

# Two Little Tigers: Culture and Institutions in Dublin and Singapore with Lessons for the Charter Cities Movement

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## *1. Introduction*

Dublin and Singapore are two cities of historical interest for the charter cities movement. Singapore is explicitly mentioned in the charter cities literature as an example of 'excellent governance' among planned cities and cities which have transformed from poor to wealthy in recent decades (Mason and Lutter, 2020). This is largely due to its low corruption, high quality public housing and openness to investment. Dublin has, by contrast, received no attention from the charter cities movement as it is not a planned city nor a city-state. However, Ireland was a pioneering force in innovative economic governance, establishing the world's first modern 'free trade zone' in Shannon in 1959 and Dublin's International Financial Service Centre (IFSC), a special economic zone, in 1987.

Just as Singapore had to survive 'without a hinterland', in the words of Lee Kuan Yew (2011: 49-69), so too has Ireland's capital established itself as a significant global city through openness to the world economy. Dublin ranks second in the OECD in terms of capital cities' shares of national GDP, constituting almost half of Ireland's economy. Although not totally removed from its hinterland in the way that Singapore was after expulsion from Malaysia, Dublin's status as a haven for global capital has an outsized effect. For instance, the IFSC is estimated to contribute 7.4% of Ireland's GDP (IFSC, 2021).

There are also significant policy continuities, such as with housing, the focus of this research. Both countries have historically adopted a form of socialised provision of privately owned housing. Norris and Fahey (2011) make an explicit connection between Irish housing policy and forms of 'asset-based welfare' common in Southeast Asia. This, they argue, is the result of the Irish state's origin in agrarian rather than urban revolt. However, today this continuity is less clear with rapidly declining home ownership rates in Ireland and an acute lack of housing considered as the second most important issue to the electorate (Leahy, 2020).

While not perfect parallels, Dublin and Singapore are two small cities who, for want of a hinterland, have pursued policies of radical openness to the global economy, rejecting dependency theory and inviting vast inflows of foreign investment. Both were important sites of British colonialism, inhabiting – as key administrative and commercial centres - an ambiguous space between colony and metropole. Both have implemented comparable systems of asset-based welfare. Despite this, when it comes to the provision of housing there is a considerable difference in outcome between the two. Why is this, and what does it mean for the charter cities movement?

## *2. Housing in Dublin and Singapore*

Hearne (2020: 11) states that the Dublin housing crisis, at its core, "results from the way in which housing, and land, as real estate has been converted into a tradeable commodity and investment asset." By this account, precipitous increases in homelessness, insecurity of tenure, and

overcrowding are a direct outcome of so-called “neoliberalism.” The decision following the oil crises of the 1970s to aggressively reduce the public subsidy of housing construction is seen as the beginning of a story culminating in Dublin’s position as one of the world’s most expensive cities to rent, ahead of Sydney, Tokyo, Barcelona, and Paris (ibid: 24). What subsidy exists today tends to be in the form of vouchers for the private rental sector or modest help-to-buy schemes but given that these do not help to increase supply they merely contribute to spiralling “cost disease” (Teles et al, 2021).

There is some truth to this story. Abolition of subsidy to prospective homeowners, elimination of rent controls, and movements towards welfare provision through rental assistance rather than social housing are undoubtedly linked to transformations in the international economy over the last forty years, including financialisation and globalisation. In 1987, public debt was 150% of GDP (Norris, 2014: 626). A contributing factor was Ireland’s socialised system of home ownership, described as resulting from a chain of ‘reactive sequences’ (ibid: 619) following the land reforms of the early 20th century. As Norris explains, from the early 20th century onward Ireland had, reacting to ongoing political pressure, expanded its system of direct support to buy housing from a small section of rural farmers to include rural and urban labourers. One could argue that changes in global economy since the 1980s simply swept away an unsustainable legacy system of expensive housing provision.

