

Submission to the National Planning Framework March 2017.

Waterford Civic Trust.

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The new National Planning Framework as a successor to the National Spatial Strategy offers a much needed opportunity for the government and the people of this country to decide how the country will develop over the next generation. It is neither tenable nor desirable that a situation would arise where two or maybe three different economies will develop in this small country. There will always be differences in growth and economic activity across the country for one reason or another and the Dublin region will, as always, continue to develop strongly and pull away from the rest of the country in gross terms. This is understandable as Dublin, being the capital, has the necessary critical mass in terms of size, investment opportunities, transport infrastructure, capital access, medical, educational, commercial facilities etc. This has however led, in recent times, to comments such as “Dublin is eating Ireland”. This is not helpful to Dublin or to Ireland as a whole. The task of the NPF is to ensure that Ireland prospers, that the ability of Dublin to compete internationally is enhanced, but that growth and prosperity is spread in a balanced way across the rest of the country.

The NPF defines its purposes under 9 key heading:

1. Ireland’s national planning challenges
2. Planning for people – society and quality of life
3. Vision for our capital, our cities and towns.
4. Key strengths and opportunities for our regions.
5. A future for rural Ireland.
6. Ireland in an all-Island context.
7. Realising opportunities for integrated land and marine development.
8. Equipping Ireland for future development – infrastructure
9. Making a virtue out of Ireland’s unique environment – sustainability

The Expert Review of the *National Spatial Strategy 2002 to 2020*, published as part of the NPF consultation process was emphatic that its replacement must observe 3 underlying principles that come from the name – National Spatial Strategy. The NPF must be therefore be **National** in scope. It is not a local plan for Ireland drawn up by the Government. It must be **Planned**, highlighting and seeking to plan and deliver on the potential of places. The NPF should seek to ensure that the spatial implications of key sectoral policies, particularly on infrastructure, are reflected in the revised document and equally the **NPF** should seek to influence emerging sectoral policies. Finally it must be an agreed **Framework**, not a vehicle for promoting planning concepts with little, if any practical significance or become a wish list

or shopping list of projects. A framework must be internally coherent and its development inevitably involves hard choices. It is not a statement of bland and unobjectionable aims and objectives.

The National Spatial Strategy:

The predecessor to the NPF was the National Spatial Strategy. Its introduction stated :

“The strategy (NSS) is a twenty year planning framework designed to achieve a better balance of social, economic, physical development and population growth between regions. Its focus is on people, on places and on building communities. Through closer matching of where people live with where they work, different parts of Ireland will for the future be able to sustain a better quality of life for people, a strong, competitive economic position and an environment of the highest quality.”

These would be, broadly speaking, similar aims to that of an NPF, but the NSS never realistically achieved its targets for a variety of reasons. Too many Gateways and hubs were chosen in an apparently “one for everyone in the audience” desire to make the NSS politically acceptable. Its scoping review suggests:

“The NSS had a number of practical and positive benefits, including:-

- It introduced the concept of spatial development to the public policy agenda, for example, aspects of the relationship with Northern Ireland and the wider European Union as well as the balance of development between Dublin and the rest of Ireland and the implications arising therefrom.
- It encouraged sectoral policy and decision makers to consider Ireland’s long term territorial development rather than just their own particular area of interest.
- It supported a range of all Ireland and specifically cross border initiatives.
- Although the €300 million Gateway Innovation Fund was postponed, the decision to allocate this funding to support the development of gateways in line with the NSS was a significant achievement.
- The NSS had a significant impact on the objectives and proposals in Transport 21, the Government’s capital investment framework for the development of the national transport system from 2006 – 2015.

The NSS did have its problems: Principal among these were:-

- The document was in parts too theoretical and concepts built on it, for example the Atlantic Gateways Corridor and the linked gateways / hubs, lacked sufficient substance and clarity on the implications.
- The designation of settlements as hubs lacked justification.

- In a practical sense, the most significant undermining of the NSS came in December 2003 with the announcement of the decentralisation 3 programme. While some Government Departments and Agencies were moved to Gateway and Hub towns, others were relocated to lower tier urban centres such as Newbridge and Trim. The logic of the decentralisation programme reached its nadir with the proposed relocation of the Department of Community, Rural and Gaeltacht Affairs to a greenfield site at Knock Airport, a proposal that was refused planning permission following a third party appeal to An Bord Pleanála in 2007.
- A policy area that worked against the NSS was housing, both urban and rural. As a result of increasing affluence and easy access to credit, individuals and families located not in higher density developments in Gateway and Hub towns but in low density developments on the periphery of villages or in the open countryside within commuting distance of major settlements.
- If the principles in the NSS had been adopted and applied more consistently, the problems arising from excessive and inappropriate zoning, and the consequent unfinished housing estates, could have been, if not avoided, then significantly reduced.

