

Report of the Waterford Boundary Review Committee

to

**The Minister for Housing, Planning, Community and Local
Government**

December 2016

Report of the Waterford Boundary Review Committee

Executive summary

1. Introduction:

- 1.1 Establishment and membership of the Committee
- 1.2 Work of the Committee
- 1.3 Secretariat
- 1.4 Evaluation framework
- 1.5 Extensions of timeframe
- 1.6 Acknowledgements

2 Consultations:

- 2.1 Overview of consultations undertaken by the Committee
- 2.2 Consultation with the local authorities
- 2.3 Consultation with Oireachtas members
- 2.4 Consultation with relevant public bodies

3 Submissions:

- 3.1 The 'Area of Interest'
- 3.2 Boundary Review website
- 3.3 Notifications
- 3.4 Overview of submissions:
 - 3.4.1 Numbers and format
 - 3.4.2 Processing and data protection
 - 3.4.3 Origin of submissions
- 3.5 Summary of the main issues raised:
 - 3.5.1 Issues raised by respondents opposed to boundary change
 - 3.5.2 Issues raised by respondents in favour of boundary change

4 Setting the context:

- 4.1 Relevant contextual issues arising from the historical development of Waterford City
- 4.2 Brief description of the Area of Interest and its setting within both Waterford City and County Kilkenny
- 4.3 Status of the Waterford Gateway:
 - 4.3.1 The National Spatial Strategy 2002
 - 4.3.2 Waterford's performance as a Gateway
 - 4.3.3 *'Putting People First'*
 - 4.3.4 Looking to the future
- 4.4 Strategic planning policies:
 - 4.4.1 The 2004 Planning, Land Use and Transportation Strategy (PLUTS)
 - 4.4.2 Implementation of PLUTS

- 4.4.3 Retail planning policy in Waterford
- 4.4.4 Belview Port
- 4.4.5 The North Quays Strategic Development Zone
- 4.5 Previous boundary adjustments and proposed boundary extensions

5 Consideration of options (based on multi-criteria analysis):

- 5.1 International comparative analysis
- 5.2 Performance of the current boundary arrangements assessed according to the stated Criteria:
 - 5.2.1 Efficiency
 - 5.2.2 Economic and social development
 - 5.2.3 Governance, accountability and local democracy
 - 5.2.4 Identity
 - 5.2.5 Service delivery
 - 5.2.6 Financial impact and complexity
- 5.3 Status quo – the No Change Option
 - 5.3.1 Maintain status quo
 - 5.3.2 More shared services
- 5.4 Options for Change:
 - 5.4.1 Move the Boundary to the centre of the Suir
 - 5.4.2 Boundary Extension to include the entire defined “Area of Interest” in County Kilkenny
 - 5.4.3 Boundary Extension to include part of the “Area of Interest” in County Kilkenny

6 Recommendations and implementation:

- 6.1 Conclusions and recommendations
- 6.2 Elaboration on key aspects of the recommended arrangements
- 6.3 Towards implementation – the next steps

Appendix 1: Terms of reference

Appendix 2: List of those who made submissions

Appendix 3: Evaluation Framework

Executive Summary

The Waterford / Kilkenny Boundary Review Committee terms of reference require it to:

Make such recommendations with respect to that boundary, and any consequential recommendations with respect to the area of the Metropolitan District of Waterford, that it considers to be necessary in the interests of effective and convenient local government.

The Committee's considerations are summarised as follows:

1. The public consultation invited by the Committee as part of its work elicited 19,131 submissions, not including those from Waterford Local Authority and Kilkenny County Councils themselves. Of these, 19,096 opposed any change in the existing boundary. The overwhelmingly singular basis upon which such opposition was based related to the potential loss of identity with Kilkenny County,
2. Notwithstanding the high level of recognition that the Committee gives to the significance of "county identity" in the cultural and social life of Irish people, the review had, due to its terms of reference, to consider all relevant matters, particularly practical issues related to the most effective administration of the functions of local government in an area that is proximate to the principal centre of population for the entire South-East region – this being formally identified at national level through its designation as one of the principal "Gateway" locations in the country.
3. In relation to delivering efficiencies through re-designation, there has already been significant reform. A focus on the most efficient means of service delivery by local government was a direct consequence of the threat to the financial stability of the state precipitated by the international financial crisis. Both local authorities in this case have demonstrated a high level of commitment to their respective communities, and it is the Committee's view that there is very limited, if any, scope for delivery of further efficiencies in day-to-day service delivery costs through a range of reconfiguration of boundaries that it has examined. The investigation carried out by the Committee has identified a high level of collaborative engagement between authorities in the delivery of day-to-day services by each authority to its constituent populations. The dedication of the elected Councillors in each area was abundantly in evidence; they are real servants of their respective communities notwithstanding the complex boundary between them. In this regard, the fruitful consultation with those Councillors, and the extent to which each Council provided extensive amounts of the baseline information requested by the Committee (supporting their respective positions and responding to detailed questions), is greatly appreciated by the Review Committee. Notwithstanding this, it is our analysis that collaboration between the two authorities is significantly less in evidence at strategic level than it is at operational. For example, no joint Retail Strategy has been developed between

the authorities, and there is no implementation plan or joint working group to deliver the jointly-adopted Planning and Land-Use Study since its initiation in 2004.

4. The Committee views the current configuration, designated at times of far lower economic activity and lesser population growth and with little or no provision for future expansion within its boundaries, as a practical hindrance to day-to-day service delivery and a real anomaly where it comes to dealing with the immediate hinterland of Waterford as the principal regional settlement. Waterford's relative lower level of economic performance in comparison with other designated Gateways requires that it has the capacity most fundamentally to consolidate the core of the city to the greatest extent possible. This must include control over any matter that poses a threat to that consolidation. Waterford city's success in terms of the promotion of its individual identity around the city centre in recent years is acknowledged. It requires every support to turn this initiative into economic success, through implementation of a successful Strategic Development Zone (SDZ) recently designated on the North Quays. All these regionally strategic initiatives to promote the primacy of the city are supported by Waterford's partner local authorities in the South-East region, particularly Kilkenny.

The summary of the Committee's recommendation to the Minister is as follows:

- A. The Waterford Boundary Review Committee recommends the abandonment of the existing impractical boundary designation in favour of the designation of an area to Waterford that gives it effective control of the immediate hinterland of the city that has expanded on the north bank of the Suir. This designation includes provision for the expansion of that area to cater for the forecast population and economic growth of the regional centre.
- B. The Committee recommends a Boundary Extension of Waterford County into Kilkenny County Council to include the area proximate to the suburban area in Ferrybank. It has chosen to recommend the designation of a new Boundary between the Authorities that will move the entire Electoral Area of Kilculliheen and those parts of the Electoral Areas of Aglish and Dunkitt contained within the Area of Interest that lie south of the of the N25 bypass to the control of Waterford Council. This revision would have the effect of retaining the entire Electoral Area of Rathpatrick to the east in county Kilkenny, thereby retaining the village of Slieverue and the port at Belview and its hinterland in that county. The Boundary as recommended follows those electoral area boundaries that follow the line of an existing stream, a minor tributary of the Suir.
- C. In deciding a recommendation on the extent of such re-designation the Committee recognises the extent to which Kilkenny County Council has, over successive decades, invested very significant strategic focus on this area at its southern end. Kilkenny has successfully promoted and developed Belview as the new location for the Waterford-based shipping industry. In so doing, it has

followed many international precedents where the changing nature of maritime trading, and resulting re-configuration of land-side ports, has rendered historically city-oriented ports obsolete. The argument for a physical connection with the city is rendered weaker by these practicalities; the current location of Belview port is unhindered by city traffic and highly accessible from the national motorway network, making it an effectively regional facility. In addition, Kilkenny has largely preserved the green belt of agricultural-use land between the port and area of residential settlement that enhances the range of uses that can be located in the port area. Similarly, in relation to the local village settlements, the Committee accepts the advantage offered by Kilkenny that these places accrue from their individual identity.

- D. For practical purposes the designation of the boundary was primarily based on the 2004 Planning Land Use and Transportation Strategy (PLUTS) designation of land-use and future land-use blocks and follows Townland and natural boundaries (the stream that is a very minor tributary or run-off to the Suir) to the greatest extent possible. It is recognised that other boundaries, such as parish boundaries, will not fall so naturally on one side or the other of the recommended line, but there is a limit to what can be equitably divided.
- E. Kilkenny County Council will suffer a loss of Commercial Rates and Residential Property Tax income arising from this boundary change that is immediately and accurately identifiable. It will have to be compensated by Waterford County for such loss of income, such loss being discounted by the relief from the requirement to provide day-to-day services in the area in question. The Committee is conscious that such saving will not be significant due to Kilkenny Council's requirement to maintain its compliment of service infrastructure and manpower in the south county despite the lesser population and area to be served.
- F. The population living within the proposed boundary extension area in County Kilkenny is estimated at about 4,500. The effect of transferring this area to Waterford is likely to be an increase of one councillor in Waterford Metropolitan District and a reduction of two councillors in the Piltown Municipal District of Kilkenny County Council. As this would result in the membership of the Municipal District dropping below the statutory minimum of six elected members, it would be necessary to reconfigure all of the Municipal Districts within County Kilkenny.

David O'Connor	Chairman of the Committee
Oliver Killeen	Member of the Committee
John Martin	Member of the Committee

December 2016

Chapter 1: Introduction

1.1 Establishment and membership of the Committee

Mr. Alan Kelly, T.D., then Minister for the Environment, Community and Local Government, appointed a statutory committee on the 19th of June 2015 to review the administrative boundary between the City and County of Waterford and County Kilkenny; this was one of four such reviews of local authority boundaries around the country¹.

Under Section 28 of the Local Government Act 1991, the Committee was asked to:

- a) carry out a review of the boundary between the City and County of Waterford and County Kilkenny;
- b) make such recommendations with respect to that boundary, and any consequential recommendations with respect to the area of the Metropolitan District of Waterford, that it considers to be necessary in the interests of effective and convenient local government; and
- c) prepare and furnish to the Minister for the Environment, Community and Local Government, a report in writing of that review and its recommendations

The Committee is independent in the performance of its functions, and the Terms of Reference clearly set out the basis upon which the Committee's recommendations were to be drawn and the scope of the Report that follows. The full Terms of Reference for the Committee are set out in Annex 1.

The Committee was chaired by David O'Connor. The original membership included Ciaran Lynch and Ollie Killeen. In September 2015, for reasons unrelated to the work of the Committee, Mr. Lynch had occasion to withdraw. The Committee's work was briefly suspended pending the appointment of a replacement, John Martin, in October 2015.

Messrs. O'Connor, Killeen and Martin were also appointed to the Committee reviewing the boundary between Cos. Carlow and Laois at Graiguecullen in Carlow town.

1.2 The Work of the Committee

The Committee met 21 times during the course of its work.

¹ Department of the Environment, Community and Local Government press release on appointment of the Committee: <http://www.environ.ie/local-government/reform/boundaries/minister-alan-kelly-appoints-groups-review-local-government>

The Committee held a total of 5 meetings with representatives of both Councils. The Committee met the elected public representatives (Councillors) of both authorities at the initiation of the process and again at the end of the public consultation period, as a formal recognition of their status as the elected nominees of their respective communities. Meetings were also held with the Chief Executives of both Councils.

The request for detailed evidence made by the Committee to both local authorities set out indicative data against each of the requirements in its Terms of Reference. This was requested as an input to the consultation process with the Councils and for their consideration in the preparation of their submissions to the Committee. A substantial volume of background documentation was provided by both local authorities in hardcopy and/or soft copy. The Committee acknowledges the support of both Councils in providing this important information.

At the same time, another Committee, under the chairmanship of Jack Keyes, had been appointed by the Minister to review the boundary between Westmeath and Roscommon at Athlone and the boundary between Louth and Meath at Drogheda. The Committees jointly decided that it was in their interest to liaise with one another for the purpose of establishing standards and procedures in common to effect the optimum administration of their respective processes. The Committees held 5 joint meetings to progress this liaison; these included meetings with public bodies who service the needs of the Local Authorities and the wider national interest – the (then) Department of the Environment, Community and Local Government (DECLG), the IDA, Enterprise Ireland, Transport Infrastructure Ireland (former NRA), and Irish Water.

The Boundary Committees also agreed to utilize a standard approach to the public consultation process across the four reviews.

1.3 Secretariat

Waterford City and County Council was requested by the DECLG to perform a secretariat function on behalf of the Committee. The secretariat role involved servicing meeting, e.g. minutes, preparation of documentation, etc., and carrying out any ad hoc research as necessary at the request of the Committee. This work was coordinated by Ivan Grimes, Director of Services for Waterford City and County, to whom the Committee is greatly indebted for his application, attention and overall professionalism.

Kilkenny County Council's Chief Executive, Colette Byrne, nominated Kevin Hanley, Senior Executive Officer, as her principal liaison person. He carried out his functions in a thoroughly professional and responsive manner.

The Committee is very grateful for the manner in which the considerable workload was discharged by both authorities.

The kind assistance of Fingal County Council facilitated the provision of an online document management system (Alfresco) for the respective Boundary Review Committees/Liaison and Support Groups. Given the volume of documentation received and generated for each review, this greatly facilitated the coordination and administration of the work of the Committees.

Administrative support in the assembly and drafting of the final report was provided by the Institute of Public Administration through the work of Angelo McNieve.

1.4 Evaluation Framework

The Waterford Boundary Committees used an Evaluation Framework, based on its Terms of Reference, which was developed jointly with its colleague Boundary Committee (see Section 1.2 above) so as to ensure a level of consistency and efficiency across all four reviews. The Framework addressed the requirements of the Committees with regard to: necessary contextual and background information; a detailed evidence base from the respective local authorities to inform the Committees' deliberations; and a method for conducting public consultations. Appendix 3 comprises the Evaluation Framework as described.

1.5 Extensions of Timeframe

The timeframe for conduct of the review has extended significantly. Initially, an extension was required in order to re-constitute the Committee. Subsequently, following the period for public consultation, it became clear that the volume of submissions received would place a significant administrative burden on the Secretariat and its IT resources. It was also evident that review and consideration of submissions by the Committee, in addition to the other consultation activities described in Chapter 2 below, would be a substantial block of work. As a result, the Committee requested a further extension to ensure appropriate consideration of all the submissions received. The Committee wish to acknowledge the support of the Department, Councils, public and stakeholders in this regard.

1.6 Acknowledgements

The Committee wishes to acknowledge the assistance received from officials of the Department of the Environment, Community and Local Government. It would also like to thank the members of the public, organisations and public representatives who made submissions to the Committee. The contributions to the consultation process from national stakeholder organisations are also appreciated.

The Committee would also like to thank the Institute of Public Administration for its support; in particular, Richard Boyle, Angelo McNeive and Mark Callanan, who provided research support for the Committee. Lastly, the Committee is grateful to

Fingal County Council. Dominic Byrne, Head of IT, and his team greatly facilitated the respective work of all four Boundary Committees by providing an online repository and ongoing support.

The Committee particularly appreciates the generosity of Tipperary County Council who, through the kind offices of its Chief Executive, Joe McGrath, provided facilities and support for half of the Committee's meetings that were held in the Nenagh offices of the Council so as to minimise travel for all members.