However, it is insufficient to simply point the finger at “neoliberalism.” Doing so obscures important factors related to culture and institutions that date back much further; the path dependencies described by Norris (ibid) did not come to a halt when OPEC turned off the oil taps. That this is true is well illustrated when we compare Dublin to other countries such as Singapore. Despite many similarities, such as heavy reliance on foreign investment to promote growth, robust land reform, and a preference for ‘asset-based’ welfare (Norris & Fahey, 2011), outcomes for these cities diverge considerably.

A metric which clearly shows this is tenure status. Among citizens and permanent residents, the overwhelming majority of Singaporeans are owner-occupiers; in other words, living in property which they themselves own. 90.9% were recorded as such in 2016 (DOS, 2021), compared to 59.2% living in urban Ireland, predominantly Dublin, in the same year (CSO, 2021). Across Irish cities, this represents an ongoing decrease from a peak of 73.2% in 1991 (ibid). Singapore’s tenure regime has been much more consistent by contrast; in 1995, owner-occupancy was at 90% (DOS, 2021). Singapore’s ownership levels have barely changed while Dublin’s are consistently decreasing.

Other measures further highlight the degree of difference between housing in Singapore and in Dublin. For instance, affordability is significantly greater in Singapore. Whereas in Dublin in 2019 the average price for a house was €370,000 (Hearne, 2019; 24), 9.3 times average annual earnings, in Singapore the median apartment is only 4.6 times the median income (Hamilton, 2020). While this is still by some accounts quite unaffordable, it is important to remember that this is in the context of Singapore’s unique ‘Central Provident Fund’ system which allows citizens

to use their accumulated social security contributions to pay for housing (Phang & Helble, 2016: 10).

The benefits of the Singaporean approach become clear when comparing mortgage debt. Although the percentage of outright ownership in Ireland has remained consistent since 1991 (30%, relative to owners-with-loan and renters), among those with loans, arrears have increased since the financial crisis. In 2009, 3.3% were in arrears for over 90 days; in 2019 this was 6% (Hearne: 2020: 40). Buy-to-let properties are in a worse state, with nearly 1 in 5 in arrears (ibid: 42), leaving renters at a profound risk. In Singapore, arrears are modest, with only 7.9% of households ever in arrears over the course of three years (Minister for National Development, 2018). In Ireland, the majority of owner-occupier arrears are long term, with the majority since 2015 being in arrears for over 720 days (Hearne, 2020: 42), while in Singapore nearly 60% of the households had cleared their arrears by the end of the three-year measurement period (Minister for National Development, 2018).

Singapore, despite radical openness to foreign investment, ensures that its housing stock is protected from speculation and financialization at the expense of its citizens. Compared with Dublin, we see this manifested in three spheres: the role of real estate investment trusts (REITs), the use of leasehold tenure, and policy on short-term lets. As Hearne (2020: 131-144) describes in detail, following the 2008 crisis there was an urgent need to reinvigorate the collapsed housing market to prevent the proliferation of negative equity and maintain the economic integrity of the Irish state. This was achieved through the establishment of the National Asset Management Agency (NAMA), which bought up over €72 billion worth of distressed loans at a discounted price of €32 billion (ibid: 131). Many of these loans were then sold off to private equity and REITs, both international and domestic.

Singapore plays home to several so-called S-REITs, following the decision of the Monetary Authority of Singapore to (Cheun & Gregoriou, 2014: 53) in 1998 to try and add greater breadth to the financial sector, with over 25 now listed on the Singapore Exchange. The fundamental difference is that S-REITS primarily hold industrial and office property (ibid: 57), while housing remains almost exclusively in the hands of owner-occupiers and the state. In Ireland, by contrast, REITs are as of 2019 in possession of 13% of all primary dwelling houses and 18% of mortgages, measured by value (Hearne, 2020: 138).

