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Minister Eoghan Murphy TD
Department of Housing, Planning, Community and Local Government
Custom House
Dublin 1
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10 November 2017

UCD response to final draft *Ireland 2040 National Planning Framework*

Dear Minister Murphy,

UCD was delighted to welcome Minister Simon Coveney TD (then Minister for Housing, Planning, Community and Local Government) to Belfield to engage with the University-community on the National Planning Framework on the 1st March 2017.

Third level institutions contribute graduates across all sectors of society. UCD has over 28,000 students drawn from 130 countries on our campuses in Dublin and a further 5,500 in our global centres in Beijing, Delhi, New York and Kuala Lumpur. The university accounts for over 30% of international students, 25% of graduate students and almost 30% of doctoral enrolments across the seven Irish universities.

UCD and its students in Ireland deliver an annual economic output of around €1.3 billion, and support around 9,000 jobs (UCD 2015).

Graduates of our education and research programmes play key roles in industries such as ICT, Manufacturing, Pharma, Healthcare and Agri-food and are critical to the sustainability and growth of these industries in Ireland.

UCD is strongly committed to excellence in research and innovation and to delivering impact locally, nationally and globally. More than 1,000 companies, both SMEs and multinationals, have collaborated with UCD researchers in the last 10 years.

UCD made a submission to the previous round of public consultation. This final draft NPF (under consultation) contains some changes in policy emphasis and inclusion of new policy issues.

In particular, we welcome:

- Recognition of the important role of Dublin in the national economy and its need to remain competitive in global markets
- Advancing urban intensification and city densification
- Focusing on living standards and quality of life rather than measures of regional income

We would emphasise the following points:

Overall Context:

- As Ireland faces the implications of Brexit, potential trade-related protectionist policies from the United States, and threats from Europe to our corporation tax, it is important that a strong platform is provided to maintain a robust and competitive economy to create jobs, invest in infrastructure and fund public services.
- The development of the NPF provides a welcome opportunity for Ireland to put forward a national strategic spatial plan to maximise our national economic potential and improve our international competitiveness through better coordination of people, investment and economic activity.
- However, the central premise of the prospective plan (as put forward in the NPF issues paper), namely the idea that Dublin is too large for the country and its future development needs to be curtailed, is not supported by any evidence provided. In particular, there are potential negative implications for Ireland, for Dublin, and for UCD and other Dublin-based universities that require evaluation.

For Ireland - the important role of Dublin:

- Dublin is a city of modest size on a European scale. It is critical to our national prospects that the NPF recognises a strong role for Dublin. The NPF issues paper makes the proposition that Dublin is disproportionately large relative to the rest of the country, and compared to the rest of our cities.
- Ireland is compared to similarly populated Finland, Scotland, New Zealand and Denmark. However, all the comparator countries have more urbanised populations, at around 85% compared to Ireland's 62%. Dublin's primacy is not unparalleled; Copenhagen, Athens, and Budapest achieve similar economic dominance. More generally, countries with a small open economy tend to have large dominant cities.
- A particular concern arising from the draft NPF is the prospect of money being diverted away from infrastructural investment in Dublin. Should its key capital investment requirements be undermined by ideas of regional parity/proportionality referred to in the draft NPF, Dublin's competitiveness would be damaged. A national competition between Dublin and the regional cities for infrastructural investment must be avoided; investment must be prioritised where the benefits are highest.
- Viewing Dublin's size as a problem and discussing Dublin in terms of national competition is concerning as our prospects are being determined in competitive global markets. We are about to become geographically isolated from the EU and we are not of sufficient scale to be regarded as a European region. We need a strong Dublin to compete.

For Ireland - outside of Dublin:

- Strengthening the urban structure outside of Dublin requires making a hard choice in Irish regions between facilitating development in rural areas or in strategic urban development. Whilst the draft NPF argues in favour of urban intensification, we have no national urban agenda despite our population being majority urbanised and facing an urbanising trend. Such an urban agenda should be underpinned by a national urban policy focused on promoting more desirable patterns of urban development and limiting sprawl. Arising from the abolition of all town and city authorities outside of Dublin (with exceptions of Cork and Galway city councils) a review of local government arrangements to deliver an urban focus is required.

For Dublin - cost of living and attracting talent:

- The cost of living in Dublin when compared with other European capital cities is 5th highest (Eurostat 2016). Improving provision of public infrastructure, improving the functionality of its public transport systems, and increasing the provision of housing can play a significant role in reducing the cost of living in Dublin, and maintaining its attractiveness to those creating jobs, and to residents, workers and students.
- Contrary to the NPF briefing paper, relative to European and OECD competitor norms, Dublin is not overdeveloped and regional income disparities in Ireland are not large (Eurostat 2016; OECD 2016). The main problems facing Dublin arise from long-standing underinvestment in housing and infrastructure. For example, a 2014 report by the Department of Transport highlights persistent failure to achieve 'steady state' investment to maintain the existing transport infrastructure (DTTAS 2015). Viewing the resolution of these problems as being about a redistributive approach to population growth and economic activity to numerous other urban locations across Ireland is not evidenced by any supporting research findings. The implications of the NPF proposal requires extensive evaluation about the potential trade-offs arising. Implementation of such a policy could damage the national economy, sacrifice the returns to scale that essential capital investment in Dublin can achieve, and very significantly reduce capital investment in Dublin's aging infrastructure.
- In contrast to the NPF proposition, intensification of development within Dublin City supporting the achievement of greater densities would improve the viability of public transport investments, and increase the attractiveness and productive capacity of Dublin.

For UCD: maintain its attractiveness; providing evidence-based research for policy

- It is essential that UCD, a globally-impactful research institution, maintains its attractiveness for students and faculty; Irish and international. Any diminution of investment in Dublin's infrastructure, including at UCD, would reduce our capacity to compete internationally for talent and for internationally competitive research funding. A reduction in investment in research and innovation capacity and output will ultimately reduce our ability to positively impact our economy and society. This includes significant work on technology development to revitalise the rural economy, through the development of a vibrant bioeconomy. At present, we are the lead institution partnering with industry to develop a bioeconomy campus in North Tipperary. Universities also have a key role to

play helping cities understand and find solutions to the problems of increasing urbanisation (see CCGA 2015).

- There is a comprehensive body of nationally and EU funded academic research into planning, regional policy and national spatial strategy. It is crucial for this research to be considered when designing national policy. It is crucial for this research to be considered when designing national policy (e.g. Shahumyan et al. 2014; Knaap et al. 2015 Ustaoglu et al. 2016). For example, UCD-based research has previously found that ‘path dependence’ will make it very difficult to alter Dublin’s growth cycle and dominance (Clinch and O’Neill 2009). Significant opportunity costs and deadweight loss will arise in attempting to redistribute population and economic activity. Such trade-offs must be evaluated.
- Ireland’s previous attempts to implement national spatial planning have not been successful. It is important that existing research is considered by policymakers when they formulate national strategies so as to achieve effective regional development.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'A J Deeks', written in a cursive style.

Professor Andrew J. Deeks
President

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