Chapter 2: Consultations

2.1 Overview of consultations undertaken by the Committee

The Committee has consulted extensively in order to develop a comprehensive view of existing local government arrangements and the appropriateness or otherwise of any change. In conducting the consultation process, the Committee sought the views of the general public, executives of the respective local authorities, elected members of the Councils and local Oireachtas members and relevant public bodies. This process has helped the Committee identify the objectives and challenges which its recommendations address.

The review process generated a significant level of public interest, which was reflected in the volume of submissions received, in particular from individual members of the public (the approach taken to wider public consultation is dealt with separately in Chapter 3 below – the remainder of this chapter deals with the Committee’s consultations with the local authorities concerned, Oireachtas members, and national public bodies).

With the assistance of the liaison officers in Kilkenny and Waterford Councils, the Committee conducted two site visits to the Area of Interest, prior to and following the change of Committee membership. This afforded the Committee members the opportunity to orientate themselves with the assistance of Council staff from key functions in both authorities. As a result, the Committee was well placed to define its Area of Interest and develop an initial understanding of key issues and opportunities in the area.

2.2 Consultation with the local authorities

Two meetings were held with each of the respective delegations of elected members from Waterford City and County Council and Kilkenny County Council. The second round of these meetings, in March 2016, afforded the elected members to offer a considered response to the submissions received by the Committee and to further elaborate their views. The Committee found these meetings particularly helpful in clarifying a range of issues raised and appreciates the constructive engagement of members in the process.

The Committee’s consultative efforts also included meetings with the Chief Executives and other senior executives from both local authorities. Based on their review of the background documentation and submissions received, the Committee engaged with both authorities to clarify a variety of issues and seek further information/analysis. The information received has been a valuable input the Committee’s deliberations.

In this regard the Committee wishes to acknowledge the extensive nature of the supporting documentation requested and the extent and quality of the submissions,

both written and in meetings, provided by Kilkenny and Waterford Councils. These submissions are listed and available through the link provided on the website. Due to the complex and sensitive nature of its enquiries, the Committee pursued a very thorough enquiry to enable it to reach its Recommendation. The case made by one side was allowed to be countered by the other, and the resulting depth of knowledge is evident in the detail in this Report. In addition, cases made by both sides, opposing or supporting the case for Boundary Revision, are summarised in the points listed in the succeeding Chapter 3 (“Submissions”), be they from individuals or by the principal corporate entities in each instance.

2.3 Consultation with Oireachtas members

The Committee met Oireachtas members² at their request in Leinster House on 19 January 2016. Two meetings were held:

- (a) With Oireachtas members from County Kilkenny: Bobby Aylward T.D., John McGuinness T.D., Ann Phelan T.D., John Paul Phelan T.D., and Senator Pat O’Neill
- (b) With Oireachtas members from County Waterford: John Deasy T.D. and Senator David Cullinane.

2.4 Consultation with relevant public bodies

The final component of the consultation process was to engage with relevant public bodies as national stakeholders. The Joint Committees met Transport Infrastructure Ireland, IDA, the Regional Assemblies, Irish Water, and the Planning Division of the (then) Department of Environment, Community and Local Government. These meetings assisted the Committees by providing a national strategic perspective on a number of the issues emerging from the other consultations.

² Titles as of the date of the meeting.

Chapter 3: Submissions

3.1 The “Area of Interest”

The Committee decided that, for its purposes, it should define a geographical area in order to set a geographical limit on the extent to which it would carry out its deliberations. This “Area of Interest” was defined through the identification of convenient landmarks – in this case the N25 to the north of the existing boundary, for the greater part. This helped to confine the extent of data gathering for the evidence base, to undertake analysis, to conduct the public consultation process and to evaluate alternatives for an appropriate area proximate to the existing boundary. The Area includes parts of Kilkenny and Waterford, as the southern boundary is the centre of the river Suir. At no stage did the Committee consider this delineation of an “Area of Interest” as a proposal for a new boundary.

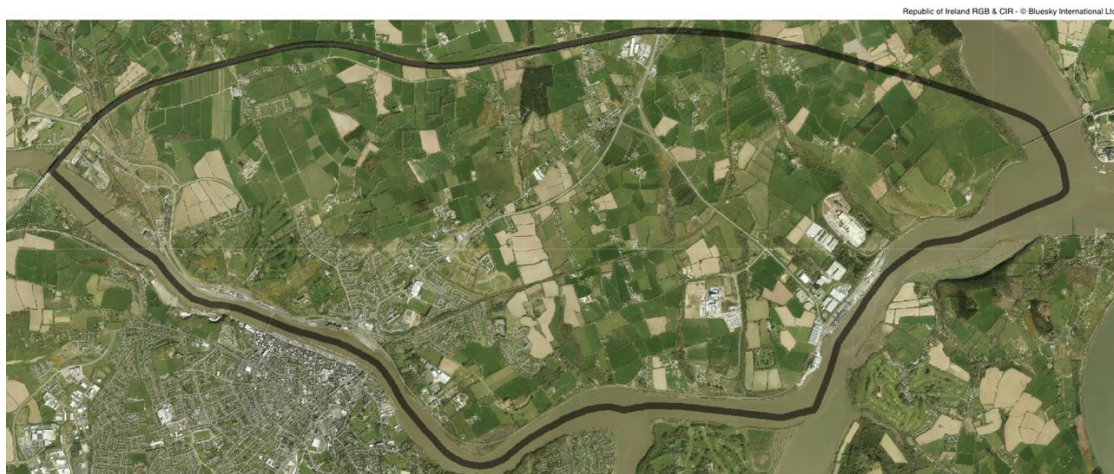
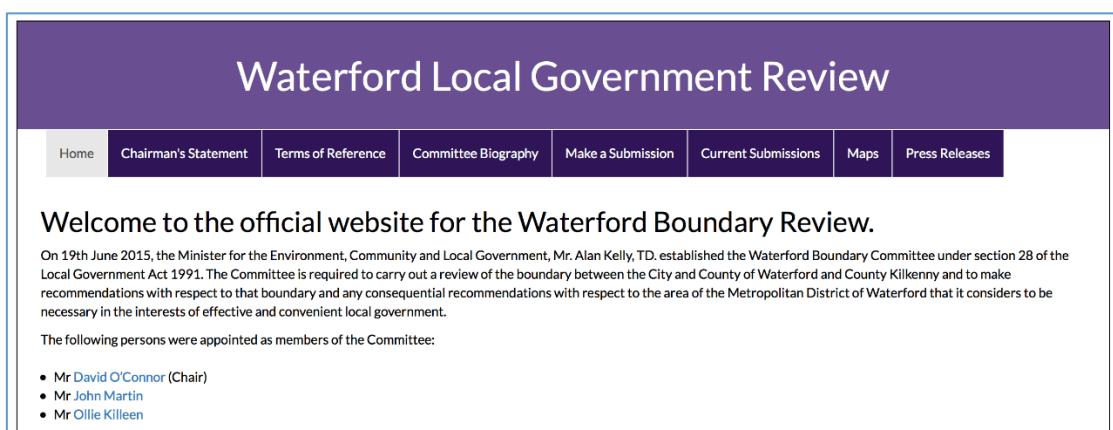


Figure 1: Waterford Boundary Review Area of Interest

3.2 Boundary Review website

A stand-alone website <http://www.waterfordboundaryreview.ie> was developed and hosted by Waterford Council who also provided secretariat support.



The website³ provides important background information, including a statement from the Chairman, the Terms of Reference, biographies of the Committee members, press releases and a map of the Area of Interest. It also gave guidance on making a submission by way of a standard set of questions derived from the Terms of Reference and offered the option to make submissions electronically if individuals and organisations so wished.

3.3 Notifications

As required by section 33(4) of the Local Government Act 1991, a formal Public Notice inviting submissions was published on 17th November 2015. It was published in the local press and online. The period for receipt of submissions closed on 15th January 2016.

3.4 Overview of Submissions

3.4.1 Numbers and Format

A total of 19,131 submissions were received by the Boundary Review Committee by the deadline of 15th January 2016. 29 submissions were in favour of a boundary extension into County Kilkenny. 6 submissions proposed that the Kilkenny County boundary be extended to the River Suir. The remaining 19,096 submissions opposed a change in the existing Boundary.

201 were received in electronic format, and 18,930 were received in hard copy.

Of the hard copy submissions, some 43 were individually drafted. Each of these individual submissions has been scanned and is available to view, in common with the electronic submissions, on the website.

³ www.waterfordboundaryreview.ie

Many of the submissions used identical or near-identical wording and format – in all there were 8 different formats used in this respect. These templated submissions are referred to in this report as ‘standard format submissions’. Each standard format submission was associated with a designated type, was published and given a standard reference A, B, C, D, E, F, G or a Newspaper template. Finally, in some cases, multiple copies of the same submission from the same individual and blank (uncompleted) forms were received. In the case of multiple copies submitted by the same individual / organisation, this was counted as one submission. In the case of blank or incomplete forms or submissions, these were not counted as part of the total number of submissions.

3.4.2 Processing and Data Protection

All submissions received, along with the name of the individual or organisation, are publically available on the Waterford Boundary Review website, which will continue to act as a public repository and record.⁴

Every submission in every category - electronic, hard copy individual submission or hard copy standard format submission according to one of the eight standard formats - was individually registered. Each submission was associated with an individual name, but with the address that is associated with an individual withheld from publication in each case - in compliance with Data Protection legislation. However, all information, including names and associated addresses submitted, is available to the Boundary Review Committee in its entirety. 1,497 submissions were received where the name of the person submitting proved illegible. Notwithstanding this, the total number of submissions include these illegible submissions. Both Waterford City & County Council and Kilkenny County Council have made submissions as requested by the Committee.⁵ These are not included in the total number of submissions.

The Committee has considered all of the submissions received in its deliberations. Particular attention was given by the Committee to the substantial submissions, counter-submissions and replies to requests for clarification from the two local authorities, as they encapsulated many of the issues raised in the other submissions.

3.4.3 Origin of Submissions

Figures 2 - 4 below illustrate the breakdown of submissions received by geographic location. The vast majority of submissions received from a Kilkenny location were opposed to a boundary change that would extend the area of Waterford City into Kilkenny. The reverse was the case with submissions received from Waterford City and County locations.

⁴ www.waterfordboundaryreview.ie/currentsubmissions.html

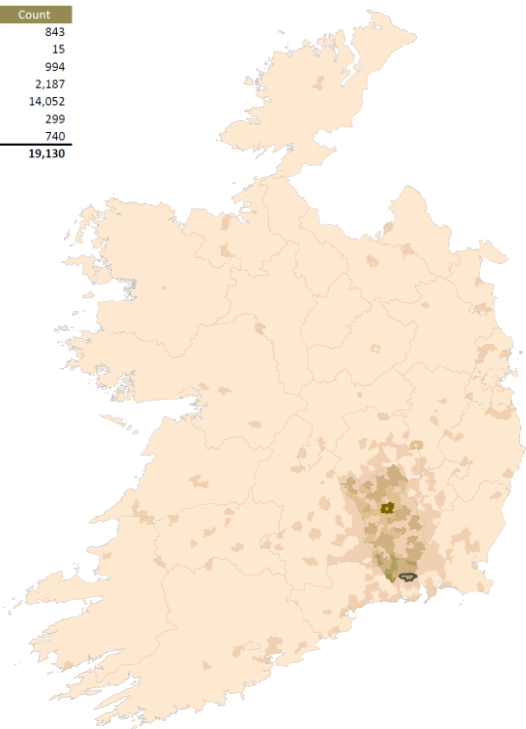
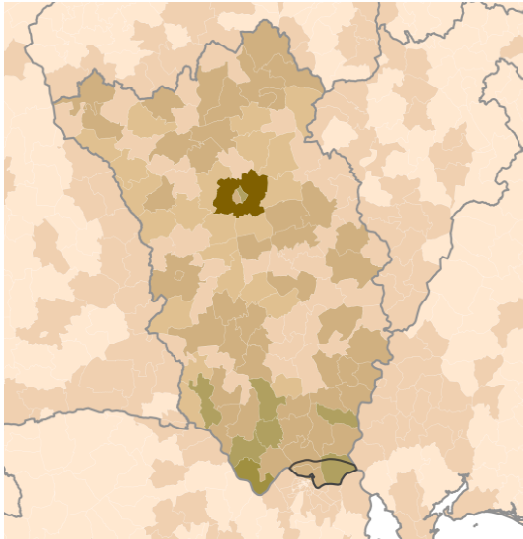
⁵ Waterford City and County Council and Kilkenny County Council submissions are available at www.waterfordboundaryreview.ie/2submissions.html.

Waterford Boundary Review Committee

Submissions

Submission Count by Electoral Division			
1,301 to 1,601	(1)	101 to 401	(46)
1,001 to 1,301	(0)	51 to 100	(23)
701 to 1,001	(1)	1 to 51	(298)
401 to 701	(7)	0	(3033)

Location	Count
No Location	843
Outside Ireland	15
Area of Interest	994
Kilkenny City + Environs	2,187
Kilkenny Rural	14,052
Waterford	299
Other Counties	740
Total	19,130



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Figure 2: Submission Count by Electoral Division and Location Nationally

