Lublin Metropolitan Area in Terms of Spatial Planning

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Summary

The metropolitan area in Polish literature is generally understood as a large city with its functionally related vicinity. The Lublin Metropolitan Area (LOM) was identified in 2011 as one among 10 such areas in Poland by the government's country spatial development concept. The concept envisages that metropolitan areas are to be supported, first of all, to improve their competitiveness, by governmental investment projects and the improvement in the functioning of public institutions. Spatial planning for Lubelskie voivodship, on the other hand, declares the need to shape LOM through numerous investment, protective, institutional and organizational activities. However, governmental and voivodship spatial planning has limited possibilities to implement its determinations. Especially the implementation of determinations concerning organizational and institutional solutions and, to a certain extent, also investment projects remains to a large degree beyond the competences of spatial planning entities. As a result, spatial planning, being the main plane of interest in the functioning of LOM on the pary of public authorities, may effectively impact the development and directions in transformations of this area only to a small degree.

Introduction

The spatial planning service subordinate to the local government of the Lubelskie voivodship has been conducting studies and planning works in terms of the area referred to as the Lublin Metropolitan Area (LOM) for several years. In 2006 the regional assembly of the voivodship adopted a resolution on preparing a plan for this area.¹ To date, the Spatial Planning Office in Lublin has developed (in 2009) a Study of LOM urbanization which was supposed to be a substantive basis for preparing the metropolitan area's plan and for the simultaneous appropriate change to the voivodship's spatial development plan (Biuro Planowania Przestrzennego 2009, 9). As a result, an obvious question arises—how and to what extent spatial planning mechanisms have real impact on the functioning and transformations in LOM.

Interest in such a significant element of the regional socio-economic space from spatial planners is obvious. It is this act on spatial planning and spatial development (dated: March 27, 2003) that introduced this notion within legal circulation and officially designated metropolitan areas as the object of interest among public authorities. Pursuant to the referred act, these areas, as elements of the national settlement network, have been indicated by the government's concept of the country's spatial development and then, in a more detailed manner, the spatial development plan for the voivodship. Additionally, the metropolitan area in the development plan for the voivodship should be covered by a separate plan, constituting a part of the plan for the voivodship. However, at the same time, the act on spatial planning and spatial development does not define which elements and aspects of the metropolitan area's space need to be regulated by decisions within national and voivodship spatial planning documents. Furthermore—the essence of this area is defined in the act in a manner which may be understood in a very loose manner. And thus, the metropolitan

^{1.} See: Uchwała nr XLIX/784/06 Sejmiku Województwa Lubelskiego z dnia 28 sierpnia 2006 r. w sprawie sporządzenia Planu Zagospodarowania Przestrzennego Lubelskiego Obszaru Metropolitalnego [Resolution no. XLIX/ 784/06 of the Lubelskie Voivodship regional assembly dated August 28, 2006 on the commencement preparation of the Spatial Development Plan for the Lublin Metropolitan Area].

area (pursuant to article 2, item 9.) is simply "an area of a large city and its functionally connected direct vicinity, defined in the country's spatial development concept."²

As a result, it is possible to formulate an initial hypothesis that—paradoxically—the role of spatial planning comes down to, first of all, identifying and "legitimizing" the metropolitan area. On the other hand, shaping and even more importantly—creating and stimulating the development of such an area to a significant extent remains beyond the substantive and functional possibilities of spatial planning.

1 Metropolitan area in theoretical literature

The laconic identification of the metropolitan area's essence in regulations demonstrates, of course, the need to interpret this notion in the manner in which it is presented in Polish theoretical literature. In the literature from the past few years the notion "metropolitan area" is, of course, understood variously but certain specific characteristics attributed to this notion by numerous authors may be indicated. The notion (as the definition of a vast spatial element of the settlement network) appeared in Polish geographic literature and literature related to spatial development quite recently. Up until the 1980s the most frequently used notion was "agglomeration." This notion was most often understood both as the process of spatial concentration of industry and settlements and the concentration itself being the effect of this process (see, for example, Leszczycki, Eberhardt, and Heřman 1971, 12–13, 18). At the same time, agglomeration treated as a concentration of population and production was identified by functional relationships (especially commuting) (Malisz 1981, 34) as well as by material spatial elements generated by this settlement structure, namely components of spatial development. The characteristics of spatial development demonstrating the shaping of an agglomeration included in particular "the municipal manner of management" present outside the administrative borders of a large city (Lier 1965, 52) or certain key components or characteristics of this management, and especially intensive investment by residential buildings, industrial or service structures (Leszczycki 1973, 111).

