

Minister Eoghan Murphy,
Department of Housing, Planning, Community and Local Government,
Customs House,
North Dock,
Dublin 01 W6XD.

10th November 2017

Re: Submission on Draft National Planning Framework "Ireland 2040 – Our Plan"

Dear Minister Murphy,

I write in respect of the above referenced.

I am pleased to submit to you a submission from Limerick City and County Council to the "Ireland 2040 – Our Plan" Draft National Planning Framework published on the 28th September 2017.

Yours sincerely,



Conn Murray
Chief Executive

Ireland 2040 Our Plan
National Planning Framework

Submission by
Limerick City and County Council



Comhairle Cathrach
& Contae **Luimnigh**

Limerick City
& County Council

10th November 2017

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1.0 Introduction

Limerick City and County Council (LCCC) welcome the publication of the Draft National Planning Framework (NPF) and the opportunity to comment on and influence this strategic framework for our country's future growth and prosperity.

LCCC agree with the overall City region growth approach that is proposed in the NPF, but consider that capping our ambition, which is to establish Limerick as a dynamic Tier 2 City of a scale which can exert critical-mass leverage at an international level, is unacceptable. This submission requests that the framework supports the development of the Mid West Limerick City Region to act as a focus for concentrated investment and growth at a level which can contribute towards national development, economic competitiveness and deliver on effective regional development.

2.0 Effective Regional Balance

In order for regions to contribute to the national economy the NPF needs to provide for the conditions for regions to grow and realise their full potential. The NPF itself highlights the risks for not securing an appropriate and effective regional balance in terms of Ireland's future development. It further acknowledges that unbalanced growth, largely focused in Dublin and the surrounding region creates a significant risk, whereby not achieving the economy's full potential will give rise to a shortfall in Ireland's economic performance with serious and long-lasting consequences for future living standards and the quality of life overall, across all regions of the country.

However a comparison of the apportionment of the 2016 population across the regions compared with the 2040 population targets percentage apportionments, demonstrates that the 'business as usual' approach will be the outcome if the Draft NPF is implemented as currently proposed.

Table 1: Regional population targets, trends and projections

	2016 Population	%	2040 Population	%
Eastern and Midlands	2,328,517	49%	2,800,000	48%

Northern and Western	847,442	18%	1,000,000	17%
Southern	1,585,906	33%	2,000,000	34%
Total	4,761,865	100%	5,800,000	100%

The proposal that Limerick, Waterford, Cork and Galway will have just under one-quarter of the overall population growth by 2040 while the Dublin commuter belt, including the 'Mid-Eastern Region' (Wicklow, Kildare and Meath) will consume 50% of the growth does not represent equitable nor effective regional balance. The final NPF needs to provide for stronger growth and far greater ambition in the population targets for the Southern Region in particular in the Mid West Limerick City Region, to provide a policy framework and critical mass to enable effective regional development and rebalancing of population.

The ESRI report published on the 26th October 2017 on "Projections of demand for healthcare in Ireland 2015 – 2030" projects an increase in population by between 14% (0.64 million) and 23% (1.08 million) from 2015 to 2030. It is advocated that the overall population growth is amended to reflect this published ESRI report and to ensure consistency in the delivery of services across government departments, as proposed in the draft NPF. This submission requests that the final NPF updates the published ESRI report and makes provision for the population growth for the period 2030 to 2040 and that this additional population is allocated to the Mid West Limerick City Region.

3.0 Population projections

3.1 Limerick City

Limerick City has enormous competitive advantages, including its central location on the Atlantic Corridor, its national and international trade and tourism connectivity through Shannon Airport and Shannon Foynes Port Company and a third level complement via the University of Limerick and Limerick Institute of Technology that ensures constant supply of graduates.

It is ideally positioned from a scale and capacity perspective to accommodate significant population growth. It benefits from having ample zoned land, some of which will be imminently serviced due to the allocation of LHIAF funding and it presents significant opportunities for urban regeneration due to its high vacancy rates compared with other Cities

The Region also benefits from partners and stakeholders who have historically demonstrated a cohesiveness and vision for the region which builds on decades of co-operation in tackling issues and delivering results across administrative, organisational, operational and institutional barriers.