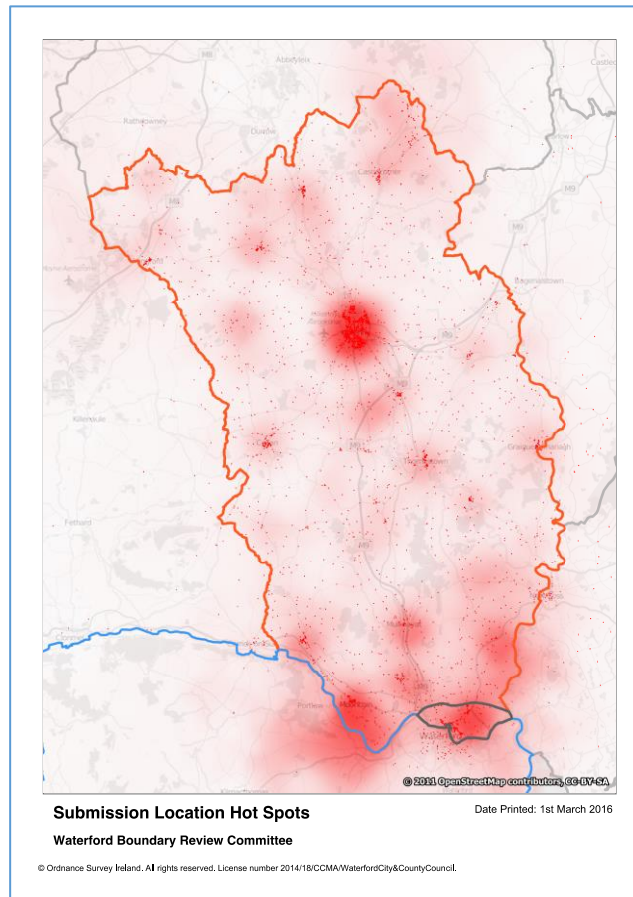


Figure 3: “Heat Map” of Submission by Location

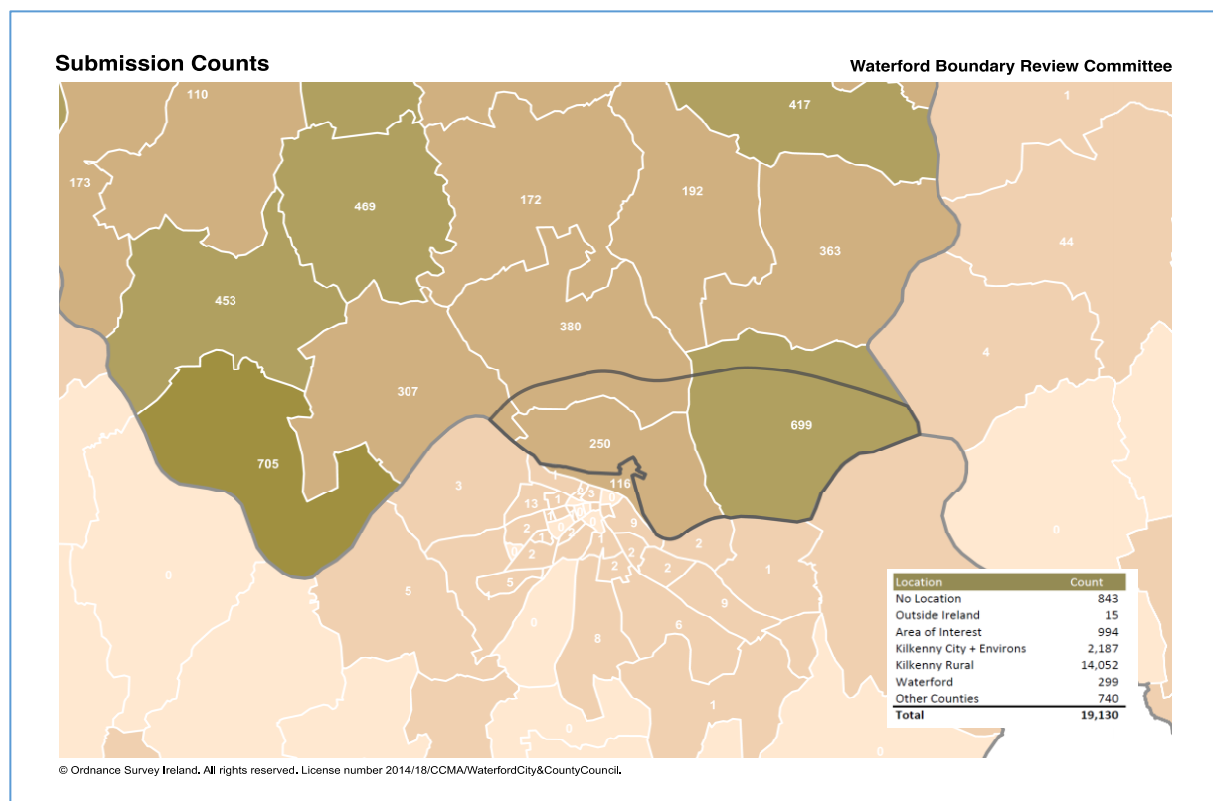


Figure 4: Detail of Submission Count by Electoral Division

3.5 Summary of Main Issues Raised

The following summarises these third-party submissions and the main points made in favour or opposed to boundary change. The submissions in full can be viewed at www.waterfordboundaryreview.ie.

3.5.1 Issues raised by respondents opposed to boundary change

The 8 types of standard format accounted for 18,887 of the 19,131 submissions. They therefore reflect both the majority of submissions and the most prominent issues or concerns raised by those opposed to any change in the current boundary. At the same time, there was a high degree of consensus with regard to the issues raised across the form types.

In summary, the main points made were:

- The sense of identity and belonging to County Kilkenny which would be lost in the event of a boundary extension.
- There are clear examples of co-operation between the two Councils and this should form the model for the future.
- A boundary extension would have significant negative financial implications for County Kilkenny due to loss of revenue from, for example, commercial rates and Local Property Tax.
- The movement of population would undermine existing Municipal District boundaries.
- Coordination and co-operation across the South East can be progressed through the Regional Assembly while still respecting existing boundaries and sense of identity.
- Changing the boundary would have a divisive effect on relations between the two counties.
- Kilkenny County Council has made significant investment within the Area of Interest in recent years which benefits the region as a whole. It would now lose out on a return on its investment as a result of boundary change. The investment made in Belview area was cited as an example.
- Boundary change could impact parish/Diocesan boundaries and the viability of sporting clubs in the area.
- The loss to County Kilkenny of planned population growth in the Area of Interest would have a negative impact on the revenue base to fund services and infrastructure in South Kilkenny.
- That Kilkenny County Council is fully competent to provide efficiently all the necessary services in the area.

- An enhanced co-operative approach between the two Councils for the benefit of Kilkenny, Waterford and the South East could serve as an alternative to boundary change.

Similar issues were highlighted in the remaining submissions. In particular, respondents expressed concern that a boundary extension would damage or hinder the identity of community, parish, county, and province. This would have a negative impact on cultural and sporting organisations. There was a level of satisfaction with current arrangements and the levels of service provided by Kilkenny County Council. There was a desire to continue co-operation between the Councils and serious concerns regarding the financial implications for Kilkenny County Council of any change. Respondents questioned whether there would be any positive economic benefit or improvement in service delivery. Some argued that a boundary change was an excuse for Waterford City and County Council to increase its revenue base. A number of submissions expressed concern that a boundary change would have a negative impact on businesses in the area and that commercial rates would be higher in Waterford. One submission suggested that the Boundary Review process is in breach of the Aarhus Convention and should be ceased.

A number of detailed submissions were received that, in addition to many of the points summarized above, raised a number of other issues. These included a perception that there is a lack of public support within Waterford for a boundary change, which brought the rationale for the review process into question. The co-operation between Waterford and Kilkenny in developing the 2004 Planning and Land Use Transportation Strategy (PLUTS) was cited, as was the need to develop a new PLUTS for the period beyond 2020. Existing boundary arrangements, it was argued, are not seen nationally as hindering economic development. The contrasting financial positions of both local authorities were also highlighted. The importance of Ferrybank as a location of educational activities in the southern part of County Kilkenny was highlighted amid concern that any change would undermine existing partnerships and collaboration across a broad range of local groups. A concern was raised that the current lack of a cohesive regional approach to economic and community development would be exacerbated by a change to the boundary. It was argued that a regional perspective [rather than a boundary change] is required to drive development of Waterford City and the region as a whole.

3.5.2 Issues raised by respondents in favour of boundary change

Among the submissions in favour of a change to the existing boundary, a number of issues were frequently raised by respondents. In summary, their main points were:

- Kilkenny County Council has never invested properly in the area.
- A Boundary Extension would lead to improved planning in the Area/ there have been poor planning decisions in the past.
- The residents would benefit from the closer proximity to the service provider.

- The community in the Area of Interest are marginalised from the rest of the county and are politically remote.
- A Boundary Extension would improve the quality of service, ensure increased efficiency and greater value for money.
- The issue of GAA identity should not be allowed to become an issue in decision making on local authority boundaries.
- There are very close links between Waterford City and the area with many residents originally from the City and many working or studying in the City.

A range of other, less frequent, points were made. For example, it was suggested that the development of Waterford is unbalanced and a boundary extension would help to address this issue. Also, a strong Waterford City is essential for the region as a whole and to attract investment. One submission suggested that the merger of the City and County in Waterford was a mistake and that an extension of the boundary with Kilkenny made more sense. A further submission, in support of an extension, acknowledged that it could be divisive.

A number of detailed submissions were received that, in addition to many of the points summarized above, raised a number of other issues. It was argued that economic performance in the area and wider region would benefit from a unified planning and development system for Waterford and its environs under one local authority. It was also suggested that a unified Waterford Metropolitan District spanning the River Suir would better address planning needs in the Area of Interest, whereas Kilkenny development planning stresses the primacy of Kilkenny City. Democratic representation would be enhanced by closer access to representation and services.

The appropriateness of planning policy in the Area by Kilkenny County Council was questioned. Specifically, it was argued that the development of a shopping centre at Ferrybank is not viable and not of an appropriate scale for the needs of the area. This represented a lost opportunity to redevelop the North Quays, which would have enhanced the status of Waterford as a Gateway City. It thus demonstrates that inter-county co-operation on planning is fictional in the respondent's view. The ongoing lack of a Joint Retail Strategy is further evidence in this regard. The development at Ferrybank was in contradiction to, and indeed undermined, a consistent policy by Waterford City Council to oppose the development of large out-of-town shopping centres.

It was suggested that Waterford City and Council's Local Economic Office is better placed to meet the needs of the Area where there is a very low awareness of services and supports available. When it comes to services in the Area, very few people are fully aware which local authority is responsible. There is a perception that many Ferrybank residents feel that they are in effect second class citizens in terms of how Kilkenny County Council responds to them. Since 2015, access to a range of training and social services is now through Kilkenny, 40 miles away, rather than Waterford

which has led to confusion and undermined take-up of these services from residents in the Area.

Chapter 4 Setting the context

4.1 Relevant contextual issues arising from the historical development of Waterford City

Waterford, Ireland's oldest city, and founded by the Vikings in the 9th century, has a long history as a strategic settlement due to its location as the optimum natural riverbank settlement location at the confluence of the Suir, Nore and Barrow on the south-east coast. Its proximity to Wales lent it particular strategic significance when the interest of the Normans in the city was fostered by alliances with local clan leaders in the 12th century.

The width and strength of current of the river Suir at this location, along with local topography, proved a significant factor in the development of what was to become the city exclusively on the south bank. Fortifications and the pattern of land plot subdivision all testify to the overwhelming focus of centuries of development on the south bank. There was a distinct pattern of development on the northern bank: mid-19th century industrial development centred on the railways was the dominant influence, a fact clearly in evidence today. This was followed by more modern port development in the early 20th century that took advantage of the deeper draught of steel-hulled vessels.

While the south-bank city centre continues to exhibit all the natural evolution of Irish cities through the centuries, no such evidence exists on the north bank. The river at this location was not effectively bridged until 1793 – a river ferry having sufficed for the purposes of linking to the north shore for centuries previously—and it was not until 1910 that a bridge with traffic capacity that would ease commerce between opposite banks was provided. Indeed, the success of this link, and the limitations on its capacity to carry regional traffic as economic development progressed, arguably put a limit to the capacity for the city to expand northwards. However, with the provision of the significant motorway infrastructure that allowed the river to be crossed upstream, thus removing regional traffic from the need to travel through the city, the practical proposition of strengthening the north bank-south bank links is far more feasible.

While Waterford city's dominant presence is river-oriented, that dominance masks the real core of city evolution as a fortified walled city on a hill whose street pattern is replete with "slips" or narrow streets and passages oriented towards the river. The city shares these characteristics with many early Viking settlements that evolved into Norman towns. An argument based in the evolution of a city that somehow failed to develop half of its capacity is flawed, as it simply ignores both local topography and the practical evolution of Waterford city through the centuries.

Notwithstanding these historical reasons for different patterns of development, there is now a strong argument to connect the city to the later-developing northern bank of

the river Suir. It is abundantly clear that northern bank evolved primarily to meet the practical needs of industry and commerce, including the location of Waterford rail station at some distance for foot passengers from the city it was to serve. The location of the bridge crossing effectively prevented locating the station more proximate, or opposite, the city as the rail line would then have effectively severed the route from the bridge that serves the northern bank of the river.

Taking the historic development of Waterford city into account, it can be seen that the natural location for the original county boundary with Kilkenny would be centred on the river. Such boundaries are commonly, and most conveniently, centred on natural features such as rivers. As the evolution of the city described above illustrates, a river boundary can reinforce the analysis of the city as being unequally developed between the north and south banks of the Suir. Historically, Waterford city did not effectively exist on the north bank of the Suir until the early 19th century.

Development that occurred during the 19th century made the northern bank relevant to city development. It was in this context that boundary revisions can be seen to have evolved to give the city more influence and control over this developing area. However, while local authorities carried out their functions in the area, the real control was held by the owners of the lands on the riverbank. The overriding concern of those owners, including private or Harbour Authority owners, could be characterised as heavy industrial/commercial uses. Though these uses doubtless had employment value, they were less immediately relevant to more normal city-associated land uses. The uses to which the northern bank was put connected them less to the everyday life of the city by comparison with other cities “straddling” rivers.

It is doubtless the case that Waterford would be strengthened, for its own benefit economically and for the region as a whole, if development on both riverbanks were to emerge that more effectively connected each area to the other. The challenge in delivering this kind of evolution is to ensure that city-associated uses – high value employment, neighbourhood and commercial critical mass, residential, cultural uses – in a high-quality urban environment with a strong identity of its own are significantly prioritised for the location.

4.2 Brief description of the Area of Interest and its setting within both Waterford City and County Kilkenny

The Area of Interest covers an area of about 2,830 ha and has a population of about 6,500. It is bounded by the river Suir from near the M9 / N25 junction to just north of the confluence with the river Barrow, to the north by the N25 Waterford bypass and by a line extending westwards from the N25 /N29 junction to the river Barrow.

The Area of Interest is comprised of a number of constituent sub-areas:

- a) The existing built-up area of Ferrybank / Abbeylands, part of which is within the administrative area of Waterford Council and the remainder in County

- Kilkenny. This area also includes a former industrial zone on the North Quays within Waterford City (see section 4.4.5 below);
- b) Belview Port and its associated industrial zone, about 5 km downstream from Waterford city (see section 4.4.4 below);
 - c) The village of Slieverue, located to the south-west of the N25 / N29 junction (see section 5.3.4 below); and
 - d) Large tracts of mainly agricultural land, albeit with some ribbon development.

Sub-areas (b) to (d) are located within County Kilkenny.

The suburban area around Ferrybank has developed rapidly in the last decade. It is served by a District Centre, which houses a library with almost 2,000 members, a local office operated by Kilkenny County Council, and a 8,900 sq m shopping centre that remains unopened. There are several schools in the area. Waterford golf club is located just west of the suburban area. Waterford Council owns about 220 houses within the administrative area of Kilkenny County Council.

Waterford Port relocated to Belview in the early 1990s and is accessed by the N29 link road from the M9 and N25. There is a substantial industrial zone beside the port. Some of this has been developed (notably the recent Glanbia plant), but there is also a significant reserve of undeveloped zoned lands, included some owned by the IDA.

The small village of Slieverue, with its mainly 1930s terraced housing is located several kilometres to the north-east of the built-up area around Ferrybank and is separated from it by mainly agricultural lands.

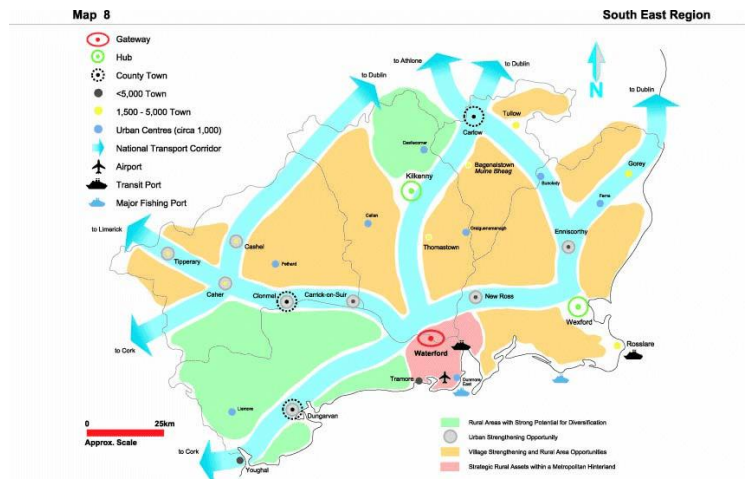
4.3 Status of the Waterford Gateway

4.3.1 The National Spatial Strategy 2002:

The concept of 'Gateway' covers an area greater than the built-up area administered by Waterford City and County Council (WCCC). The influence of the Gateway extends not only into the Ferrybank area administered by Kilkenny County Council (KCC), but also into the wider sub-region which looks to Waterford for employment and services such as city centre shops, the regional hospital and the Institute of Technology.

