The Kilkenny PPN welcomes this consultation to the Regional Spatial and Economic strategy.

Observations from members have been collated and presented below

Growth Potential

The proposed population growth figures of 10% for large towns do not reflect the potential growth of Kilkenny and are more likely to stunt the natural development of the City.

Kilkenny is a city with a population of over 26,000 people it has been carefully planned into 4 districts with supporting infrastructure, all of which have real potential to expand beyond the parameters suggested. The City is not being given respectful recognition of its City Status by being categorised as a large town and bundled together with smaller towns that do not have the same existing infrastructure and potential infrastructure and in turn growth potential. We propose that each town is examined on its existing merits in terms of expansion.

We welcome the fact that there is a targeted population growth for Ireland's small towns and rural areas however there are thresholds of numbers (population) for services provided e.g. educational institutions which are essential service to areas in terms of attracting population growth. This is a bit of a chicken and egg scenario. Do we provide services and wait for the population growth or do we try to expand the population and create more satellite towns whose inhabitants are forced to go outside of the town for essential services? We propose that threshold numbers for essential services are reconsidered and made explicit for smaller towns.

Partnership approach

In order for Waterford to expand to reach its potential as the main City in the South East it will need the use of land within the border of County Kilkenny namely Ferrybank and surrounding area.

The relationship between Waterford and Kilkenny has been perceived as being one of non cooperation however this is not the case as can be seen from an earlier proposal that the PPN Made to the NPF with the Combined Residents Association of Ferrybank on the issue of a boundary change

- *In our opinion, things were starting to really happen for Ferrybank. Both councils were beginning to work together for the greater good of the residents living in the area. Just one example of this is where both Kilkenny County Council and Waterford City & County Council worked together to establish the Ferrybank Tidy Towns project. The logo we had designed recently sums up the 'working together' of the two councils concept.*

Unfortunately all this 'Proposed Boundary Extension' has achieved so far is that it has created animosity and built an emotional wall between both counties. In our view this is a seriously backward step and has potentially set us back years.

In light of this working relationship and to avoid the disruption and the upset of further talks of boundary changes we propose that a partnership model is created for the local Authorities of Waterford and Kilkenny, with joint retail, economic and planning strategies for expansion thus elevating the need for boundary changes..

Infrastructure

If the SER is to be seriously considered as the Gateway to Europe and relieve development pressure on the Greater Dublin Area then investment in infrastructure is required.

- The N24 road from Waterford through Tipperary to Limerick offers great potential however needs to be upgraded to Motorway standards before it can be considered as an economic driver.
- The role out of Broadband has been slow and has inhibited the economic recovery and revitalisation of rural Ireland in many rural towns/villages. Greater urgency and transparency is required to drive local economies.
- The airport in Waterford has the potential to attract major investment to the region but only if it is the recipient of major investment itself.
- Both the port of Waterford (belview) and Rosslare need investment to capitalise on their close proximity to England and Mainland Europe and drive the South East as the Gateway to Europe.
- Road and rail upgrades are required to link the cities of the South East e.g. there is no direct rail from Kilkenny to Wexford.

University status/Employment

The idea of University Status for the South East is a long running argument but the importance of a quality University for the area cannot be underestimated. With Universities in Dublin, Galway, Limerick and Cork, the South East is the only region without a University and therefore does not attract a full range of industry or student type.

The South East Region has the highest unemployment rate in the Country and also offers the lowest quality of jobs; plans for a University in the region must go hand in hand with attracting investment in quality jobs.

KEY ISSUES ADDRESSSED BY THE ENVIRONMENTAL PILLAR KILKENNY.

Introduction: The philosophy underpinning the Southern RSES is predominantly that of economic and population growth. The Environmental Pillar's opinion is that, in the context of current global overpopulation and global environmental challenges, this is the wrong perspective and should be replaced with a vision of social progress and prosperity that stabilizes population growth and defines a core set of spatial principles for allocating resources and developing a quality human environment consistent with respect for the natural environment. The strategy must address local challenges of homelessness, low pay, sprawling development, and congested roadways in addition to the global challenges of the coming century, i.e. over population, climate change, biodiversity loss and excessive waste production.