REITs in Ireland not only possess much housing wealth, but they also own considerable land holdings. Hearne (2020: 136) writes, 'Between 2010 and 2015, NAMA sold development land to investors that had the potential for up to 20,000 housing units. Just 5% of the land bought from NAMA was developed by 2016.' Ireland, given its historic preference for freehold landholding, combined with the short term need to refinance the Irish economy, struggles to encourage housing density and prevent speculation, with major developers accused of 'dragging out' developments to avail of rising prices (The Sunday Times, 2018). Such predatory behaviour is compounded by widespread NIMBYism (Not-In-My-Back-Yard) compounding the issue (Tutty, 2022). Despite high population density (4,588 people per km<sup>2</sup> versus Singapore's 8,358 people

per km<sup>2</sup>), swathes of Dublin beyond the center have densities of 25 homes per hectare, far lower than Singapore's 240 homes per hectare (Mandel, 2020). As will be discussed in detail, this is largely the result of cultural preferences for low-rise, detached housing reinforced by governance structures that even the Taoiseach recognizes contributes to 'a culture of NIMBYism' (McNeice, 2021).

Singapore by contrast is distinguished internationally by its system of leasehold land tenure and robust planning legislation which has allowed the state to seize land at discount prices when deemed to be in national or even commercial interest. The basis of this is the Land Acquisition Act 1966 which permits compulsory purchase:

- “(a) for any public purpose;
- (b) by any person, corporation or statutory board, for any work or an undertaking which, in the opinion of the Minister, is of public benefit or of public utility or in the public interest; or
- (c) for any residential, commercial or industrial purposes.”

Finally, Dublin and Singapore differ considerably in how they manage short term lets. Singapore's system has been described as 'hierarchical' with regards to platforms like Airbnb (Li & Canelles, 2021) and it has been consistently reiterated and enforced since 2015 that lets of under six months are illegal. In some instances, Housing and Development Board (HDB) homes have been repossessed in response to violations of this rule (ibid: 5). Meanwhile, in the greater Dublin area there are more entire homes to rent for more than 90 days on the Airbnb platform (2,856) than there were properties to rent as full-time homes (1,500) (Hearne, 2020: 9)

None of this is to imply that Singapore is, without qualification, superior to Dublin. Various metrics render difficult the identification of simple 'lessons learned' for the charter cities movement. For instance, both cities are comparable in terms young people's dependence on the family home. In Ireland, the average age when the majority tenure status becomes ownership has increased from 26 in 1991 to 35 in 2016 (CSO, 2021). 35 is the same age when single Singaporean citizens become eligible for support from the Housing and Development Board (HDB, 2021), with an average age of marriage of 29-30 (The Economist, 2021). In other words, both young people in Singapore and Dublin share frustration at the extent of time needed to achieve independent ownership, especially if unmarried or lacking parental support; it is simply that in Singapore the 'stuck at home' dynamic is more formalized in the system of public housing provision.

Secondly, Singapore's system is the product of delicate compromises which have shown signs of strain. As with Dublin, policy has been enacted to protect homeowners from widespread negative equity, which would prove ruinous for either city's model of 'asset-based welfare'. For instance, in 2002 following the Asian Financial Crisis and the SARS pandemic, the slowing down of the economy meant the HDB found itself in possession of 17,500 unsold flats. However,

fearing a collapse in resale house prices, the ruling party resisted calls to expand HDB eligibility to single mothers and unmarried people below 35 years old (Chua, 2014: 527).

However, there is no sphere that complicates utopian discourses around Singaporean housing more than migration. Following 2008, the city-state's reputation for good governance attracted massive flows of foreign direct investment, something which necessitated an expansion in the labour force. As a result, Singapore's population increased from 4 million in 2005 to 5.4 million today (SingStat, 2021). Of these, approximately 3.5 million are citizens, half a million are permanent residents, and the rest are foreigners. Notably, Singapore's national statistics website does not explicitly name the remaining 1.5 million foreigners as a group.