The National Development Plan 2000-2006 specified balanced regional development as a core objective and identified Cork, Dublin, Galway, Limerick-Shannon and Waterford as 'Gateways' – locations where public and private investment would be prioritised in order to drive the development of their wider regions. The National Spatial Strategy for Ireland (NSS) 2002 was a 20-year planning framework designed to achieve a better balance of social, economic, physical development and population growth between regions. The research undertaken for the NSS confirmed that Ireland's existing and emerging city-regions were critical sources of economic dynamism within the national economy which should be nurtured and built upon for the benefit of all. The NSS defined the role of Gateways as:

Balanced national growth and development are secured with the support of a small number of nationally significant centres, whose location and scale support the achievement of the type of critical mass necessary to sustain strong levels of job growth in the regions.⁶



In the South-East, the NSS identified substantial potential for the enhancement of critical mass through the further expansion of the designated gateway of Waterford, including the port at Belview, and the potential, over the life of the NSS, to further strengthen the position of Waterford in support of its role as a strong driver of regional development. Thus, the population of Waterford and its catchment area was envisaged as increasing from 119,000 in 2002 to between 138,000 and 164,000 by 2020, depending on rates of economic growth in the interim. Kilkenny and Wexford were designated in the NSS as supporting 'Hubs' within the South-East region, as shown on map 8 from the NSS.

NSS policy has been transposed into lower tier spatial plans by means of the regional planning guidelines and city / county development plans. The current Waterford City development plan emphasises the city's national and regional roles. The Kilkenny county development plan 2014, while promoting Kilkenny's role as a NSS Hub, is also supportive of Waterford's role as a Gateway.

4.3.2 Waterford's performance as a Gateway

The population of Waterford city and environs (which includes part of County Kilkenny) increased by 10.2% between 2002 and 2011, from 46,736 to 51,519. This may be compared to an increase of 17.1% in the population of the State over the same period, or 16% in Galway.

⁶ Government of Ireland, *National Spatial Strategy for Ireland 2002-2020: People, Places and Potential* (2002), p. 39. In addition to the five cities (including Waterford) designated as Gateways in the 2000 NDP, the NSS identified four new national level gateways - Dundalk, Sligo, and the "linked" Gateways of Letterkenny/(Derry), and Athlone/Tullamore/Mullingar.

It has long been acknowledged that Waterford as a Gateway and the South-East as a region have been underperforming. In 2006, the Department of the Environment, Community and Local Government's *'Implementing the National Spatial Strategy; Gateway Investment Priorities Study'* noted the following:

The presence of a number of other relatively large urban centres situated close to Waterford (such as Kilkenny, Clonmel and Wexford), coupled with the fact that Waterford City itself straddles local authority boundaries, presents challenges for the co-ordination of development in this Gateway and its role as the driver of development in the South-east Region.⁷

However, it is acknowledged that the NSS was prepared and adopted at a time when the Irish economy was performing strongly prior to the post-2007 'crash'. A subsequent 2013 review of progress in the Waterford Gateway⁸ found that:

- The deferral of the Gateway Innovation Fund in 2008 removed a vital funding mechanism specifically intended to enable the delivery of necessary flagship infrastructure and to aid in the realisation of goals and objectives within the individual Gateways. This impacted upon the realisation of the goals of the Waterford Gateway in a number of ways, with the most notable of these concerning the ongoing regeneration and urban renewal projects within the urban core; and
- There was a decline in the amount of economic activity occurring within the Waterford Gateway between 2006 and 2011. The unemployment figure for Waterford was the third highest of any of the designated Gateways, with only Letterkenny and Dundalk experiencing higher unemployment figures.

4.3.3 'Putting People First'

Waterford's status as regional Gateway was also addressed in the DECLG *'Putting People First'* (2012) in the context of local government arrangements for the city and county:

The [Waterford Local Government] Committee concluded that one local authority is the most clearly beneficial option for Waterford, as part of a wider and more dynamic response to the challenges currently facing the region, including sub-optimal institutional arrangements, below average growth in city population and high regional unemployment. [Their] report identifies a number of benefits associated with merger and outlines the Committee's vision for a new Waterford under strong local leadership, with a regenerated City as an intellectual and business engine of the region, attracting visitors and investors on

⁷ Department of the Environment, Heritage and Local Government and Forfás, *Implementing the National Spatial Strategy* (2006, p. 63)

⁸ Border, Midland and Western Regional Assembly and Southern and Eastern Regional Assembly, *Gateways and Hubs Development Index 2012: A Review of Socio-Economic Performance - Waterford Gateway Report* (2013).

a scale not previously envisaged. Specific advantages identified by the Committee with the merger include:

- *More cohesive economic and social development and a single point of entry for businesses wishing to locate or continue to do business in Waterford;*
- *A single authority to provide a voice for 114,000 people [in the city and county] and hence scale and critical mass to enhance Waterford and enable it to compete more effectively regionally, nationally and globally ...*⁹

4.3.4 Looking to the future

In December 2015 the DECLG published 'A Road Map for the delivery of the National Planning Framework 2016'.¹⁰ The National Planning Framework (NPF), the successor to the NSS, will be the long-term, 20-year strategy for the spatial development of Ireland, and as such will influence regional strategies and city / county development plans. In addition, new Regional Spatial and Economic Strategies are to be prepared by the three new Regional Assemblies, established in January 2015. Waterford is within the new Southern Region, and also within a constituent 'Strategic Planning Region' corresponding to the former South-East region (Cos. Waterford, Kilkenny, Wexford and Carlow).

The NPF will develop forecasts for economic output, employment, demography and key property development requirements for the 12-year period following 2016 in respect of:

- Ireland;
- The three regional assemblies including their constituent Strategic Planning Areas (see map, below); and
- Metropolitan areas.

Revised population forecasts, based on the returns from Census 2016, will inform the preparation of the new Regional Economic and Spatial Strategies by the regional assemblies, but could also provide a key input to an updating of the Waterford Planning, Land Use and Transportation Study (PLUTS).

⁹ Department of the Environment, Community and Local Government, *Putting People First - Action Programme for Effective Local Government* (2012, p. 83)

¹⁰ Department of the Environment, Community and Local Government, *Towards a National Planning Framework: A Roadmap for the delivery of the National Planning Framework 2016* (2015)



4.4 Strategic planning policies

4.4.1 The 2004 Planning, Land Use and Transportation Study (PLUTS)

The NSS noted that co-ordinated land use and transport planning strategies had been adopted in Dublin and Cork and were being developed in Limerick, Waterford and Galway: ‘The implementation of such strategies, particularly in terms of public transport investment, will represent a key step towards enhancement of critical mass and unlocking the potential of these cities and their surrounding areas of influence.’¹¹ Thus, in relation to what needed to be done next, the NSS called for:

Action by all relevant stakeholders to work in partnership and with enthusiasm to achieve an enhanced role for gateways, hubs and their broader regions. The focus for immediate action must lie in establishing consensus on integrated spatial frameworks for land use, planning, urban design, transport and public service delivery. Such frameworks should allocate specific roles to existing agencies for delivering the aspects of the framework for which they are responsible. Local authorities have primary responsibility for driving the preparation of these frameworks and translating their provisions into statutory development plans that will guide the development process through the planning system.

The strategies should focus on the practical realisation of the gateway or hub. In some cases, more than one local authority may be involved. However, provision has been made in the Planning and Development Act 2000 and in

¹¹ Government of Ireland, *National Spatial Strategy [NSS] for Ireland 2002-2020: People, Places and Potential* (2002, p. 70).

*the Local Government Act 2001 for the preparation of joint plans and the use of joint committees between adjacent local authorities to address cross boundary issues, including transportation issues.*¹²

The Waterford Planning Land Use and Transportation Study (PLUTS) was commissioned by Waterford City Council in February 2001 in order to provide a vision and strategy for the development of Waterford City and Environs (including the Area of Interest) up to the year 2020. It was adopted in 2004 by the then Waterford City Council, the then Waterford County Council, and by Kilkenny County Council. The Study was primarily focused on Waterford City and its immediate environs in Counties Waterford and Kilkenny. It envisaged that the population of the City and environs would increase from 51,517 in 2002 to 81,519 (+ 57%) by 2020; about 12,000 (40%) of the increased population was to be accommodated north of the river. The PLUTS population projections were subsequently reflected in the South-East regional planning guidelines (RPGs), the Waterford City and Kilkenny County development plans, and the local area plan for Ferrybank / Belview.

4.4.2 Implementation of PLUTS

The following was proposed in the PLUTS with regard to implementation:

*The local authorities in Waterford City Council, Kilkenny County Council and Waterford County Council will agree on how best to co-operate and co-ordinate on implementation issues and to agree on appropriate joint monitoring and review structures. The overall implementation process will be designed to achieve the objectives set out above in the areas of: authority/agency commitment to the plan; providing staff, technical and financial resources for rapid implementation; and ongoing management, co-ordination and review. It is proposed that a dedicated in-house team should be set up comprising staff of all the local authorities involved for implementing and monitoring the PLUTS. This office could be staffed full-time by local authority officers and by staff from other agencies as and when required.*¹³

Appendix 5 of the Kilkenny County Council (KCC) submission to the Committee includes correspondence with the then Waterford City Council in 2004-5 regarding establishment of joint monitoring and review structures. According to page 37 of the KCC submission,

“An Implementation Committee was subsequently established which met on three occasions with the most recent meeting in 2008. A further request by KCC seeking the re-establishment of the Implementation Committee and co-operation on a joint retail strategy was sent in August 2011 during the preparation of the Waterford City Development Plan. No response was received.”

¹² NSS, p. 123.

¹³ Waterford City Council, Waterford County Council and Kilkenny County Council, *Waterford Planning Land Use and Transportation Strategy (PLUTS) 2004-2020* (2004, pp. 67-68)

While the broad PLUTS strategy has been reflected in the development plans of Waterford City and Kilkenny County, changed circumstances since 2004, including significantly lower population projections (see below), have overtaken the PLUTS, and effective implementation would require not only effective implementation mechanisms but an updated strategy.

4.4.3 Retailing planning policy in Waterford

Joint retail strategy:

The DECLG Retail Planning Guidelines 2012 emphasised the need to secure plan-led retail development:

Furthermore, a plan-led approach will also be underpinned and delivered through the co-operation by planning authorities in the preparation of joint or multi-authority retail strategies for certain areas. Consequently, these Guidelines require the preparation of strategies, by relevant planning authorities, for the gateway cities and towns identified in Chapter 3 (namely Dublin, Cork, Galway, Waterford, Limerick/Shannon and the Midlands).¹⁴

The joint strategy for Waterford is to be prepared by Waterford City and County Council (WCCC), and Wexford, Kilkenny, and Tipperary County Councils. The Guidelines also stated that to give these strategies statutory backing, the policies and objectives of the strategy should be adopted into the development plan and local area plan as appropriate or adopted as a variation to a development plan. The joint or multi-authority retail strategies for urban areas identified in the guidelines must be prepared or reviewed as appropriate to inform the relevant development plan review process. It is not clear what progress, if any, has been made by the relevant local authorities in preparing the joint retail strategy for Waterford.

Waterford Council's submission has queried the scale of Ferrybank shopping centre and its designation by KCC within the retail hierarchy.

Scale and designation of Ferrybank shopping centre:

According to the KCC submission, Ferrybank shopping centre was completed circa 2009; it has a permitted convenience floorspace of 4,577 sq m and comparison floorspace of 4,341 sq m. It has remained unopened since then. As such, it has not posed an actual competitive threat to the retail attractiveness of Waterford city centre. Nonetheless, WCCC's submission complained that KCC's Ferrybank/Belview Local Area Plan 2009 "sought to rationalize the development of the shopping centre by introducing a designation of retail development which does not exist in the Retail Planning Guidelines while at the same appearing to justify the development on the grounds of leakage of potential retail expenditure from the plan area". The reference to designation is in an amendment to the Ferrybank-Belview local area plan in 2012 which provided that:

¹⁴ Department of the Environment, Community and Local Government, *Guidelines for Planning Authorities: Retail Planning* (2012, p. 14 – emphasis in original).

The Ferrybank-Abbeylands shopping centre is to be designated as a 'Gateway Suburban Centre' above the level of the existing District Centre contained in the Retail Planning Guidelines but below the level of town centre. This will allow for the reconfiguration / expansion of the existing centre of additional level 2 type comparison shopping.

While the shopping centre predated the DECLG's 2012 Retail Planning Guidelines, it can be said that the permitted convenience floorspace appears large not only in relation to the 3,500 sq m convenience floorspace cap¹⁵ introduced under those Guidelines for cities such as Waterford, but also in relation to its potential catchment area. The population of Ferrybank in 2011 was 4,787, and it is projected to rise to 6,500 by 2022 under the relevant regional planning guidelines. The 2012 Retail Planning Guidelines indicated that a District Centre should serve a catchment population of about 10,000.

The current KCC development plan 2014 now designates Ferrybank as a District Centre, rather than as a 'Gateway Suburban Centre' above the level of a District Centre. However, the dispute between the Waterford and Kilkenny Councils highlights the absence of an agreed retail planning strategy for Waterford and its environs.

4.4.4 Belview Port

National Ports Policy:

The Department of Transport's National Ports Policy 2013 identifies the Port of Waterford as a Tier 2 National Port, and as the fourth largest of the State commercial port companies in terms of total tonnage handled. The Policy noted that:

*There has been a significant fall-off in trade in the Port of Waterford over the past decade. This is particularly severe in the case of Waterford's share of the LoLo market, which has fallen from almost 20% in 2001 to 8% in 2011 ... While the declines in recent years have been exacerbated by the economic conditions, the port has also suffered due to the impact of the underlying trends in maritime transport, which has resulted in a consolidation of routes and services, particularly in the LoLo sector. In responding to these issues, the Port of Waterford engaged consultants to conduct a strategic review of operations and make recommendations as to its future operation and development. The outcome of this review and on-going work within Government will inform future policy developments in relation to the Port of Waterford.'*¹⁶

The following points from the National Ports Policy are also of relevance to Belview:

¹⁵ These floorspace caps apply to new retail stores or extensions to existing stores which will result in an aggregate increase in the net retail floorspace of the convenience element of such retail stores.

¹⁶ Department of Transport, Tourism and Sport, *National Ports Policy* (2013, p. 28)

- *Port master-planning is in line with international best practice generally and it is consistent with policy to improve integrated planning for all modes of transport. National Ports Policy recognises strongly the desirability of this process for the long-term planning of all Ports of National Significance (Tier 1 and 2). Dublin, Cork, Shannon Foynes and Rosslare have each completed or are in the process of completing masterplans.*
- *The relationship between a port and its city is constantly changing. The location of most major port facilities has shifted downstream over time, allowing redevelopment of previously port-related lands for other commercial, residential or recreational uses. However, redevelopment proposals must take account of the need for sufficient replacement port capacity within the region. Any development proposal requires careful consideration by all relevant stakeholders, in particular the planning authorities, local communities, port authorities and port users.¹⁷*

Across the European Union, there is widespread recognition of the benefits to be gained from reintegration of a port's relationship with its city and community. In many port cities a growing spatial separation between ports and their communities has arisen in recent decades due to a multitude of factors, including the need for increased port security and the relocation of port facilities away from city centres. While the important role of ports in facilitating economic activity is frequently overlooked, their social role in shaping a city's development and indeed its history is often completely overshadowed by the seemingly conflicting demands of a port's development and the development of the city.

