

To whom it may concern,

I wish to make the following submission to the Ireland 2040 National Planning Framework. My name is John Cummins, I am a public representative in Waterford City and have been Mayor on two occasions. I believe this plan is critical for Ireland and I concur with the Minister in his view that it must create strong regional cities which are able to be a counterbalance to rapidly sprawling Dublin. I will address my submission across a number of headings in the national context and specifically in the Waterford context

Transport

Nationally our transport links must be enhanced and upgraded with the main focus on our road network, as our main mode of transport is via cars/buses etc. The national motorway network linking Dublin and the regional cities of Waterford, Cork, Limerick and Galway has brought a huge benefit not only to these cities but the numerous towns that are located within the vicinity of the routes. The focus over the duration of the Ireland 2040 plan must be to link all the regional cities with one another. While construction is on going on the M11 linking Dublin to Waterford bypassing Enniscorthy and New Ross and the M18 linking Galway and Limerick which will bring huge benefits - the focus must be on linking Limerick to Waterford (N24) and Limerick to Cork (N20) and Cork to Waterford(N25) via a high quality dual carriageway network.

Waterford Context: In terms of transport (in addition to the above), the focus must be on the continued support of Waterford Airport. It must be supported to enable a runway extension to enable 737 jets land at the airport which would enable it serve the population of the South East 582,440 (Preliminary Census 2016). The port of Waterford must also be funded to act as a counterbalance to Dublin and Cork Port - particularly in the context of Brexit and possible further links direct to Europe. Waterford is closest port to Europe and has a competitive advantage in this regard. Consideration should be given to the construction of a cruise terminal/docking station at Dunmore East. Waterford Port loses several lucrative cruise liners each year due to an inability to tender passengers ashore during bad weather from the harbour in Dunmore - large vessels cannot get up the estuary to the port due to the lack of draft as a result of silt in the estuary. The maintenance of the rail network in the Waterford area is also of crucial importance in the context of freight transport from Balina to Belview Port. Rock fall in the vicinity of Plunkett station is a major concern in this regard and redial action is required but can be addressed via the SDZ on the North Quays (see below).

Housing & Governance

The housing crises facing the country has been well documented and has effected Dublin and Cork primarily but the other main urban centres of Galway, Limerick and Waterford have not been immune in terms of a lack of social, affordable and private housing. As the economy has improved and jobs have returned to the market demand for housing has surged in the main urban centres and a lack of construction over the previous 7 years is having a severe impact on the rental market.

Waterford context: Waterford must aim to double its urban population over the duration of the plan to approximately 110,000. This will require the expansion of the city concentrically from its core on both sides of the river. This is an issue that interchanges with governance. At present the surrounds of the Ferrybank area (on North side of the river Suir) is controlled by Kilkenny County Council which has stymied the growth of the city Northwards and ensured a lack of balanced growth, solely on the South Side of the River Suir. The city has effectively been like a bird with one wing and not enabled to expand Northwards into its natural hinterland. An independent boundary commission has unanimously recommended a redrawing of what they describe as the current "impractical boundary". It should be noted that the proposed boundary change is simply a realigning of a former boundary that pertained until approx 1896 (see attached map) when the then Local Government Act was introduced. This recommendation must be implemented as a matter of urgency - prior to the next Local Elections to enable a redrawing of the Metropolitan districts as recommended by the commission. The importance of this issue cannot be underestimated, an urban planning framework for an expanded Ferrybank area that will cater for approximately 30,000 needs to be developed and the rural development policy being pursued by Kilkenny County Council must be ceased immediately and a green belt inserted for the entirety of the proposed new boundary area.

Jobs

Jobs must be focused on the main centres of Dublin, Cork, Waterford, Limerick and Galway with a concerted effort made to drive jobs into the named urban centres outside of Dublin. While the LEO's, micro finance supports and broadband will drive job creation in rural areas and smaller towns across the country, the focus must be on directing jobs to the above named centres. Critical mass must be created to counter Dublin and it will be a win win for all surrounding counties.

Waterford Context: Jobs created by companies supported by the IDA in Waterford have not been delivered in the same quantum as other cities such as Cork, Limerick and Galway. Waterford's unemployment is well above the national average with high profile job losses such as Waterford Crystal and Talk Talk. Up until 2014, different levels of IDA supports were available in Galway vs Waterford due to our location as part of the Southern and Eastern region. This has since changed and an IDA director appointed specifically for the South East region (currently vacant). This is a necessity, having Waterford as a subset of Cork has not worked and will not work into the future. Each of the main urban centres must be treated equally and have the same IDA and EI personnel driving job creation in these areas. Site visits are not equal, with Waterford consistently seeing less IDA clients being brought to the City.