The NPFs definition of Limerick City as a regional centre, capping the population target at 150,000 and restricted population growth targets for the Region as a whole, falls short in recognising the potential and ambition of the City Region.

The significant financial investment in Limerick through initiatives such as Limerick Twenty Thirty (since the launch of this Plan, some 9,600 jobs and €1.4 billion in investment has been announced for Limerick), an award of €4 million under the Sustainable Urban Development Priority in the Southern and Eastern Regional Operational Programme 2014-2020 for improvement works on O'Connell Street, the public investment in housing (under Rebuilding Ireland) and accompanying necessary infrastructure under the Local Infrastructure Housing and Activation Fund, Smarter Travel works and the Limerick Regeneration Framework Implementation Plan (LRFIP) needs to be recognised through significant population and economic growth to ensure return of investment to the exchequer.

In order to allow Limerick develop to a sufficient scale and quality to compete internationally and to be a driver of national and regional growth and investment the NPF needs to provide for greater growth and ambition for Limerick City.

3.2 Population growth past trends

Based on the projected population figures and apportionments set out in the Draft NPF it is estimated that the population increase for the Mid West (which includes all of Tipperary) from 2016 to 2040 will be 24%. This represents only a 3% increase on the population growth for this region from 1996 to 2016. Limerick City depends on this region to provide a wider workforce and skills base and in turn the city has the potential to boost the region by promoting growth and employment. The population growth of the Mid West Limerick City region needs to be increased in order to drive the economic development of Limerick City as proposed in the framework.

3.3 Population allocation

National Policy Objective (NPO) 2b requires a target of around 66% population and jobs growth to be focused in the cities and their suburbs together with a number of large regionally distributed towns and their environs. NPO 14 further requires an overall population growth target of 15% for small towns of less than 10,000 people and rural areas. It is unclear as to

where the remaining 19% is accounted for. The NPF should clearly state the overall vision and population allocations to avoid confusion during the implementation stage.

3.4 Towns under 10,000 population

It is considered the population threshold adopted of 10,000 will undermine the role played by large towns, which are below this threshold, that act as key service centres within the region and offer a high quality of life and strong support structure to their communities and businesses. The proposed restrictions on population growth outside the cities and large towns will result in the demise of the vibrancy and viability of these towns. The table below, which represents a high level assessment of the figures, highlights that the population projections as outlined in the draft NPF represents little or no targeted growth of towns, villages and rural areas over the lifetime of the Framework. It is also worth noting that the social housing demand in areas outside of Limerick City will exceed the annual allocation figure in table 2 below.

Table 2: Proposed estimated population growth in Southern Region

Population allocation for southern region	375,000 (maximum growth figure)
3 Cities (Cork 115,000) (Limerick 52,000) (Waterford 29,000)	196,000 (allocated growth figures)
Large Towns	60,000 (16% of total)
Remaining population for small towns below 10,000 and rural areas	119,000
Distributed between 9 Counties in Southern Region (proportions to be decided by RSES)	13,222 (between 2018 and 2040)
Average annual growth in population (23 years of the NPF)	575 people pa
Houses required at annual basis (occupancy rate of 2.5)	230 houses pa

It is recommended that the NPF set out a vision for all towns, which are under the 10,000 based on a hierarchy approach.

Intrinsically linked to this is the requirement to align infrastructural capital investment in smaller tiered settlements. Many smaller tier settlements in Limerick County are displaying a significant demand in terms of housing need, whether of private owner occupier or private/social rented tenure. Although some limited development can take place through the use of on-site sewerage treatment facilities, a more aligned policy position is required between the DHPLG and Irish Water to ring-fence monies to expand or provide treatment plants within Limerick's rural towns and villages, and not just major urban centres as a priority. Planned infrastructural capital investment will future proof the economic and social growth of smaller tier settlements and meet an evidential housing demand in line with NPF policy.

