



Waterford Institute *of* Technology
INSTITIÚID TEICNEOLAÍOCHTA PHORT LÁIRGE

Response from

Waterford Institute of Technology

to the draft

National Planning Framework Ireland 2040

10 November 2017

General Remarks

1. Waterford Institute of Technology (WIT) welcomes the opportunity to comment on the draft National Planning Framework. WIT recognises both the desirability and the necessity of the Framework.
2. WIT has advocated for particular attention to be given in the Planning Framework to the recovery and development of the South East and particularly to what may be defined as the South East Waterford City Region.¹ It is therefore welcome that the city of Waterford is mentioned prominently in the Framework as key to effective regional development and national planning. The Institute views the continued growth of Waterford city as part of the South East Waterford City Region as vital to the future prosperity of the wider region and the nation.
3. The enhancement of the education infrastructure, and specifically the higher education infrastructure, in the South East is critical for future growth—critical in order to be able to respond to future population needs, critical in order to create and sustain high quality jobs, critical in order to retain and attract talent, critical in order to attract FDI to the region, critical in order to upskill the existing workforce. Notwithstanding the demonstrable success of WIT and IT Carlow, the region continues to be constrained in its ability to grow by the lack of a university with a wide breadth of disciplines, a strong international presence and reputation, and enhanced research capability in key domains. The Framework should place greater emphasis and priority therefore on supporting the creation of a University in the South East—the only region in the country without a university.
4. WIT welcomes the commitment in the Framework to “effective balance of growth between Ireland’s three regions ... as opposed to a continuation of the current long-term trend whereby the rest of the country has lagged behind the increasing rate of population, jobs and housing provision rates in Dublin and the wider Eastern and Midland area” (p.8). The emphasis on balanced, co-ordinated growth for all the nation’s regions is clearly the only sustainable way forward. A more strongly-worded articulation, indeed, of commitment to the development of the South-East within the Southern region would be welcome, taking account of the particular profile of the Waterford city region (and its underperformance nationally in, for instance, unemployment).
5. Moreover, more ambitious targets for population growth in the Southern region in particular to off-set the projected growth in the East and Midlands would be desirable; the projections proposed indicate only modest adjustments from the “business as usual” approach. The projected population increase for Waterford and the wider South-East/South seem to be underestimated; we estimate a more likely population for Waterford over the period to be closer to 100,000. In part this is based on a projected growth in the student population that would follow the creation of a university in the region. Precedent suggests a three-fold increase in student numbers would not be unlikely and this alone would add potentially 15,000 to the projected numbers.

¹ The South East Waterford City Region comprises the strong urban areas and towns in the region—Waterford city, Kilkenny, Wexford, Carlow and Clonmel—working in collaboration with a common purpose.

6. The commitment to restoring and revitalising “the fabric of our network of smaller towns, village and rural areas” (p.8) is welcomed by WIT. Sustaining and developing rural communities is vital to retaining Ireland’s unique identity and to offering diverse places within which citizens can live and contribute to the imagining of Ireland’s future. Significant investment in connecting rural and smaller communities is required.
7. The Framework will only be meaningful in so much as it guides both legislative priorities and capital and other investment by the State. It is critical that the National Investment Plan and the proposed National Smart Growth Initiative (“a competitive, bid-based fund to leverage both public and private investment” (p.9)) are not synonymous. State investment in the infrastructure required to achieve the Framework priorities is essential; other funding streams, such as public-private schemes, should support and enhance State investment.
8. In the long term, the State should continue to retain public lands in public ownership, notwithstanding the desire to “harness public lands as catalysts to stimulate regeneration and wider investment” (p.9). The Framework is an opportunity for the State to commit to its citizens that it will be the primary place-maker in Ireland for future generations. The opportunity to imagine, plan, build and sustain vibrant, humane, high-quality places should not be surrendered to commercial interests.
9. At the heart of the Framework must be the quality of life of citizens and their sense of belonging to life-enhancing communities (whether urban or rural, regardless of region). The discourse that indicates that “Ireland’s people are a critical resource” is regrettable (p.20). Artistic and creative endeavour contributes to human well-being and is part of the process by which humans imagine and re-imagine their futures and make sense of their past. The vision that sees Ireland in 2040 “as a creative, innovative and culturally attuned society” is a good one, though the emphasis in the vision as articulated (“whose people, businesses and communities are equipped to further our national economic output and artistic endeavour”(p.20)) is misplaced and should be revised. Giving citizens meaningful opportunities to develop and enhance their creativity should be a priority within the Framework, regardless of the perceived contribution of such activity to economic development. Similarly, the commitment that by 2040 Ireland will be “the most successful, advanced, competitive and environmentally sustainable economy and society in Europe” (p.22) places inappropriate emphasis on a market-based, economic discourse; this should be replaced with a vision grounded in citizenship, quality of life, and equality. Therefore, WIT suggest that the commitment in the Framework should be to **an Ireland that is the most fair, equal society in Europe based on the provision of high quality of life for all citizens, that sustains diverse and vibrant communities in which individuals find places to belong, and where every individual has the opportunity to make a lasting contribution to the nation’s and to Europe’s future.** In terms of measurement, the emphasis should be on improving Ireland’s ranking in quality of life, environmental performance, and liveability (see p.15).