The notion "metropolitan area" as well as notions related to it and sometimes used interchangeably—"metropolitan center," "metropolitan region," as well as those which appeared later, are referred to by "the agglomeration" by various authors in different ways. In some views, formulated especially in the previous years, the metropolitan area or region is identified with the agglomeration (see, for example, Lier 1965, 52). However, the majority of authors acknowledge that metropolization and the resulting metropolitan area is a higher and more advanced stage of the functional and material spatial expansion of a large municipal center than an agglomeration (see, for example, Drzazga 2005, 50; Heřman and Eberhardt 1973, 13–14).

However, the perception of the metropolitan area as a specific formation of socio-economic space results in views of Polish theoreticians on the essence and the manner of functioning of such an area and thus on the criteria of identification key for this discussion. It is noticeable that only certain authors, especially those publishing during the People's Republic of Poland (PRL) acknowledge both functional (socio-economic relationships) and morphological criteria (urbanization) (see, for example, Gontarski 1980, 87) as the criteria for the identification and delimitation of metropolitan areas (regions). Authors publishing after the Polish transformation in 1989 focus, on the other hand, on functional aspects of the metropolitan area. And thus, K. Trafas (2003, 96) defines the metropolitan area as a closer vicinity to the "metropolis," namely a large city. Similarly, K. Bald (2005, 60) suggests the definition "a large city and the area directly related to it," while D. Drzazga (2005, 50) understands the metropolitan area as a large city (metropolis) connected with the vicinity. J. Słodczyk (Słodczyk 2001, 48–49), using the notion "metropolitan region" (identified by him implicitly with the metropolitan area) and stressing its polycentricity, also indicates the functional relationships (the ability to attract inhabitants, employees and customers) as characteristics for such a region.

^{2.} Ustawa z dnia 27 marca 2003 r. o planowaniu i zagospodarowaniu przestrzennym (DzU z 2012 r. nr 0 poz. 647) [Act dated March 25, 2003 on spatial planning and spatial development].

T. Markowski and T. Marszał probably present this point of view to its fullest extent suggesting that in order to identify the metropolitan area it is necessary to use, first of all, functional criteria in respect of which morphological criteria are only secondary. These authors acknowledge the following as criteria for recognizing a city as a metropolis (namely the core of the metropolitan area):

- the number of people (at least 0,5-1,0 million)³
- a considerable economic potential and a developed higher category services sector
- a high innovative potential
- functions of a metropolitan nature
- the role of a center in the system of transport, organizational and innovative relationships combined with good spatial availability
- the ability to stimulate the network model of economy and management

T. Markowski and T. Marszał also indicate morphological characteristics typical of metropolitan areas, although they consider them as derivatives of functional characteristics. Their key morphological elements include:

- developed metropolitan spatial systems with a vast urbanized suburban zone with strong concentric integration connections
- the exceptional and specific character of the place (especially the city center) with regard to (e.g., historical significance, cultural or architectonic-urban qualities) (Markowski and Marszał 2006, 11–13)

2 Lublin Metropolitan Area in spatial planning documents

The concept of the country's spatial development (KPZK), being the basis for the government's spatial development policies, became effective in 2012 pursuant to provisions in the act on spatial planning and development.⁴ This concept includes an indication of the 10 strongest municipal centers around which metropolitan areas are formed. These are: Warsaw, the Upper Silesia conurbation, Kraków, Łódź, the Tri-City (Gdańsk, Gdynia, Sopot), Wrocław, Poznań, Bydgoszcz with Toruń, Szczecin and Lublin. The concept's authors identified metropolitan centers following several criteria referring in the majority to the size of these centers and the functions performed by them. These criteria include:

- size of metropolitan center, exceeding 300 000 inhabitants
- employment in market services amounting to more than 40 000 people
- number of students exceeding 60 000
- cooperation of scientific-research institutions as part of the 5th and 6th European Union framework program
- the location of an airport handling passenger traffic
- the location of 4- and 5-star hotels
- international fairs taking place in the years $2006{-}2008$

The planning decisions in the spatial development concept were not related in a significant manner to the Lublin Metropolitan Area. This notion did not appear in this document at all. On the other hand, the arrangements concerning spatial development objectives addressed to all Polish metropolises included in the concept apply to Lublin and its metropolitan area. These centers, just like other main cities, according to the objectives of the country's spatial development policy adopted in the concept, are to be, first of all, the object of supporting their competitiveness, understood as:

- supporting the development of metropolitan functions
- intensifying functional relationships (national and international)

^{3. [}In the journal (in both Polish and English texts) European practice of number notation is followed—for example, 36 333,33 (European style) = 36 333.33 (Canadian style) = 36,333.33 (US and British style). Furthermore in the International System of Units (SI units), fixed spaces rather than commas are used to mark off groups of three digits, both to the left and to the right of the decimal point.—Ed.]