3.5 Open Countryside

There are a number of issues that require clarity in relation to one off rural housing:

3.5.1 Economic Need

In relation to the need to demonstrate an economic housing need in certain rural areas the framework should set out a definition of "economic need". Maps indicating the OECD defined urban functional areas should also form part of the framework. In fact increased use of maps throughout the document should be considered.

3.5.2 Areas under urban influence

The Framework would appear to indicate that, in the context of rural housing, there is a distinction between rural areas located within the commuter catchment of the five city regions or of a large town and those that are outside commuter catchments. This statement does not take account of the pressure that exists on rural areas within close proximity to large towns which are under 10,000, high value amenity areas, tourism routes or highly productive agricultural areas. These locations also generate pressure for urban generated housing which needs to be considered within the Framework.

3.5.3 Housing Need Demand Assessment

Methodology in relation to the how the mandatory requirement to allocate population to the open countryside under the Housing Need Demand Assessment is required.

4.0 Metropolitan Area Strategic Plans

The proposal in the NPF for the inclusion of Metropolitan Area Strategic Plans and their role in the development of City Regions are unclear. There must be greater clarity in relation to the

proposed content, the definition of “appropriate authorities”, the timelines, together with relationship between the MASPs and the City Regions.

It is suggested that the strategic objectives for Metropolitan areas should be set out in the RSEs and should articulate how the city regions based on the Strategic Planning Areas can support the cities. It is also requested that the City Regions around each of the five cities should be examined and not just Dublin and Cork as proposed. The boundary for these MASPs should be defined by the functional inter-relationship with their surrounding areas including achieving critical mass, land use and transportation planning, employment, connectivity and access to educational and health services, green infrastructure, cultural and retail services etc as well as the commute patterns.

5.0 National Strategic Outcomes and Key Future Enablers

To facilitate the growth of the Mid West Limerick City Region and to maximum its potential, the NPF must include supporting statements within the National Strategic Outcomes and key future growth enablers. These should include the following:

- Identify Limerick City as a dynamic Tier 2 European city region.
- Policy support for the Limerick Northern Distributor road, the development of which is considered critical to facilitate future economic development of the city and the region. It will benefit regional city interconnectivity, provide improved access from the region to the University of Limerick, the IDA National Technology Park, Shannon International Airport and the businesses and industries in the Shannon area. This will significantly enhance the attractiveness of the region from a research, innovation and development perspective. Policy support for this road is already in place at local level and it has gone through the Strategic Environmental Assessment and Appropriate Assessment process by way of variations to both the Limerick County Development Plan and the Clare County Development Plan.
- Shannon Airport must be recognised as a strategic international airport of national and international importance. There is a need to maximising existing spare capacity and, in line with other sectoral plans, National Aviation Policy should be aligned to reflect approach to effective regional development in the NPF.
- Shannon Airport must be recognised and promoted as an international centre for Aviation, including leasing, maintenance and training. The continued growth and development of this sector in Shannon will build on an established international reputation and can achieve significant economic growth and investment for the Country.

- The wording in relation to public transport connectivity to Shannon Airport from the wider region needs to be strengthened with clear support for direct rail connectivity to the Airport subject to appropriate economic appraisal.
- Faster rail link between Limerick and the Dublin / Cork line to allow faster commute times.
- The framework fails to recognise the importance of tourism areas to the national and regional economy and the importance of supporting the protection, enhancement and investment in these areas for generations to come. A national policy objective should be included to support International Tourism Destination Strategies and Local Tourism Companies.
- Facilitating the growth of Shannon Foynes Port, Ireland's largest dry bulk port and a key economic driver for the region should be recognised as a National Strategic Outcome under the section "High Quality International Connectivity" in line with that proposed for Dublin, which is also a Tier 1 port of national significance.
- The NPF needs to support the reinstatement of the Limerick to Foynes Railway line, linking Ireland's deepest port to the national rail network. SFPC has already secured €800,000 in funding to undertake a study of the potential for reinstating and expanding the rail line connecting the Port of Foynes to the Irish rail network. As well as port benefits, reinstatement of the rail line has the potential to bring added tourism and environmental benefits to the economy. Both the road and rail links are key twin element for the TEN-T requirement for Tier 1 ports and are intrinsically linked to delivering the balanced economic growth objectives as set out in the Draft NPF. With adequate support in the NPF, a potential rail connection has the real possibility of forming a central part of the 'access strategy' for the port, consistent with European and national transport policy.
- If the Mid West Limerick City Region is to maximise the economic and social benefits for all arising from digital transformations, to deliver innovation, business and jobs growth, it requires tier-one connectivity. Investment into our digital networks will ensure that the region has the infrastructures to capitalise on growth markets such as blockchain and artificial intelligence.

