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As outlined in my original submission I believe the new National Planning Framework is critical for our country to grow and evolve over the course of the plan. I largely agree with the thrust of the document which seeks support ambitious growth targets to enable all four cities - Cork, Limerick, Galway and Waterford to each grow by at least 50% to 2040 and to enhance their significant potential to become cities of scale. However I believe a number of areas contained within the plan need to be fleshed out a bit more.

Infrastructure Deficits contained within the plan

The plan while comprehensive does not detail critical infrastructure projects which are required to address the very issues it highlights throughout the plan. Specifically in relation to '*connectivity*' the plan states "connectivity is underpinning our national, regional and local development, as well as Ireland's overall international competitiveness" (NPF, P.21). It further states the importance of "Improved accessibility between centres of scale separate from Dublin, to ensure that levels of service (travel times per km) between the Capital and Ireland's cities are replicated" (NPF, P.36). However while it signals out the "Accessibility to the North-West" and highlights specific road projects such as M17/18, N15/N13 Link and N4, M3/N3; it does not mention the deficits that exist due to inadequate road links between Waterford and centres of scale Cork and Limerick.

Given that the Taoiseach has announced the intention to upgrade the N20 (Cork to Limerick) to motorway status, the obvious gap in the national road infrastructure is the N24 Waterford to Limerick and N25 Waterford to Cork routes which must be upgraded to at least Dual Carriageway in the new 10 year National Investment Plan. If this is not specifically stated in the National Planning Framework I fear it will fall off the priority list and Waterford as a growth centre will be serious hamstrung as a result.

The Atlantic Corridor was originally to stretch from Letterkenny to Waterford via Limerick (N24), this was revised to Letterkenny to Waterford via Cork (N25), I assume to support the construction of the long mooted M20. Given the commitment to the aforementioned road I suggest an action under this plan would be *“to upgrade the N24 between Limerick & Waterford via Cahir to motorway status”*. This would serve to link Waterford to the Atlantic corridor at Limerick, utilising the existing Cork Dublin motorway for access to Cork (aprox 145km) and via a new M24 to Limerick (aprox 129km).



This would meet the NPF target of creating an “average inter urban speed of 90kmph” (NPF, P.133)

High Quality International Connectivity

> Airports

While the plan states “In terms of airport facilities, the main airports including Dublin, Cork, Shannon and Knock, together with smaller regional airports are a key infrastructure for

national and regional development” (NPF P.133), no mention is made to supporting the smaller regional airports to enable them to grow significantly passenger numbers. Specifically in relation to Waterford Airport, the main inhibitor to increased passenger numbers and scheduled flights is the length of the runway. The inability to land 737/A320 aircraft means Waterford Airport cannot fulfil its role of being of ‘supporting regional development’.

I suggest that an action under the heading airports should be to **“support development/enhancements at our national/regional airports where clear evidence of regional economic dividend can be demonstrated”**.

➤ **Ports**

While the NPF states “Tier 1 ports account for 80% of national freight traffic”, due consideration is not given to the strategically important ports of Waterford and Roslare particularly in the context of Brexit. Both ports are the closest ports to Europe with the potential to expand greatly over the course of the plan. Both are served by good road/rail infrastructure, with Waterford Port having a direct rail link from Balina right into the port itself. In light of CO2 commitments one considers this a vital asset that should be exploited. “Rail produces 76% less CO2 than road per tonne carried and uses less than half the fuel as road per tonne km” (Irish Rail, 2017)

I suggest that an action under the heading ports should be **“To support the expansion of routes to/and from ports which have access to Intermodal freight rail lines with a view to lowering CO2 emissions”**.

Health

➤ **Acute Hospital Services**

If the National Planning Framework is to be effective, the HSE and Department of Health must be bound by the principals of the plan which is to create strong growth centres outside Dublin, focusing on the cities of Cork, Galway, Limerick and Waterford. In the case of all four cities, they each have a model 4 hospital which provides a suite of acute hospital services for their region. However as

highlighted in my original submission University Hospital Waterford as the model 4 hospital for the South East region is part of the South/South West hospital. The Higgins report on the reconfiguration of Acute Hospital Services recommended that UHW act as the acute hospital for the entire SE region despite Kilkenny and Wexford being part of Dublin Hospital groups.

As evidenced in the Herity report on the need for additional Cardiac services at UHW, specifically a second cath lab and 24/7 PPCI services (which are present in every other model 4 hospital in the country) due consideration was not given to entire population of the South East. If Waterford is to double its population over the course of this plan, the maintenance and development of acute hospital service provision at UHW must be a priority of the HSE and Dept. Health - there is no point in one apparatus of the state going against the direction that the NPF is trying to achieve.

I suggest an action under the heading Acute Hospital Services should be **“Reconfiguration of acute services with strong emphasis on the cities of Cork, Galway, Limerick and Waterford”**. Given that this plan is to have legislative backing and be placed on a statutory footing, the inclusion of the four cities will not allow the HSE or the Dept. Health to pursue a policy that would have a negative effect on goal of ensuring propulsive growth in the four cities. Any stripping of services or failure to develop service provision equally within any of the four centres would seriously inhibit such a centre from reaching its target population growth figure.

Education

Equality for the regions in terms of third and fourth level education is critical. In this regard a University must be developed in the Southeast that can act as an engine, driving innovation and retention of educated, talented graduates within the region. This new University must be headquartered in Waterford and service the entire needs of the region.