^{4.} See: Uchwała Nr 239 Rady Ministrów z dnia 13 grudnia 2011 r. w sprawie przyjęcia Koncepcji Przestrzennego Zagospodarowania Kraju 2030, Monitor Polski z 2012 r. poz. 252 [Resolution no. 239 of the Council of Ministers dated December 13, 2011 on accepting the country's spatial development concept 2030].

- integrating functional areas (namely metropolitan)
- improving mutual availability

What is interesting are actions planned in the country's spatial development concept to be used to aid the competitiveness of metropolitan centers. And thus, as a principle, this document has no field instructions typical of spatial planning, which is, of course, related to its scale. On the other hand, it contains proposals for investment projects and organizational activities. For example, the following may be considered proposed investment projects (or projects with a dominant share of investments) and thus actions consisting in creating or transforming spatial development elements:

- creating conditions for the location of investment projects with high added value
- renovating and modernizing cultural structures and revitalizing historical and historic buildings for cultural and tourism purposes
- expanding and modernizing road and railway routes

The concept's decisions referring entirely or to a dominant extent to functional issues, including organizational issues, seem to be at least equally numerous and, at the same time, quite wide with regard to scope. The concept plans includes:

- the strengthening of scientific potential and improving cooperation between science and business
- the support for locating management functions from the public sector with national or regional range and increasing the quality of functioning in already existing institutions
- the adjustment of offices to support international business affairs in English

The place of the Lublin Metropolitan Area in spatial planning implemented by the local government of the Lubelskie Voivodship seems to be of a specific character. The already valid spatial development plan for the voivodship, adopted in 2002,⁵ refers to this notion only to a marginal extent. Of course, this results from the fact that this plan was drawn up when the act from 1994 on spatial development was still valid. This act did not use the notion "metropolitan area" and the spatial development plan for the voivodship was only supposed to define "the principles for organizing the spatial structure," including basic elements of the settlement network. For this reason, the plan for Lubelskie Voivodship only mentioned "the metropolitan area of Lublin agglomeration," constituting an element of the desired voivodship spatial structure (Biuro Planowania Przestrzennego and Banak 2002, 35). However, the plan does not formulate separate principles for shaping the spatial development of this area.

Thus, the *Studium urbanizacji...* (Biuro Planowania Przestrzennego 2009) referred to in the introduction seems to be the first, and thus the rudimentary, document for voivodship spatial planning in the Lubelskie Voivodship, which was supposed to both arrange the view of the essence of LOM as well as suggest principles for its transformation. The study undoubtedly points to the pursuit of the identification of the Lublin Metropolitan Area's territory on the basis of, first of all, criteria demonstrating socio-economic phenomena and on the basis of morphological indexes (namely demonstrating the spatial development) only to a supplementary extent. The study adopts 4 basic delimitation criteria for LOM:

- social—population density, migrations, share of population of working age as well as buildings commissioned for use
- economic—number of business entities per 1 000 inhabitants, presence of companies significant for the region, commune budget's own income per inhabitant, share of urbanized areas in the commune's total area
- infrastructural—percentage of people using gas, sewage and water supply grids as well as the location near a national and voivodship road or railway line,
- transport availability—location inside specified isochrones (30 and 60 minutes) of access to metropolis center (Biuro Planowania Przestrzennego 2009, 132).

The study has suggested "shaping the optimum urbanization model" for this area as the main objective of the voivodship spatial development towards LOM. In order to implement this objective,

^{5.} See: Uchwała nr XLV/597/02 Sejmiku Województwa Lubelskiego z dnia 29 lipca 2002 r. w sprawie Planu Zagospodarowania Przestrzennego Województwa Lubelskiego [Resolution no. XLV/597/02 of the Lubelskie Voivodship regional assembly dated July 29, 2002 on the adoption of the Spatial Development Plan for Lubelskie Voivodship].

the study "recommends" several major directions of activities and groups of activities constituting their specification for the future planning authorities of the voivodship. These are:

- strengthening functional relations in settlement centers indicated first of all as part of growth in connections between local economies and development functions complementary to the centers' and strengthening the centers' specializations and diversity
- preserving the continuity of natural systems and open areas especially the protection of areas of natural wealth and the limitation of investment projects in open areas
- developing effective collective transport systems—including developing economic and ecological means of public transport, increasing the competitiveness of public transport, and the integration of public transport subsystems
- reasonable urbanization of the area—the arrangement of the existing spatial structures and developing new effective spatial structures in areas designated for investment activities have been indicated (Biuro Planowania Przestrzennego 2009, 188).