6.0 Housing Provision

6.1 Development within built up areas

The target growth of cities, towns and villages through emphasis on renewing and developing existing built up areas is welcomed. However, the uniform prescriptive use of percentages across the country does not take into account the actual capacity of each urban area to

accommodate the specified target. For example the area of opportunity for infill development in areas outside the Dublin urban area is significantly smaller, therefore the 50% / 30% requirement is considered excessive. It is recommended that the emphasis on the renewal of core urban areas is retained in the NPF, however the apportionment should be allocated following an assessment of the capacity at local level rather than a uniform nationwide approach.

6.2 Headroom

While it is appreciated that there is a need to avoid excessive zoning of land it is considered that the 50% headroom proposed in terms of zoning is not sufficient and could potentially result in increased land prices and issues with land availability. Therefore it is recommended that the headroom percentage is increased.

6.3 Location of Homes

LCCC endorses National Policy Objective 34 which seeks to 'prioritise the provision of new homes at sustainable locations and at an appropriate scale relative to location'. In the interests of clarity and realisation, the NPF should define what a 'sustainable location' is or at least make reference to policies that show the requirements that define a sustainable location to ensure that each local authority applies the methodology in a consistent manner.

The clarity on the definition of a 'sustainable location' is linked to Appendix 2 of the NPF - A Methodology for the Prioritisation of Development Lands (page 150). It is recommended, in the interests of consistency for all Local Authorities, that the DHPLG issue Ministerial Guidelines or a Circular in relation to the methodology proposed and align the methodology to the requirements recently contained Circular APH 2/2017 relating to Strategic Development Management Plans (SDMP). It is important that language is consistent between national government land management policies to avoid confusion and ensure a clear approach to the policy implementation at a local level - e.g., tier 2 lands (NPF reference), secondary sites (SDMP reference) etc.

LCCC have been proactive in implementing a local policy and methodology on land management in its 'Assessment of Sites for Housing' (ASH) methodology. The methodology developed identifies strategic and local constraints of lands and uses a weighted 'traffic light' assessment – green, amber, red – against a series of individual site criteria. This measurement ensures that the ASH provides both an absolute measure of whether a site is suitable or unsuitable for development, but also a measure of its suitability when compared against other

sites for development in the process which informs the prioritisation process. It is considered that an objective and weighted methodology such as the ASH should be promoted nationally to ensure a consistent approach to active land management by all local authorities and could provide a useful case-study to support Appendix 2 of the NPF - A Methodology for the Prioritisation of Development Lands.

6.4 The Importance of the Built Form and Public Realm

It is widely recognised that the quality of our built form and public realm plays a key role in the success of our communities. Well designed places enable healthy and active lifestyles, minimise impacts on the environment while supporting biodiversity and providing opportunities for creativity to flourish and our economy to grow. The importance of a well designed built form and public realm extends beyond just the functional and aesthetic; it symbolises a place's identity, culture and values. It is therefore important that the NPF helps to provide the framework within which these objectives, which are also set out in other Government publications¹, can be realised. The commitment within the NPF to deliver better places under National Policy Objective 4 is to be commended, however, it is suggested that the NPF should consider how the strategic objective of 'place-making' might be delivered at a micro-level to support practitioners and make the strategic objective more likely to be realised. Consideration of a subsection to achieve the 'high quality urban places' through the consideration at a national level of reference to 'Design Codes' should be promoted as a tool to deliver high quality built form and public realm. Defined by the Commission for Architecture and Built Environment UK (2011), a Design Code is a set of "illustrated design rules and requirements which instruct and may advise on the physical development of a site or area. The graphic and written components of the code are detailed and precise, and build upon a design vision such as a masterplan or a design and development framework for a site or area."