The projected increase in population should be discouraged and a stable population promoted. An increase in economic activity is desirable but need not be dependent on population growth, it can be achieved with innovation, increased efficiency and automation. A more distributive economic model can help ameliorate social injustice, and adverse environmental impacts can be avoided by transition to a circular economic model. The economic strategy should aim to support circular and distributive models.

We support the emphasis given to economic development of major urban centres outside Dublin but believe that it should take into account certain economic models and avoid adverse environmental impacts.

Targets: It is essential that the RSES acknowledges a global environment of overpopulation, increasing climate impact, and ecological destruction. In order to deliver an economic model and spatial strategy that provides a sustainable development pattern, targets should be set, not for population increase, but for the following:

- Achieving Equity i.e. creating a better society through a planning and land system that spreads public goods to meet societal needs, and an economic system that is distributive and delivers as a minimum a living wage. Targets should be set for achieving, for example, an incremental reduction in homelessness, elimination of zero hour contracts and implementing fair terms and conditions of work.
- Promoting a 'circular economy' where resource input, waste emission and energy leakage are minimized. Targets should be set, for example to achieve elimination of single use plastics, microplastics and synthetic micro fibres, improvement of waste management, use of renewable resources and reduced energy consumption.
- Achieving smart compact growth in our cities, rural towns and villages that is enhanced with green infrastructure and has the public realm designed for children. Targets should be set, for example, for compact housing developments, with local amenities & services.

- Achieving sustainable mobility i.e. decarbonized transport. Targets should be set for the development of safe walking routes & cycling lanes that provide good connectivity between neighbourhoods and amenities & services, park and ride facilities and electrified public transport in every metropolitan area. Good connectivity by sustainable means between metropolitan areas outside Dublin is also desirable.
- Implementing a shift away from current polluting and carbon-intensive agriculture in order to protect biodiversity and meet climate change challenge. Targets should be set for compliance with Environmental Directives, transition to less intensive agriculture and organic farming.

Issues: Our approach to the issues is focused on Kilkenny and its rural areas, so we have omitted some of the suggested issues on the Southern Assembly list (numbers in brackets) and added others.

	Key Issues to be addressed	Suggested points for consideration
1 (6)	What are the potential barriers to achieve the Draft NPF targeted levels of 20-25% growth for larger centres (with populations in excess of 10,000) and how can the RSES address these barriers?	Population growth is undesirable because of the inability of the planet to sustain increased numbers due to associated resource depletion, waste accumulation and ecological destruction. The RSES should actively support stabilizing the population and growing the economy through innovation, efficiency, automation and transition to a circular model. Investment in education is necessary to meet the challenges of self employment in the future. Connectivity between larger centres outside Dublin needs to be improved.
2 (8)	How can the RSES assist the work of Local Authorities and other stakeholders in incentivizing urban centre renewal and achieving targets for 30% of new housing on infill/brownfield sites?	The planning system should deliver well designed streetscapes and compact housing with pocket parks, children play areas, good connectivity, safe walkways & cycle lanes, public transport, park & ride facilities. Housing should be family friendly. The public realm should be designed for children. This may require investment in a town architect/designer.
3 (9)	How can the RSES support the development of high quality and socially inclusive urban communities which can become locations of choice to live, work, visit and invest in?	Good planning applied to street & housing design. Good connectivity that encourages active transport and use of public transport. Provision of amenities, services and access to transport infrastructure within 15 minutes walking distance. Support for local culture, protection of local history and

