

The Secretariat
Waterford Boundary Review
c/o Kilkenny County Council
County Hall
John Street
Kilkenny R95 A39T

15th January 2016

Re: Kilkenny Chamber submission to Boundary Review Commission

Dear Sirs,

As an acknowledged business leadership organisation, Kilkenny Chamber represents the interests of businesses in Kilkenny City and County. In this context and having given due consideration to the Terms of Reference for the Boundary Committee, taken note of the location of the existing boundary and of the Committee's area of interest, the Chamber hereby wishes to state its vehement opposition to the proposed changes for the following reasons.

1. The proposed boundary extension from Waterford into Kilkenny would have significant financial implications for Kilkenny City and County:
 - a. Loss of commercial rates income within the area of interest which currently amounts to €2.1 million per annum and represents 11% of the total rate income in Kilkenny City and County.
 - b. Loss of Local Property Tax to the County amounting to €412,000 per annum at 2015 levels.
 - c. Loss of future rate income from potential development of industrial land in the area (e.g. 190ha of undeveloped industrial zoned land in and around Belview Port has the potential to realise millions of Euro into the near future).
 - d. Loss of future Local Property Tax from new housing developments in the area (e.g. the potential exists to develop a further 6,171 housing units in the Ferrybank area if the full development area is built out).
2. The estimated infrastructural investment required in Kilkenny City and County over the next 3 to 5 years stands at some €86 million and in this context it is clear that Kilkenny cannot afford to bear the financial losses outlined above. Such a financial loss would significantly hamper the ability of Kilkenny County Council to deliver its investment programme.
3. In the wider South East Regional context and given the existing settlement pattern, population distribution and the existing small levels of concentration of industry clusters, the pursuit of a boundary alteration would be counter productive and inconsistent with the area's current layout and needs going forward.
4. Bearing in mind that the overarching challenges facing Waterford as a Gateway City are the same as for the Region as a whole and meeting these challenges is best achieved through the pooling of resources and facilitating cooperation between the Councils of Kilkenny and Waterford. Implementing a boundary change would seriously undermine the existing momentum of cooperation between these two bodies and fail to make any positive contribution to this dynamic into the future.

- a. The common challenges facing Waterford and the whole Region include:
 - i. The establishment of a University for the South East.
 - ii. The development of Waterford Regional Airport with a runway extension to give greater international connectivity.
 - iii. The revitalisation of Belview Port.
 - iv. The lack of a connection to major dark fibre networks (e.g. the Aurora Telecom Ireland Network).
5. Rather than changing boundaries, the focus should be on establishing enhanced regional collaboration aimed at helping the South East region to lift itself to equal or better levels than other Irish regions. The pooling of the regions resources in a spirit of genuine cooperation can produce far better outcomes as is evident in the Regional Economic Forum and the Three Sisters Project.
6. There are numerous examples of instances where Kilkenny County Council has been to the forefront in seeking and establishing cooperation with the City Council and County Council of Waterford with the objective of advancing the interests of Waterford City and its environs. Examples of this would include:
 - a. Planning studies 1974, 1999, 2004.
 - b. Integration of overarching planning studies into the Kilkenny County Councils land use plans for north Waterford.
 - c. The Three Rivers Capital of Culture bid.
 - d. South East Regional Waste Management Plan.
 - e. Community Development.
 - f. Regional Road Design Office in Tramore.
 - g. South East Regional Authority.
 - h. Fire Service.
 - i. Tall Ships Festivals (2005 & 2011).
 - j. Social Housing Delivery Task Force.
 - k. The Belview Forum (Kilkenny, Waterford, Port of Waterford).
7. There already exists within Waterford City a range of key opportunity sites which have been identified in planning documents over the years and which have the potential to deliver significantly to Waterford's developmental needs going forward. The focus should be on resourcing and financing these projects and not creating the unnecessary and costly distraction of this boundary review. Examples of these potential projects includes:
 - a. The North Quays.
 - b. The Ard Ri site.
 - c. The Waterford Stanley Foundry site.
 - d. The former Brooks site at Newtown Road.
 - e. The Bolton Street car park.
 - f. The Johnstown Industrial lands.
 - g. The former Waterford Crystal Factory site.
 - h. The Michael Street Shopping Centre site.
8. Kilkenny County Council has already made significant investment in the Belview Port in partnership with the Port of Waterford and the IDA and likewise has invested in the delivery of the following projects:
 - a. The N29 Port Road.
 - b. The IDA and Belview Port land bank (facilitating FDI and Glanbia investment and port related services).
 - c. The Waste Water Treatment Plant for Waterford City and its environs.

- d. The Belview Strategic Water Supply Scheme.
- e. Waterford City by-pass.
- f. M9 Motorway.
- g. New Ross by-pass (in progress & commencing in 2016).

It would be wholly inappropriate to make the proposed boundary changes in this context.

- 9. The Waterford and County Local Economic and Community Development Plan has already identified the lack of a cohesive regional approach as a weakness to the region and the proposed boundary alteration will further exacerbate this situation.
- 10. Waterford of itself does not have the scale required to enable it act effectively as a Gateway City and a wider regional perspective must be adopted. This regional approach would incorporate the wider rural hinterland and other urban areas within the region (e.g. Kilkenny, Wexford, Carlow, Clonmel, Dungarvan and other smaller settlements) and thus achieve a level of regional scale well in excess of anything Waterford alone could achieve. This approach would require the already mentioned cross boundary sharing, cooperation and cross sectoral development to help drive the development of Waterford City and the region. The proposed boundary changes would act as a significant barrier in this overall context.
- 11. The people and communities in the area will not benefit and do not want changes that impact on the identity, heritage and culture of individual counties. Their commitment to their area revolves around family, history, sporting activity and culture and the proposed boundary alteration would be very damaging in this context.
- 12. County boundaries are invisible to business, regional and national development. The South East Region has many ongoing challenges which can best be dealt with by adopting an approach of cooperation and pooling of resources between all the people of Kilkenny and Waterford and the South East in general. Changing the boundary is not a solution and instead would be divisive, disruptive and costly.

Furthermore and in addition to the above points, as part of its submission to this process the Chamber has answered the 7 Questions posed on the Boundary Review website.

In conclusion, Kilkenny Chamber opposes any proposed changes to the boundary and urges the Boundary Review Commission to acknowledge this as the overwhelming view of the people and businesses located in the area and accordingly close off this issue for once and for all.

Yours faithfully,

Martin Costello

President

Kilkenny Chamber of Commerce