Design Codes, as part of large strategic multi-phased development applications (e.g., strategic housing developments over 100 units to An Bord Pleanála, LIHAF schemes, SDZs etc), to deliver a consistent high quality design approach where many design led teams firms may be involved should be endorsed at a national level through the NPF.

¹ - Design Manual for Urban Roads and Streets (2013), Dept. of Transport, Tourism and Sport & Dept. of the Environment, Community and Local Government

- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns and Villages) (2009), Dept. of the Environment, Community and Local Government

- Urban Design Manual (2009), Dept. of the Environment, Community and Local Government

Limerick City and County Council actively promote and implement design codes to deliver 'high quality urban places' and suggests that the Limerick Design and Public Realm Code, authored with and endorsed by the DHPLG, should be included in the NPF as a case-study to this section as to how high quality urban design and place-making can be delivered.

(<https://www.limerick.ie/council/services/housing/regeneration/design-and-public-realm-code>)

6.5 Vacancy

LCCC welcomes the NPF's commitment to reuse existing building stock and that it "*must be accounted for and considered as part of any evidence basis for housing policy formation and at a local level*" (page 87). However, key to the implementation of this policy is correct and reliable data. Discrepancy between CSO figures and other databases such as the Geodirectory needs to be addressed to provide a definitive evidence base with validity and rigour.

A spot-check on vacancy data recorded in Limerick city by the Geodirectory database (which is updated every quarter) and the Census data (updated 5 years) demonstrated a large discrepancy between the two datasets, as demonstrated below.

- Geodirectory as at Q2 2016 - 386 residential vacant postal addresses.
- CSO figure as at April 2016 - 2583 units.

The discrepancy between the two datasets is of concern and needs resolution to be able to define reliable data to inform a realistic policy to implement.

6.6 Refurbishment

The objective for a liveable and adaptable housing development that responds effectively "*without requiring costly and energy intensive alterations*" (page 87) is welcomed. Linked to this is the Government's proposed change-of-use 'permitted developments' as proposed under the Action Plan for Rural Development. For this to succeed the NPF needs to promote a policy and subsequent action to streamline the practical and regulatory requirements (building regulations, architectural conservation, health and safety regulations) to allow changes of uses to be delivered effectively and efficiently without undue cost and time burden to the applicant/agent. This could be delivered through a one-stop shop for statutory consents to provide homes for people who urgently require them.

6.7 Lifetime Homes

In order to effectively implement the objective to *'support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time'* (page 87), consideration should be given to requiring a certain percentage of new-build private and social housing schemes to be designed to a 'Lifetime Home' standard.

In relation to social housing schemes, there needs to be recognition of full integration of disability standards into planning and design, rather than just improve on wheelchair access to new homes and buildings through adaptation grants (such as the Disabled Persons Grant) after a scheme is built. This is more costly in the long-run and not cost-beneficial to the State. The Department of Housing, Planning and Local Government should allow an increase in funding (as defined under unit cost ceilings by local authority area – all in costs) for new-build residential dwellings to incorporate Lifetime Homes Standards. A measure which could be implemented immediately by the DHPLG would be consideration to allow 10% - 15% of units in a new-build scheme to be designed to a Lifetime Home standard and providing a funding allowance top-up to incorporate Lifetime Homes Standards to meet our increasing ageing population. By promoting the policy in public housing and leading by example, the DHPLG sets a benchmark to support the NPF's objective above.

6.8 Monotenure

LCCC supports the NPF's statement regarding the problems experienced with the addition of more social housing to areas that are already dense with social housing (page 88). The most efficient method of housing development from an outputs perspective is the building of large-scale housing schemes. This method was adopted in Limerick in response to housing crises in the 1930s, 1950s and 1970/1980s with the construction of Moyross and Southill being the most dramatic examples of this type of response. Over 1,200 social houses were built in each of these estates. From an outcomes perspective, both of these estates experienced very serious social issues and are now part of the Limerick Regeneration programme together with Saint Mary's Park and part of Ballinacurra Weston. Significant failures have occurred in Limerick with the volume building approach. While the scale of the developments involved was only one factor among other issues, it was a significant contributor. It is extremely important that a consistent approach is applied to this policy recognising that short term solutions to deliver output is a high risk approach. The NTMA PPP Social Housing Delivery model appears to contradict this policy.