		archaeology. Our towns are 'over-engineered', the inputs of a good town architect and an urban designer are necessary. Well paid jobs. Affordable housing.
4 (10)	What are the key challenges and barriers to the achievement of sustainable economic growth for towns less than 10,000 population and rural areas?	For economic growth to be sustainable it must adhere to the principles of the circular model , be distributive by design thereby improving standards of living for all, be regenerative by design thereby respecting planetary limits (e.g. resources, wastes, energy) Improve Broadband. Provide education.
5 (11)	How should we define the hinterlands or functional areas of towns with populations of less than 10,000 people?	Less than 5 km i.e. within walking and cycling distance.
6 (12)	What are the most suitable criteria for determining the range of services which would be necessary for towns of between 1,500 and 10,000 people?	Flexible design of service centres e.g. educational facility that provides school by day, adult education in evening, and site of social activities. Services within walking distance. Good connectivity and public transport to larger metropolitan areas. Amenities such as library, sport grounds, playgrounds, parks.
7 (13)	What is the most appropriate form and density of residential development in these existing towns?	Terraced houses and 3 storey apartments set in attractive streetscapes with good connectivity and public spaces.
8 (14)	What are the key infrastructure priorities (physical and social) to address to achieve tangible population and employment growth in rural areas, in particular to assist vibrant regenerated town and village centres which are competitive and attractive locations of choice for living and working?	Broadband. Urban consolidation. Attractive streetscapes. Good connectivity via walking and cycling in order to reduce sprawl. Community Centres.
9 (15)	How can the RSES support growth and diversity in rural economic sectors which are successfully embedded in our region, particularly agriculture, marine, forestry,	Education & training Broadband provision Good connectivity Reduce intensity of agriculture.

	tourism, energy and the green economy? What are the examples of other emerging sectors that will further drive the rural economy and what are infrastructure requirements that will assist their success?	Support organic farming Enforce environmental legislation that protects the quality of our waterways
10 (16)	How can the RSES strengthen protection of the rural environment and rural resources in tandem with objectives for sustainable growth in the rural population and employment?	Support for the bioeconomy. Biodiversity enhancement. Landscape protection. Pollution control. Access to the rural landscape on walking trails. Introduce effective climate, biodiversity and sustainability proofing for all Common Agricultural Policy (CAP) and other rural development funding.
11 (17)	Population and economic growth within our region will require inward migration. What are the key priorities at a regional level for service and infrastructure provision that will make the region a high quality and competitive location by choice to attract and retain people from a variety of cultural backgrounds to live and work here?	Population growth should be stabilized. Automation will in the future replace many jobs and provide new types of jobs and be an asset in achieving economic growth. The infrastructure required to attract people is the same as for current residents. Community schools that help integrate young people and improved language skills are desirable.
12 (18)	Noting the Draft NPF targets for the Southern Region, what are the key challenges to achieving 175,000-190,000 new housing units in the region by the year 2040?	Land reform – make it easier to procure land for public use. Transition from developer led to community/social led development. A housing policy with greater involvement by Local Authorities and delivery of more affordable housing. Financial incentives for purchasers. Ensure at least a living wage for workers.
13 (20)	What are the key supporting infrastructures that will ensure the supply of strategic housing locations to succeed in attracting residents and workers to our region?	Good architecture and streetscape, and local distinctiveness that instils a sense of place and wellbeing and is attractive to live in. Infrastructure for cultural activities. Protection of architectural heritage and archaeology. Good connectivity that facilitates active travel e.g. provision of safe walking and cycling routes to work and school and provision of park & ride facilities.

14 (26)	What are /How do we deal with the key threats to water quality and how can investment in water and wastewater infrastructure be focused so as to achieve the greatest possible return on investment and support the economic growth and health of citizens?	The key threats to water quality are agricultural pollution and urban wastewater (EPA,2017). Septic tanks will become an increasing problem if flooding becomes more frequent. All urban (town/village) sewage should be connected to main sewage treatment works. Apply effective timetable for achievement of standards and targets in Water Framework Directive, the Nitrates Directive and the Urban Wastewater Directive. Plastic and microfiber waste should also be regulated.
15 (27)	Given the high level of carbon emissions from agricultural activity and the transport sector, what are the key changes that need to be made to bring these sectors into line with national targets?	Agriculture: Introduce effective climate and sustainability proofing for all Common Agricultural Policy (CAP) and other rural development funding. Promote organic farming. The targets for Irish agriculture as set out in Food Harvest 2020 and Food Wise 2025 are export driven and in direct conflict with maintaining and enhancing biodiversity, as well as climate mitigation. This needs to be reversed. Transport: Active travel facilitated with safe walking and cycling routes separate from vehicular traffic. Clean public transport (Electric). Expanded rail network (carriages, frequencies). Incentivize switch to electric cars.
16 (28)	How can the Southern Region become a leader in renewable energy production together with research and development into next generation technology?	Promote decentralised energy generation through, for example, small-scale wind, hydro, biomass, geothermal, combined heat and power, and solar. Ref: Tipperary Energy Agency (TEA). Use of solar panels on industrial and agricultural roofs should be promoted.
17 (29)	What are the key changes which need to be made to grow the bioeconomy in the Southern Region?	Bio-economy includes primary biomass production/extraction sectors (agriculture, forestry, fishery, food, beverages) and industries using or processing biological resources e.g. pulp and paper products,