In general the compromises on locations and the associated diffusion, indeed loss of focus, meant that many of the hoped for outcomes have not been as positive as envisaged”.

The NSS was also not legislatively supported to a sufficient level to ensure that its aims were embedded in local, regional and national policy across state and public services. Failure to adopt and embed appropriate regions and regional structures has weakened the ability of Ireland, outside Dublin to compete.

Nomenclature of Territorial Units for Statistics (NUTS)

At the beginning of the 1970s, Eurostat set up the NUTS classification as a single, coherent system for dividing up the EU's territory in order to produce regional statistics for the Community. For around thirty years, implementation and updating of the NUTS classification was managed under a series of "gentlemen's agreements" between the Member States and Eurostat. Work to give NUTS a legal status started in spring 2000. This was adopted in May 2003 and entered into force in July 2003.

These regions are used for statistical purposes in Ireland. There are eight regions at **NUTS III** level in **Ireland**. The NUTS regions for Ireland were agreed between **Eurostat** and the **Government of Ireland**, in line with the minimum and maximum population thresholds set out by Eurostat for the size of NUTS regions. The geographical remit of each region is defined by combining the areas under the jurisdiction of **LAU-1** units of **local government** — the **counties** and **cities** of Ireland. Prior to 2014, each region was governed by an associated

Regional Assembly. Since that date, the association between Regional Assemblies and NUTS regions has ceased. The NUTS regions are used for statistical reporting to Eurostat, while the Regional Assemblies are responsible for planning at a [local government](#) level.

The employer's organisation Ibec for example, is organised into 8 regions. Each region has its own regional executive council, headed by a regional president, championing business and addressing local issues. These are supported by six Ibec offices across the country, roughly corresponding to NUTS 3 regions.

Regional structures.

Regional structures followed the original planning regions from the 1960s and 1970s and were used from that period for many regional services such as the Regional Health Boards, Dept. of Social Welfare and the IDA among many others. Some private sector groups such as IBEC modelled their structures on these. Government services mostly aligned with those regions and the statistical basis of the regions allowed clear statistical information to be collected which gave an accurate picture of regional performance. The existence of the Regional Development organisations further underpinned regional performance assessment. These organisations were replaced by 8 Regional Authorities established by the *Local Government Act 1991* which came into existence in 1994. Under this Act, the Regional Authorities had two main functions: to promote the co-ordination of public service provision and to monitor the delivery of [European Union](#) Structural Fund assistance in the regions. The Regional Authorities were dissolved in 2014 and were replaced by Regional Assemblies.

While the NUTS 3 regions are still used for statistical purposes, the failure of state bodies and departments to align their services with those boundaries combined with a lack of political representation associated with the regions, as existed with the Regional Authorities, may be an inherent weakness of the public administration system and consequently weakens regional ability to compete.

Regional Cities/Gateways.

Strong regions are essential to compete with the huge strengths of Dublin. Strong regions need strong cities, supported by national policy and investment, at their centre. The success of Galway over the past two generations is testament to enlightened regional policy as well as political and infrastructural investment support. The Expert Scoping of the NSS document for the NPF favours continuing with each of the National Gateways adopted in the first NSS with the exception of the linked Midlands Gateway. They propose instead that Athlone should be recognised as the Midlands Gateway, because the linked centres approach has not been sufficiently established, diffuses focus, and has proven to be of little substance or value in practice. To a great extent, the Gateways are self-selecting (and this is the case with

Athlone) as they have the largest populations, the best transport connections, the highest levels of economic activity and the critical mass of key services such as education and health. They are the key to regional and national success. The south east region has a well-defined hierarchy of towns and villages with Waterford city as the largest urban centre at its heart

NPF Implementation.

The NPF should also set out how the new framework/strategy is to be implemented, in particular the key policies and decisions it seeks to influence and how it will be kept under review. It should provide a long term perspective on Ireland's spatial development but the assumptions on which it is based need to be monitored and policies and decisions which are impacting on Ireland's spatial development should be highlighted. An important element to keep under review, are the parameters within which flexibility is operating to ensure that mistakes which have undermined the current NSS are not repeated. The extent to which regional divergences and disparities are being maintained/reduced/increased will be a key test of the NSS. A biennial update should be provided, and every 5 years there should be a more formal review. Monitoring would also allow for the introduction of measures to prevent 'over-heating' and the development of further regional disparities at the earliest possible opportunity. There is a significant role for the proposed Planning Regulator in these issues.

