenny. People attach a value to their county identity, they have a deep respect for it and it greatly informs their sense of place and their sense of community.

The strength of feeling is evidenced by the fact that of the 19131 submissions 99.85% were against any change in the boundary. That sense of identity is understood by people of Waterford and 90% of the submissions that originated there were opposed to any change in the boundary.

The submissions were a statement of the democratic will of the people of Kilkenny.

We note the suggestion in the introduction (1.1.6) that the most important question that needs to be asked at the outset of the National Planning Framework process is what the vision should be :-

What sort of place should Ireland be in 2040 and what do we need to achieve this?

We are glad that a sense of place is included as it is a defining characteristic of Irish people and it is an essential element of Irish identity. It has a centrality in our heritage and it is something that should be passed on to future generations and certainly to the generation who will benefit from the outcomes from the National Planning Framework.

We note the references to place in subsequent sections of Issues and Choices – the development of Ireland as a place, place based aspect to public policy and quality of life through place making. We further note the interrelationship between people and place in terms of social connectedness, community cohesion and well-being, vibrancy of places and place based leadership.

The document makes a statement 'Place based characteristics matter more than ever', with which we fully concur. Thus we contend that people's sense of identity should not only be preserved but also nurtured as part of the realisation of the vision of the National Planning Framework.

No cost savings

The Boundary Review Committee recognised that there was limited, if any, cost savings for further efficiencies in day to day service delivery costs and it recognised the skill and determination of both Councils in providing the optimum level of services from the resources available to them.

Gateway City

The Boundary Committee recognised that Kilkenny County Council supported strategic initiatives to promote the primacy of the city centre in Waterford and it noted that the key aspiration of the development of Waterford City is widely shared in the region, especially in Kilkenny. The support for Waterford as a Gateway is implicit in the high level of engagement which exists, according the Boundary Review Committee, between the two local authorities.

Constraints

There have been geographical and historical factors which have impeded the development of Waterford on both sides of the Suir. These include the width of the Suir, the topography of the lands on the north side of the river and the fortification of the city on the southern side of the Suir. The river was not bridged until 1793 and a bridge with traffic capacity was not built until 1901.

There is no doubt that improved connectivity between the two sides of the river would strengthen the development of the city. This is an issue on which both local authorities have already begun to work.

Population Growth

A study of the graphics on population growth on Page 8 of the Issues and Choices prepared by the Department of Housing, Planning, Community & Local Government shows that population growth on the northern side of the Suir exceeded 50% over the past 25 years. This growth has been accommodated by Kilkenny County Council.

Consistency

We note that there were four boundaries reviewed and only one recommendation for a boundary extension has been made. We cannot understand why a conclusion reached for Athlone, Carlow and Drogheda has not been replicated with regard to the relationship between Waterford City and County Kilkenny. While there may have been variations in each review we believe that the underlying fundamental issues pertained in all four reviews and consistency would have suggested that an outcome for three would have applied to all four. The people of Kilkenny were entitled to that consistency.

It is, moreover, difficult for people in Kilkenny to understand that the approach put forward by them in all public meetings, all submissions, all correspondence and in all engagements with the Boundary Review Committee which was based on cooperation, collaboration and a regional dynamic would underpin the recommendations for the Carlow, Athlone and Drogheda should be denied to the people of County Kilkenny.

Boundary Review Recommendation

The Boundary Review Committee came to a view that there are inherent rivalries too significant to render practical in the medium to long term to favour a continuance of the existing boundary configuration with arrangements for improved inter-authority cooperation.

Kilkenny County Council's approach, as stated above, was firmly based on the concept of inter-authority cooperation. The approach was not only rational and forward looking but it was informed by our experience of previous interaction with Waterford City Council prior to 2014 and with Waterford City & County Council over the past two and a half years.. Examples of cooperation were cited such as the work on developing and agreeing the Planning, Land Use and Transportation Study in 2004, the support for the Tall Ships in 2005 and 2011, the installation of the Waterford Main Drainage Scheme, support for the Technological University of the South East and for improved service provision at University Hospital, Waterford and the South East Action Plan for Jobs.

It was stated by the Boundary Committee that it came to this conclusion in the context of a simpler practical alternative being available. Hence its recommendation for an extension of the boundary of Waterford City into County Kilkenny.

We cannot understand how this can be regarded as a simpler or more practical alternative. It has huge implications for the people of County Kilkenny and also for the people of Waterford. We have summarised them thus.

- Denying at least 5,500 people of their identity as Kilkenny people
- Taking all of Ferrybank inside a Waterford boundary
- Splitting the parishes of Slieverue and Kilmacow
- Closing down of Kilkenny County Council's Area Office in Ferrybank
- Reduction of two Councillors on Kilkenny County Council
- Reconfiguration of all electoral boundaries within county Kilkenny
- The loss of regional cohesion and perhaps irreparable damage to it.
- Compensation to be paid by an already heavily indebted Waterford Council to Kilkenny County Council

It is our view that Waterford would benefit far more from cooperation and collaboration with adjoining local authorities, including Kilkenny, than it could get from any boundary change.