In Singapore, foreign workers are not entitled to access public housing, either through direct sales from the HDB or via resale. Outside of the public housing market, Singapore has some of the highest private rental costs in the world, and as such many people (at least 300,000) are compelled to live in dormitories provided directly by their employers, the oppressive conditions of which have been highlighted by the Covid-19 pandemic (The Economist, 2021). For example, in the early stages of the pandemic, 90% of infections were among low-wage migrant construction workers who were frequently depicted as disease factors in Singaporean media (Kaur-Gill, 2020). While foreign workers in Dublin also often live in overcrowded and unsanitary conditions, particularly in the context of crowded multiple occupancy housing, many such workers have greater rights regarding family unity and freedom of movement to and from their country of origin. The sheer number of foreign workers in Singapore undermines all utopian depictions.

### *3. Culture in Dublin and Singapore*

The first lesson for the charter cities movement emerging from the comparison of Singapore and Dublin is that different cultural orientations towards housing can precede crisis, even after long periods of ostensible success. Going beyond Hearne (2020)'s thesis that the Irish housing crisis was caused by "neoliberalism," the trends of the last 40 years were pre-configured by key cultural factors, namely: a romanticisation of the agrarian ideal and freehold tenure, a suspicion of ground rent as fundamentally colonial, and a calcification of Catholic identity that precluded land reform on a scale comparable to Singapore.

Culture and institutions are often difficult to disaggregate and usually mutually constitutive, as noted by Alesina and Giuliano (2015). It is entirely reasonable to be suspicious of attempts by theorists like Greif (2006) to clearly distinguish between culture and informal institutions, recognising that such a distinction is impossible given that norms and conventions are both cultural and institutional in nature (ibid: 902). As such, while this section focuses on beliefs and values and the next section focuses on formal institutions of multi-level governance, it is important to emphasise that there is a significant overlap between the two.

*The agrarian ideal*

As already mentioned, Norris & Fahey (2011) have discussed the similarity of Ireland's housing provision with Asia's model of 'asset-based welfare'. Culturally, the emphasis on homeownership shares a common origin in Singapore and Ireland: opposition to communism. Just as Lee Kuan Yew (2011) emphasised the need for new migrants and potential revolutionary malcontents to feel they had a stake in their society, so too did the Bishop of Cork state in 1957, "The man of property is ever against revolutionary change, consequently a factor of the first importance... is the widest possible diffusion of ownership...." (Cited in Hearne, 2020: 113)

Yet the ideal vision of ownership was fundamentally different. One such difference was the connection of Irish housing policy to the agrarian ideals of Irish nationalism, Irish independence having been preceded by many years of agitation, at times violent, by peasants seeking fair rents and fixity of tenure. Recent research by Beatty (2019; 157) has highlighted the consistent emphasis on 'agrarian masculinity' articulated by post-independence governments, married to protectionist rhetoric lamenting Ireland's reliance on imports. In this context, redistribution of land was not merely an economic exercise, but the vindication of centuries long national humiliation at the expense of Britain.

Singapore's housing policy was connected to a land reform initiative that aimed to ensure speculators and proprietors could not profit from public improvements to land value, whereas Irish land reform did not substantially improve production incentives or provide any meaningful disincentive to speculation. Rather, it focused on restoring the dignity of the Irish peasantry by abolishing the institution of landlordism via compulsory sale of land. Such a move towards peasant proprietorship had already begun in 1881 with the first Land Act, and was accelerated via the Wyndham Act in 1903, where the state helped peasants directly to purchase land. While this move to peasant proprietorship represented an incredible redistribution and (despite being largely facilitated under British rule) a key pillar of Irish nationalism, Guinnane and Miller (2015) have convincingly argued that it did little to improve economic incentive structures. For instance, agricultural productivity did not improve as a result of the reform and for many tenants it actually became harder to get credit following the decline of 'co-proprietorship' institutions where landowners would forgo rent on the security of the tenant's right to sell on their tenancy. For charter cities, this represents an exemplary wasted opportunity to reform the basis of urban governance towards a sustainable future. Whereas Singapore, following its independence, radically changed the structure of its economy to make the land more productive and ensure its long-term utility to the state, Ireland merely took it from a few large landlords and created many smaller landlords.