In Ireland the benefits to be gained from reintegration and rejuvenation of this relationship between port and city have been demonstrated with the success of events such as the Volvo Ocean Race in Galway, the Tall Ships events held in recent years in both Dublin and Waterford, and the increasing number of cruise vessel visits, with the associated knock-on beneficial economic effects in local areas. The National Ports Policy encourages ports and local authorities to collaborate on issues of mutual benefit and work together to maximise the potential afforded by their natural, as well as man-made, environment.

Kilkenny County Council Policy:

Kilkenny County Council (KCC) prioritised Belview as a key strategic development area since the County Development Plan of 1994; the Council's Ferrybank-Belview Local Area Plan 2009 includes the port and the surrounding employment zone.

Table 7.2 in KCC's submission states that the Area of Interest currently has 190 hectares zoned for employment uses, as follows:

Specialist industrial activity	53 ha.
Pharmaceutical industry / technology	25 ha.
Development of port-related facilities and industry	111 ha.

¹⁷ Department of Transport, Tourism and Sport, *National Ports Policy* (2013, p. 45-46)

The Local Area Plan also seeks to protect existing residences in the Belview area by creating a residential amenity buffer zone, although no net increase in residential development (other than for immediate family members of existing landowners) would be permitted so as not to compromise expansion of the port and ancillary development.

Belview has also been prioritised in KCC's Economic Strategy 2010 and the Local Economic and Community Plan 2016-2021. The Council's submission points out that infrastructural upgrades have been carried out, facilitated and supported by KCC and have been recognised as key factors in attracting industry into Belview. These include:

- Waste Water Treatment Plant and sewerage scheme in partnership with IDA and Waterford City Council. KCC provided the land bank and a capital contribution.
- Belview Strategic Water Supply Scheme – delivered in partnership with IDA – cost €23m.

4.4.5 The North Quays Strategic Development Zone

The North Quays comprise of 7 hectares of brownfield port lands close to the commercial centre of Waterford City lying across the river to the south. The quays stretch from Rice Bridge 2 km eastward to Abbey Church. They are an assembly of wharves consisting of disused open spaces, industrial buildings and storage sheds which serve as a reminder of the city's industrial and maritime past. Unlike the historic south quays, the North Quays are a 20th century development, now derelict following the relocation in the 1990's of the port of Waterford to Belview 6 km downstream. The area has no currently occupied buildings in use, and the existing silo buildings are being demolished (with the exception of a seven-storey building which has historical significance as one of the first in-situ reinforced framed concrete buildings in the country).

Waterford Council's vision for the area is to create a sustainable modern quarter connected to and consolidating the city centre while facilitating the development of the northern city environs. The development of the North Quays will reinstate the primacy of the river by creating a compact city core centred on the River Suir.

The North Quays have been designated by Government as a Strategic Development Zone (SDZ). The redevelopment of the North Quays is considered essential to Waterford's future economic prosperity and represents an extension to the core city centre. As effectively a city centre site, the Zone will facilitate a mix of uses consistent with an urban centre of this scale. The implementation of an appropriate transport infrastructure will be incorporated into the SDZ planning scheme. The planning scheme is likely to include:

- Relocation of railway station
- Pedestrian bridge
- Third and fourth generation office development
- Recreation and Amenity - particularly in the development of the waterfront

- Hospitality - Waterford suffers from a lack of high-quality accommodation and the zone has the potential to address this deficiency
- Culture and Community
- Other uses to be developed in the longer term which may include high-quality apartments and educational facilities.

4.5 Previous boundary adjustments and proposed boundary extensions

Following the construction of the first wooden bridge in the 1790s, the boundary of Waterford city moved in 1840 from the river-centre to include lands north of the river. This boundary was delineated not by land holdings, townland boundaries or other topographical means but by line of sight from the railway station northern boundary in a west-east straight line to the steeple of the Ferrybank Roman Catholic church and then in a south south-easterly direction to the river centre again, at a riverbank location named Cromwell's Rock in the townland of Christendom. A 1890 boundary definition defined the greater city, including the Ferrybank area, previously incorporated in 1840. In 1980 an overall boundary redefinition was made of Waterford City, incorporating its then existing suburbs. This redefinition incorporated a minor extension to city boundaries in 1955 that included Waterford City public housing immediately north of Ferrybank Roman Catholic Church.

In recent decades there have been several proposed boundary extensions, prior to the current proposal. These were not adopted or seen to completion:

- In 1979 Waterford Corporation requested boundary extensions into both County Kilkenny (1,564 ha) and County Waterford (2,394 ha). Kilkenny County Council objected, and the proposed extension into County Kilkenny was not granted.
- In 1992 Waterford Corporation proposed a boundary extension north of the river Suir, but did not formally pursue the petition.
- In 2005 Waterford City Council applied for an extension of the boundary into County Kilkenny. County Kilkenny formally objected, and the City Council did not proceed with the application.

It is the view of the Committee that such proposals may well have had an adverse impact on the relationship between elected members in the two local authorities. For example, the 2005 application was made only a year after the two authorities had formally adopted the Waterford Planning and Land Use Study (see section 4.4.1 above), and it may have detracted from successful implementation of the PLUTS.

Chapter 5 Consideration of options

5.1 International comparative analysis

The Committee as part of its work also sought to investigate international experiences with boundary changes and inter-local authority working as a means of informing its work – indeed a number of the submissions made to the Committee (including the submission from Kilkenny County Council) referred to international examples of joint working between adjoining local authorities.

While it is of course instructive to look at international examples for ideas that could potentially be replicated in Ireland, it is also necessary to acknowledge the different range of powers, responsibilities and roles assigned to local authorities across different countries, and sometimes even within countries. Local authorities vary in their range of functions, their population size, their decision-making structures, their revenue raising powers, and so on. Amongst these can be included:

- Differences in functional responsibilities and the suite of services provided by local government – arrangements in other jurisdictions may relate to the choice of service delivery models that may be relevant to the provision of services provided by local government in that country. Depending on the country in question, this can include public services that are not delivered by local authorities in Ireland, including primary and secondary education, childcare, public transport, primary healthcare, social services, or (in the case of North America) policing.
- Differences in the size of local government units – arrangements in other jurisdictions may relate to the size of local government units in that country (typically measured in terms of population size). For example, local authorities (often referred to as municipalities) in continental Europe and North America on average are considerably smaller than the 31 county and city councils in Ireland, and some decisions around service delivery models may relate to the relatively smaller size of local government units.
- Differences in local government financing – local government systems vary in terms of the extent to which local authorities have financial discretion in raising revenue and the extent of central government controls over local government expenditure. This can relate to differences in the balance between local sources of revenue and central funding, as well as the balance between central discretionary grants and central specific grants, and the buoyancy of local sources of revenue.

In addition to these fundamental differences between systems of local government, there are also differences between jurisdictions in the nature of boundary change. For example, in the United States the most common form of boundary change comes from instances where a municipality expands its territory through taking responsibility for an area that is not serviced by another municipality (a so-called ‘unincorporated

area')¹⁸. This is a process that is not directly comparable to the current proposal concerning Waterford, namely the proposed change to the boundary of one local authority to include an Area of Interest currently serviced by another local authority.

These differences in scale, service responsibility and financial resources are significant in influencing the criteria used in considering proposals for boundary changes. Different forms of revenue streams for local authorities produce different potential financial implications arising from boundary change. The nature of distinctive service responsibilities has to be considered in assessing proposals for boundary change. The process for undertaking boundary reviews varies from country to country (and sometimes between different regions / states within the same country). All of this means that identifying directly comparable 'like-for-like' cases as a means of assessing the Waterford situation is highly unlikely.

The Committee therefore concluded that the Waterford case must be considered on its own merits, and that an approach based on searching for a direct 'like-for-like' comparator with Waterford would lack validity. Nevertheless, the Committee was conscious of drawing on international experience in terms of the criteria and methodologies that can be used to evaluate proposed boundary change in different jurisdictions, even if these would have to be adapted to suit the particular characteristics of the Irish local government system.

5.2 Performance of the current boundary arrangements assessed according to the stated criteria

In assessing the performance of the current boundary arrangements, the Committee has had regard to the criteria set out in its terms of reference (see Annex 1).

Examination of the historical evolution of the boundary between Waterford and Kilkenny – from the centre of the Suir through the extensions that have been designated on the north bank – as set out in Section 4.5 above, illustrates that the configuration of the existing boundary, delineating diverse responsibilities to Waterford and Kilkenny Councils, has little relevance to the day-to-day lives of people working in these areas. The current boundary delineation is historical and is simply no longer administratively rational at this time.

Resolution of anomalies that have the potential to put barriers to the delivery of development strategies that deliver improved connectedness to the city core across the river is in the ultimate interest of a population and workforce who, for all practical purposes, live and work in Waterford.

The Committee, having informed itself and being informed in response to queries under the principal headings as designated by the Minister, is in no doubt about the

¹⁸ Feiock, R.C. and J.B. Carr 'Incentives, Entrepreneurs, and Boundary Change: A Collective Action Framework', *Urban Affairs Review*, 36(3), 2001, pp. 382-405

skill and determination of the respective elected Councils and their Executives in providing the optimum of services to the people of their areas within the resources available to them. Neither does it doubt their respective visions for the development, both economic and social, of the areas within their charge. Indeed, it is clearly evident that they share a vision, in common with their partner local authorities in the South-East Region, for that Region as a whole. In that vision the primacy of Waterford city and the key aspiration for its development and success is widely shared within the Region.

There have been several previous proposals to extend the boundary of Waterford City into south County Kilkenny (as described in 4.5 above – in 1980, 1992, and 1995). These were resisted strongly by Kilkenny County Council, and it would appear that petitions by the former Waterford City Council to extend the boundary did not contribute towards harmonious relationships between the neighbouring local authorities.

Both local authorities are inheritors of the current conditions of boundary delineation. The respective positions that they have adopted – in opposition to or in favour of boundary extensions – must be seen to have arisen from the circumstances in which they find themselves today.

5.2.1 Efficiency - *Need to maximize efficiency and value for money in local government*

To establish what efficiencies, if any, could be achieved as a result of a boundary change it is necessary to look at developments in Local Government in recent years. These comprise:

- a) Structural reforms, including the abolition of 80 town councils and the mergers of Waterford City and County Council, North and South Tipperary County Council and Limerick City and County Council, have resulted in the reduction of the number of elected representatives from over 1,600 to less than 1,000.
- b) New funding and governance arrangements, including the introduction of a local property tax to fund local services, and performance monitoring with the establishment of the National Oversight and Audit Commission.
- c) Local Government was also affected by the general moratorium on recruitment and promotion and incentivised early retirement and career break schemes, resulting in an overall staffing reduction of approx. 20%. Both the Croke Park and Haddington Road agreements also introduced pay reductions and additional working hours.
- d) The establishment of Irish Water has also removed a key service that had been provided by Local Authorities. The assignment of staff, for at least the period of the Service Level Agreement, together with the as-yet-unresolved issue whether the sector may yet bear the pensions burden for those employees, have had a significant impact on the operational and strategic role of Councils.
- e) Shared services have become more prominent in areas such as payroll and superannuation, procurement, waste collection permitting and the Housing

Assistance Payment Scheme. Based on the submissions from both authorities and evidence assembled it is the view of the Committee that a boundary alteration will not realise any further financial or resourcing efficiencies, and that both authorities currently fulfil their respective roles in the Area of Interest in an efficient manner.

- f) The configuration of the boundary – drafted at another time when development did not straddle that line – has resulted in practical anomalies that would not exist if that boundary was not present.
- g) The relative levels of expenditure on services have been provided by both Authorities and are judged appropriate for the need, but these are doubtless more complex due, for example, to Waterford servicing its housing customers outside its administrative area.
- h) The question is put as to whether there are any plans/projects of either local authority within the Area of Interest that are being hampered by the current arrangements or for which the existing boundary arrangements have no relevance. From the Waterford Council perspective, the general and “natural” expansion of the city has been “unnaturally” curtailed through their lack of influence or more particularly through its lack of control of the north bank of the river Suir. The phrase “a bird never flew on one wing” was used in this regard. Attention is drawn to the analysis of the historical development of the city of Waterford (Section 4.1). Comparisons with other cities in support of this argument is weakened by the evidence on the local physical and historical constraints on growth. However, that is not to say that the exercise of such control over a wider area would not be of benefit to the city generally, now or in the longer term. There is strong evidence of the benefit of the concentration of control of the city and its environs in one authority arising from the recent amalgamation of Waterford City and County Councils through the enabling of more direct planning control in support of the primacy of Waterford city centre.

5.2.2 Economic and social development

As regards services from both authorities in respect of support for economic and social development, both authorities can be seen to be attentive to the social and community needs of their respective communities. In that respect, the “Kilkenny residents” can avail of the benefit, in common with the population of the region generally, from the events and festivals provided by and centred on Waterford city.

Waterford Council has stated that, in the event of an extension of the Boundary into Kilkenny, it will retain the existing Kilkenny-provided Branch Library in Ferrybank, but it does not propose to offer other non-library local services, currently provided by Kilkenny, from that location due to the proximity of the area to Waterford City Hall.

Both Waterford and Kilkenny Councils have adopted Local Economic and Community Plans under section 36 of the Local Government Reform Act 2014. While the making of such plans is a statutory requirement, the result is that two separate plans apply within the built-up area in the immediate environs of Waterford city.

5.2.3 Governance, accountability and local democracy

It is clear that, in the event of any boundary reconfiguration that would involve encroachment by Waterford Council into the Kilkenny area, the loss of services currently offered by Kilkenny County Council from within the Area of Interest would impact on the provision of services for the remainder of the Piltown Municipal District.

Such a change, dependent on the extent of change, could in turn influence the configuration of all Municipal Districts in Kilkenny County as a whole, were the membership of the Piltown Municipal District Committee to drop below six in the event of the District not having the required population. This may include levels of democratic representation that may require to be reconfigured as a consequence of loss or gain.

5.2.4 Identity

Chapter 3 (Consultations) above provides a comprehensive account of the volume and extent of submissions on the Boundary Review associated with any perceived “threat” to re-designate any part of county Kilkenny to the administrative control of the adjoining Waterford authority. Of the total 19,131 submissions, identity/loss of identity was clearly the dominant issue – a fact amply illustrated by the complete predominance of submissions from and on behalf of Kilkenny, the authority facing the greater prospect of loss of territory. The analysis proves the extent of submissions from Kilkenny over Waterford (17,233:299 or 57:1 ratio) and the origins are from every part of Kilkenny.

At the outset the Committee wishes to emphasise that it thoroughly appreciates the extent to which identity with one’s origins – particularly identity associated with one’s native county – is profoundly part of the Irish collective “cultural DNA”. We stated so repeatedly during the very valuable engagements with the Elected Councillors. They were not reluctant to illustrate the depth of the issue with examples from their own experience. People examining our deliberations should therefore understand that identity was a theme that underlay all our considerations, no matter how technical they otherwise had to be.