6.9 Analysis of Future Housing Requirements

National Policy Objective 38 (page 89) to standardise 'requirements by regulation for the recording of planning and housing data by the local authorities in order to provide a consistent and robust evidence base for housing policy formulation' is welcomed. While local authorities have an understanding of their own housing market, at present, these are researched with differing geographies, timescales and techniques. Analysis of a selection of councils' published Housing Strategies, available on their websites, identified considerable variation in the scope of variables assessed. There were also significant differences in the way councils explained how their assessments of future housing need had been determined, how they proposed to support wider objectives, and how these objectives would be delivered. Many local authorities focus on the provision of social housing rather than social, affordable and private housing.

In the interests of consistency, particularly important housing variables for analysis as part of this Housing Strategy must include:

- Analysis of the Housing market Areas
- Stock and Supply Trends
- Housing Market Dynamics and Signals
- Assessment of Future Housing Need
- Affordable Housing Need
- Requirement for different types of homes
- Requirements for specific groups

A particular weakness of the Housing Strategy is that it is prepared every 6 years in line with the Development Plan and is based on a projection for that period that may not be realistic or relevant in varying market cycles. A review every year in line with the statutory requirement to update the Social Housing Needs Assessment should be undertaken for accurate and relevant information for policy making. The benefit of consistency in variables to be measured allows a readily available comparison of housing assessments within and across different local authority jurisdictions.

6.10 Affordable Housing

Given that all affordable housing schemes nationally have been stood down since its announcement in the Government's Housing Policy Statement in 2011, LCCC are particularly interested in progressing an affordable owner occupied housing model again. The NPF should

expand on its reference to affordable housing (page 88) with a section dedicated to Affordable Housing and a definition (as it relates to rental and mortgaged properties).

O’Cualann co-operative housing AHB introduced a recent scheme to meet the demand for affordable housing. This model could be replicated nationally on State and Local Authority lands. The O Cualann model involves two parties – an AHB Co-operative and a Local Authority. The Local Authority transfers its land at discount to an AHB in return for the provision of affordable owner occupied housing by the AHB. The AHB then assesses eligible applicants based on income criteria to determine the allocation of units. Each new owner will be bound by a Co-operative Charter and claw-back mechanisms are built into legal agreements on purchase. Linked to the requirement for a renewed Housing Strategy, as described previously, affordability is about mixed and balanced communities with housing that addresses and analyses the medium income of a particular area to determine the affordability range. Not all local authority administrative areas are the same, and a renewed Housing Strategy can provide the regular and accurate evidence base to determine affordability thresholds. LCCC urges the DHPLG to define affordability and introduce a national affordable owner occupied scheme that would address the affordability gap for prospective purchasers.

6.11 Viability Assessments

Linked to affordability outlined above is the requirement for independent viability assessments. The Planning Policy Statement (DECLG, 2015) and Rebuilding Ireland (DHPCLG, 2016) indicates that planning must proactively drive and support sustainable development, integrating consideration of its economic, social and environmental aspects at the earliest stage to deliver development in an economically viable manner that will sustain recovery and future prosperity. Viability assessments can provide a credible, robust and sound evidence base in order to assess housing viability and in particular affordable housing viability.

There is an urgent need to bring the workings of viability assessments into planning policy by providing a consistent methodology to be applied by all local authorities. This can be achieved through upskilling seminars (with the IPI for example), workshops and the preparation of planning guidance in relation to viability (such as the UK’s Viability Testing Local Plans - Advice for planning practitioners {2012} ‘the Harman Report’ (June 2012). Without any clear and consistent guidance at national level, an ad-hoc approach to land activation will ensue, and in some cases considerable loss of land value and delivery of affordable housing due to inexperience in assessing viability.

