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NPF Submissions
Forward Planning Section,
Department of Housing, Planning and Local Government
Customs House
North Dock
Dublin 01 W6X0

10th November 2017

Re: "Ireland 2040 – Our Plan" Joint Submission on Draft National Planning Framework

To whom it may concern,

I write in respect of the above referenced.

I am pleased to submit to you a joint submission to the "Ireland 2040 – Our Plan" Draft National Planning Framework published on the 28th September 2017.

This joint submission, in support of the South East Waterford City Region, is being made by Waterford City and County Council, Tipperary County Council, Kilkenny County Council, Wexford County Council and Carlow County Council.

This submission is being made in support of the previous submission, dated the 30th March 2017, to the Issues and Choices document.

Yours sincerely,

Brian Beck
Senior Planner

Ireland 2040 – Our Plan

Submission by South
East Waterford City
Region

10th November 2017



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1.0 Introduction

A joint submission to the **National Planning Framework 2040** consultation process was made by the Councils of Waterford, Tipperary, Carlow, Wexford and Kilkenny. The submission articulated a strategic vision for the South East Waterford City Region, as a focus for concentrated investment and growth at a level which can contribute towards national development and economic competitiveness.



The development of a City Region of a scale which could exert critical mass leverage at an international level is not embraced by the Draft NPF. The draft does not adequately recognise the City Region's potential or articulate a clear vision and ambition for the City and its region.

2.0 South East Waterford City Region

The SEWCR is made up of strong urban areas, all working together for the benefit of the South East. Waterford City, Clonmel, Wexford, Kilkenny City and Carlow collaborate as a City Region which is not only located in proximity to Dublin, but is also an international gateway to mainland Europe and Britain. The five Local Authorities, working in collaboration, have the vision, ambition, capacity, statutory remit, governance and proven track record to coordinate and drive the delivery of the strategic aims as set out in the NPF. The SEWCR has the potential to be developed into a nationally significant economic, social and sustainable location, achieving effective regional development, creating sustainable communities and increasing the quality of life for all who live, work and visit the region.

The National Planning Framework must, however, clearly articulate a strategic and ambitious vision for the City Region. A vision which maximises the potential of the region and will drive future growth and investment. The SEWCR must be identified in the NPF as a location which can be branded and developed as Ireland's Gateway to Europe, working in support of, and helping to relieve development pressure on the Greater Dublin Area. While the NPF acknowledges this opportunity, a stronger commitment to develop the vision is required, to ensure that it is effectively transposed into future policy documents.

In an effort to rebalance unemployment between the SEWCR and the rest of the Country, a new National Policy Objective for the South East is recommended. This should seek that *“Within 5 years of adoption of the NPF the unemployment rate for the South East will be within 1% of the National Average and that the jobs profile will reflect that of the national average.”*

3.0 Effective Regional Development

A key element of the National Planning Framework is the achievement of regional balance within the Country. However, an analysis of the apportionment of the 2016 population across the regions compared with the 2040 population targets demonstrates a 'business as usual' approach (see table below).

Regional Population Targets – Trends and Projections

	2016 Pop	%	2040 Pop	% ¹
Eastern and Midlands Assembly Area	2,328,517	49%	2,800,000	48%
Northern and Western Assembly Area	847,442	18%	1,000,000	17%
Southern Assembly Area	1,585,906	33%	2,000,000	34%
Total	4,761,865	100%	5,800,000	100%

The proposal that Waterford, Limerick, Cork and Galway will have just under one-quarter of the overall population growth by 2040 while the Dublin commuter belt, including the 'Mid-Eastern Region' (Wicklow, Kildare and Meath) will consume 50% of the growth does not represent greater balanced regional development. There needs to be stronger growth in the regional areas outside the Eastern and Midlands Region to allow for rebalancing of population. Sustainable spatial planning and more cost-effective investment in the regions will grow regional economies exponentially and, in doing so, enable them to alleviate much of the pressure currently on the capital. The SEWCR advocates that an increase in population allocation outside the Mid Eastern region is required.