### *Suspicion of ground rent and preference for freehold*

It is unfair to simply charge Irish reformers with sentimentalism. The point is that cultural memory has the power to shape understandings of prosaic concepts like rent. This is something that city planners must be sensitive to when implementing the charter cities model. In Ireland, the salient memories were of mass starvation and emigration under a callous colonial administration acting



on behalf an Anglo-Irish elite. The indelible mark left on the Irish consciousness by the famine is hard to overstate but can perhaps be communicated in the fact that Ireland's population remains significantly below pre-famine levels (Irish Post, 2019).

By contrast, Singapore's relationship to colonialism is more ambiguous. The narrative of "from third world to first" emphasises that while Singapore is no longer a colonial outpost dependent on monopoly opium sales to their Chinese neighbours (Haila, 2015: 33), British tutelage should still be assigned an equivocal role in Singapore's success. This difference in perception is symbolised by Singapore's continued preservation of the statue of Sir Stamford Raffles, contrasted with the destruction of Nelson's Pillar in 1966 by the Irish Republican Army, an event immortalised in numerous songs (The Go Lucky Four, 1966; The Dubliners 1966). More fundamentally, whereas Ireland sought to make explicit connections to its distant, pre-colonial Celtic past (consider the designation of the prime minister as Taoiseach, meaning 'chieftan'), Singapore's leadership made a conscious decision to craft a national narrative that began in 1819 (Barr, 2021). Collective considerations of Singapore's 'long' Malay history have only recently emerged.

Given such contrasting historical framings, understandings of rent are unsurprisingly different. The opening line of a 2010 Irish Times article is exemplary, "The public may see it as a relic of colonisation, but ground rents are far more complicated than that and should not be ignored." The author explicitly states that despite most tenures since 1978 being freehold, homeowners on occasion discover that their leases are due to expire and interpret it as 'an odious hangover from colonisation for which they shouldn't have to pay' (ibid). Such a romanticisation of freehold tenure has been depicted in famous works of Irish literature, such as when Joyce's Leopold Bloom dreams of coming into possession of comfortable suburban home not "by primogeniture, gavelkind or borough English" but purchased "by private treaty in fee simple" (Cited in Gibson, 2013: 959). 'Fee simple' being a term for freehold ownership under English property law.

This philosophy of property can be readily compared with Singapore's, which Haila (2015: 54) describes as fuelled by modernist optimism and rooted in *kiasu*, a Hokkien word meaning 'fear of losing'. Although landed property may be a visionary aspiration for many (much like the 'American dream' of riches achieved through entrepreneurialism and hard work), housing politics is more commonly tied to Singaporeans' anxiety that they remain globally competitive and that both individual and communal prosperity are preserved. Concerns with freehold ownership are secondary to demands for constant upgrading projects which are readily enabled under Singapore's system of quasi-Georgist leasehold tenure.

### *Catholic identity versus multiculturalism*

This is not to essentialise Ireland as having irredeemably conservative ideas about ownership, nor to suggest cultural factors made the current situation inevitable. There was a limited Georgist tendency in the Irish land reform movement, advocating for similar principles to Singapore's. Michael Davitt, one of the most significant activists in the Irish Land League, embodied this. He



had met Henry George during a fundraising exercise to the United States, had read George's works in prison, and 'was intensely interested in George's ideas and promised to do what he could to push the sale of *Progress and Poverty* in Britain' (Sheppard, 2014).