Nonetheless, while the identity issue can be a powerful source of solidarity for community-building and other laudable aims, it may also obscure rational measures for delivery. The Committee has observed sharp differences and critical judgement exercised by each authority over the other in exchanges that could be adversarial. In our judgement, both authorities go about serving their citizens to the best of their ability on a daily basis. They hold and develop a shared ambition for their region, delivering for their collective citizenry, despite how they might choose to characterise each other’s performance in these respects. They deal as best they can with realities that are the result of history and precedent, some of which leave legacies that could

mitigate against their realisation of their collective ambition – not least identity in that context.

5.2.5 Service delivery

The issue of overall service delivery is comprehensively covered under the variety of headings in this section viz. Efficiency, Economic and Social Development.

5.2.6 Financial impact and complexity

The formal and supplementary submissions from both authorities on the financial impact of a boundary change as outlined in the Area of Interest addresses this issue.

The Kilkenny submission estimate the net loss to that authority at approx. €2 million based on 2014 figures, whereas the Waterford submissions estimate the loss at between €750,000 and €1.00 million based on best available information. Both figures relate to the Area of Interest as a whole.

At service division level the loss is relatively small, with the largest loss to Kilkenny on commercial rates of €1.7 million (gross) and local property tax of €412,000. These two figures are not in dispute, so it is the view of the Committee that if a boundary extension is to proceed both authorities should work together to ensure a common understanding of the financial impact and to negotiate an equitable arrangement. Other financial issues such as treatment of arrears—including development levies, operational and other assets, loans, etc. —should also be agreed, based on precedent in this area, between the authorities.

The issue of Commercial Rates differential is more complex, as the valuation revision process has been completed in Waterford but not yet commenced in Kilkenny. A review of the historical Annual Rate on Valuation (ARV) up to 2014 in both authorities shows that the ARV's in Waterford City, Waterford County and Dungarvan Town Council were higher than either of the ARV's in Kilkenny County Council or Borough Council. Since the merger in 2014 the Waterford ARV was harmonised down to the Dungarvan old ARV (the lowest) and the harmonisation process has also commenced in Kilkenny to a point midway between the old Borough Council ARV and County Council ARV.

It is therefore estimated that the Rate differential should not significantly impact on the Commercial Rate Payers in the area of interest.

5.3 Status quo – the No Change Option

5.3.1 Change or no change – background considerations

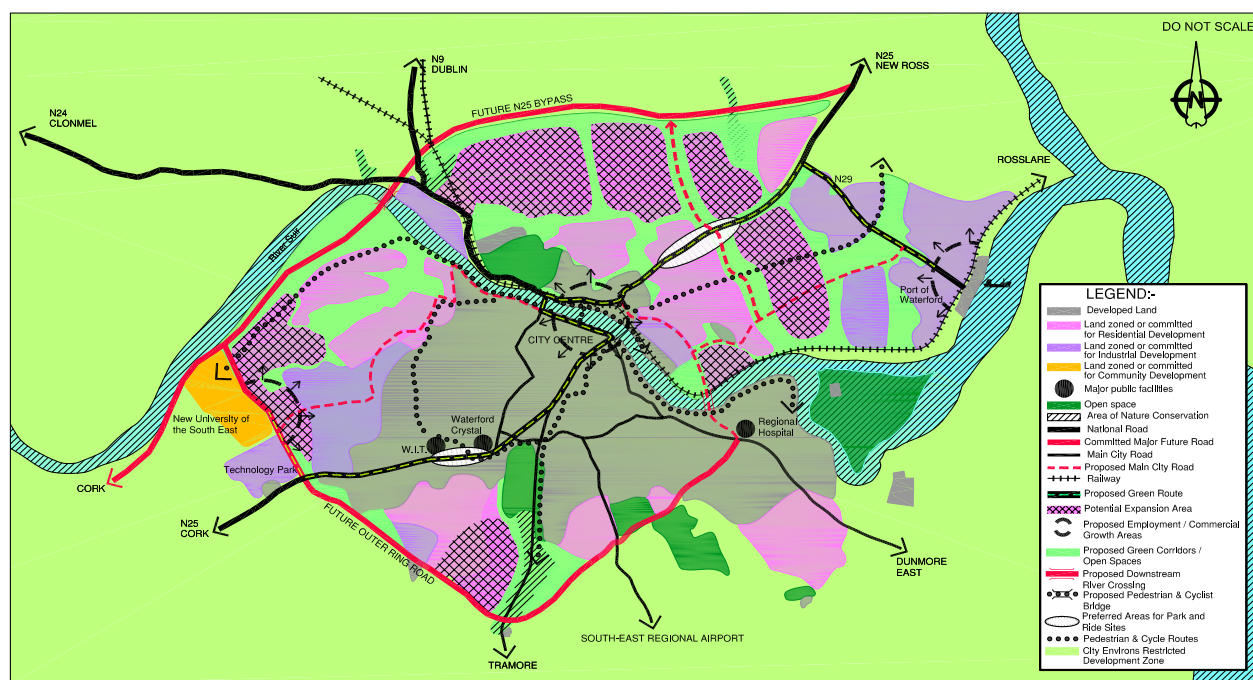
The Boundary Review Committee, having regard to its terms of reference, may recommend that there should be no change to the existing Waterford / Kilkenny boundary at Ferrybank, or it may recommend a boundary extension. In the latter event, the issue of the size and location of a boundary extension arises.

The brief given is to consider, taking all criteria into consideration, if a boundary change is warranted and if so to what extent. The Committee is required to take into account considerations around such extension, or retention of status quo, that place priority on fostering development and growth that is coherent, in planning terms, and that caters for the estimated future population growth on the north bank of the river Suir in the medium to long term (20+ years). It should broadly reflect any existing strategic planning policies.

In 2004 the then Waterford City and County Councils (now merged), together with Kilkenny County Council, adopted the PLUTS to provide strategic planning guidance for the development of the City and Environs to 2020. The Strategy envisaged that 42% of the estimated demand for new housing would be accommodated on lands to the north of the Suir; over a longer period of 30 years up to 50% would be located there. Similarly, PLUTS estimated that about 24% of new jobs would be located north of the Suir.

Figure 2.1 in the PLUTS shows the proposed spatial strategy. On the north bank, the N25 bypass (between the junctions with the M9 and the N25 New Ross road) and the N29 (Belview Port access road) formed the outer boundaries of the future development area, save for some industrially-zoned lands north of the N29.

According to the PLUTS (page 28), it was foreseen that all of the land then zoned residential in the northern suburbs would be developed over the period of the plan (i.e. by 2020). 'Potential Expansion Areas' as shown cross-hatched on Figure 2.1 were notional development areas where it might be possible for the City to expand post-2020 should the need arise. However, rates of both economic and population growth in Waterford in the period up to 2011 (the most recently available Census data) were less than envisaged in the PLUTS, so there is still ample scope for both housing and industrial / port development within the long-term development areas indicated in Figure 2.1.



PROPOSED SPATIAL STRATEGY FIGURE 2.1

Option 1 – No Change - Continuance of Existing Boundary Configuration without change

Consideration of **Option 1** must review how successful or otherwise the existing arrangements have proven to be.

The configuration of the existing boundary makes little practical sense. The boundary was configured to contain development associated with Waterford City as it existed at a particular point in time. There was no concession to any further development – in terms of a buffer zone into which the next phase of development might be located – and the boundary became outdated over time. It is now an administrative nuisance that interferes with the optimum delivery of services by both authorities due to the complex configuration.

The Committee's judgement is that, taking into account what has transpired in the area of the PLUTS since its adoption, it is not sustainable to continue the status quo, which although working in many operational areas, is not proving resilient in strategic terms. Simply put, the coherent development of Waterford city centre—a core strategic objective of PLUTS—cannot have the same priority for the Authority with a lesser material interest in such development as it must have for the Authority in whose area that centre lies.

Indeed, the experience of the unification of the Waterford Councils (City and County)—where a now unified strategy for the city in its wider context, arising from development pressure on the (former County-located) lands for development on the

city periphery, is in place as the unified Council pursues priority for city-centre development—is illustrative of the improved dynamic of giving a single authority responsibility.

The Committee therefore does not favour Option 1 - continuing with the existing boundary configurations without amendment to inter-authority arrangements for service provision.

5.4 Options for Change

5.4.1 Option 2 – Continuance of Existing Boundary Configuration with arrangements for improved inter-authority co-operation

The submission by Kilkenny County Council argued strongly against a boundary extension and in favour of closer strategic co-operation between the adjoining local authorities, citing a number of international examples.

Option 2 envisages arrangements – such as joint covenants and procedures and the like between both authorities – whereby strategies would be adopted jointly that would be seen to be enforceable in both areas.

In examining the practical application of such arrangements the Committee has found them to be significantly problematic in terms of delivery, as both authorities are legally constituted as separate autonomous corporate bodies. It is the opinion of the Committee that such arrangements work where the interests of both parties are particularly closely aligned around practical implementation. In this instance there are significant natural rivalries that would mitigate against continued co-operation in strategic terms; evidence of these has surfaced since the time of the joint PLUTS adoption. Attention is drawn to **Section 5.1 International comparative analysis** in this regard, where examples of collaborative arrangements are relatively few. Further, in cases where success is in evidence, it has generally arisen from preceding years of practical strategic collaboration not apparent in this instance.

In their submission to the Committee, Kilkenny County Council cited correspondence since 2004 with the then Waterford City Council seeking agreement on how the PLUTS could best be implemented, including the preparation of a joint retail strategy for the greater Waterford area. A PLUTS Implementation Committee only met on three occasions, the most recent being in 2008. There was no agreement in relation to the joint retail strategy. In addition, the successive Boundary Review proposals initiated by Waterford (Corporation and City Council) have reduced the level of trust and collaborative action at strategic level between these Authorities that is essential to a good working relationship in this context.

The Committee therefore does not favour Option 2 - continuing with the existing boundary configurations to include amendments to inter-authority arrangements for service provision. It believes that there are inherent rivalries too significant to render

such arrangements practicable in the medium to long term in a context where a simpler practical alternative is available.

5.4.2 Option 3 – Moving the Boundary to the centre of the Suir so that the entire north bank would be in County Kilkenny

This change involves the revision of the successive iterative boundary revisions since the first delineation of a Waterford boundary on the north bank of the Suir in 1840. The Committee sees little practical advantage and many complex administrative and legal problems in such a change. Indeed it would be initially burdensome on both authorities with significant financial reimbursement to Waterford by Kilkenny, with doubtful advantage accruing to the receiving authority having regard to the additional responsibility of ensuring collaborative and coherent administration of part of a city in another administrative area. Waterford city would lose control of its stated aspiration to deliver the North Quays SDZ for Waterford.

The Committee therefore does not favour Option 3 – revision of the boundary to the centre of the Suir—due to the potentially significant loss of control of the development of the North Quays as part of Waterford city core. Such a loss would prove significantly disruptive to the administrative arrangements for implementation and could undermine the coherent growth of Waterford city.

5.4.3 Option 4 - Boundary Extension to include the entire defined “Area of Interest” in County Kilkenny

Virtually all of the area shown on PLUTS Figure 2.1 within County Kilkenny comes within the scope of the Ferrybank / Belview Local Area Plan (LAP), the exception being a relatively small area around the village of Slieverue (see below). The LAP is currently under review; a pre-draft Stage Issues Paper was published for public consultation by Kilkenny County Council earlier this year. The previous LAP provided for limited new residential development adjoining the existing built-up area at Ferrybank, and for substantial industrial and port-related development on either side of the N29 at Belview. Large tracts of land to the north of Ferrybank and between Ferrybank and Belview were zoned for agricultural or open space uses.

While the Committee found the delineation represented in the LAP convenient in terms of providing definition of an area for enquiry purposes, that does not mean that it considered such designation as a “natural boundary”. The Committee’s preference is to use topography, the landscape, the proximity to existing built-up areas, the urban and rural morphology as it is in evidence on the ground to examine and determine where sustainable and coherent land use patterns have the potential to yield best outcomes for the area having regard to the strategy as set out in the PLUTS.

In this regard within the Area of Interest there are several clusters of uses that arise from natural historic aggregated growth – the industrial quays and railyard environs,

the original Ferrybank settlement with the church and its attendant 1930s terraced housing to name a few. There are places that have developed from later 20th century planned land-use zoning – largely the suburban housing in both Waterford and Kilkenny administrative areas, including social housing by either authority, but also the significant re-location of Waterford Port to Belview and the associated land-use zonings. Finally, there are individual developments and places located in the Area – such as Waterford Golf Club, the former Ard Ri Hotel, individual historic houses in the countryside (Athanaeum Hotel), and one-off house ribbon development in the countryside.

The Committee therefore does not favour Option 4 – Boundary Extension to include the entire defined “Area of Interest” in County Kilkenny—as it does not see the Area of Interest as a naturally occurring coherently identifiable place for the purposes of the exercise of its consideration in this instance. As noted in section 4.2 above, Belview Port is separated from the existing and zoned area around Ferrybank by an extensive ‘green belt’. There is also a substantial amount of un-zoned agricultural lands within the Area of Interest which are unlikely to be required for development in the medium to longer term.

5.4.4 Option 5 – Designation of a Boundary Revision into County Kilkenny, effectively extending the Waterford-controlled Ferrybank area, proximate to the existing City boundary, primarily residential in character

As the Committee views the existing Boundary configuration as overly complex, impractical and outdated, as outlined in consideration of **Option 1 No Change**, it has concentrated its efforts on the identification of a preferable delineation that is equitable to both Councils in the circumstances.

The Committee, therefore, has considered the delineation of an area, according to the criteria as described under Option 4 above, that would constitute the most coherent addition to the control of Waterford local authority in the interest of the development of the city overall, providing an adequate buffer to cater for future projected growth, but that also recognises issues of identity raised in the submissions and the investment in services provided by Kilkenny Council over recent decades. The Committee considers that the structure and aspiration of the PLUTS for this area are coherent and appropriate but are due a significant revision that takes account of the existing place, its buildings and uses, and delivers a far more fine-grained Plan, one that includes a table of Deliverables linked to a realistic timetable. For example, the aspiration for a new downstream river crossing will need to be realistically determined. The North Quays SDZ has the potential to be the game-changer for the future of the area overall; with its attendant new pedestrian bridge, it will appropriately command dominant attention.

Slieverue

As regards the non-proximate areas of the Area of Interest, it is suggested that the area around Slieverue should not be included in any proposed boundary extension for the following reasons:

- a) According to Table 3.1 'County Settlement Hierarchy' in the Development Plan, Slieverue is listed among the 'Smaller towns and villages' in County Kilkenny, whereas Ferrybank / Belview is indicated as forming part of the Waterford Gateway. Slieverue is one of 12 towns and villages which used to have their own LAP, but as these LAPs have expired, they will not be reviewed, nor will they be assigned a separate population target (given their limited scope for expansion). Instead, development proposals within the settlement boundaries included as part of the Development Plan will be assessed on their merits, based on Development Plan policies and objectives.
- b) In its submission to the Boundary Review Committee, Kilkenny County Council referred at page 44 to the strong cultural heritage of South Kilkenny and specifically mentioned the history of Slieverue.

Belview Port

Waterford Port at Belview, being a port of Regional significance, has no particular link with Waterford city that is not commonly shared by all authorities in the region from the M9 or N25 national routes as they meet its own length of national route N29.