The South East NUTS 3 region comprises Waterford city and county and the counties of Wexford, Carlow, Kilkenny and South Tipperary. The amalgamation of Waterford city and county and of Tipperary North and South Ridings has an impact on future policy. The region is fully in the NUTS 2 Southern and Eastern Region although has sometimes been described, because of its economic performance and its traditional employment structures in agriculture and construction, as belonging to the Border Midlands and Western Region. The region is sandwiched between the strongest two metropolitan areas in the country, Dublin and Cork and its ability to attract investment and services will always be compromised by that location. Nevertheless the region has excellent potential, a good climate and excellent land. It comprises approx 11% of the population of Ireland. It has a network of strong urban centres and good communications infrastructure around road, rail and sea transport. Air services are compromised by the shortness of the runway at Waterford Airport which hinders its ability to attract industry standard short haul Boeing 737 and Airbus 320 aircraft.

The lack of a politically and economically, well supported regional city, and consequent leakage of demand for medical, educational, commercial, retail and other services has hindered the ability of the region to reach its natural potential. The role as Gateway should clearly be performed by Waterford city. While it is understood that not all Gateways under

the NPF will be identical, given the disparity in population size between them, it is self-evident that if the south east is to prosper as a region with Waterford city at its centre, that it must offer services to its regional population broadly in line with similar gateways such as Limerick and Galway.

Two examples, in regional acute medicine and in third level education demonstrate the deficits.

University Hospital Waterford

The Health Service Executive (HSE) states that University Hospital Waterford provides general medical, surgical and maternity care to people living in South Kilkenny, Waterford City and County. The hospital provides specialty services to the population of the south east (NUTS 3) region Waterford city and county, counties Kilkenny, Wexford, Carlow and South Tipperary, c. 500,000 in the following areas of clinical practice:

Cardiology (including Interventional Cardiac Procedures), Trauma Orthopaedics, Ophthalmology, Neurology, Nephrology, Rheumatology, Urology, Vascular Surgery, ENT and Neonatology, Radiology, Pathology and Microbiology.

The hospital is the designated cancer centre for the south east, providing rapid access assessment for Breast, Prostate, Lung and Skin cancers. Cancer surgery is centralised at UHW. Haematology, Medical Oncology and Palliative Care is provided through our inpatient and day care facilities.

There are 431 inpatient and 85 day procedure beds and the following services are provided

<ul style="list-style-type: none"> • • Haematology • • Palliative Care, • • Breast Care • • Radiation Oncology • • ENT, • • Ophthalmology • • Neonatal, • • Rheumatology, • • Dermatology, • • Nephrology & Renal Dialysis • • neurology • • Orthopaedic Trauma. 	<ul style="list-style-type: none"> • • General Medicine • • Endocrinology • • Gastroenterology • • General Surgical, • • Obstetrics and Gynaecology (note the Regional NICU is UHW hence In – Utero transfers from other hospitals are received) • • Paediatrics, • • Acute Psychiatry • • Obstetrics and Gynaecology • Respiratory Services
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<ul style="list-style-type: none"> • · Pathology • · Neurology • Urology • · Adult Cystic Fibrosis Service • · Cardiac Interventional Service • · Regional Dept. of Laboratory Medicine – Consultant Pathologists, Microbiologists and Haematologists are based at WRH • Pain Services 	
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Cardiology services.

In 2012 the Government published a *Model of Care for Acute Coronary Syndrome* to standardise treatment of patients suffering from heart attack in its different forms which included a Primary Percutaneous Coronary Intervention (PPCI) treatment facility at UHW. In February 2013 the Government published a report by Prof John Higgins of UCC called '*The Establishment of Hospital Groups as a transition to Independent Trusts*'. This is otherwise known as the 'Higgins Report'. The Higgins Report Recommended *inter alia* that: UHW will continue to provide invasive cardiology services for the South East Population for all its existing and expanded specialties and would retain its catchment across hospital group boundaries.

"In response to the assurance pertaining to Waterford Regional Hospital in the report in 2013 to the Minister on "*The Establishment of Hospital Groups as a Transition to Independent Hospital Trusts*". These assurances have been given in full at various fora over the past 18 months including during a visit from Secretary General DOHC (Feb 2013). The Minister, in November 2012 in WRH, confirmed that Waterford Regional Hospital would continue with its full range of services. In response to the points made in relation to the Catchment Area; It has been confirmed that the clinical network of services currently delivered will be retained even where these Networks cross Hospital Group boundaries. The catchment area for WRH is as defined in the current clinical network of services and this geographically extends to Carlow/Kilkenny, Wexford, South Tipperary and Waterford. Formalisation of current clinical network will be a work in progress with each of the local hospitals and across groups."

