

UCD Students' Union Company Limited by Guarantee,  
Student Centre, UCD, Belfield, Dublin 4Tel +353 1 7163108  
Fax +353 1 7163109

NPF Submissions,  
Forward Planning Section,  
Department of Housing, Planning,  
Community and Local Government,  
Custom House,  
Dublin D01 W6X0

0658

28/03/2017

Dear Sir/Madam,

UCD Students' Union wishes to make the following submission to the National Planning Framework public consultation, in relation to the future long term planning and development of higher education in Ireland.

We specifically request that the following objectives are included as part of the National Planning Framework:

- 1. All people in Ireland should have the opportunity to study a higher education course they wish to avail of. Cost, availability of places, or location should not create a barrier to higher education for any potential or continuing students.**
- 2. Third level education facilities should be provided to match the demand for potential students in each area, so that as many students as possible can have the option of being able to attend a course within a reasonable commuting distance of their home.**
- 3. All Irish third level education facilities should be of the highest standard in terms of teaching and learning.**
- 4. All students should have the option of being able to obtain affordable quality accommodation within a reasonable distance of their place of study.**

Directors  
C. Brennan, F. Hynes, A. Kelly, B. Lannoye,  
M. O'Halloran, C. Smith McKiernan,  
J.P. Swaine, C. Viscardi.

Company Secretary  
M. Jacob.

Registered No.  
514900

Each of these objectives will now be addressed in more detail.

- 1. All people in Ireland should have the opportunity to study a higher education course they wish to avail of. Cost, resourcing, availability of places, or location should not create a barrier to higher education for any potential or continuing students.**

Investment is required in order to increase the capacity and equity of access of Irish third level courses and ensure that HEIs can cater for increasing demand. At present, many courses are oversubscribed. It is clear that the sector has seen significant cuts in funding since the financial crash of 2008, negatively impacting on the quality of teaching and learning and its underlying resource provision. Ensuring that there is sufficient funding allocated, will determine that the sector is not only sustained, but is enabled to grow and continue contributing to the public life of the state. Numbers of places should be planned for and provided, so that all people can have the opportunity to undertake and study a course which they have an interest in.

In line with the aspirations of the NPF, consolidating and expanding the education sector should be a primary objective to; stimulate innovation and the growth of industry, increase the quality of life of Irish citizens, and act as a measure to enhance the distribution of societal development.

In the context of the spatial scope of the framework, the above points should be considered on both an individual and community level. It is important to consider that prospective, current and graduate students represent key- players, pro-actively contributing to the development of the state.

Cost should not be a barrier for any potential students, and attending a third level course should be affordable for all students, and not place any significant burden on them or their families. With the current financial burden significantly reversed, the scope and impact that higher education will have will not be conditioned to the traditional groups or communities which avail of tertiary education, but rather act as a key component to enhance social cohesion throughout the country.

Directors

C. Brennan. F. Hynes. A. Kelly. B. Lannoye.  
M. O'Halloran. C. Smith McKiernan.  
J.P. Swaine. C. Viscardi.

Company Secretary

M. Jacob.

Registered No.

514900

- 2. Third level education facilities should be provided to match the demand for potential students in each area, so that as many students as possible can have the option of being able to attend a course within a reasonable commuting distance of their home.**

While we fully recognise that it is not possible to provide all courses in all places, courses should be provided where there is a justifiable demand for them. If a justifiable demand exists for a particular course in an area, then students should not be forced to travel to another location to attend that course. Notwithstanding the fact that many students voluntarily choose to live away from home, being forced to make long commuting journeys or live away from home can add significantly to the cost of education, as well as stress levels for students, and should be avoided where possible.

Where students are required to live away from home in some instances also increases demand for accommodation in the vicinity of third level education facilities, and exacerbates the current accommodation shortage, leading to higher cost rents in these locations. The provision and location of third level educational facilities should be a key consideration in the settlement strategies of the National Planning Framework, Regional Spatial and Economic Strategies, and City and County Development Plans.