Waterford Council's submission argues that:

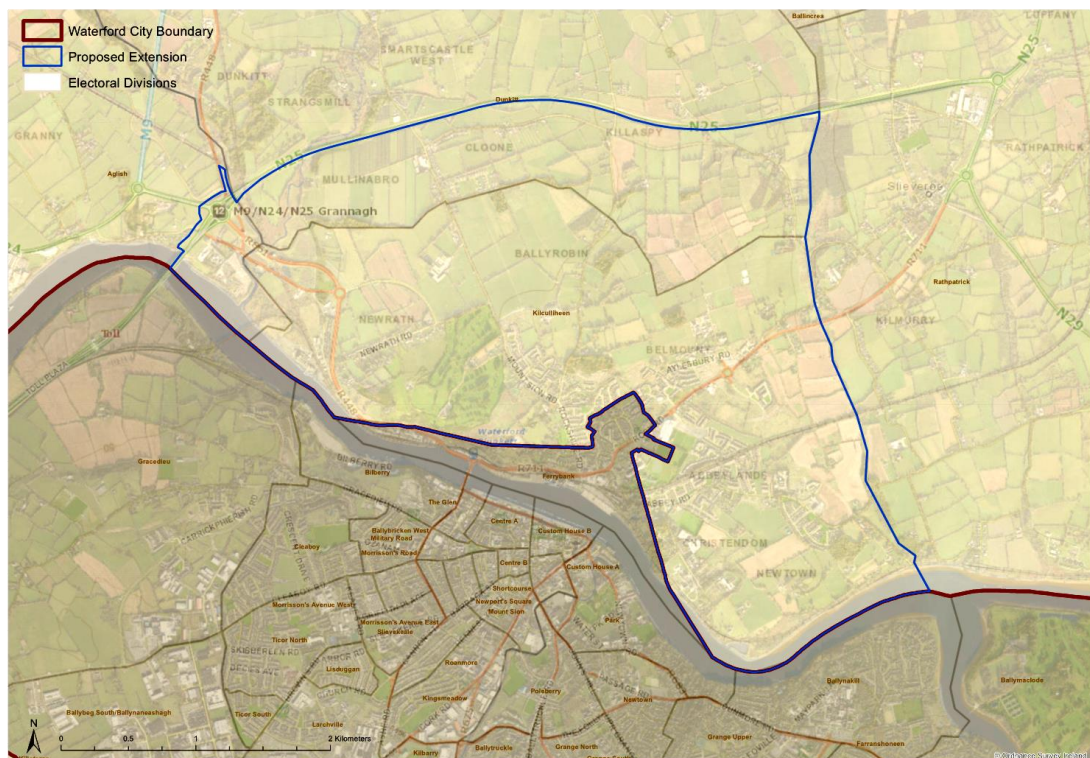
Ports are vital to the health and well-being of the local economy and also provide a major transport node. The development policy for Belview Port cannot be disassociated from the city planning policy and the geographical migration of the Port away from the city should not result in a severance of its relationship with the city and its administration. The relationship between the city and Port should be enforced by the implementation of a common planning mechanism such as a master-plan to frame the co-ordination between urban development and port dynamics. This has to be carried out by a single authority with a vested interest in the development of the Gateway and driving economic development for the region.

In the opinion of the Committee, the future development of Belview Port would best be determined within a hierarchical policy framework:

Level	Policies
<i>National</i>	1. <i>National Ports Policy 2013</i> 2. <i>National Planning Framework 2016</i>
<i>Regional</i>	<i>Regional Spatial and Economic Strategies (Forthcoming)</i>
<i>Gateway</i>	<i>(Revised) PLUTS</i>
<i>Local</i>	<i>(Revised) Ferrybank-Belview local area plan</i>

The missing level is a revised PLUTS, which is needed to provide the wider metropolitan context for a review of the local area plan.

The Committee therefore favours Option 5 – Boundary Extension to include that part of the “Area of Interest” in County Kilkenny proximate to the existing and emerging suburban area in Ferrybank. It has chosen to recommend the designation of a new Boundary between the Authorities that will move the entire Electoral Area of Kilculliheen and those parts of the Electoral Areas of Aglish and Dunkitt contained within the Area of Interest that lie south of the of the N25 bypass to the control of Waterford Council. This revision would have the effect of retaining the entire Electoral Area of Rathpatrick to the east within the Area of Interest in county Kilkenny, thereby retaining the village of Slieverue and Belview Port and its hinterland in that county. The boundary as recommended follows the line of an existing stream, a minor tributary of the Suir.



Chapter 6 Recommendations / next steps

6.1 Main recommendation:

The Committee, having regard to its Terms of Reference (Annex 1), has given careful consideration to the detailed and well-researched submissions it received from the elected members and senior management teams of both Kilkenny County Council and Waterford City and County Council. The Committee has also considered the wide range of issues raised by almost 20,000 members of the general public in their submissions. The Committee has benefitted greatly from the opportunity to consult with relevant public bodies and with our colleagues on the Athlone and Drogheda Boundary Review Committees, and from research studies provided by the Institute of Public Administration.

For the reasons set out in chapter 5, the Committee recommends that the Minister should extend the boundary of Waterford City and County Council into County Kilkenny by including the entire Electoral Area of Kilculliheen and those parts of the Electoral Areas of Aglish and Dunkitt contained within the Area of Interest that lie south of the of the N25 bypass.

6.2 Consequential actions:

Should the Minister decide to accept the recommendation for a boundary extension, a number of consequential measures should be taken:

6.2.1 Changes to electoral representation in local authorities:

The population living within the proposed boundary extension area in County Kilkenny is estimated at about 4,500. The effect of transferring this area to Waterford is likely to be an increase of one councillor in Waterford Metropolitan District and a reduction of two councillors in the Piltown Municipal District of Kilkenny County Council. As this would result in the membership of the Municipal District dropping below the statutory minimum of six elected members, it would be necessary to reconfigure all of the Municipal Districts within County Kilkenny.

6.2.2 Need to review and update PLUTS:

The current Waterford city development plan 2013-2019 acknowledges that ‘as the current economic circumstances are very different from those which existed when the PLUTS was adopted in 2004, it is considered that many of its growth expectations will not be realised by the strategic framework’s end horizon of 2020’. The 2010 RPGs scaled back the 2022 population target for Waterford city and environs to 62,500, in accordance with DECLG guidance; within that target, 6,500 would be accommodated with the Ferrybank area in County Kilkenny.

Any new PLUTS report would need to address the wider implications for the Area of Interest of the recent Ministerial designation of the Waterford North Quays as a Strategic Development Zone under the Planning Acts. A revised PLUTS would also provide the overarching planning framework (e.g. population projections) for a joint retail strategy for Waterford.

6.2.3 Future of the local area office at Ferrybank:

Waterford Council has stated that in the event of an extension of the boundary into Kilkenny, it will retain the existing Kilkenny-provided branch library in Ferrybank but does not propose to offer other non-library local services, currently provided by Kilkenny, from that location due to the proximity of the area to Waterford City Hall.

The Committee recommends that Waterford Council should re-consider that decision for the following reasons:

- The Ferrybank office provides a convenient service – probably within walking distance for most – to local residents. It would be a pity if a boundary extension resulted in a diminution of the existing level of service.
- As outlined in section 4.4.1 above, the PLUTS envisaged a substantial increase in the population of lands on the north side of the Suir in the medium to longer term. Such an increased population would in all probability require the provision of an area office.

On the other hand, Kilkenny County Council will have to consider how best to provide services to the Piltown Municipal District currently based at Ferrybank. The existing library at Ferrybank will continue to serve the public within its catchment area, regardless of local authority boundaries.

6.2.4 Financial implications of Boundary Revision

The extent of revision is primarily confined to areas dominated by Residential land-use zonings. However, there are some Commercial and Industrial uses that deliver Commercial Rates income to Kilkenny County Council. Loss of Residential Property Tax and Commercial Rates income will require to be compensated to Kilkenny County Council by Waterford Council. This will be balanced to some extent by the removal of responsibility for cost of delivery of services for Community Development (including the branch library in Ferrybank) in Housing and for Transport-associated expenditure in maintenance and upkeep. The Committee acknowledges that Kilkenny County Council will have to carry the bulk of in-house delivered services due to the retention of staff and due to the requirement to keep or relocate services for the Piltown Municipal District currently sourced from the Ferrybank area.

This concludes the Recommendation of the Waterford Boundary Review Committee as constituted.

David O'Connor	Chairman of the Committee
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Oliver Killeen	Member of the Committee
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John Martin	Member of the Committee
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December 2016

Appendix 1: Terms of Reference

1. The Minister for the Environment, Community and Local Government hereby establishes the Waterford Boundary Committee under section 28 of the Local Government Act 1991, hereinafter referred to as “the Committee”.
2. The following persons are hereby appointed as members of the Committee:
 - David O’ Connor (former Fingal County Manager) (Chair)
 - John Martin (former Principal Planning Adviser in the Department of the Environment, Community and Local Government)]
 - Ollie Killeen (former Head of Finance, Limerick County Council).
3. The Committee shall be independent in the performance of its functions and shall stand dissolved on submission of its final report to the Minister for the Environment, Community and Local Government.
4. In accordance with sections 32 and 33 of the Local Government Act 1991, the Committee is hereby required to:
 - Carry out a review of the boundary between the City and County of Waterford and County Kilkenny
 - Make such recommendations with respect to that boundary, and any consequential recommendations with respect to the area of the Metropolitan District of Waterford, that it considers to be necessary in the interests of effective and convenient local government
 - Prepare and furnish to the Minister for the Environment, Community and Local Government, a report in writing of that review and its recommendations.
5. In the event of a recommendation that the boundary between the City and County of Waterford and County Kilkenny and the area of the Metropolitan District of Waterford should be altered, the report shall contain relevant supporting information, analysis and rationale relating to or arising from such recommendation, including the following matters:
 - The financial and other relevant implications, including the potential outcomes to be achieved, and likely benefits and costs.
 - Any significant issues that are considered likely to arise in the implementation of revised arrangements and how these should be addressed.
 - Measures that should be taken consequential to or in the context of the recommended arrangements, including any measures in relation to financial arrangements.
 - Any matters in relation to which provision should be made in a primary order or a supplementary order (providing for matters arising from, in consequence of, or related to, the boundary extension) within the meaning of section 34 of the Local Government Act 1991, including any financial adjustments required.
 - Any interim measures which should be taken, if necessary, in advance of, or

- in preparation for, the full implementation of the recommendations.
 - The appropriate timescale for implementation of recommendations, including any interim measures.
- 6. In carrying out its review and formulating its recommendations, the Committee shall address the following matters in particular, insofar as relevant to the requirements of articles (4) and (5):
 - (a) The need to take full account of:
 - Current demographic and relevant spatial and socio-economic factors, including settlement and employment patterns
 - Detailed information to be provided by the relevant local authorities in relation to their structure, services, finances and operations or other matters relevant to the Committee's functions
 - Government policy in relation to local government as set out in the Action Programme for Effective Local Government, Putting People First, and in relation to the public service and the public finances.
 - (b) The need to maximise efficiency and value for money in local government.
 - (c) The need to ensure that the arrangements recommended are financially sustainable and will not result in an ongoing additional cost to central Government through increased subvention.
 - (d) Staffing, organisational, representational, financial, service delivery and other relevant implications or requirements.
 - (e) The need to ensure effective local government for Waterford and its hinterland, with particular regard to the need to maximise the economic performance and potential of the area; to facilitate the delivery of efficient and good value local authority services; and to ensure effective and accountable democratic representation.
 - (f) The need to have regard to the identity and cohesion of local communities.
 - (g) Any weaknesses in current local authority arrangements or operations that need to be addressed.
 - (h) Any additional matters that the Minister may specify.
- 7. The Committee shall make such recommendations with respect to the requirements at (4) and (5) and (6) as it considers necessary in the interests of effective and efficient local government. It shall prepare and furnish to the Minister, no later than 31 March 2016, a report, in writing, of its review and recommendations, which the Minister shall publish.

Appendix 2: List of submissions

<http://www.waterfordboundaryreview.ie/currentsubmissions.html>

A total of 19,131 submissions were received by the Boundary Review Committee by the deadline of 15th January 2016. Of these submissions, 205 were received in electronic format and the remaining 18,930 were received in hard copy. Of the hard copy submissions, some 43 were individually drafted, and each of these individual submissions has been scanned and is available to view, in common with the electronic submissions, on the website. Of the remaining hard copy submissions, there were 8 types of Standard Format submissions received.

Each Standard Format has been published and given a standard reference A, B, C, D, E, F, G and a Newspaper extract. Each submission received in standard format has been associated with its designated type. Finally, in some cases, multiple copies of the same submission and blank (uncompleted) forms were received. These have not been counted as part of the total number of submissions.

Every submission in every category—electronic, hard copy individual submission or hard copy according to one of the six standard formats—has been individually registered. Each submission has been associated with an individual name, but with the address that is associated with an individual withheld from publication in each case - in compliance with Data Protection legislation. However, all information, including names and associated addresses submitted, is available to the Boundary Review Committee in its entirety. 1,497 submissions were received where the name of the person submitting proved illegible. Notwithstanding this, the total number of submissions include these illegible submissions.