However, Davitt's ideas were not to prevail. The focus on peasant proprietorship, promoted by Charles Parnell's faction of the League was to be the victor. Although Parnell was known for his anti-clericalism and ultimate disgrace as an adulterer in the eyes of a religious population, a factor in his ideas triumphing over Davitt's was nonetheless the influence of Catholic social teaching. This had influenced elements of Cumann na nGaedheal's anti-statism and Fianna Fáil's vision of rural autarky (Puirseil, 2017). Eamonn De Valera stressed that their labour and land policies were influenced by the encyclical *Rerum Novarum*, which Henry George had interpreted as a direct attack upon his doctrine (Sheppard, 2014). It is not clear that it was such an attack (Nuesse, 1985), but this dynamic nonetheless highlights how the socio-religious context created an atmosphere inimical to mass nationalisation of land or the creation of anything likeable to Singapore's Housing Development Board.

Additionally, unlike in Singapore there was no impetus in Ireland to cultivate a multicultural society. Singapore, following independence, had to deal with the twin problem of extreme territorial boundedness combined with simmering ethnic tensions. These tensions had on more than one occasion resulted in violence (PSD, 2015). The need to accommodate such conflict in extremely limited space is the basis of Singapore's well known ethnic housing quotas today. Ireland had also suffered well known ethno-nationalist tensions for years. However, given the size of the island and the creation/partition of the majority Protestant Northern Ireland in 1921, there was no such impetus in Dublin. Although allusions to ethnic cleansing are largely considered inappropriate and exaggerated in relation to Ireland's independence (Fitzpatrick, 2013), there has nonetheless been a considerable decrease in the proportion of Protestants living in Ireland, decreasing from 10% in 1911 to 3.2% in 2011. Although counter-factual, it is not unreasonable to expect that had Dublin been more territorially bounded and had there remained a significant Protestant minority, the logic of urban planning may have been profoundly different.

#### *Why does culture matter?*

This comparison of historic and cultural foundations carries a more fundamental lesson for the charter cities movement. It is a reminder that even as planners and developers can identify greenfield sites, this does not mean that the societies in which they build are *tabulae rasae*. Charter cities therefore may need to look for tactical insertions during moments of radical upheaval, and those seeking to build them must be prepared to act boldly in the face of historically rooted values and preferences.

#### ***4. Institutions in Dublin and Singapore***

Cultural factors do not exist in a vacuum but are mutually constituted by formal institutions. While the previous section establishes the relevance of cultural ideals and identities for configuring

land policy, this section considers institutions, or what North (1990) calls the 'rules of the game'. Echoing Alesina & Giuliano's (2015: 902) framing, it avoids the term 'informal institutions', which are really a form of culture, using the term 'institution' only to refer to formal laws and codes. However, it also considers how culture and institutions inevitably intersect, as for instance, in the way the Irish constitution is invoked politically as an obstacle to radical housing reform.

This section pays attention to the idea of path-dependency in the land and housing systems of Dublin and Singapore, noting how particular configurations of power and specific decisions have pre-configured outcomes. In doing so, it offers a lesson to the charter cities movement about how apparently minor institutional differences at one point in time can snowball into profoundly different results. More specifically, it shows how what were effectively minor differences in urban development policy during the height of Fordist industrial capitalism have had radically different implications following neoliberalism's fundamental transformation of the city's role in the global economy.

Three institutional factors are examined. The first is 'metrophobia' in Ireland, a term used (Moore-Cherry & Tomaney, 2019) to describe extreme centralisation of planning authority, nonetheless existing alongside hyper-localised clientelist politics (Breathnach, 2010). This is almost the inverse of Singapore which, being a city-state, does not have to compete with a hinterland for resources. Secondly, the intersection of institutions with culture are considered, considering the discretionary nature of Ireland's planning process in comparison with Singapore's rules-based approach, as well as issues related to the constitution. Finally, consideration is given to the global institutional context, particularly the international migration regime and the changing role of land.