Letter of 14th April 2014 from Mr Gerry O'Dwyer CEO SSWHG, Cork to Paudie Coffey TD.

Medical Policy development.

In May 2016 the *Programme for a Partnership Government* was agreed between Fine Gael, Independent TD's and the Independent Alliance. The Programme for Government stated:

“We are committed to the development of a second Cath Lab in University Hospital Waterford subject to a favourable recommendation from an Independent clinical review of the needs of the region to be carried out within 6 weeks” In July 2016 a report entitled an *‘Independent Clinical Review of Provision of a Second Catheterisation Laboratory at University Hospital Waterford’* otherwise known as the Herity Report was published which purported to limit the catchment of UHW to Waterford city and county, south Wexford , south Kilkenny and south east Tipperary despite the previous assurances given by all relevant parties to the hospital. This curtailment was largely based on the notion that St Luke’s General Hospital in Kilkenny was sending its cardiology patients to Dublin for treatment. It is ironic that the interventional cardiology services at UHW were first proposed for development when the South Eastern Health Board, based in Kilkenny, which covered the provision of hospital services in the NUTS 3 South East region, was in existence.

The Herity Report was therefore opposed to existing Government and HSE Policy and would threaten the development and the role of UHW as a Regional Level 4 Hospital. It would also have long term negative implications for Waterford city as a Gateway city servicing the south east region. While the Minister for Health currently accepts Dr Herity's findings and recommendations, it is neither obvious nor desirable in the context of an NPF that emergency acute medical services such as PPCI should be centralised in Dublin or Cork or indeed that the population traditionally associated with UHW for all services should be curtailed to bring that centralisation about. The corollary to that possible centralisation is the dismemberment of the south east region between those two poles (Dublin and Cork) to the detriment of Waterford city as a gateway for the south east. Such a policy would render the south east peripheral to both Dublin and Cork and effectively undermine the idea of a sustainable south east region and its Gateway.

It is important that the latest proposals by Minister for Health Simon Harris TD, which were presented to the Oireachtas Committee on Health Reform in March 2017 which propose the geographical alignment of the hospital group structures with the Community Health Office structures are cognisant of the aims of the NPF and that no action is taken in the context of these proposals which would undermine the status of a gateway city like Waterford.

Evidence based outcomes.

The proposals of the Herity Report as discussed in the last paragraph have some resonance in what happened in 1996 when the IDA regional offices in Waterford, which served the south east were closed and its functions decanted to Dublin and Cork. A decline in IDA

supported jobs and incoming Foreign Direct Investment ensued which caused great damage to the south east economy.

That decline in IDA jobs in the region and in new Foreign Direct Investment into the south east led to a decision by Richard Bruton to reappoint a regional manager to Waterford “**January 13th 2015** - IDA Ireland is pleased to announce the appointment of a new Regional Manager for the South East. Anne-Marie Tierney-Le Roux will have responsibility for counties Carlow, Kilkenny, Waterford, Wexford and South Tipperary.” **Minister for Jobs, Enterprise and Innovation, Richard Bruton TD, said:** “The South East has suffered from historically high unemployment. That is why since taking office we have put a particular focus on the South East, with the development of the South East Plan and implementation of a range of measures to support job-creation in this region. Today’s announcement that IDA is appointing a new Regional Manager for the South East is a further significant boost for jobs in the region”. The associated table of IDA job numbers from 2016 show the positive trend for the south east region.

REGION	TOTAL EMPLOYMENT	GAINS	LOSSES	NET CHANGE	NET CHANGE AS % OF TOTAL EMPLOYMENT
Dublin and Mid East	91,339	9,681	-3,888	5,793	6.3%
South West	33,831	4,151	- 665	3,486	10.3%
Mid West	15,766	1,689	- 637	1,052	6.7%
West	19,121	1,475	- 924	551	2.8%
South East	12,766	735	- 431	304	2.4%
North West	5,370	478	- 187	291	5.4%
Midlands	4,307	376	- 136	240	5.6%
North East	4,556	398	- 282	116	2.5%
Total	187,056	18,983	- 7,150	11,833	6.3%

The **Minister for Jobs, Enterprise and Innovation (Deputy Mary Mitchell O'Connor)** further outlined the situation in the Dáil on 1st June 2016.