Online Submissions [205]

Anne Shortt	James Mark Plunkett	Sean Wall
Ellen Norris	Mick Flynn	Dermot Druhan
Maria Skehan	Bernadette Kelly	Liam Cody
Aaron O'Doherty	James Walsh	Serina Brennan
Emma Barron	Moloney & Barron Families	Des Griffin
Marie & Murt Cashin	Bessie Wall	Liam Gahan
Abhainn Ballantine	Jane Gillman	Shane Aylward
Enda Keane	Marie Therese Barron	Donal Higgins
Marie Doyle	Billy Hearne	Lorraine McArdle
Agnes Brick	Jeannie Frampton	Sheila Scanlon
Eoin Irish	Murphy Family	Eamon McPhillips
Martina Roche	Bobby Aylward TD	Mailo Power
Aidan McGrath	Jim Hetherington	Sinead Browne
Eoin Kavanagh	Natalie Swain	Edouard Ouin
Mary & Martin Mealey	Brian O'Keeffe	Margaret Aylward
Aine Byrne	Joan Knox	Sinead Norris
Fiona Sutton	Neil O'Rourke	Eimear O'Shea
Mary Doyle	Brid Kavanagh	Margaret Buggy
Aisling Dunne	Joan O'Neill	Siobhan Spillane & Family
Frank Lahiffe	Niall Lonergan	Stella Butler
Mary Hetherington	Brid Walsh	Tommy Kielthy

Alan Murphy Gabriel Murray Matt Jordan Alex Halpin Gary Cooke Michael Alcock Andrew Bernos Gavin Crowley Michael Grace Anthony Power Ger Buggy Michael Kavanagh Anthony Wall Hannah Holden Michael Knox B. Kane Heather Doyle Michael Prendergast Barry Freyne Jack Stephenson Michael Sutton Ben Doherty James Foskin Michael Sweeney Bernadette Buckley Phil and Helen Brennan Daniel Coughlan Kay Sheehy Philip Funchion Daniel Holden Ken Walsh Piltown World Dave Hearne Kersty Evans R. Doherty David Brazil Kieran Dowling RM Bellevue Res Assoc David Culleton Kieran Ryan Ray David Gargan Kilkenny & Carlow ETB Richard Holden David Gray Kilkenny Chamber of Commerce Robert Malone David Gunner	Jody Power Niamh Ahern Bridget Whitaker Joe Wall Niamh Murray Bridget, Peter, Curt Phillips John & Brid Vereker Nicholas Fennelly Carmel Farrell John & Claire Devine Nicky Barron Carmel Phelan John Breen Nicole Dunne Caroline Joyce John Brennan Orla Wall Catherine O'Neill John Browne Paddy O Ceallaigh Catherine Walsh John Butler Pádraig O'Griofa Ciaran Browne John Cullen Pat Burke Clare Aylward John Dunphy Pat Duggan Cllr David Kennedy John G. Walsh Cllr Pat Dunphy Cllr Fidelis Doherty John James Connolly Pat O'Doherty Cllr M. Shortall John Lawlor Patrick Kelly Cllr Malcolm Noonan John Paul Phelan TD Patrick McKee Cllr Melissa O'Neill Joe Stokes, WAP Paul Moore Cllrs Roche, O'Neill, Daniels Josephine Wall Paul O'Brien Conan Doyle Karen Maher	Waterford Business Group Stephanie Taheny Trish Orr Waterford Chamber Susan Acheson Trish Rockett William Cooke Tadgh Williams Valerie Bhreathnach Jean Grace Thomas Grant Valerie Ryan Paul Haley Thomas Holden Virginia Grace Cllr. David Kennedy Tom Comerford Walter Jordan Cllr. Tomás Breathnach Robbie Grace David Walsh Laura Mooney Sarah O'Connor David Williams Laura Wall Seamus Norris Deirdre Fitzpatrick Lawlor Family Sean Fleming Derek Delaney Liam Byrne Paul Damien Barry Kathleen O'Sullivan Pauline Cass Damien O Suilleabhan Kay Browne Peter Browne Damien O'Neill Kay Dunne Kilkenny City Centre Business Association Roger Forrest Conan Power Kathleen Funchion Paul Thomas Brophy
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By individual letter [43]:

Aine Grant Breda Lynch Breda Walsh Brigid Gleeson Brigid Murphy (1), Brigid Murphy (2) Catherine Nolan Damien O Suilleabháin Des Griffin Elizabeth Browne Gemma Dowling Gerard O'Connor (1), Gerard O'Connor (2) Helen Walsh J. Dowling James Dowling James Walsh John Cuddihy	John Harte John Lacey & Brigid Murphy John Purcell Kathleen Brennan Larry Walsh Liam Shore Margaret Buggy Margaret Champion Margaret Farrell Marie Buggy Martin Gittens Mary Murphy Michael Aylward Michael Bergin	Nicholas Kelly Nick & Peggy Kenneally Owen Sheehan Padraig Walsh Patrick Champion Patrick Dowling Peter Walsh Rory Williams (1), Rory Williams (2) Seamus Kelly Tony Dowling
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Appendix 3: Evaluation Criteria

The following is a summary of the information to be assembled as an evaluation framework to be used for the purposes of meeting the requirements of the Terms of Reference.

The framework will comprise three sections:

Background Documentation, Detailed Evidence Base and material derived from the **Public Consultation** process.

Each of these is described as follows:

1. **Background Documentation:**

This is general contextual and background information in documentary form compiled to provide the Committee with sufficient reference sources to undertake its work.

2. **Detailed Evidence Base:** This component must provide the Committee with the necessary quantum of data to enable an assessment of the extent to which any revision of the statutory boundary between authorities will change the means whereby services are provided for the people in the areas so revised, including the practical impact of such revisions on the economic development and community cohesion of the areas, as well as on the operation of both authorities.

3. **Public Consultation:** The process of public consultation will inform the work of the Committees of the range of opinions of people's perception of the impact of any revisions to the administrative boundary between the respective Local Authorities.

Public submissions will be particularly important in this regard, as well as the views of those in elected office as representatives of the people in the area under consideration. A website is in place for the convenience of making online submissions.

The Committee especially requests that people respond to the questions assembled by the Committee for ease of assimilation of views under particular headings. People are by no means to be confined to making responses under those headings alone but may submit any opinion or material they wish that is relevant to the remit of the Committee within its Terms of Reference as set out by the Minister.

There will be some overlap between material requested in Background Documentation and Detailed Evidence Base sections. The local authorities may cross-reference where such information is provided under one or other heading where this happens so as to avoid having to insert, or read, the same information in two places.

1. Background Documentation

The respective local authorities are asked to provide the following documentation, although they are not limited to same. These will be provided in electronic formats in the first instance. All documentation, in hard-copy format, must be assembled by each authority and held in a “data room” so that it can be made available on request for the Committee.

Each Local Authority is to submit the following information - insofar as it applies to the identified Area of Interest outlined by the Committee - a Summary Document that comprises analysis of organisation-wide Policies, Plans, Strategies, Budgets, Workforce and general Resource Deployment,. This includes such matters as

1.1 The Council Corporate Plan, Workforce Plans, Municipal District Budgets and associated Implementation Plans, Services provided through relevant Municipal District, Schedule of Municipal District Works for Town in respect of Parks and Open Spaces, housing maintenance, road maintenance, street sweeping and litter management.

In addition, the Committee requests transactional analysis for relevant MD (incl. housing rental income, motor tax, payments, library visits, sports centre visits, parking fines, litter fines).

1.2 Available plans, proposals etc of State agencies having a bearing on the Area of Interest in terms of economic and/or community development (e.g. EI, IDA Ireland, HSE, Regional Authority/Authorities, LEADER)

1.3 County / City Development Plans, Local Areas Plans or any statutory Land-use or Transportation Plans that may be relevant – including draft or lapsed documents (the committee requests copies of the documents in draft or if they are lapsed and will give appropriate consideration these, given the status of each, as may be relevant).

1.4 Democratic representation - Local Representatives by electoral area.

1.5 1.3 Population Profile and Census Statistics: Data is available on statistics for the overall context assembled by the CSO – termed “Area Profiles”. Links to this database output should be assembled and, insofar as it is practically possible to do so, a comparative analysis of this data and that for the Area of Interest should be compiled. The headings used by the CSO in their “Area Profiles” should be used for this purpose. Small Area statistical data, in addition, will be particularly useful information for the Committee in this regard.

1.6 1.4 Mapping and Statistics:

Both Local Authorities are requested to cooperate to assemble a Land-use Zoning Map for the Area of Interest that uses the Land-use categorisation developed for MyPlan so as to have common zoning references available for both authority areas. The authorities are requested to provide an analysis of the sequential development of the contiguous urban areas, in both their areas, by decade, over the past 70 years

in particular, to aid the Committee's understanding of the sequential development of the general area.

Separate mapping of land in public ownership should be provided to include local authority lands, lands in ownership of the state and its agencies e.g. the CIE group (Iarnród Éireann, Bus Éireann), IDA, Development Agencies etc..

Maps should be provided to identify CSO and DED Boundaries, referenced so as to be associated with population distribution, offices, facilities and depots under the control of the local authorities. These maps should also identify the functional areas in use by state agencies serving the population e.g. Garda Síochána districts, HSE districts and areas, public transport routes and termini.

In addition the Councils are requested to provide the latest aerial photography available for the Area of Interest.

2. Detailed Evidence Base

The following table provides indicative data by which each of the Terms of Reference requirements may be evaluated. It is not intended to be exhaustive and the consultation process may propose other data, hence the process will be iterative until a final evidence base is available. In preparing the following, the Committee has taken into consideration the relevant recommendations of the Report of the Local Government Efficiency Review Group (2010).

Terms of Reference Requirement:

a) Current demographic and relevant spatial and socio-economic factors, including settlement and employment patterns

Indicative Data:

- Relative levels of deprivation (Pobal)
- Levels of unemployment relative to the average in both Local Authorities
- Evidence of joint development planning
- Current and target population in overall settlement (LAs)
 - Availability of land to accommodate such a population
 - Service and enterprise land needed for such a population
 - Availability of such land and current zoning

b) Structure, services, finances and operation of the relevant local authorities

(This information overlaps with some of the Background Documentation outlined above)

- Staff assigned to the area in question/per head of population relative to the average in each Local Authority (LAs)
- Evidence of collaboration between the two local authorities in the following areas:

Development Plans (Joint/Collaborative Plans and Actions for the purpose of coordination such as joint Retail Strategies, Transport Strategies, Infrastructure Strategies and the like)

- Road Maintenance and Road Safety Programme arrangement,
- Water infrastructure (supply and waste) provision;
- Housing: Social housing collaboration for the purposes of addressing housing need (joint or separate housing lists, the efficient use of housing stock, alignment of housing policies to address housing demand and homeless services), joint housing and associated community facility projects,
- Commercial Rates – comparative analysis of Commercial Rates between local authority areas and the extent of the Commercial Rate Base within each existing local authority area – including the income derived therefrom. base of the area of interest
- Emergency Services arrangements including the how the arrangements around Major Emergency Planning are jointly coordinated.
- The extent of existing or proposed shared service arrangements in general that may not be covered under any of the headings outlined here.

c) Government Policy in relation to Local Government, the public service and the public finances

Details are requested as to how overall policy in the following areas is coordinated and/or impacts on the Area of Interest in particular under the headings:

- Action Programme for Effective Local Government
- Action Plan for Jobs
- Regional Planning requirements

d) Need to maximize efficiency and value for money in local government

Responses under this heading will have been addressed under other headings as requested above. The local authorities are asked that, through the other indicators and through submissions they address what they regards as opportunities to achieve specific savings.

- Both local authorities are invited to provide an initial outline of the impact of any change in boundary on the practical administration of their area as a consequence of either the gaining of additional contiguous area or the loss of such an area. These analyses should extend to the impact on their services that may be delivered from a base or bases outside the Area of Interest and also to how they see that services outside that area might need to be reconfigured as a consequence of loss or gain.
- Are there savings or costs that would be envisaged over and above those arising from existing collaboration?
- Are there financial performance indicators e.g. relative level of and/or collection rates/arrears of LPT that are relevant in this regard?
- Any plans/projects of either local authority, within the Area of Interest, that are being hampered by the current arrangements or for which the existing boundary arrangements have no relevance?

- LA view of managing or providing services in an area not under its control if such exist (e.g. housing, water, waste-water). This issue could be one for either authority. (LAs)

e) Need to ensure arrangements recommended are financially sustainable and will not result in ongoing additional cost to central Government

Both local authorities must set out the extent to which the following may arise as a result of any changes boundary configurations:

- Outstanding debts and rates, development levies and property.
- Commercial Rates differential and compensation between Councils that may be implied as a result of changes – to varying degrees of extent as may be postulated in such submissions.
- Are there implications, in the opinion of any party, for impact on central government funding as it is specifically required that any change involves no additional ongoing costs to central government?
- Relative levels of expenditure / income per head in area under review relative to average in both authorities.

f) Staffing, organizational, representational, financial, service delivery and other relevant implications or requirements

Estimated potential financial costs/savings resulting from recommendations is to be assembled as a summary by each local authority.

Each local authority should submit its opinion on the implications of any change for local representation.

Each local authority should submit its case on how service delivery will be affected in the Area of Interest and in any area contiguous to that location, to include change requirement associated with offices, depots and council facilities as relevant in the opinion of the authority.

Finally an overall assessment of the implications for staff resourcing for each local authority that will affect continuing service delivery to the community in area where change may arise.

g) Need to ensure effective local government for the 'Town' (or city as may be the case) and its hinterland with particular regard to need to maximize the economic performance and potential of the area; to facilitate the delivery of efficient and good value local authority services; and to ensure effective and accountable democratic representation

Each local authority should outline its view of the implications for:

- enterprise development including FDI of having an existing area extended under the remit of the neighbouring local authority;

- wider economic development, both in terms of the development of the city/town itself and the impact on the economic development of the wider hinterland served by the city/town, and where relevant, in a regional context;
- political governance and the functioning of local democracy. This includes issues such as local political oversight and accountability, and the role and arrangement of municipal district, to include current political representation of the areas under review and the implications of any changes for this representation;
- the extent to which the population may perceive alienation or to be otherwise marginalised in a new context and how the electorate will perceive an affect on the most effective and efficient delivery of local authority services in their area;
- access to LA services and a need to travel for such services and whether there is or will continue to be a local area service office provided, including if there are implications for population adjacent to new boundary of the withdrawal of such a service office.

h) The need to have regard to the identity and cohesion of local communities

Each authority is requested to outline levels of civil society activity/volunteering/local organisations (Census/Volunteer Centre). They may highlight the extent to which the activities of each is associated with existing local authority boundary configurations. This should include an account of how, in the opinion of each authority, any change on existing boundary arrangements may impact on any such identified group or activity, and where relevant, on wider social and community coherence and needs.

In support of arguments in any direction (for or against change) some demonstration of how local authorities are enabled to leverage community actions and/or local innovation to improve local areas or otherwise should be submitted. Any such case cited should robustly show this may have real or marginal relevance in the context the most effective and efficient delivery of local authority services to the residents and business interests.

i) Are there any weaknesses in current local authority arrangements or operations that need to be addressed?

Are there, or have there been any difficulties in collaboration between local authorities experienced by either authority in the past?

Are there plans/projects of either local authority which are not possible to be fully implemented to the extent that might otherwise be the case or is either local authority being specifically constrained or hampered by the current arrangements?

3. Public Consultation

Submissions Template

The following provides a template (and related guidance) for inclusion on the respective boundary review websites which are in addition to the public notice text (see code provided by Waterford City and County Council).

Make a Submission

*To make a submission **please complete the form below** as it helps to guide you through the main points that the Review Committee has to consider in making its recommendation to the Minister.*

You may any other points you wish in addition and you may add references to reports or evidence you believe to be relevant to the consideration of the Boundary Review.

Please Note:

The submission deadline is xx xx 2015. The maximum file size you may upload with this form is 8Mb.

You should know that all submissions made will be publicly available on this website at the end of the public consultation period. Your contact details are required to ensure transparency regarding the consultation process and to allow us to contact you should there be a need for clarification regarding the content of your submission.

The addresses, email addresses and phone numbers of private individuals will not be published on the website, and subject to the requirements of the Freedom of Information Act, will not be released otherwise.

Name:

Address:

Email Address:

Daytime Contact
phone number:

Area in which you
reside (for
publication
instead of

specific address).

To aid our work the Review Committee would be grateful to receive your answers to any or all of the following questions:

Question 1 How might alteration of the boundary help or hinder the retention or creation of employment and the general economic performance of the area?

Text Box to be inserted to receive answers to each question.

Question 2 How might the alteration of the boundary help or hinder the identity or cohesion of local communities in the area?

Question 3 How might alteration of the boundary help or hinder delivery of services by local government to ensure that the needs of the local community are met now and in the future?

Question 4 How might alteration of the administrative boundary help or hinder the need to maximise efficiency and value for money in local government?

Question 5 How might alteration of the boundary help or hinder the Planning and Development needs, as administered by the local authority, of the community?

Question 6 How might alteration of the boundary help or hinder the delivery of effective and accountable democratic representation?

Question 7 What strengths or weaknesses do you see in current local authority administrative boundary arrangements in the area?

You may Upload a file here, if you wish to provide supporting documentation for points made in response to these questions or in relation to any matter you believe to be relevant to the task assigned to the Boundary Review Committee.

Box to be inserted to receive submissions