

12 September 2024

**REF: Waterford Chamber Submission to public consultation
Draft Revision of National Planning Framework**

To Whom It May Concern,

As the largest business representative organisation in the South-East, Waterford Chamber is making the following submission to the Draft Revision of the National Planning Framework in behalf its 600+ members, representing over 18,000 employees.

As the Capital of the South East region and driver of economic growth, investment in public infrastructure in Waterford is crucial for revitalizing all areas of the South-East (SE) city-region, so we can develop with the National Planning Framework. It is promising to see national resources being consistently allocated to address long-standing deficiencies in public infrastructure. However, it is essential to realign this investment programme to ensure that regions in Ireland, such as the South East, which are being left behind, also reap the benefits of this national funding initiative.

DRAFT REFLECTIONS

It is our considered view that the revised NDP and consultation materials lack basic data and detail on the €46 billion already committed under the €116bn+ investment programme. The little data that is used in the revised plan, particularly the population statistics, are inaccurate as they do not use comparable data structures to establish urban populations. From the inadequate data that is in the public domain, it appears that investment in Cork and Dublin have been far in advance of a pro-rata fair share, and that other regions have yet to really benefit from the NDP.

Similarly, estimates suggest that over the past decade, public capital spending in the South East was less than one-third of a pro-rate fair share, remaining at austerity levels long after our national economic recovery, and this has exacerbated regional inequalities and continues to hold back the whole region.

The sustained impact of long-term below average public capital spending in the South East, when coupled with above average population growth, has exacerbated longstanding infrastructure deficits. As a result, the region has experienced a sustained drop in GDP since 2019, with lower levels of productivity and labour market participation and elevated rates of unemployment. In this context, it is disappointing that a more analytical revision of the NDP has not been attempted.

The South East's lack of inclusion in and benefit from the NDP is also evidenced by the failure to advance critical transformative projects in the South East, as outlined below.

Waterford Airport runway extension: This critical project was first approved for capital grants of €22.3 million in 2007, which were halted in the context of the global financial crisis.

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Between 2020 and 2023, €484.94m of public money has been invested by the Government in Irish airports (PQ 24241/24), and yet, the promised public investment of €12m at Waterford Airport, to unlock a €24m development, has not been made by Government.

SETU expansion: From 2005 to 2018 the then WIT was told no investment or programme expansions would be forthcoming until the technological university merger was completed. SETU is the only higher education provider in the region, and expanding SETU is considered vital to halting the brain-drain. Two thirds of each cohort of leaving certificate students who go onto higher education leave the region and this has immediate implications for FDI attractiveness, as well as long-term consequences for economic and social vitality. Since the merger completed two and a half years ago, the new university has advanced a strategic plan to develop:

- New student places and research capacity, underpinned by a five-year capital programme of €350m, to include the PPP programme first announced in 2005/6 and acquiring and developing the old Crystal site.
- New disciplines, in the first instance in Veterinary Medicine, Pharmacy and more places in Nursing.
- Student accommodation, supported by a borrowing framework for technological universities.
- New lecturer, professoriate and management contracts to support a research-led university.

None of these actions have meaningfully advanced, and to date capital investment in the embryonic university stands at less than €10m.

N25 and N24 roads: Both these roads are critical to regional cohesion, service access and economic activity. The decision to advance the M20 Cork-Limerick motorway over the proposed M24 Limerick-Cork-Waterford route is understandable in the context of the long-term ambition to advance the M25 Cork-Waterford-Wexford route; but vital investment to improve safety and maintain route times on the N25 and N24 will be needed in the 20-25-year timeframe to deliver the M25. Both roads are now in critical need of safety and efficiency upgrades.

Healthcare investment: The regional acute model 4 hospital was significantly downgraded in the misguided participation in the ill-fated South-South West hospital group. This decade of relative decline in service capacity, particularly in capital investment, needs immediate remedial intervention.

Enterprise investment and marketing support: The region does not have a publicly-funded regional development agency, such as the WDC or legacy organisations of SFADCO/Shannon Development. For over a decade the region was left without an IDA manager during with the renewal of the FDI platform in the region was stunted. The South East has around half the per-capita number of IDA-supported jobs, and the pipeline/visits suggests the relative decline in MNC/FDI performance will continue unchecked. The region has a structural deficit of high quality, large enterprise employment. The regionally funded initiative, Ireland South East Development Office, and bottom-up orientated Regional Enterprise Plan lack the ability to act at scale and prime the investments required to close the gap. In turn the absence of

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strategic enterprise supports impacts on the ability to compete for various public funding schemes. Exacerbating all this is the signalling effect of public capital formation and higher education capacity, being less than one third of the national rate.

Port of Waterford: The Port has advanced an ambitious 2020-2044 Masterplan to achieve 4% growth per annum which requires a €60m investment that remains unactioned.

In stating these unactioned transformative investments that lie within the NDP, it is important to note that Waterford has benefited from the following:

- National Broadband Programme (€60m to connect 16k premises; representing one-fifth of a pro-capita investment)
- A pro-capita participation in the various housing programmes
- The flagship North-Quay development including new railway station transportation hub, sustainable bridge and Greenway

The revised NDP lacks basic ambition for Waterford and the South East region, and importantly, lacks any sense of a voice or understanding of the region in general. Within the revision there is a notable lack of local or bottom-up engagement in framing the strategic ambitions of the NDP. The revision fails to acknowledge the lack of investment in the region in the first phase of the NDP, the difficulties in renewing the local knowledge-economy enterprise system, and, that in simple terms, the South East economy is now unlinked to the national economy and has been left behind.

RECOMMENDATIONS

Waterford Chamber request the following changes be reflected in the Revision of National Planning Framework:

1. Engage in meaningful regional consultation before finalising this revision. To support this, baseline performance data with clear NUTS3 regional KPIs should be published for this mid-term revision of the NDP.
2. Break out the national budget and spending programme for the NDP to NUTS3 regional level. To date, it is evident that the NDP has been unfairly concentrated in Dublin and Cork, against the ambition of both the National Spatial Strategy (2002-2020) the National Planning Framework (2018-2040). To maintain national cohesion and the legitimacy of the €116bn+ spending programme, it is vital that budgets and spending programmes are offered at the NUTS3 regional level. It is now clear that some regions are not meaningfully participating and benefiting from the transformational aspirations of the NDP.
3. Reinstate a schedule of priority projects for the South East. Priority projects, named in earlier iterations of the NDP and listed above, are now substantially washed out of the revised plan– they need to be reinstated, reinvigorated and recommitted to in the revised plan. It is ominous, that having been mentioned in the original plan and associated materials and presentations, and having not advanced in the first period of the NDPs operation, they are now absent from this revision.
4. Revisit the boundaries used for population calculations. Notably, the 2017 Statutory

Boundary Commission report to expand Waterford City was uniquely and without precedent unacted. This is echoed in the unusual treatment of Waterford City's MASP, which artificially suppresses the urban population in the region, and works to weaken the case for urban services in healthcare, retail and higher education. Indeed, the South East economy is unlinked to the Southern region, and is materially disadvantaged by not being considered independently.

In conclusion, it is our belief that Government must be ambitious in its longer-term planning and infrastructure goals for Waterford and the South East region. For prosperity, quality of life and importantly national cohesion, it is vital that the mis-steps of the first phase of the plan are corrected, rather than doubled-down upon.

We respectfully ask you address the issues outlined above in the Revised National Planning Framework, allowing Waterford and the South East region to move forward in terms of prosperity and growth, in line with other regions.

Kind regards,

Gerald Hurley
CEO, Waterford Chamber