“The recent economic crisis hit the South East’s job numbers badly with the loss of 37,800 jobs from Q1 2007 to Q1 2012. However, through the focused collaborative approach and a range of reforms delivered in the region over the recent years, the unemployment rate has fallen from a peak of 20.1 per cent in Q1 2012 to 12.5 per cent in Q1 2016, with 204,400 now at work, which is an increase of 23,100 over the period.”

Third Level Education.

The *Programme for Government 2016* states: "Meeting the Skills Needs of the Future. "We support the creation of Technological Universities, linked to industry and with the capacity to create and retain jobs in regions."

The desire for university status in Waterford city first emerged in 1936 when the De La Salle male primary teacher training college in the city was closed by the state and offered by the religious order concerned as a constituent college of the National University of Ireland. That offer was rejected by the state. A subsequent committee seeking university status was established in 1956 and held a series of meetings with the view of creating university facility in the city. The publication of the report "*Waterford Technological University*" in 1985 by Dr Michael Bannon of the Urban Policy Unit of University College Dublin for Waterford Chamber of Commerce again brought the matter to a head and public pressure for university status has been a consistent and logical part of Waterford's political and educational life in the 32 intervening years. Initial pressure led to the designation of the then Waterford Regional Technical College, established 1969, as Waterford Institute of Technology. The institute is now a large and comprehensive institution with some 8500 students spread across a wide range of cert, degree and post graduate courses.

A report by Dr Jim Port published on 20th February by the Minister for Education underlined the quality of WIT but pressure from the university sector and a rapidly declining national economy ended up with the issue on the long finger. . "The Minister for Education and Science, Mary Hanafin T.D., today published the report by J M Consulting on the application by Waterford Institute of Technology for designation as a university. Minister Hanafin said that in publishing the report she hoped that the "complex issues involved and addressed by Dr. Jim Port will help inform the debate nationally and regionally." The Minister commissioned Dr Jim Port to carry out a preliminary review of the application from Waterford Institute of Technology as an input in to consideration of whether to trigger the full formal review process. Dublin Institute of Technology has also applied for designation as a university. Minister Hanafin said "while the report's focus is specifically on the Waterford application, it also provides a useful analysis of the context in which any application must be considered. I hope that the publication of the report today will provide an overview of the complex issues involved and help inform final consideration of the matter. "Minister Hanafin said that Waterford Institute of Technology is a highly regarded institution making a "great contribution to higher education generally and to the economic and social wellbeing of the South East region. –

Many international experts such as Dr Ferdinand von Prondzynski, Principal and vice chancellor of Robert Gordon University in Scotland believe that WIT should be allowed proceed to university status. In his view, "WIT is an excellent academic institution with real strengths. It has been able to demonstrate its ability to compete in the research agenda, and its buildings and infrastructure are very impressive. Furthermore, I work for a university