The ESRI report published on the 26th October 2017 on "Projections of demand for healthcare in Ireland 2015 – 2030" projects an increase in population by between 14% (0.64 million) and 23% (1.08 million) from 2015 to 2030. This is a stronger growth scenario of 1 million extra people by 2030 than the population anticipated in the NPF. It is advocated that the overall population growth is amended and the additional population allocated to the Southern Region.

If achieving effective regional development within the Country is to be a cornerstone of the NPF, then delivering long term sustainable growth, outside of the Dublin and Mid-Eastern Region must be clearly supported within the National Policy Objectives and National Policy Outcomes outlined in the Plan.

¹ *Note: Percentages have been rounded down and therefore total is 99% when computed.

3.1 Towns over 10,000 population

The limited population growth of 16% allocated to the thirteen large towns in the Southern Region (six of which lie within the SEWCR) will significantly impact on the ability of these towns to meet their potential as regional economic drivers which support the growth of the Cities and the City Regions as a whole. The Draft NPF must clearly identify the role that the larger urban centres Carlow, Clonmel, Kilkenny and Wexford will play in the future of the Country and that they will be supported through investment in infrastructure, population and jobs growth.

3.2 Towns under 10,000 population

The NPF understates the regional and local importance which our towns play in the economic, social and cultural development of large parts of our Country. In defining rural areas to include towns up to a population threshold of 10,000, the NPF will undermine the role played by large towns. These towns have the ability to be economic drivers within their municipal districts offering a high quality of life and strong support structure to their communities and businesses.

It is recommended that the NPF should apply the CEDRA Report “Energising Ireland’s Rural Economy” in defining large towns i.e. those above 5,000 people. NPO 7 should be amended to acknowledge this distinct category, and policy provision should be included which supports large scale economic development, job creation and strong residential growth.

3.3 Population projections

The population projections as outlined in the Draft NPF, when analysed further, represents little or no targeted growth of SEWCR’s towns, villages and rural areas over the lifetime of the Plan. If we are to deliver meaningful effective regional development and to support the viability of rural communities, the population distribution must be re-examined.

While the table below sets out a broad extrapolation of the figures presented in the NPF, the implications of the figures would appear to indicate that the population being allocated to the Southern Region, outside of the cities and large towns, is low and a more appropriate figure should be included.

Proposed Estimated Population growth in Southern Region

Population allocation for southern region	375,000 (maximum growth figure)
3 Cities	196,000
(Cork 115,000)	(allocated growth figures)
(Limerick 52,000)	
(Waterford 29,000)	
Large Towns	60,000 (16% of total)
Remaining population for small towns below 10,000 and rural areas	119,000
Distributed between 9 Counties in Southern Region (proportions to be decided by RSES)	13,222 (between 2018 and 2040)
Average annual growth in population (23 years of the NPF)	575 people pa
Houses required at annual basis (occupancy rate of 2.5)	230 houses pa

3.4 Development within built up areas

The NPF proposes in Table 2.1 that 50% of new housing shall be within built up areas on infill / brownfield sites in the cities and 30% elsewhere. This target would benefit from a more detailed analysis of urban areas outside of Dublin. With the constraints on the effectiveness of current CPO powers to release lands for development, it is uncertain whether this can be achieved. This could have significant implications for the growth of our cities and large towns. It is suggested that for Cities outside Dublin, the percentage be reduced to 30% and that for urban centres below 20,000, that the target on brownfield and infill sites should be 15%.

The reduction in zoning headroom to 50% is not considered sufficient to allow for the effective delivery of housing within urban centres. The dezoning of land to achieve this

headroom could potentially result in increased land prices and issues with land availability and land hoarding.

3.5 Metropolitan Area Strategic Plans

The proposal in the NPF for the inclusion of Metropolitan Area Strategic Plans and their role in the development of City Regions is unclear. There must be greater clarity in relation to the proposed content, the definition of “appropriate authorities”, the timelines, together with the relationship between the MASPs and the City Regions.