		biofuels and bioenergy, textiles, some textile and chemicals, pharmaceuticals, biotechnology. Sustainability of above requires a clean environment & circular economic model.
18 (36)	What key infrastructural investment is required to facilitate the development of the towns and villages in the Southern Region?	Broadband. Improved connectivity for active transport and public transport. Renewable energy. Quality compact housing. Well designed streetscapes and public spaces. The public realm should be designed for children.
19 (37)	What are the key infrastructure investments needed to support sustainable connectivity (including modal shift to sustainable transport modes) throughout our region including infrastructure between our large urban areas, within our metropolitan cities, towns and villages?	Safe walkways. Cycle lanes. Enhanced rail network. Good public transport. Power points for fast electrical charging. Limit investment in private transport to construction of bypasses around towns and villages and park & ride facilities.
20 (40 a)	Is digital infrastructure sufficiently prioritized as an essential infrastructure for the economic and social development of communities throughout our region's cities, towns, villages and rural areas?	No, the infrastructure is not sufficient, broadband access needs to be increased and improved.
21 (40 b)	What are the main barriers to the successful implementation of the National Broadband Plan and other digital economy initiatives throughout our region and how can the RSES address this?	Finance. Technical. The development of new data centres should be linked to the generation of renewable energy equivalent to their needs and linked to the grid.
22 (41)	What measures need to be put in place at a regional level to ensure full implementation of the National Policy Objectives in the Draft NPF and the more detailed policies and objectives of the RSES?	The achievement of targets should be legally binding. Effective Planning that delivers a quality environment to live and move in. An economic model that delivers equity and social justice and respects planetary limits.
23 (43)	What are the key indicators that could be used to determine the level of success of the adopted strategy?	Quantifiable targets, periodic review, corrective action in the case of target failure, effective implementation measures.

24	What measures are required to deal with the impact of automation on future employment trends.	It is estimated that half of all current work activities have the technical potential to be automated. New occupations will be created and others displaced. Artificial Intelligence (AI) and robots will improve productivity and create economic growth. Successful introduction of automation requires Education and Training.
25	How can the market diversification necessary to meet the Brexit challenge be facilitated.	Diversified markets are especially needed in the agri-food sector because the UK accounted for 35% of Irish food and drink exports in 2017. Expertise in languages, marketing and financial management will be required. Access to good broadband is necessary
26	How can we ensure the economy delivers sufficient income to enable people live with dignity.	Minimum wage should be a living wage. No zero hour contracts. Well educated workforce. Education for self-employment. Financial assistance should only be given to economic activities that are distributive and regenerative by design.
27	How can we sustainably maximize the economic and tourist asset that is our cultural heritage and landscape.	The RSES needs be informed by the National Landscape Character Assessment, the National Inventory of Architectural heritage, and associated inventory of Historic Gardens and Designed Landscapes in considering the preferred location for infrastructure, urban expansion and other development. (An Taisce submission to NPF) Support for 'Ireland's Ancient East'
28	What are the challenges of good Strategic Environmental Assessment (SEA) of the measures required to address issues.	The SEA needs to identify, address and make concrete proposals for mitigation of climate impacts, reversal of biodiversity loss, deterioration in quality of life and sustainable use of resources.
29	How can we support the transition to a circular economy that minimizes resource input, waste emission and energy leakage.	Regulate packaging i.e. reduce where possible and transition to natural or

		biodegradable packaging
		Implement regional waste management plans.
		Apply the polluter pays principal to industrial and service activities.
		Generate renewable energy to meet needs of industry.
		Incentivize and fund only activities that employ a circular economic model.

Submitted on behalf of the Kilkenny PPN

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