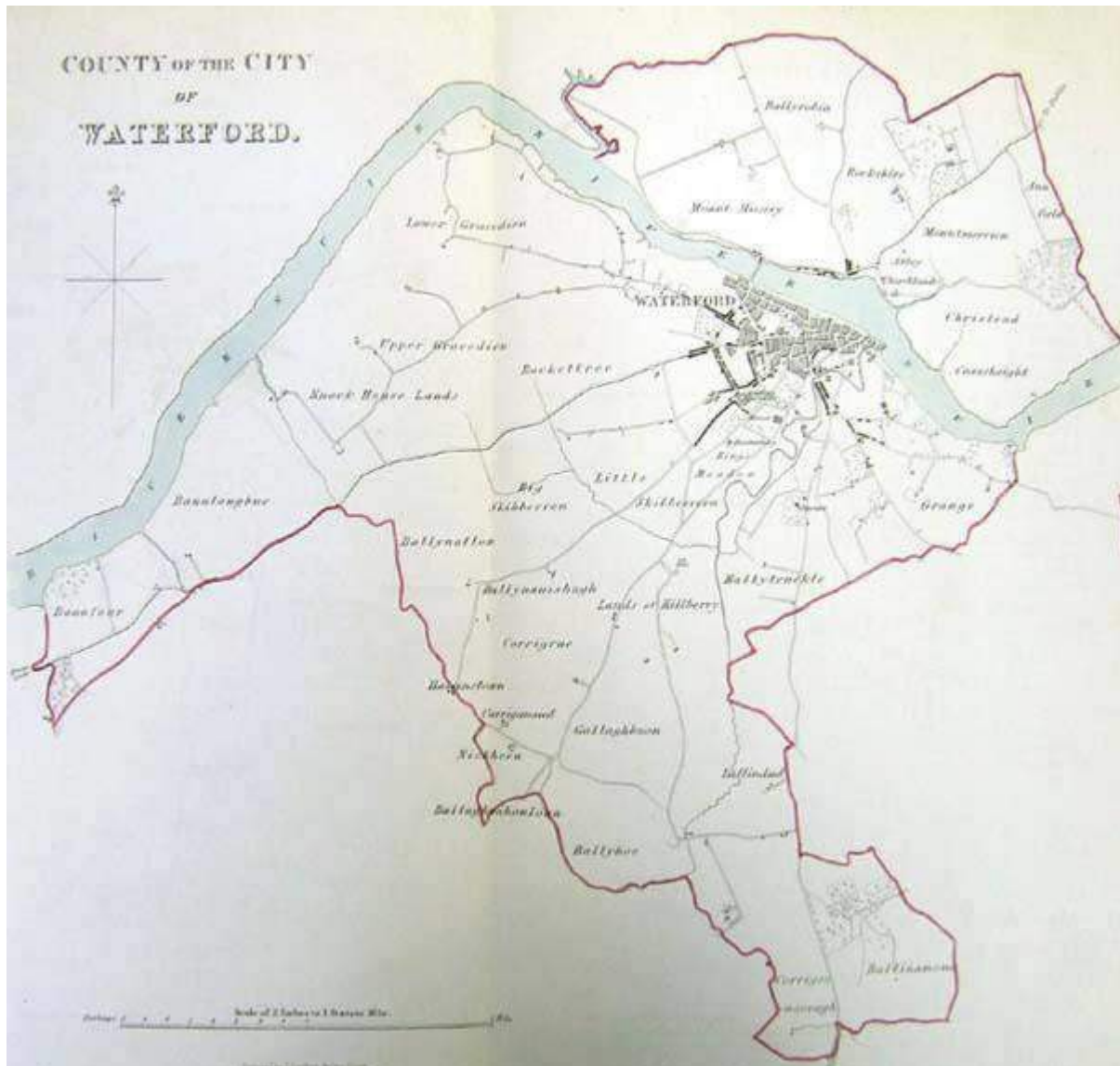
– and until July 2010 worked for another – that only achieved that status relatively recently, and so I should feel sympathy for the Waterford case. And if I wanted to find other voices supporting their position, it would not be difficult: for example Dr Ed Walsh, founding President of the University of Limerick, has backed WIT’s case. Since 1997 there has been a statutory mechanism for examining the case an institution might make for conversion to university status. Under the Universities Act a panel of national and international experts would be established to examine the application, and would make a recommendation to the government based on criteria set out in the Act. There is at the very least a strongly arguable case that any such application by WIT would succeed.”

The idea of technological universities emerged in the Hunt Report, *National Strategy for Higher Education*, published in 2011. This report suggested that such institutions could be created by merging clusters of institutes of technology and calling the resulting organization a ‘technological university’. The criteria to be applied, which were to be set out in legislation, do not differ markedly from those we might expect for a university more generally. It is now proposed that WIT and Carlow Institute of Technology would together form a linkage leading to the establishment of a multi campus South East Technological University. Such an institution is essential to allow the south east region retain its best and brightest. At present many students seek out university level education in Cork and Dublin and while this will always be a fact of life there is some evidence to suggest that many students are attracted out of the south east by the understandable cachet of a university education. It has been widely acknowledged in the south east, and is the subject of much anecdotal comment that this outmigration results in a double financial disadvantage for the region whereby students are maintained away from the region by their parents and on graduation rarely tend to return to work in the region. The creation of a university in the south east is essential for the future development of the region and the proposed NPF should indicate its full support for such a development.