We note that Kilkenny would suffer the loss of two elected representatives. Under current arrangements the number of elected representatives would be reduced from 24 to 22. Given the requirement of six as a minimum number of members per municipal district the unavoidable consequence of a boundary extension would be the reduction in the number of municipal districts to three. Such is the geography of County Kilkenny that each municipal district would greatly increase in size and possibly reduce the level of service to the population which councillors have been elected to serve. You will be aware that electoral areas were reconfigured prior to the 2014 local elections and another reconfiguration required as a consequence of the recommendation would be most unfair to all electorates in County Kilkenny.

The Boundary Committee envisages an additional member for Waterford City & County Council. Not only would there be a net reduction of one elected representative but the additional representative in Waterford would be one of thirty-three in a county that would stretch from Grannagh almost to Youghal Bridge.

Piltown Municipal District Council

Reference was made above to the experience of interaction with Waterford City & County Council over the past two and a half years. The Municipal District of Piltown has been most proactive in the relationships it has forged with adjoining local authorities including Tramore & Waterford City West Municipal District (eight meetings), New Ross Municipal District (two meetings) and Carrick on Suir Municipal District (three meetings).

Among the issues discussed and progressed with Tramore & Waterford West Municipal District are the following.

- Regional approach to the development of greenways
- Upgrade of the N24 between Waterford and Limerick
- Development of the North Quay
- Improved connectivity for Waterford City
- Housing
- Support for the University Hospital, Waterford

In fact the Piltown Municipal District has proved pivotal in some issues. For example it liaises with the adjoining local authorities with regard to the greenways proposed for Waterford, Wexford and Tipperary. These joint meetings also allow for information sharing, in particular Kilkenny County Council was able to learn from the experience of Waterford in developing its greenway to Dungarvan. This proved useful to Kilkenny as it progresses its own greenway in South Kilkenny from New Ross to Waterford. Likewise a motion for the upgrade of the N24 has been progressed through Kilkenny, Waterford and Tipperary and has been referred onto Limerick so as to ensure a unified regional voice on the issue. Most recently Waterford and Kilkenny agreed to work together to get regional support for the provision of improved cardiac services at University Hospital, Waterford.

Ferrybank

Should the Boundary Review Committee's recommendation be accepted the all of Ferrybank would come inside the extended boundary. Ferrybank has benefited greatly in recent years from cooperation between the two local authorities. Examples include the provision of a childcare facility, a community centre and the proposed new neighbourhood park and children's playground. We would argue that the active involvement in the Ferrybank area of the two local authorities is a strength and not a weakness, as sometimes it is portrayed. It is noteworthy that the crest adopted by the Tidy Towns Committee in Ferrybank is based on the old ferry which traversed the Suir for over 300 years. The two figures on the crest are symbols of Kilkenny and Waterford. The motto which emerged to accompany the crest is 'An Tairbhe as Tarraingt le Chéile' – The Benefit of Working Together.

Regional Identity and Dynamic

We believe that a new regional identity needs to be forged among the counties of the South East. The five counties together have many advantages in terms of climate, fertility of lands and seas, proximity to Britain and Europe, major ports, tourism offer and the presence of many major companies of national and international renown. Yet the region has not performed as well as the endowments would suggest or as other regions have progressed. There is a need to develop a new regional dynamic which would facilitate the address of some of the deficiencies experienced by the region. Most notably progress on the Technological University of the South East will require cooperation and coordination not only of the local authorities but also the educational establishments and other stakeholders.

A new regional identity and dynamic would enable a vision for the region to be agreed and would facilitate the development and implementation of programmes on a cross local authority basis as envisaged in the National Planning Framework. We note the latter's intention to commit firmly to national, regional and local cooperation. We note also the intention for a programme of structured cooperation, underpinned by legislation. This is an approach which we fully support.

National Planning Framework

We believe that the thrust of the National Planning Framework has much to commend it, particularly with its emphasis on place and people. We also support the intention to seek strengthened cooperation on a cross local authority basis, underpinned by legislation. We believe that the Regional Spatial & Economic Plans proposed for more detailed planning would best be progressed where regions have an agreed vision and a determination to work together for the benefit of all.

Specifically in relation to Waterford and Kilkenny we believe that Planning, Land Use & Transportation Study (2004) should be updated on the basis of an agreed vision and the Joint Implementation Committee to oversee it should be put on a statutory footing. Likewise a Joint Retail Strategy can be developed and agreed. A Service Delivery Plan should be prepared to monitor implementation and to ensure stated objectives are achieved.