However IDA companies that have located in Waterford are very happy and expansions have occurred in the likes of Sanofi, Teva, Baush and Lomb, Sunlife etc. over the last 3 years. These companies cite the quality of life and cheaper cost of living as extremely important in being able to attract talent to Waterford. Equally so Enterprise Ireland has had many success stories with the likes of Feed Henry, Eirgen and Eistech being some of their most high profile clients nationally. There is no

question that with a more concerted effort to bring jobs to Waterford City that the population will expand and it will be able to act as an attractive counterbalance to Dublin

South East Region

As a former Chairman of the South East Regional Authority I believe it is vital that the South East Region remains intact. Tipperary should not be hived off to support a greater population in the Midwest region. The affinity of Tipperary (in particular the former South Tipperary Local Authority) with the South East should not be dismantled. Many other state services such as Health are focused on this model. The new Southern Regional Assembly area paint 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. There is a case to be made that this NUTS 3 area be classified differently and that increased supports be available to attract jobs to the area. The lack of a University is a major contributing factor and in order to enable Waterford develop to its full potential as a major urban centre, this must be addressed.

Waterford context: The North Quays SDZ is contained in the current Capital Plan and is critical in the context of Waterford's future potential over the context of this plan. The planning framework is currently being finalised and Waterford City and County Council have secured investors (Saudi based Al Hokair group) who are willing to develop a 100,000 sq/m mixed used development comprising of a 30,000 sq/m retail development, 30,000 sq/m of accommodation, 15,000 sq/m hotel and conference venue, 10,000 sq/m of office accommodation and 10,000 sq/m of a tourist facility capable of housing a relocated Waterford Crystal at a cost of circa €300 million. 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. Government support to enable access/egress to this difficult site and connection to the existing City Centre via a pedestrian/tram bridge and a relocated train station into an integrated transport hub on the quays must be prioritised and funding in the region of €50 million will be required but its transformational effect and cost benefit analysis stands up to the highest scrutiny. This is a top short term priority that is capable of transforming the perception of Waterford nationally and indeed internationally.

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 the logical progression is for WIT (the largest 3rd level facility in the region) be upgraded to University status. WIT should be granted stand alone University status and act as University for the entire South East Region, just like UCC for the South West, UL for the

Midwest, UCG for the West, Maynooth for the Midlands and multiple universities in Dublin for the East and North East. This must be underpinned by a significant capital plan that enables it to develop and compete on a level playing field with the existing universities. If this is in the guise of a technological university, such universities must be autonomous, have the ability to borrow and receive core funding for research and development.

The current policy of requiring IoT's to merge prior to applying for Technological University status is flawed in the Southeast context. While the merger of smaller IOTs and 3rd level facilities into a reconstituted DIT, it should be noted that the realisation of a main campus at Grangegorman and outreach campuses in other parts of Dublin is not the same as asking for the merger of WIT and IT Carlow which are so geographically separated.

Health

The groups for acute hospital services as recommended by Prof. John Higgins and adopted as government policy are noteworthy and it is disappointing that his report has not been implemented in full. It should be noted that a number of hospital groups still do not have a board in place, several years on, to hold the CEO of the group to account. These must be prioritised as a matter of urgency and other recommendations implemented in full. The move to primary and community care is sensible but the roll out of facilities has been notably slow and should be sped up to take the strain off our acute hospitals.

Waterford context: UHW as the model 4 hospital for the South East region, but constituted as part of the South/South West hospital group must be, as was recommended in the Higgins report act as the acute hospital for the entire SE region despite Kilkenny and Wexford being part of Dublin Hospital groups. It is regrettable that the SE Region could not have been maintained as part of this reorganisation but clinical differences dictated otherwise - it is my opinion that medical politics and competition should not be allowed to undermine service provision. Clear clinical pathways must be implemented across the SE region across the main specialities to ensure that UHW maintains its catchment population. This was shown in the recent Herity Report on cardiac services not to have taken place. Instead of the 582k population being used as the catchment population for expanded cardiac services, a calculation was made based on existing pathways as a percentage of the population of each constituent county. The fact that Kilkenny does not send patients to UHW meant the Kilkenny population figures were skewed and the fact that the percentage was based on the existing 9-5 services artificially produced a low figure that was used to justify the non provision of a second cath lab at UHW. 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.