It is suggested that the strategic objectives for Metropolitan areas should be set out in the RSEs and should articulate how the city regions based on the Strategic Planning Areas can support the cities. It is suggested that the City Regions around each of the five cities should be examined and not just Dublin and Cork as proposed. The SEWCR would point out that a City region is more than those who commute into it. Cities regions should be defined by the functional inter-relationship with their surrounding areas including achieving critical mass, land use and transportation planning, employment, connectivity and access to educational and health services, green infrastructure, cultural and retail services etc.

4.0 Gateway to Europe

It is recognised that Dublin Port is physically limited in its capacity for future development being constrained by Dublin city on one side and the protected habitats of Dublin Bay on the other. Rosslare Harbour and the ports within the SEWCR provide critical access routes to Continental Europe which are of national and international importance. Rosslare Euro Port, geographically located at the position closest to mainland Europe, has the capacity to carry additional traffic. It provides an alternative to the land-bridge crossing to the UK which is likely to be under threat as a result of the UK leaving the European Union. Further investment in the development of Rosslare Europort can offer a viable complimentary port which, working together with Dublin Port and Belview, can maximise freight and passenger transport for the benefit of the whole Country.

The recognition of the importance of Rosslare Port should be fully reflected within the NPF, with the designation of Rosslare Euro Port as a Tier 1 Port being essential. Expansion of the Port will provide value for money investment that will improve our competitiveness and help retain Ireland’s freedom of movement of people, goods and services.

It is imperative that the Rosslare to Dublin rail line is upgraded to improve passenger and freight services. Investment that will reduce the threats from coastal erosion along the line is essential to protect this infrastructure for the future. Additional services that would link Gorey, Enniscorthy and Wexford Towns would also support more sustainable travel to France, Wales and Southern England.

5.0 National Strategic Outcomes and Key Future Enablers

The SEWCR is based on modern economic, infrastructural, demographic and social interrelationships and potential, rather than historical administrative areas. To allow the SEWCR to achieve this ambition and to grow to its maximum potential, a number of key National Strategic Outcomes and key future growth enablers need to be provided for in the Framework:

- Policy support and an identified National Strategic Outcome should be included to deliver an up-grade of the M24 to motorway standard.
- The NPF should provide for clear support for the establishment of a multi-campus Technological University in the South East, building on the existing high quality third level institutions within the South East.
- Waterford Airport must be recognised as a national infrastructural asset with the potential to grow and develop into a regional airport providing short haul connectivity, not only to the south east but to the wider eastern and southern region. There should be a clear commitment under the National Strategic Outcomes to grow and develop the Airport throughout the lifetime of the NPF.
- The runway at Waterford Airport be extended to accommodate jet carriers and strengthening of air transport services to and from the South East Waterford City Region. Waterford Airport served an average of 83,000 passengers per year over the period 2003 – 2013. The extension of the runway is necessary to facilitate use of the Airport by larger/jet propelled aircraft which would give the airport capacity of the order of 300,000 to 500,000 passenger journeys each year and relative to the low investment cost needed, makes economic sense and represents an excellent investment in the future development of the South East Waterford City Region. The optimisation of existing capacity at the airport would be more cost effective than developing additional infrastructure in Dublin airport, and would demonstrate a strong commitment to effective regional development.
- There must be a commitment within the NPF, to provide public transport connectivity to Waterford Airport.
- Faster rail link from Waterford, serving Kilkenny and Carlow, to Dublin to maximise the city's proximity to the Capital. There should also be a commitment to retaining and investing in the Waterford to Limerick Rail line and to reopening the Rosslare rail line.
- Facilitating the growth of Rosslare/Belview Ports to ensure that connectivity to Europe is strengthened following Brexit. The Ports should be supported in their development and acknowledged as key economic drivers for both the region and the Country. This should be recognised as a National Strategic Outcome under the section "High Quality International Connectivity" in line with that proposed for Dublin Port.
- Public transport connectivity between the large towns within the South East should be protected and enhanced.
- The National Strategic Outcomes for health must include a commitment to grow and develop health services appropriate to the size and scale of the City Region. In particular Waterford University Hospital must be prioritised as a centre of excellence for the South East.
- To maximise the public investment which has already taken place, and to fully utilise the potential of key strategic sites in public ownership, the National Strategic Outcomes must support the development of key strategic sites in the SEWCR, including the North Quays, Trinity Wharf, Abbey Quarter, Kickham Barracks and Ballingarrane Technology Park.
- The SEWCR welcomes the strong support given to the development of greenways and blueways in the NPF. There are further opportunities within the Region to