In relation to the term justifiable demand above, we recognise the considerable level of investment which can be required to provide certain third level education facilities, and that while demand might exist for a particular course, this must be accessed in the context of improving the experience of students supporting their academic progression. This needs to be planned for, taking into account the current and projected demand which puts a strain on the current resource provision and the level of investment required to maintain a high standard.

The presence of a third level education facility is a huge attractor for populations in urban centres, and should be used as a key factor in guiding where future development should take place. Where necessary, new facilities should be constructed and existing facilities should be expanded to support the achievement of objectives in the National Planning Framework.

**Directors**

C. Brennan. F. Hynes. A. Kelly. B. Lannoye.  
M. O'Halloran. C. Smith McKiernan.  
J.P. Swaine. C. Viscardi.

**Company Secretary**

M. Jacob.

**Registered No.**

514900

**3. All Irish third level education facilities should be of the highest standard in terms of teaching and learning.**

All Irish third level education facilities should aspire to the highest international standards of teaching and learning, and the Irish higher education system should aim to be a leading and recognised higher education system internationally.

Regardless of which course students choose to undertake, or which third level facility they choose to attend, they should be able to expect that they will receive the highest standard of education. No student should feel that they have to choose a course or third level education facility which is not their preference, simply because it is a more recognised qualification..

More investment and collaboration between educational facilities is required in order to ensure that all facilities can be of a high standard, and be recognised for the high standard of their graduates. While it is understandable that it will not be possible to provide every third level facility with the same level of facilities, students should receive the same standard of teaching and learning, and should have access to specialised facilities when required in their course.

Students who choose to attend a course in one third level education facility should not be at any disadvantage in comparison to students in a similar course in another third level education facility, and no student should have to choose their preferred course on this basis. All students in the Irish higher education system should receive a high recognition for their degree or diploma.

**4. All students should have the option of being able to obtain affordable quality accommodation within a reasonable distance of their place of study.**

While we strongly support the option of students being able to attend third level education locally, we recognise that the demand does not exist for all courses in all parts of the country, and that there will be students who will need to move to another location to attend a course of their choice, particularly if it is more specialised. We also recognise that many students voluntarily choose to move away from their home, to experience new opportunities and challenges, and this also should be facilitated.

For all students who choose to do this, they should be able to obtain affordable accommodation within a reasonable distance of their place of study. At present there is a severe shortage of accommodation near universities and institutes of technology, which has resulted in very high and often unaffordable rents for students. While we recognise the fact that there are many promising developments currently in the pipeline, including UCD's current proposals to provide 3,000 new bed spaces over the next 10 years, and many private off-campus developments, there is still a need for more.

In addition to this we feel that more planning is required, specifically for off-campus privately developed student accommodation. At present, there appears to be no overall plan in place, and student accommodation developments are entirely developer led. The National Planning Framework should include measures requiring planning authorities to consider the provision and location of student accommodation as part of their respective City or County Development Plans.

**Directors**

C. Brennan. F. Hynes. A. Kelly. B. Lannoye.  
M. O'Halloran. C. Smith McKiernan.  
J.P. Swaine. C. Viscardi.

**Company Secretary**

M. Jacob.

**Registered No.**

514900

**Key Recommendations:**

UCDSU recommends that within the composition of the national planning framework, directives are integrated to recommend to the appropriate departments to assist in the spatial development of Higher Education to ultimately facilitate wider societal engagement within the sector.

Within the primary theme of *equity of access* in H.E., striving for this in the context of the NPF, should be considered as releasing an *equal spatial distribution of engagement*. From this perspective the following factors should be considered:

*The gross cost of higher education (living costs and academic fees).*

*The lack of engagement from specific communities and regions, compounded by a prevailing culture.*

*The necessary resources and supports to consolidate the sector enhancing the teaching and learning experience.*

**One - Higher Education Fees -**

That the Departments of Finance, Public Expenditure and Reform, Education and Skills, and the Higher Education Authority conclude on the appropriate funding model for Higher Education which would significantly reduce the financial burden on students and their families. To realise equity of access in the sector while simultaneously driving GDP and Tax Growth, the re-instatement of the free fees initiative is implemented to further economic development and improve the income tax base of Irish earners.