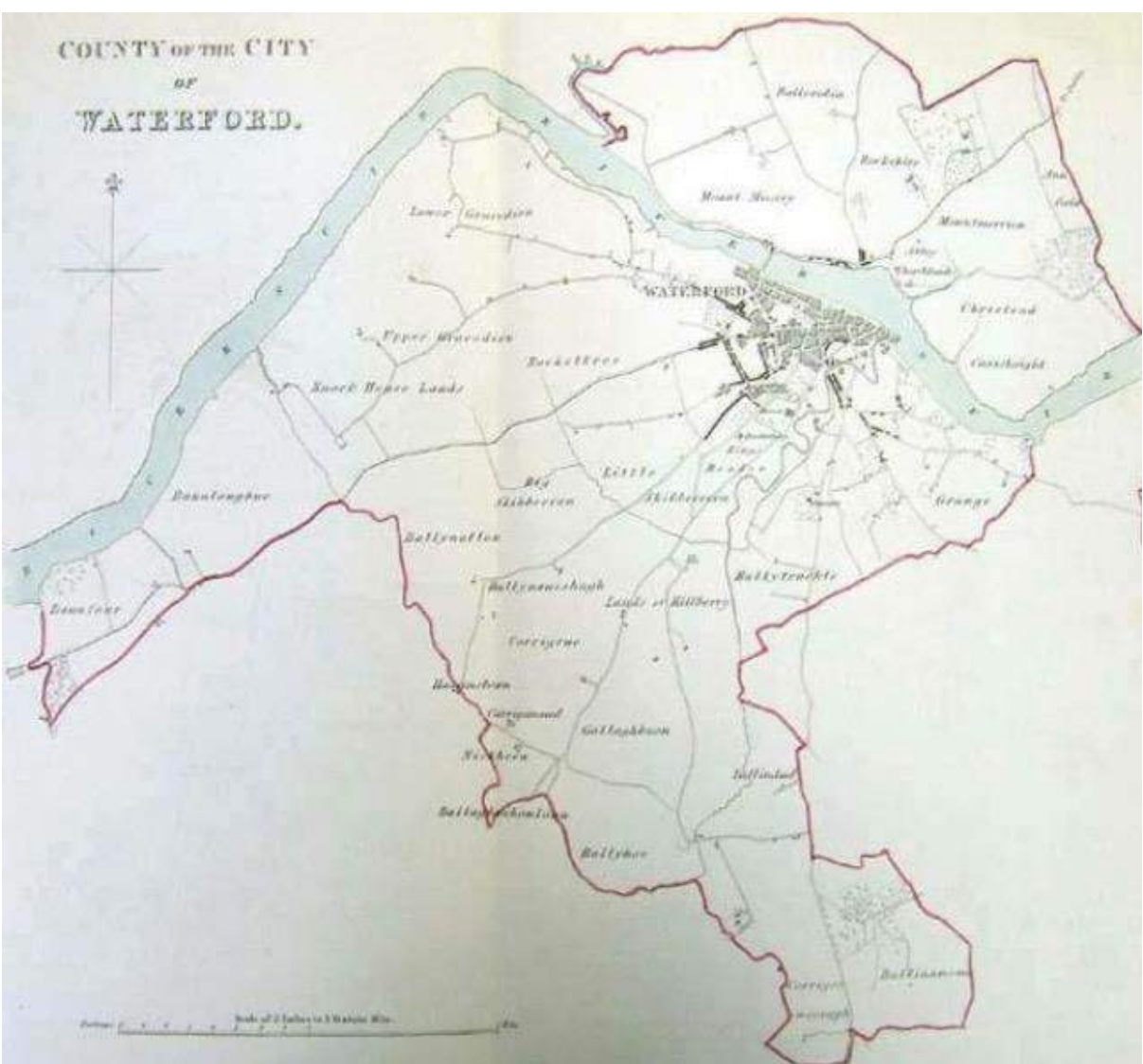
Conclusion

While I believe that a strong capital, capable of competing internationally is critical, I believe that the empowerment of our regional cities - Waterford, Cork, Galway and Limerick should form the main focus of this Ireland 2040 National Planning Framework. Each regional city has the capacity to deliver and compete in niche specialities such as life sciences, software development, engineering, medical devices, Pharma/BioPharma among many more. Unlike the previous National Spatial Strategy, this Framework must not become so spread out that it dilutes its main aim - to create strong centres capable of acting as a counterbalance to Dublin. If our regional cities are not empowered by all government departments and state agencies being statutorily obliged to follow the NPF when devising and implementing policy, we will continue to have an overheating Dublin. This Policy is essential for the future economic and social prosperity of our entire nation and I wish all involved in finalising it every best wish.

Kind regards,

Cllr. John Cummins

COUNTY OF THE CITY OF WATERFORD.



Scale of 1 Inch to 1 Statute Mile