continue to build on the potential of greenways and blueways for the benefit of both our communities and visitors.

- The impending impact of Brexit on Rosslare Euro Port would support the upgrading of the N80 (Central Spine concept as contained in the NSS) as a strategic linking corridor within the Country. This route would connect a network of strong urban centres strategically located proximate to Dublin City which could build synergistic competences attractive to FDI companies. The upgraded route would enable easier movement of freight and other public and private transport, facilitating access to other regional and rural destinations.
- Expedite the roll out of the National Broadband Plan to ensure that all parts of the region can access high speed broadband. Broadband connectivity is of critical importance for attracting investment, facilitating economic growth and stimulating innovation.

6.0 Summary of Recommendations:

- a. Published population projections for 2040, as evident by recent ESRI reports, are demonstrated to be too low. It is recommended that overall national targets are re-examined to reflect the most recent ESRI report and it is advocated that an increased projected population is allocated to the Southern Region.**
- b. Alternatively - Population and Jobs Growth projections needs to be significantly re-distributed from the Eastern and Midlands Region to large and small towns in the Southern Region.**
- c. The N24 should be upgraded to motorway standard to provide connectivity between the three cities in the Southern Region and the between the M18, M7, M8 and M9 motorways.**
- d. The NPF should take reference from the CEDRA Report “Energising Ireland’s Rural Economy” in defining large towns i.e. those above 5,000 people. NPO 7 should be amended to acknowledge this distinct category, and policy provision should be included which supports large scale economic development, job creation and strong residential growth.**
- e. The NPF should set out a clear role for towns which have a population over 10,000 in the future of the Country and that they will be supported through investment in infrastructure, population and jobs growth.**
- f. The emphasis on the renewal of core urban areas is retained in the NPF, however the apportionment should be allocated following an assessment of the capacity at local level rather than a uniform nationwide approach.**
- g. Different Headroom for Cities, Towns and Villages need to be provided. For Cities, Towns and Villages the minimum headroom should be 150%. Local Authorities should have the flexibility to not apply a zoning framework in small villages.**

- h. Local authorities need to be given appropriate legislative powers for land assembly, site development activation and enforcement. In this respect CPO, Dangerous Structures, Derelict Sites Legislation etc. all need to be reviewed; streamlined and made fit for purpose. With these additional powers the need for a National Development Agency would be eliminated.**
- i. The City Regions should be defined by establishing a clear vision for their growth and development. This is to ensure that the socio-economic characteristics of each region achieve a critical mass to an international/national status. The metropolitan strategic area planning should be developed and refined as part of the preparation of the Regional Spatial and Economic Strategies and should be a central element of these Strategies when published.**
- j. Ireland 2040: Our Plan should acknowledge that Waterford and Limerick are much broader than simply their cities and suburbs and include a wider City Region which supports the development and success of the Cities.**
- k. In order to achieve balanced regional connectivity, critical regional infrastructure mentioned in this submission should be identified as Strategic National Outcomes and in the National Investment Plan.**
- l. The NPF should recognise tourism as a nationally important economic driver, and spatially identify and support the development of Fáilte Ireland’s tourism destination propositions, including the ‘Lakelands Area’ and “Ireland’s Ancient East”.**

7.0 Conclusion

The SEWCR has the capacity to deliver in the sectoral areas of employment, housing, education, port development, tourism, transport, health and human capital using existing and planned infrastructure and the shared desire by the local authorities to move away from the “business as usual” model for the delivery of effective regional development.