A New Way Forward

10. The “regional parity” approach proposed in the Framework (p.34) is reasonable and can be delivered. The presumption is, however, that the regions as defined have a meaning and coherence in and of themselves. This is not necessarily the case, particularly at the margins

of regions. Moreover, with three of the five cities (Cork, Limerick, Waterford), the growth potential of the Southern region far outweighs that of the Northern/Western Region and might therefore be expected to carry the bulk of the growth. This needs to be taken into account in determining resource distribution.

11. WIT supports an approach that prioritises “improved accessibility between centres of scale separate from Dublin, to ensure that levels of service (travel times per km) between the Capital and Ireland’s cities are replicated” (p.36). Continued investment in the Waterford to Dublin rail link and to the improvement of the Waterford Limerick rail link would be desirable. WIT supports the focus on “improving accessibility and connectivity northwards on the emerging Atlantic Economic Corridor (AEC)” but suggests also a move eastwards to connect the AEC to Waterford. The upgrade of the N24 to motorway standard should be included as a priority in future plans.
12. Further clarity is required on the mechanisms by which city, county and regional development strategies will be aligned. In particular greater clarity on the formal relationship between city region plans, regional plans and county plans is required.

Making Stronger Urban Places

13. WIT is ready to play its role in the development of Waterford city, better to build its population, its employment base, the quality of life of citizens there, and its long-term sustainability (p.60). Some clarity is required on what is understood by “the wider south-east” (p.60) in the context both of Southern regional development and in its relationship to the Waterford city-region. The South East Waterford City Region as a concept is proposed.
14. WIT asserts the vital role enhanced third level educational provision will have in city, regional and national development (see p.60). Notwithstanding the significant contribution Waterford Institute of Technology, along with other education providers, has made to date to regional development, a significant scaling up of third level provision in terms of increased capacity (which will include investment in infrastructure) and greater flexibility and breadth in terms of course and discipline offerings, is required to meet the needs of the region. As an enabler for city and regional development, the creation of a University is absolutely critical and should feature at the top of the list. More forceful wording of this priority is desirable: WIT proposes that the existing wording (“The development and expansion of the City’s third level institution and integration with the City and region”) be replaced by “the enhancement of higher education provision in the city and region through the creation of a University of the South East with significantly greater scale, breadth and reach, integrated with the City and region”. Note that the indication of an approach to the development of WIT that is “integrated with the city and region” (p.61) is entirely in alignment with WIT’s own approach.
15. It is notable, in this regard, that the figure on p.77 (“The Hierarchy of Settlements and Related Infrastructure”) lists “University” as a critical piece of infrastructure for a city. Waterford, to repeat, is the only city listed in the Framework without a university. The figure also implies the need for cities to have other strong elements in their infrastructure, all of which are present in Waterford but in need of enhanced investment: the city port; the hospital; the airport. WIT supports future investment in these and other critical infrastructural pieces. The lack of an airport in particular—and thus a connection to London, for instance, and other international

centres—is a key weakness in infrastructure when compared to Limerick and Cork. At the same time, WIT asserts the absolute priority for enhanced higher education provision as the most important enabler and driver of sustainable economic, social and cultural development in the region.