The character of specific projects suggested in the study as an element of decisionmaking in the future voivodship plan is internesting in how it indicates ways of achieving objectives and development directions. A significant share of these projects is to be of a character considered "classic" for spatial planning field instructions. Thus, the study contains suggestions of principles for zoning and staging new spatial development. These suggestions relate especially to the principles of forming new spatial systems, the structure of functions in settlement centers, zones of entrepreneurship, principles of protection against scattered development and even shaping the landscape and esthetics. In addition, however, the study contains suggestions for decisions concerning the implementation of future investment projects—e.g., the construction, modernization or repair of technical and road infrastructure objects and even the creation of new plants to fill gaps within the economic structure.

Recommendations of an organizational character are also a developed part of the suggestions for the new voivodship spatial development plan. They especially apply to the public transport system—establishing a transfer junction, improving the functioning of municipal transport or the railway timetable. However, creating an integrated management system for the Lublin Metropolitan Area is a particularly significant organizational suggestion. The managing institution would deal with formulating a uniform urbanization policy and coordinating changes in LOM's space (also on the local scale) (Biuro Planowania Przestrzennego 2009, 189–194).

3 Mechanisms of spatial planning impact on development of LOM

The objectives and directions in spatial transformations presented above, referring to the Lublin Metropolitan Area, are, of course, significant only to that extent in which they may actually and effectively shape the reality. At the same time, it is obvious that the documents prepared by public authorities may be implemented only on the basis of specific authorizations which are provided by legal regulations to the entities in these documents. The act on spatial planning and spatial development, but not only, is the major such regulation in the case of spatial planning acts. This act defines the mechanisms for the implementation of decisions in the country's spatial development concept and the voivodship's spatial development plan in a slightly various manner. The basic mechanism for the implementation of determinations from the national concept is introducing them into the voivodship spatial development plans. Thus, it should be assumed that the implementation of the concept is identical to the implementation of voivodship plans to a significant extent. However, the concept is also supposed to constitute the basis for the preparation of government task programs, prepared by ministers. Although the government did not define to what extent it will be the basis for such programs when adopting the concept, the concept itself has several instructions concerning future documents of a detailed character relating to, among other things, metropolitan areas. First of all, the concept states that the specification of its determinations towards metropolises will be contained in the government "Assumptions of the national

municipal policy," adopting an integrated model for the management of municipal areas consistent with other strategic documents.⁶

The concept's authors indicate, in addition, the fact that its determinations (as well as the determinations, among others, in voivodship spatial development plans) need to be taken into account in plans of sustainable development for collective public transport prepared by authorities in voivodships, counties and communes. Such plans, prepared on the basis of the act on collective transport define, among others:

- the transport network on which transport of a public utility character is planned
- preferences concerning the selection of the means of transport
- principles for the organization of the transport market
- the desired standard of transport services.⁷

Thus, we may presume that "transport plans" which are supposed to be acts of local law are this tool which may—although indirectly—be used for the implementation also of those determinations from the national concept and the voivodship plan, which refer to functional mechanisms serving and integrating metropolitan areas. However, the fact is that they apply only to a very narrow, although undoubtedly significant, segment in the functioning of those areas. It seems that the concept's authors are aware of this fact.