The approach advocated in this submission is for a tailored approach to Effective Regional Development utilising the strengths and opportunities of the south east which will reduce the disparity between the SEWCR and other regions, by embracing the spatial development opportunities specific to the South East within the Southern Regional Assembly Areas resulting in more effective regional development.

The partners to this submission request that the National Planning Framework sets out a clear vision and foundation on which the South East can build and develop. A vision that will instil confidence, clarity and ambition for all those looking to invest, live or visit the south east. A vision which will demand that the South East set itself targets and build on established partnerships and cohesiveness in the region.



Comhairle Cathrach & Contae Phort Láirge
Waterford City & County Council

Minister Eoghan Murphy
Department of Housing, Planning and Local Government
Customs House
North Dock
Dublin 01 W6X0

9th November, 2017

Re: **“Ireland 2040 – Our Plan” Joint Submission on Draft National Planning Framework**

Dear Minister Murphy,

I write in respect of the above referenced.

As Chief Executive of Waterford City and County Council I would like to endorse this joint submission which is being made in support of the South East Waterford City Region.

This submission is being made in support of the previous submission, dated the 30th March 2017, to the Issues and Choices document.

Yours sincerely,

Michael Walsh,
Chief Executive
(Designated Public Official under the
Regulation of Lobbying Act 2015)



Minister Eoghan Murphy,
Department of Housing, Planning & Local Government,
Customs House,
North Dock,
Dublin,
01 W6X0.

9th November, 2017

**RE: "IRELAND 2040 - OUR PLAN" JOINT SUBMISSION ON
DRAFT NATIONAL PLANNING FRAMEWORK**

Dear Minister Murphy,

I write in respect of the above referenced.

As Chief Executive of Kilkenny County Council I would like to endorse this joint submission which is being made in support of the South East Waterford City Region.

This submission is being made in support of the previous submission, dated the 30th March, 2017, to the Issues and Choices document.

Yours sincerely,

**Colette Byrne,
Chief Executive.**



Comhairle Contae Thiobraid Árann
Tipperary County Council

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Minister Eoghan Murphy
Department of Housing, Planning and Local Government
Customs House
North Dock
Dublin 01 W6X0

9th November 2017

Re: "Ireland 2040 – Our Plan" Joint Submission on Draft National Planning Framework

Dear Minister Murphy

I write in respect of the above referenced.

As Chief Executive of Tipperary County Council I would like to endorse this joint submission which is being made in support of the South East Waterford City Region.

This submission is being made in support of the previous submission, dated the 30th March 2017, to the Issues and Choices document.

Yours sincerely,



Joe MacGrath
Chief Executive



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9th November, 2017.

Minister Eoghan Murphy
Department of Housing, Planning and Local Government
Customs House
North Dock
Dublin 01 W6X0

Re: "Ireland 2040 – Our Plan" Joint Submission on Draft National Planning Framework

Dear Minister Murphy

I write in respect of the above referenced.

As Chief Executive of Carlow County Council I would like to endorse this joint submission which is being made in support of the South East Waterford City Region.

This submission is being made in support of the previous submission, dated the 30th March 2017, to the Issues and Choices document.

Yours sincerely,

Kathleen Holohan,
Chief Executive.

DIRECT LINES: CODE 059

Carlow MID Area Engineer	9136272	Information Technology	9136215	Fire Service & Building Control	9131144
Planning	9170346	Housing	9136296	County Museum	9131554
Human Resources	9170314	Waste & Environment	9136231	Rent Payments	9172497
Melnochtbeg MID Area Engineer	9172415	Rates	9172489	Recreation & Amenity	9170377
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