16. It would be useful to highlight (p.61) the opportunities and attractiveness—already part realised—of Waterford in the knowledge-intensive domains such as pharmaceuticals, telecommunications and information technology, along with food and agri-business and related areas. The high-quality employment created in these and other knowledge-intensive sectors represent the future profile of Waterford and the region. It would be unfortunate if the Framework referenced the city as offering opportunities merely in “back-office functions in areas such as financial or professional services” and in tourism (p.61). Sustainable and effective regional development in this case requires high-quality, high-paid employment. The region’s ambitions are focussed on developing these kinds of opportunities.
17. The need for improved communications between Waterford and Limerick, as well as between Waterford and Cork, should be highlighted. As indicated above, improved infrastructure (rail and road) between Waterford and Limerick is essential to support future growth.

Planning for Diverse Rural Places

18. The plan is largely silent on the future development of Gaeltacht regions. It is important for Waterford that *Gaeltacht na nDeise* continues to flourish and form part of the diverse places in which citizens live and work. It would be appropriate that Gaeltacht regions are given special consideration in the Framework in themselves and not simply as part of the rural landscape (though the presence of a paragraph on p.82 on Gaeltacht areas is noted).
19. WIT agrees that “facilitating the development of the enterprise and local economy to allow for the creation of a wider variety of employment opportunities will include building on the continued education of those living in rural areas” (p.69). The scaling up of third level provision in Waterford and the South-east will require both investment in higher education and investment in hard infrastructure better to connect dispersed populations with one another, especially when it comes to digital and blended learning.
20. It is important that community-based employment generation schemes (such as “Communities Creating Jobs” [www.ccj.ie]) and the employment opportunities generated by those operating in the social enterprise domain.

People, Homes and Communities

21. WIT endorses the view that “enabling and fostering community leadership at a local level shall continue to be supported at Government level” (p.76). However, further clarity is required on how such support will manifest itself; the manner in which the State will “facilitate the promotion and creation of sustainable community development” (p.76) needs some elaboration. The relationship, once more, between local, city-region, and regional development plans needs to be further articulated so that community development plans find formal purchase with authorities responsible for planning on a larger scale.

22. Section 5.5 is entirely inadequate; the Framework must prioritise inclusivity and diversity and frame at much greater length the commitment to supporting “continued development towards achieving a more progressive and inclusive society that supports our citizens’ basic human rights and assists in helping people to gain access to a better quality of life” (p.82). A much more extensive consideration of the implications for planning of this commitment is required, in addition to the (short) paragraphs on people with disabilities and Travellers.
23. The indication in Objective 32 of a prioritisation of “the expansion and consolidation of third level facilities at locations where this will contribute to regional development” (p.84)—presumed to include Waterford—is welcome. However, more extensive and nuanced treatment of the contribution of third-level institutions to the development of regions in areas that are not specifically linked to economic development and not directly responsive to perceived “skills gaps” (p.84) needs to be given. For instance, third level institutions, as well as attracting international “talent” into regions for specific ends, also contribute greatly to societal diversity through the provision of courses to international students.
24. WIT would wish to see more explicit reference in Objective 32 to the *enhancement* of third-level provision in the region, rather than simply to expansion based on the consolidation of existing facilities and activities. The consolidation of existing third-level activity in the region is with a view to enhancing the ability of higher education in the region to impact culturally, economically and socially on the region; the University of the South East in other words will be significantly more impactful than the sum of its parts. The University will, it is proposed, be in a better position to attract and retain regional talent than the existing institutions. The “step change” that will follow the development of the university must be acknowledged in the objective.

Realising our Island and Marine Potential

25. WIT fully supports the necessity of integrated land and maritime planning that ensures the sustainability of our marine heritage and resources.
26. The remarks above relevant to the further development of rural Ireland also apply to many maritime communities. Further investment in education and in infrastructure will be required to support the growth of the maritime economy (as envisaged in Objective 41).