It has already been mentioned above that the main tool for the implementation of the country's spatial development concept is the voivodship spatial development plan. Thus, the identification of implementation methods for the voivodship plan is essential to evaluate the possibility of the implementation of both the concept's determinations as well as the abovementioned urbanization study. Pursuant to the act on spatial planning and spatial development, the voivodship spatial development plan is not an act of law, thus it is not valid for all entities operating within the voivodship. The plan is implemented as a matter of principle by introducing its determinations into other planning documents—prepared by communes. What is significant is the fact that the voivodship spatial development plan is not a statutory basis for planning the activities of the plan's entity, namely the local government in the voivodship. This is visible, first of all, in terms of: the voivodship development plan—the voivodship development strategy. As a matter of fact, the act on local government in voivodships states that the strategy "is consistent" with the plan. However, at the same time, the act on spatial planning and spatial development clearly places the strategy as the superior document. It states that the plan take into account the strategy's determinations. It should be thus considered that the determinations of the plan (e.g., suggestions for investment projects or activities of an organizational character) do not have to be introduced within the strategy or operational documents prepared on its basis.⁸

Thus, the mechanism for the implementation of the plan consists, first of all, in taking into account its determinations by the local government in communes when preparing a study of land use conditions and directions in communes. The commune's study of spatial development determines a number of elements in local space, including:

- the intended use of the land
- the principles of shaping development, including land excluded from development
- the principles of protecting nature, cultural qualities and landscape
- the principles of shaping agricultural and forest production areas
- the principles of shaping technical infrastructure and transport systems
- the location of public utility structures

It is thus noticeable that the determinations in the commune's development study regulate, first of all, the functions of particular sites as well as the principles of locating and shaping the form of new construction structures. Therefore, it may take into account only those determinations of

^{6.} See: Uchwała Nr 239 Rady Ministrów z dnia 13 grudnia 2011 r. w sprawie przyjęcia Koncepcji Przestrzennego Zagospodarowania Kraju 2030, Monitor Polski z 2012 r. poz. 252, page 76.

^{7.} See: Ustawa z dnia 16 grudnia 2010 r. o publicznym transporcie zbiorowym (DzU z 2011 r. nr 5 poz. 13) [Act dated December 16, 2010 on public collective transport].

^{8.} Ustawa z dnia 5 czerwca 1998 r. o samorządzie województwa (DzU z 2001 r. nr 142 poz. 1590) [Act dated June 5, 1998 on local government in voivodships].

the voivodship plan which are of a similar substantive character. On the other hand, the study does not refer to issues—e.g., of an organizational character, and it does not define the time horizon or the schedule for the implementation of its determinations. At the same time, the study is, of course, a document which is much more detailed than the voivodship plan. The valid plan for Lubelskie Voivodship was drawn up using maps, on a scale of $1:200\ 000$ —and the next plan, taking into account the recommendations from *Studium urbanizacji…* will probably be drawn up using a similar scale. On the other hand, the commune's development study has been prepared on a scale of at least $1:25\ 000$ and may be prepared even on a scale of $1:5\ 000.^9$ Therefore it is not possible to directly (literally) transfer the determinations of the voivodship plan to the commune's development study.

The determinations from the voivodship plan reach the local spatial development plan, being the basis for issuing construction permits, through the commune's development study. The determinations from this plan need to be consistent with the study's provisions. It is also possible to directly introduce the determinations from the voivodship plan to the local plan. Such a plan, as an operational document shaping the future shape of the new spatial development, is drawn up on a very large scale. Pursuant to the act on spatial planning and spatial development, it should be prepared on a scale of 1:1 000, in special situations on a scale of 1:500 or 1:2 000. Only when it is drawn up to introduce a ban on development or approving afforestations—on a scale of 1:5 000. The determinations from the plan, just like the determinations from the commune study, regulate—of course, in a manner which is much more detailed—the location and the form of future construction structures and their acceptable functions.

However, the condition for introducing the determinations from the voivodship plan to the local plan is a previous arrangement between the voivodship marshal and the village-mayor or the mayor concerning the deadline for the implementation of public purpose investment projects contained in the voivodship plan. The marshal also needs to conclude a contract with the village-mayor for compensating the costs of damages for inhabitants whose property may lose value as a result of introducing a superlocal task into the local plan. At the same time, the marshal may claim necessary funds for this purpose if tasks introduced into the local plan result from the gov-ernment's intentions (e.g., contained in the country's spatial development concept). The fact is that these requirements significantly limit or marginalize the mechanism of direct introductions of the determinations from the voivodship plan into the local plan. However, even when they are fulfilled, only those determinations from the voivodship plan may be introduced into the local plan, which than may be introduced into decisions on the construction permit issued on the basis of the local plan. These are thus only those elements in the voivodship plan's content which unambiguously refer to the material aspects of spatial development, along with functions performed by them.