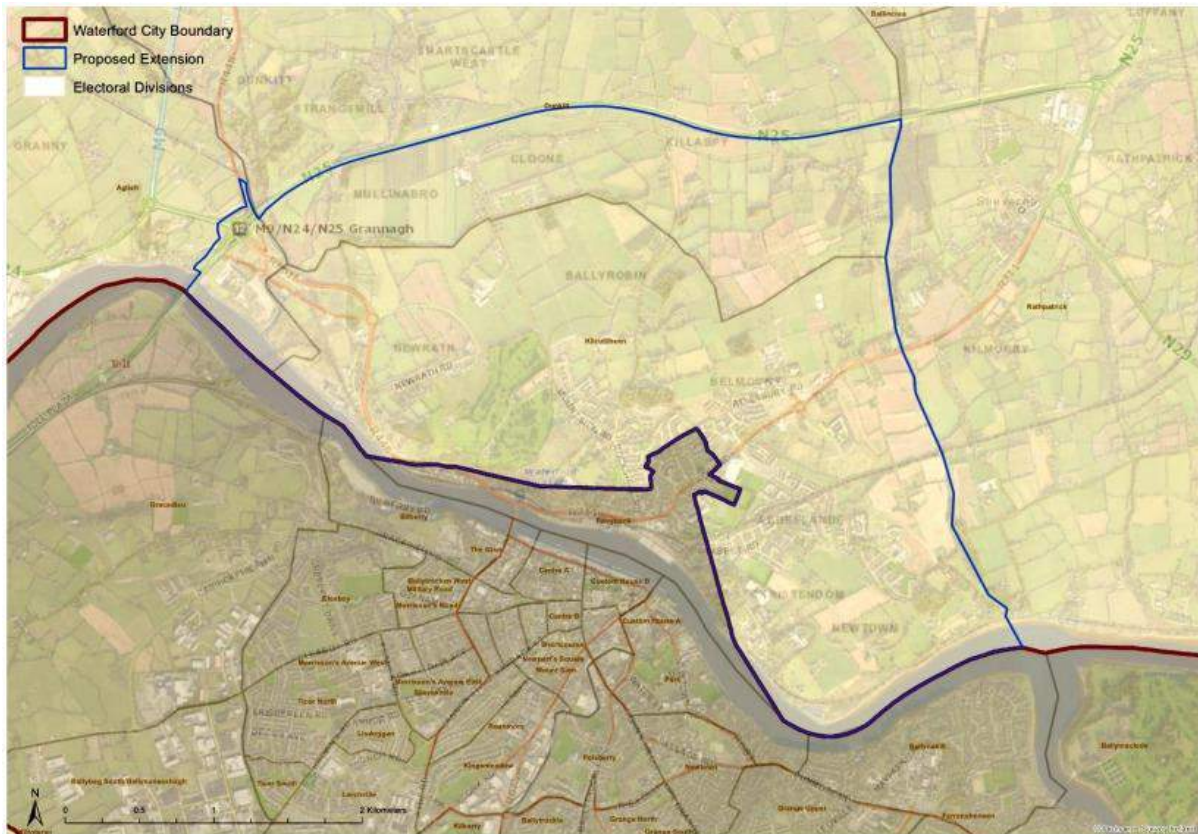
Other actions.

Among a number of other actions which are required to support Waterford and the south east region is the proposed boundary extension of Waterford city into its northern hinterland in county Kilkenny. This has been the subject of a legally appointed and independent Boundary Commission who have recommended that this should be done and the matter is presently (March 2017) with the appropriate minister who has announced a decision on the subject will be made shortly. The unbalanced development of Waterford city being almost entirely on the south bank of the river Suir has been a hindrance to proper development of the city and by extension to the ability of the region to compete. Predatory planning is also visible in the immediate vicinity of Waterford city’s northern boundary. It is ironic that the Waterford city waste water treatment plant which was built following years of lobbying an investment by the then Waterford Corporation, is in Gorteens Co Kilkenny and by itself has serviced an entire southern strip of south Kilkenny, adjacent to Waterford city, for building, commercial and industrial purposes.

The historical perspective of the area shows that the area recommended to be transferred from Co Kilkenny to Waterford city was in fact the traditional Liberties of Waterford city and administered as such by Waterford city for many hundreds of years until 1840. The area in question was finally transferred to co Kilkenny in 1898 immediately before county councils were established in 1899.



County of the city of Waterford 1840.



Boundary Commission proposals.

Submission summary.

- If we are to have a National Planning framework, we must have clarity in what we are aiming for. It is not possible, in a situation where government regional planning is entirely ad hoc from department to department and from agency to agency, to capture a true and realistic picture of regional activity. It is essential that clearly understood boundaries are established as they were with the NUTS 3 regions as these allow appropriate statistics to be marshalled in pursuit of argument and policy development. We need strong regions with strong and supported regional centres.
- Ireland needs to do better in terms of regional planning and distribution of facilities and investment across the country to enable better regional participation in a growing and more creative economy. This will assist in a more orderly development of Dublin by among other things, easing housing demand. Creating a small number of designated regional Gateways across the country, backed by appropriate legislation, state investment and clearly defined and enunciated NPF policies would facilitate the development of centres of critical mass which would give access to employment, higher order educational and medical facilities and services as well as

commercial services for regional populations without requiring general recourse to the capital except in the case of national level functions. The National Children's Hospital is a case in point, where a relatively small cohort of patients across the whole country, ie seriously ill children, underpins the rationale for a single national treatment facility. Such developments by their very national nature should be relatively rare. There should also be a presumption against the establishment of the HQs of state bodies or semi state bodies in the Dublin area. Modern ICT systems should allow greater locational flexibility in these cases.

