

## **Submission by Limerick Institute of Technology (LIT) to the National Planning Framework**

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### **Introduction**

Limerick Institute of Technology (LIT) welcomes the principle of the National Planning Framework. Given the major changes which are likely to take place in Ireland over the next two decades and beyond it is necessary that there is a clear vision of how the spatial structure of the country will be guided in order to provide a framework for the many decisions which will be made regarding investment and public policy and in order to maximise the quality of life of each citizen of the country.

A joint submission is being made by a number of organisation in the Mid-West Region, including LIT, and LIT fully endorses and stands behind that submission.

This submission will address a number of key issues which are of particular concern to the Institute and which it wishes to bring to the attention of the Department specifically and independently. The following are the issues which are addressed –

1. The extent of the growth envisaged for Limerick City
2. The role of towns
3. References to critical infrastructure
4. Higher education outside of cities
5. Achieving the objectives
6. Use of infrastructural capacity which already exists
7. National Policy Objective 32
8. National Strategic Outcomes

### **Issue One: The extent of the growth envisaged for Limerick City**

National Policy Objective 5 is stated as being to *‘develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth and investment.’* This implies that cities and towns need to achieve a scale that makes them distinguishable or puts them into a category which is not over-crowded internationally. In that context setting a target of 150,000 for Limerick is a limited objective and the Institute is concerned and will prevent the city from being lifted into a different category – it will merely become a somewhat larger city of the same type. There are nearly 500 cities in Europe alone which have populations greater than 150,000 *at present* and it is likely that this number will have increased significantly by 2040. Raising the target to 250,000 would put Limerick close to being in the top 250 cities in Europe. We believe that creating this ambition is vital to ensure that the development of the wider region is maintained and accelerated as part of an overall balanced approach to regional development.

The previous joint submission by key organisations in the Mid-West City Region noted the capacity of the Region and the City to accommodate and operate a city of this scale and it is submitted that the target for Limerick City should be increased in order to give it the status, which will allow it to compete internationally. It is also not clear as to whether the 150,000 population target for Limerick City is seen as a cap. It is now understood that this number should be seen as a minimum target rather than as a cap. This is not clear in the document and this should be clarified.

## **Issue Two: The role of towns**

LIT is a regional organisation which has a function in the social and economic development of the region which it serves. It notes that the re-designation of rural areas to include towns of up to 10,000 population and the identification of a new category of town with a population of over 10,000 for the purposes of the NPF, has significant implications for future investment in the region. The towns of over 10,000 population are scheduled to grow by 20-25% over the period of the plan and, while it is acknowledged that towns can't grow beyond the NPF designated rates, LIT is concerned that this approach within the NPF will influence the RESS to an extent that most investment in infrastructure and services will be targeted to these areas. This would seriously disadvantage the Mid-West Region which has one town only which reaches the 10,000 population threshold compared with approximately 30 in the remainder of the Eastern and Midland and Southern and Eastern Regions and the five in the Border Region.

The arbitrary choice of the figure of 10,000 population could have significant implications for the settlements in the region served by LIT. It is strongly suggested that this figure should be re-visited and consideration given to targeting the achievement of a number of settlements of this size in each county relative to the size of population with such settlements to be identified in the County Development Plan for the County. The approach taken to towns and indeed to rural areas in the Draft document relies far too much on developing responses within the existing framework rather than identifying a desirable framework, which should be sought in the context of a long-term spatial plan for the country as a whole.

A further issue with regard to this topic relates to the criteria, which are proposed for considering future targeted patterns of growth. These are listed as

- Whether a settlement is located inside or outside one of the five defined City-Region catchments.
- The scale of employment provision and net commuting flows.
- Accessibility and influence in a regional context.
- The extent of local services provision i.e. administration; education - particularly third level; health; leisure and retail.
- Particular sub-regional interdependencies, for example, where a settlement may be located in relation to a number of nearby settlements.
- Local ambition, initiative and commitment to achieve compact growth.

This approach has two difficulties associated with it. In the first instance it relies heavily on the current status of towns rather than on their potential; and secondly it does not indicate the weight which should be given to different factors.

Within the Mid-West Region Thurles offers a case in point. It does not lie within a defined city-region catchment and the scale of employment provision and net commuting is likely to be negative rather than positive. However, it has a very wide range of service provision including two third-level institutions; there are interdependencies between it and other settlements in the sub-region; its accessibility is one of the highest in the country by both rail and road; and it has high levels of local initiative and commitment as evidenced by a variety of recent community driven and local authority assisted initiatives. The draft plan provides no guidance as to how the clear strengths of the and potential of the town are to be balanced against its location outside a city-region catchment.

LIT is of the view that unless it is made clear in the document that all criteria are of equal value and that potential is a critical consideration, there is a danger that the RESS will concentrate on the current status and the location of the settlements in question.

### **Issue Three: References to critical infrastructure**

It is noted that *The continued expansion of the City's third level institutions and integration with the wider City and region* is identified as a key enabler of the growth of Limerick City and this is welcomed.

However, it is also noted that a number of key infrastructure projects are referred to in the Draft Framework (mainly in Dublin and Cork) but that no reference is made to the Northern Distributor Road in Limerick. As well as being a key element of the City's transport infrastructure and a fundamental enabler of the Limerick Northside Regeneration Project, the development of this road is critical to the creation of a "Knowledge Corridor" which will link the Shannon Free Zone, the LIT Campus at Coonagh, the National Technological Park and the University of Limerick. This is, therefore, just as much a piece of critical infrastructure for Limerick as Metro North is for Dublin.