6.12 Age-Friendly

LCCC understands the principle of supporting older persons. However, well considered places and spaces should focus on all age-cohorts and not just those of older persons. This is the philosophy of Universal Design and it is suggested that reference should be made to this objective in the NPF. It is suggested that the very worthwhile work of the National Disability Authority (NDA) and its promotion of Universal Access in buildings and public spaces should be brought in as a case study to this section².

7.0 Active Land Management

In relation to the proposal to create a National land development agency to manage state lands it is suggested that the funding and legislative powers are given to Local Authorities to undertake this work. In particular a review of the Compulsory Purchase process would be of significant benefit to public authorities seeking to deliver on Rebuilding Ireland and driving economic growth within our urban areas.

8.0 Prioritisation of infrastructure provision

Under the implementation section the Framework suggests that accessibility between key urban areas such as the key cities of Limerick and Cork will be enhanced only after cities have reached a critical population mass. If the cities are to grow and prosper investment and delivery of infrastructure needs to be prioritised.

9.0 Implementation

9.1 Need for Legislative support

The document needs to contain commitments to create the legislative and funding framework necessary to achieve the goals, targets and objectives proposed in the NPF.

9.2 Progress reports

Implementation progress of each policy and action contained within the NPF needs to be measured to ensure its effectiveness. It is suggested that Chapter 9 of the NPF should include reference to the inclusion of a NPF Monitoring Report every 3-5 years, enough time to identify substantive patterns and directions of change. This Monitoring Report should be made

² <http://universaldesign.ie/Built-Environment/Building-for-Everyone/>
<http://universaldesign.ie/Built-Environment/Shared-Space/>

available on the NPF website to ensure that policies are on track. If policies are not – there should be a mechanism in place to allow policies be modified in an open and transparent manner to ensure the outcomes required are delivered in the most efficient manner.

10.0 Conclusion

If achieving effective regional balance within the Country is to be a cornerstone of the NPF, then delivering long term sustainable growth, outside of the Dublin and Mid-Eastern Region must be clearly supported within the National Policy Objectives and National Policy Outcomes outlined in the Plan. Furthermore, if Limerick and the other regional capitals do not get a significant share of population growth, the NPF will have merely exacerbated economic imbalance on the island, rather than eased it.

Limerick is ideally placed to accommodate additional employment and residential growth due to its central location, which gives it a strategic national accessibility advantage over all other regional centres. This submission therefore requests:

- The identification of the Mid West Limerick City Region as a dynamic tier 2 European city region.
- More ambitious population growth for the Mid West Limerick City Region,
- Updated population projections to reflect the ESRI report published on the 26th October 2017 in relation to healthcare requirements.
- Policy support for the Limerick Northern Distributor road, the development of which is considered critical to facilitate future economic development of the city and the region.
- Faster rail link between Limerick and the Dublin / Cork line to allow faster commute times.
- The NPF to facilitate the growth of Shannon Foynes Port Company and the Estuary as a major economic zone.
- Policy support for the reinstatement of the Limerick to Foynes Railway line, linking Ireland's deepest port to the national rail network.
- The continued development of Shannon Airport.
- The text addressing enhanced regional accessibility must be amended to highlight that intercity connectivity is a priority within the southern region. The suggestion that regional accessibility will only be enhanced once the cities have achieved a critical mass is not practical and will only serve to limit the potential for the cities to grow.
- The emphasis on the renewal of core urban areas is retained, however, the apportionment should be allocated following an assessment of the capacity at local level rather than a uniform nationwide approach.

- Increased headroom should be provided for.
- Clarity should be provided in relation to the proposed Metropolitan Strategic Area Plans and in determining the area consideration should be given to the wider region areas which support cities.
- Recognition that investment is required in digital networks to include tier-one connectivity.
- Recognition that towns below the 10,000 population threshold can act as important economic and service drivers within their municipal districts.

To conclude, from Limericks perspective, the development of a City with a scale that can impact on a national and international scale is imperative if the NPF is to deliver for the nation. Therefore the National Planning Framework must compellingly articulate a clear, strategic and ambitious vision for the City Region supported by an increase in the projected population growth.