- The IDA experience in the south east between 1996 and 2015 supports the development of regional policy across the area with regional structures in place which underpin regional development. Expecting the south east to be served from either Dublin or Cork , as happened with the IDA, sidelined the region and condemned it to two decades of economic underperformance. An NPF which defaults to this scenario will simply repeat the mistakes of the past. A new regional structure put in place in Waterford for the south east saw immediate and tangible positive, economic benefits.
- The proposals by the Department of Health and the HSE in accordance with the Herity Report to withdraw PPCI emergency heart attack treatment from UHW, based on the limiting of the hospital's already agreed catchment for all other acute medical treatment , including regional cancer services, undermine Waterford, UHW and the south east . While this decision is apparently subject to the findings of an upcoming (2017) national review of PPCI centres, it seeks to remove an existing service from the south east region. If the NPF is to have any validity and if it is to succeed, it is self-evident that decisions such as this cannot be taken in isolation or in advance, and must accord with the aims of an NPF and projected future population growth in the designated centres. New proposals (March 2017) by the Minister for Health to align hospital group networks and Community Health office structures cannot undermine a Gateway city like Waterford, or be put in place without being cognisant of the aims of the NPF.
- The creation of a regional technological university based in Waterford city and on the success of WIT, to serve the south east should be a corner stone of any future NPF. The lack of such designation in a region of 500,000 people is an inherent and implicit deficit which must be ended.

- A boundary extension for Waterford city as recommended in a 2016 Boundary Commission Report is essential to allow the development of Waterford city as an urban centre of appropriate critical mass.
- A whole suite of actions needs to be taken to ensure a better overall all-Ireland economy. Much was attempted in the National Spatial Strategy but the political and administrative will did not really exist to make the necessary decisions. We cannot, as a country, continue with such a *laissez faire* attitude. We can act wisely with a sensible NPF for the betterment of life in this country in general. The alternative is to do nothing and watch while Dublin grows in a haphazard manner out along the national motorway network. This was ironically designed to spread growth around the country by easing access to the capital, but instead has allowed the capital to spill over instead into its surrounding counties. The thrust of the published documents of the proposed National Planning Framework all suggest that this scenario is not what is desirable or acceptable in a well-managed north western European economy.
- The foreword by An Taoiseach, Enda Kenny to the *National Action Plan for Jobs* launched by him in January 2016 was instructive when he said:
- “As well as raising our sights, as the process has evolved we have also widened our focus. We know how some parts of the country have been slower than others to see the fruits of recovery. That is why a particular focus for this year is to stimulate regional growth, delivering on the wide range of Government initiatives in place to realise the potential of each region, chief among them our new Regional Action Plans for Jobs. We will be driving them forward in 2016 with the goal of having up to an additional 15 per cent at work in each region by 2020, and to ensure the unemployment rate is within one per cent of the State average”.
- In the introduction to its 2017 publication *Doing Business Locally*, the employer’s organisation IBEC says “Economic growth must be shared across the country. Policy makers must examine areas to ensure the right conditions exist on a local level to allow the entire country to succeed. It is vital that we learn lessons from what data is openly available. IBEC has compiled a series of indicators for the areas within each local authority area, region and the country as a whole. It is our intention that this set of comprehensive indicators encourages public debate and better decision-

making". This underlines the extent to which thinking at the highest levels of political and business administration concur. We support the aim of balanced national growth based on clearly understood, well designated and coherent regions which will be supported by national legislation, investment and overarching policy decisions on necessary infrastructure.

- The near future challenges posed by a very hard Brexit from the EU by the UK and possible US isolationism and protectionism may exacerbate regional difficulties which if unattended will result in a wider gap between the Dublin and the rest of the country. That is in no one's interests. It is good to hear that The Government is "determined to rebalance" a situation where half of all our economic activity is generated in Dublin. This compares unfavourably to the situation across the Irish Sea, where London is responsible for just 32% of economic activity. We have seen a two-tier development in Ireland, whereby population growth has been driven on the eastern side of the country because of the magnetism of Dublin as a capital city that's very dominant in the Irish economy". We believe that sensible NPF policies will help remedy that situation and assist Ireland to be a better country. It should spread economic development and wealth creation, allow local communities to thrive and prosper and help our national capital achieve its undoubted potential in the context of an All-Ireland economy.

Des Griffin, Chair,

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Waterford.





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