It is submitted either that no reference should be made to any specific infrastructure in the Draft document or that all critical infrastructure throughout the country, including the Limerick Northern Distributor Road should be referenced.

It is also noted that no reference in the document to the Limerick-Cork Motorway. It was subsequently indicated by the Taoiseach that this project would go ahead and, if critical infrastructure is being mentioned in the document, then this Motorway should be included.

### **Issue Four: Higher education outside of cities**

It is noted that in the diagram titled *Hierarchy of Settlements and Related Infrastructure* on page 77 of the Draft document, the only form of Higher Education that is referred to are Universities and that these are indicated as being located in cities only. This does a service both to the Institutes of Technology which provide a major part of the higher education in this country and to the many towns in which they and indeed at least one university (Maynooth) are located.

It is submitted that the term University should be amended to Higher Education Institutions in the Cities part of the diagram, that the same designation should be included in Towns over 10,000 and that Campuses of Higher Education Institutions should be included in Towns Under 10,000.

Since it is clear that not all settlements will be provided with all of the facilities noted for their class, it should either be clearly stated that the services identified are what would be typically expected and should not be used as the basis for future investment decisions or that all of the facilities noted for a particular category of town may not be available in every town that falls within that class.

As it stands the diagram is unsatisfactory and if used as a guide for investment could cause extensive difficulties for many key elements of the National Strategy for Higher Education.

### **Issue Five: Achieving the objectives**

Even if all of the goals, objectives and targets of the National Planning Framework were considered to be satisfactory, it is not clear as to how these are going to be achieved. The language which is used in the document is very aspirational in the majority of cases and the Institute is concerned that it is assumed that the setting of targets and reference to the need for certain things to happen will

ensure that they will. This is an unrealistic expectation as was the experience with the National Spatial Strategy.

It is submitted that for the focus of the National Planning Framework to be achieved, major changes will be required in the law and in the funding available to those bodies which will be charged with ensuring that targets are achieved. It is noted that there is an undertaking to provide some 'seed finding' to facilitate such developments but overall there is a reliance on the market to drive these outcomes. This is not realistic. For example, the target of 50% of housing development in cities taking place on brownfield sites will only be achieved if substantial changes are made to the ways in which land ownership is managed in this country; substantial changes are made to the compulsory purchase powers of Local Authorities so that, for example, public hearings for compulsory purchase would not be held in respect of sites which remain undeveloped and which have been designated for development; and far larger funds need to be made available to Local Authorities and other bodies to allow them to acquire the properties needed to achieve the targets of the framework and make them ready for development.

The document needs to contain commitments to create the legislative and funding framework necessary to achieve the outcomes sought. Unless changes such as those referred to are made the distribution sought will not occur.

#### **Issue Six: Use of infrastructural capacity which already exists**

Many parts of the country have underutilised infrastructure which is capable of being used to promote a better balance in regional development. It is not clear from the Draft document that this has been taken into account in future investment decisions.

As has already been noted in the previous submission from the Mid-West bodies, the Mid-West Region has significant capacity in infrastructural and organisational terms to accommodate significant amounts of social and economic activity.

One good example of this is the spare capacity in Shannon Airport. This spare capacity has arisen from considerable public-sector investment and it is submitted that the NPF should specifically include undertakings and mechanisms to maximise the use of such infrastructure before additional investment in similar facilities is made elsewhere. In this regard, it is noted that further investment in Dublin Airport is referred to in the report without any specific reference to or plans for maximising the use of other airports in the country. It is submitted that proposals for maximising the use of existing infrastructure should be considered ideally prior to considering any further investment but at worst in parallel with such investment.

#### **Issue Seven: National Policy Objective 32**

It is noted that the importance of Higher Education and different delivery modes is recognised under this section and that is recognised. However, one of the parts of NPO 32 is stated as being - *The expansion and consolidation of third level facilities at locations where this will contribute to regional development*. It is not clear what this means. At present many Institutions have distributed campuses (LIT, LKIT, GMIT, Carlow IT, NUIG, CIT, MIC amongst them). These distributed campuses make a major contribution to regional development but the terminology in this policy objective and particularly the use of the term 'consolidate' leaves the future role of these campuses open to question.

It is submitted that this issue needs to be clarified and that the role of existing distributed campuses needs to be clarified and future investment in them assured.

## **Issue Eight: National Strategic Outcomes**

One of the national strategic outcomes is stated as follows - *Access to Quality Childcare, Education and Health Services: Good access to a range of quality education and health services, **relative to the scale of a region, city, town, neighbourhood or community** is a defining characteristic of attractive, successful and competitive places. Compact, smart growth in urban areas and strong and stable rural communities will enable the enhanced and effective provision of a range of accessible services.*

The word highlighted in bold are somewhat unclear and, if interpreted in a certain way, could suggest that services in a particular settlement must be related to the size of the settlement. This ignores the services which are provided in certain smaller towns and which serve a far wider, sometimes indeed a national or even international, market.

It is submitted that the phrasing of this Outcome needs to be re-examined so that it is not implied that services in a particular place must always be tied to the size of that place. This is of specific relevance in a Higher Education context in that Higher Education Institutes serve areas far beyond the communities in which they are located.