Working with our Neighbours

27. WIT supports the principles set out in the Framework with regard to our relationship with Northern Ireland and other parts of the United Kingdom and Europe.
28. There are opportunities in particular in the South-east of Ireland to partner with Wales. WIT has been involved in a number of very successful research and development programmes with Welsh partners through INTEREGG.
29. Again (as indicated several times above), greater interconnectedness between Waterford, Limerick and other cities (and not just to Dublin) is a requirement for future growth.

Realising our Sustainable Future

30. WIT welcomes the strong commitment throughout the Framework to sustainability and the recognition contained in the Framework of our responsibilities as a society towards our environment. Welcome also is the recognition of the contribution a cleaner environment has to health and to quality of life in general (section 8.4).

Implementation and Investment

31. It is clear that the Framework can only be meaningful if the mechanisms for implementation are in place. The integration of the various strategies given in the Framework is vital if the Framework's objectives are to be met. In particular the alignment of the Framework with investment will be necessary. Some articulation—perhaps in diagrammatic form—of the relationship between the various strategic entities and plans would be helpful (see comments above on city region and on regional plans and their integration with national strategies and see also p.127). Reference 32 on p.151 is noted in this regard: the note gives the impression that the boundaries of metropolitan areas have yet to be identified and agreed, clearly a challenge in developing Metropolitan Area Strategic Plans (MASPs).
32. WIT would welcome adding the name of Waterford to the paragraph entitled “Enhanced Regional Accessibility” on p.123. It is vital that Waterford as much as the other cities is fully connected, and not just to Dublin.
33. Reference is made to the Waterford MASP and to other such plans on p.126. In developing and delivering these plans—specifically urban plans—universities based in cities have a critical role to play. Again it must be noted that of the cities listed in the Framework Waterford is the only city without a university.
34. A range of outcomes are proposed (albeit as indicative) on pp.132ff of the Framework. Some comments are merited on some of these proposed outcomes:
- a. The use of the word “encourage” (in a number of outcomes) should be reviewed; it seems particularly intangible and success in achieving such an outcome is very difficult to measure (see, for instance, a number of outcomes listed on p.132);
 - b. Initial focus, it seems, in terms of enhancing regional accessibility will be on Cork-Limerick. It would be appropriate however also to prioritise Cork-Waterford and Waterford-Limerick and to offer some schedule with regard to the developments of infrastructure between these cities (p.133);
 - c. The “promotion” of Ireland as having a strong digital economy is, like “encourage”, a rather intangible outcome and the wording could be reviewed (see p.136);
 - d. Some detail, perhaps in an appendix, on the alignment of the Framework and the Action Plan for Rural Development (referenced on p.136) could take place;
 - e. The further development of DIT is mentioned (p.140) and the contribution of consolidated higher education institutions to “deliver the talent necessary to drive social and economic development in the regions” is also indicated. This implies a limited view of the function of regional higher education institutions, which is to do more than supply talent. The particular regional consortia are not mentioned: they should be. The following wording or similar may be more appropriate: **The centrality of enhanced and accessible public higher education in regional centres is vital to maintain and develop our culture, society and economy. The enhancement of higher education provision—driven by consortia of**

HEIs in the South, the South-east, and the North-West--will be necessary for such development to take place. The consolidation of the DIT campus ...;

- f. A similar points may be made about the reference in the next bullet point (p.140) on the alignment of higher education life-long learning programmes with needs identified by the Regional Skills Fora. The contribution of education to quality of life and to the promotion of equality and diversity is missing in such an analysis. The following wording is proposed: **Investment in higher and further education will be a key driver of increased life quality for Irish citizens, of enhanced equality and diversity in the state, as well as of economic development and competitiveness. The development of life-long learning opportunities and access paths to higher education for all citizens is a priority, as will be the alignment of life-long learning development with skills needs at regional and national level, to ensure meaningful and fulfilling career paths and ways towards rewarding employment are available to all.**

Assessing Environmental Impact

- 35. WIT welcomes the addition of this final chapter as an expression of the state's commitment to sustainable development.