Conclusions

The metropolitan area, according to the most common method of its definition in the literature, is, first of all, a functional whole. This means an area where strong internal social and economic relationships are visible. Morphological aspects, related to spatial development, are thus only the effect and reflection of socio-economic processes. At the same time, metropolitan areas are an object of interest mainly for spatial planning, especially—for the time being—of a superlocal character, namely national and voivodship. This raises obvious doubts about the adequacy of spatial planning documents as tools for shaping metropolitan areas, including also the Lublin Metropolitan Area.

The act on spatial planning and spatial development quite unambiguously places the country's spatial development concept and the voivodship spatial development plan as documents of a dominant structural character, namely determining the desired future shape of the country's or the voivodship's space. On the other hand, it provides only marginal opportunities for determining

^{9.} See: Rozporządzenie Ministra Infrastruktury z dnia 28 kwietnia 2004 r. w sprawie zakresu projektu studium uwarunkowań i kierunków zagospodarowania przestrzennego gminy (DzU z 2004 r. nr 118 poz. 1233) [Regulation of the Minister of Infrastructure dated April 28, 2004 on the scope of the draft of the study of land use conditions and directions in communes].

specific actions aimed at achieving a specific shape of the spatial structure determined in the plan. The determinations concerning the anticipated investment projects contained in the concept and in the plan may gain binding force no sooner than when they are possibly taken into account in other official documents—especially in governmental and voivodship programs and strategies.

At the same time, the object of determinations from the concept and the plan assumed in the act relates to spatial development in the material sense only to a small extent (apart from the framework specification of locations for the abovementioned investment projects). This undoubtedly results, first of all, from the scale in which the graphic parts of these studies are drawn up. On the other hand, their determinations should focus on defining functions (social, economic and natural, etc.) for particular sites and centers within the territory of the country or the voivodship.

Planning documents relating to the Lublin Metropolitan Area in different ways, viably prepared in recent years, try to adjust the mechanisms for its transformations (including its development) in a manner which is considerably wide. In many issues it exceeds the strict meaning of the notion of "spatial development." Thus, these studies include, in an interdependent manner, suggestions for the future shaping of spatial components of the following nature:

• intangible—namely social and economic phenomena

• material—namely spatial development elements, along with functions performed by them

Such a view is in fact consistent with the understanding of the metropolitan area's essence dominant in Polish theoretical literature. However, the actual possibilities for the implementation of the described documents resulting from regulations on spatial planning and spatial management bring about significant doubts as to the actual possibilities of affecting LOM's future by these studies. First of all—some determinations relating to (e.g., organizational or investment issues, are not always clearly based on statutory regulations). In addition, it seems that the possibility of implementing this part of the determinations is beyond the sphere of rights of the entities in these documents (particularly the local government in the voivodship). Thus, this means that a considerable part of the determinations contained in the discussed planning documents may not actually directly shape the mechanisms forming the Lublin Metropolitan Area.

The implementation of the voivodship's spatial development plan (and thus also, to a large extent, the country's spatial development concept) takes place mostly through their introduction into the determinations of communes' spatial development studies and local plans. Both the commune study and the local plan are "structural" documents—just like the voivodship plan—namely those shaping the image of the future condition of the commune or its part. However, their determinations in general relate only to material components of spatial development and functions performed by them. On the other hand, they do not regulate social, demographic, organizational issues, etc. This means that they actually reflect only those determinations from the country's spatial development concept and the voivodship's spatial development plan which refer to material components of space—their location, performed functions, and sometimes even the architectonic form.

It may, therefore, be concluded that the impact of spatial planning on the future of the Lublin Metropolitan Area is quite limited. It does not refer to the mechanisms of socio-economic integration shaping this area. However, it may have impact on material conditions of functions, and thus the development of LOM. This means, however, that spatial planning may only indirectly shape the area. Furthermore—a substantial part of the content of planning documents referring to LOM, regardless of their substantive value, will not indeed have impact on the development of the Lublin Metropolitan Area. This condition should be clearly evaluated as unfavorable, especially in terms of the situation in which the Polish legal system does not provide other possibilities of a complex impact on the space of metropolitan areas, apart from spatial planning. This situation could be improved only through appropriate changes in legislation—e.g., strengthening the role of spatial planning. Such suggestions are also formulated by the authors of the country's spatial development concept.¹⁰

^{10.} See: Uchwała Nr 239 Rady Ministrów z dnia 13 grudnia 2011 r. w sprawie przyjęcia Koncepcji Przestrzennego Zagospodarowania Kraju 2030, Monitor Polski z 2012 r. poz. 252, page 166 [Resolution no. 239 of the Council of Ministers dated December 13, 2011 on accepting the country's spatial development concept 2030].

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