**NPF Integration:**

*Availing of a funding model for higher education will have the following impact on planning and development in Ireland:*

*Increase engagement in the sector across the socio-economic and spatial spectrum.*

*Enhance the skills sets of individual citizens furthering the distribution of economic and social development.*

**Directors**

C. Brennan, F. Hynes, A. Kelly, B. Lannoye,  
M. O'Halloran, C. Smith McKiernan,  
J.P. Swaine, C. Viscardi.

**Company Secretary**

M. Jacob.

**Registered No.**

514900

UCD Students' Union Company Limited by Guarantee,  
Student Centre, UCD, Belfield, Dublin 4

Tel +353 1 7163108  
Fax +353 1 7163109

*With no consequential financial burden on students post - graduation, income bases improve, furthering GDP growth and enabling the further development of SME or equivalent enterprises/ engagements with the work force.*

**Directive:**

*The national planning framework recognises the need to reduce the financial burden on Irish society associated with higher education and recommends that the DF, DPER, DES, and the HEA re-instate and implement the free fees initiative.*

**Two- Higher Education Funding -**

That the Department of Public Expenditure and Reform, (by a directive/ recommendation of the NPF) identify the Higher Education Sector (through the Department of Education and Skills), as a key contributor to economic and social development and the appropriate fiscal framework determines strategic investment in the sector to improve the provision of teaching, learning and support services.

**NPF Integration:**

*Substantially re-investing in the higher education will have the following impact on planning and development in Ireland:*

*Improving facilities in HEIs increasing student retention and engagement in the sector.*

*Enhancing and integrating the role of HE in economic and social development, to ensure the delivery of the main objectives of the NPF.*

**Directive:**

*The national planning framework highlights the need to invest in the HE sector to enhance the quality and scope of HEIs and recommends that the DPER and the DES facilities this need for resourcing.*

**Three - Student Focused Accommodation in the External Market -**

The Department of Housing Planning, Community and Local Government work in partnership with the Department of Finance to develop a tax incentive to enable private property developers to construct and retail student focused accommodation at a rent threshold not exceeding €4,500 per annum (academic year - nine months)\*. The percentage of the tax incentive *per rental unit* on the properties would account for inflation in operational costs and regional rental prices\*. This incentive would realise

**Directors**

C. Brennan, F. Hynes, A. Kelly, B. Lannoye,  
M. O'Halloran, C. Smith McKiernan,  
J.P. Swaine, C. Viscardi.

**Company Secretary**

M. Jacob.

**Registered No.**

514900

UCD Students' Union Company Limited by Guarantee,  
Student Centre, UCD, Belfield, Dublin 4

Tel +353 1 7163108  
Fax +353 1 7163109

that student focused accommodation becomes a viable option for prospective and current students not acting as barrier to education.

**Example relative to South County and City Dublin\*:**

*Inflated Retail Price: €6,500 per annum\* /unit*

*Threshold Retail Price: €4,500 per annum\* /unit*

*Tax Incentive: 31.8% (€2,000 difference, Inflated vs. Threshold)*

**Directive:**

*The national planning framework identifies that the availability and cost of student focused accommodation plays a significant role in achieving equity of access in the sector and recommends that the DECLG and DF develop a tax incentive for private property companies to keep rates affordable for students.*

**Four - On Campus Accommodation -**

*On campus accommodation forms an integral role to facilitating students access to higher education while also integrating entrants into college life with accommodation in close proximity to their place of study. Further to this, the development of on campus accommodation has been identified as a means to alleviate the pressure on the external market, as predominantly HEIs are located in regions or urban areas of acute housing shortages with the associated inflation in rental prices due to demand. It is therefore recommended that on-campus accommodation is considered in the context of supply and price point:*

**Supply:**

*Through institutions such as the HFA and ISEF and first tier banks including the EIB etc., the availability of senior debt finance to HEIs is facilitated and realised at base interests rates to ensure that the pursuit of capital development projects, realise the rapid delivery of student focused accommodation in light of the acute shortage.*

**Price Point:**

*Availing of the low interest rate environment, this would ensure that in the capital appraisal and development phases that returns would be minimal not having a negative impact on the price point.*

Directors

C. Brennan, F. Hynes, A. Kelly, B. Lannoye,  
M. O'Halloran, C. Smith McKiernan,  
J.P. Swaine, C. Viscardi.

Company Secretary

M. Jacob.

Registered No.