While the plan states that “the consolidation of the DIT campus at Grangegorm is a critical flagship infrastructural project for the higher education sector” (NPF, P.140), no reference is made to a University in the South East which is the single biggest inhibitor of growth for Waterford and the South East when compared with every other urban centre. Cork, Limerick and Galway each have an IoT and a University, Waterford does not and unless this is addressed Waterford will not be able to fulfil the targets outlined in this plan. Given that the National Investment Plan is to take its lead from National Planning Framework it is critical that a University for the South East is contained in this

Plan. I suggest the following action to be included under investment – ***“Infrastructural deficits will be addressed in the creation of a University for South East region”***

Growing the Regions

Chapter 2.3 deals with growing the regions and by how much. The concentration of the Regional Assembly areas solely without reference to the NUTS 3 areas contained within same is flawed as such regions are under performing in comparison to others. For example the new Southern Regional Assembly area paints a positive picture in terms of the main economic indicators - educational attainment, disposable income, employment etc, however within this, the former South East region continuously underperforms across all of the same indicators, for example unemployment is 4% above the national average. As a former Chairman of the South East Regional Authority I believe it is vital that this sub-set of the regional assemblies is referenced in the new National Planning framework.

I suggest that acknowledgement of such disparities within the Regional Assembly areas is acknowledged and that a map of the existing NUTS 3 regions is contained in the plan, no changes to any should be made. I suggest an action under ‘growing the regions’ would be “To examine the reasons for under performance within the NUTS 3 regions and increase the suite of supports available to regions performing below the level of their respective assembly areas”

Key future growth enablers for Waterford include

➤ North Quays SDZ

The Draft Planning Framework for the North Quays SDZ is now on public display. It envisages a mixed use development with maximum permitted uses – retail: 30,000sqm, Food & Beverage: 7,000sqm, Office: 15,000sqm, Hotel & Conference Centre: 15,000sqm, Tourism/Culture/Enterprise/Community: 15,000sqm, Residential: 300 Units. An fully costed and independent economic analysis of the proposed project by Indecon has been submitted to the Department of Public Expenditure. €61.5 million is required to construct the enabling infrastructure to facilitate private investment of over €400 million by Al Hokair. The enabling infrastructure includes a new transport hub which will see the relocation of the train/bus station, a pedestrian/public transport bridge and new/upgraded road infrastructure to access the site. This vision will reposition Waterford as the main centre of retail

within the region and provide the city with a large quantum of high end city centre office accommodation capable of housing a possible financial cluster in the context of Brexit. This project is a top priority capable of transforming the perception of Waterford nationally and indeed internationally. It will also assist Waterford in meeting the targets contained in this plan.

I suggest the following wording is included which details more accurately what is in the draft planning framework and infrastructure application to Government ***“Delivering the North Quays SDZ regeneration project for integrated, sustainable development together with supporting infrastructure, including a new pedestrian/ public transport bridge over the River Suir, a transport hub and upgraded road network”***.

➤ **Waterford Greenway**

Reference to the Deise Greenway extension should be corrected to read “Waterford Greenway” which is its correct title. The Plan should also reflect the ongoing plans to connect with the New Ross Greenway via the new pedestrian/public transport bridge referenced above. I suggest the following ***“Extension of the Waterford greenway to link WIT to the City Centre and onwards to link with the New Ross Greenway”***.

➤ **University**

To have no reference to a University under ‘key future growth enablers for Waterford’ is a major omission in this plan. For reasons set out above, I suggest point 6 on page 61 be amended to read ***“The development and expansion Waterford Institute of Technology to University status and integration with the City centre and region”***.

➤ **Port/Airport**

To have no reference to Port/Airport under ‘key future growth enablers for Waterford’ is a major omission in this plan. For reasons set out above, I suggest an additional point is added to read ***“The development and expansion of Waterford Airport/Port to increase international connectivity to/from the region”***.

Governance

The population targets for Waterford City and suburbs detailed in Table 3.1 on page 47 of 29,000 persons are achievable if the measures detailed above and the issue of governance is adequately addressed in the final draft of this plan.

While page 126 speaks to Metropolitan Area Strategic Plans (MASP's) as a way of addressing high-level and longterm strategic development issues around the cities of Dublin, Waterford, Cork, Limerick and Galway, they fall short of addressing the issue of governance which we know is impeding the growth of our cities. Local Authorities are forced into concentrating on development within their boundaries in contravention of sustainable planning practice which would see concentric development.

In the case of Waterford an independent boundary commission report unanimously recommended a redrawing of what they describe as the current "impractical boundary". The creation of 'Urban Area Plans' as suggested on page 127 will not address this matter. It is not unreasonable to suggest that residents and businesses in 'urban area plan' locations should have a direct say in decisions made in such an area. This can only be done via local governance - for example a resident that resides in Ferrybank which is located less than 1km away from Waterford City Centre is not represented by a councillor who makes decisions about the area they use to work, shop and socialise in.

The quote "Enhanced co-operation in the preparation of joint urban/ local area plans will ensure consistent approaches to planning without changes to existing county boundaries (NPF P.127) is totally impractical in the context of a 20 year plus strategic plan. Boundaries must be addressed in Cork, Limerick, Galway and Waterford. I suggest the following action ***"Boundaries around the cities of Cork, Limerick, Galway and Waterford will be reviewed to remove any impediments to growth and to ensure effective public representation and governance structures are in place"***.

Conclusion

Unlike the previous National Spatial Strategy, I believe this plan is more robust as it strives to create strong urban centres in Cork, Limerick, Waterford and Galway that are capable of acting as a counterbalance to Dublin. It is essential that this plan is put on a statutory footing and that all

government departments and state agencies are bound to follow the NPF when devising and implementing policies.

Kind regards,

A handwritten signature in black ink, appearing to read 'John Cummins', written over a horizontal line.

Cllr. John Cummins

Deputy Mayor of Waterford