514900



UCD Students' Union Company Limited by Guarantee,  
Student Centre, UCD, Belfield, Dublin 4

Tel +353 1 7163108  
Fax +353 1 7163109

*Further to this, the department of Public Expenditure and Reform, develop a strategic investment initiative through the DES, HEA, and the DECLG, to invest in HEIs accommodation projects to reduce their prices by 40% and sustain their operation:*

**Example of Higher Education Institution:**

**Year One** - 3,000 Units (beds) - €7,500/unit/academic year - *Inflated Price*

**Income** - €22,500,000

**Year Two** - 3,000 Units (beds) - €6,500/unit/academic year - *Phased Price Threshold*

**Income** - €19,500,000 - **Difference** - €3,000,000 - Strategic Investment Phase One

**Year Three** - 3,000 Units (beds) - €5,500/unit/academic year - *Recommended Price Threshold*

**Income** - €16,500,000 - **Difference** - €3,000,000 - Strategic Investment Phase Two

**Year Four** - 3,000 Units (beds) - €4,500/unit/academic year - *Recommended Price Threshold*

**Income** - €13,500,000 - **Difference** - €3,000,000 - Strategic Investment Phase Three

**Total Difference** - €9,000,000 - *Strategic investment from Inter-departmental framework to realise, more affordable accommodation, break even basis and sustain operational costs.*

**NPF Integration:**

*Substantially facilitating the delivery of student focused accommodation and ensuring its affordability will have the following impact on planning and development in Ireland:*

*Facilitating the construction of student focused accommodation will ensure that supply is met with increasing demand.*

*The appropriate fiscal framework should facilitate this delivery.*

**Directors**

C. Brennan, F. Hynes, A. Kelly, B. Lannoye,  
M. O'Halloran, C. Smith McKiernan,  
J.P. Swaine, C. Viscardi.

**Company Secretary**

M. Jacob.

**Registered No.**

514900

UCD Students' Union Company Limited by Guarantee,  
Student Centre, UCD, Belfield, Dublin 4

Tel +353 1 7163108  
Fax +353 1 7163109

*The reduction in accommodation rates plays an integral role in achieving equity of access in the sector.*

**Directive -**

*The national Planning framework recognises that affordable student focused accommodation is a key requirement to stimulate engagement in the sector and achieve equity of access and therefore recommends the following to ensure the development and availability of student focused accommodation:*

*A Tax Incentive to ensure that private property developers retail affordable student focused accommodation.*

*Senior debt finance is made readily available to HEIs to ensure the rapid construction of on campus accommodation.*

*That the DPER, DES, HEA, and the DHPCLG, develop and establish a strategic framework to reduce the cost of on-campus accommodation to a threshold of 40% per unit while also supporting operational costs.*

Finally, we wish to request that UCD Students' Union, and other students' unions, are included as key stakeholders to be consulted in relation to the long term planning of this country. While we recognise that all universities and institutes of technology were invited to take part in the Preliminary Stakeholder Consultation, we wish to point out that their views may not correspond directly with the views of students in all circumstances, and students unions can also offer a perspective on the wider issues affecting students, many of which might be outside the higher education system. The inclusion of students' unions as key stakeholders would be a welcome addition.

Yours sincerely,

Conor Viscardi - President of UCDSU 16/17



Directors  
C. Brennan, F. Hynes, A. Kelly, B. Lannoye,  
M. O'Halloran, C. Smith McKiernan,  
J.P. Swaine, C. Viscardi.

Company Secretary  
M. Jacob.

Registered No.  
514900