### *Metrophobia*

An explanation frequently offered for Singapore's success is good governance. Lee Kuan Yew (2000: 167) cites his refusal to underpay ministers (lest they neglect their duties or enrich themselves through corruption) as essential. Others, especially Chinese policy makers (Ortmann & Thomson, 2018), highlight the instrumentalisation of the market by the state, implying that such success could not be achieved in a liberal-democratic society. Such explanations ignore that corruption often attends economic growth (Sachs, 2006: 191; Ang, 2020) and leaves out the possibility that Singapore's existence as a one-party state is the result of, rather than the cause of, good policy.

Haila (2015: 86-119) offers a more sophisticated explanation. While not denying that probity among officials and electoral continuity are important or helpful, she suggests the institutional foundation of Singapore's housing policy lies elsewhere. She highlights a balance of powers among institutions like the Singapore Land Authority (SLA), charged with leasing land; the Housing Development Board (HDB), responsible for providing housing; and the Jurong Town Corporation, charged with developing industrial space. Furthermore, there is separation at the ministerial level, with the SLA reporting to the Ministry for Law and the HDB to the Ministry for

National Development. These institutions are furthermore given considerable powers of eminent domain, existing in balance (although not always harmoniously) with private property rights. A good example is the HDB's Selective En Bloc Redevelopment Scheme (SERS) where a majority of residents in a building can compel the minority into an early sale in areas targeted for development. All these institutions operate in the context of a city state, where the central government does not have to negotiate competing demands between a hinterland and various cities.

This differs from the institutional foundations of Ireland's land and housing regime, particularly in Dublin. Not being a city-state, Ireland exists under a system where local government and national government are clearly bifurcated, with distinct responsibilities. In Ireland, especially compared to most European countries, the role of local government is marginal and totally subservient to the central authorities (McGuirk, 1994). In such a context there is not so much an effective horizontal separation of planning powers, but a dysfunctional vertical separation of powers where the role of local government is essentially limited to land use zoning (Moore-Cherry & Tomaney, 2019: 10).

Such a distribution of power leads to a number of dynamics, defined as 'metrophobia' (ibid). Metrophobia is characterised by 'race to the bottom' competition among municipalities who, lacking the capacity to raise significant funds independently, compete for large scale infrastructure projects regardless of their broader utility in a city. This leads to dysfunctional outcomes like the construction in Dublin of three regional-scale shopping centres, within 25km of each other (ibid: 10). This in turn facilitates harmful behaviour by private actors who exploit the weakness of local government and leverage their connections to a remote central government (ibid: 12). The concrete result is sprawl on the periphery, underused land in the core, and the general proliferation of unlivable spaces. For example, the International Financial Services Centre, ostensibly a project aligned with the charter cities philosophy, was built with national sectoral objectives in mind, but little concern for spatial outcomes (ibid: 13).

Metrophobia emerges from institutional contradiction identified by Breathnach (2010: 1180): the 'peculiar post-colonial combination of a localised populist politics and a centralised state bureaucracy'. According to Breathnach, the underlying economic institutions of agricultural extractionism that developed in the nineteenth century meant that when Ireland gained her independence, she lacked an organised working class or industrial bourgeoisie (ibid: 1186). This led to local politics that were highly clientelist, with representatives seeing their purpose as the appropriation of resources from the central government even when such redistribution was inefficient. A concrete example of how metrophobia, rooted in this institutional context, undermined effective urban development is the failed 'National Spatial Strategy 2002-2020', which proposed to develop infrastructure, housing and human resources so as to attract direct investment in 'gateway' areas, including Cork, Limerick, and Galway.

Although rooted in a justifiable desire to mitigate sprawl in Dublin and empower other potential recipients of foreign direct investment, the project was poorly implemented. There were a

number of reasons for this, including the failure to give local authorities new statutory powers and the financial crisis (O’Riordain and Van Egeraat, 2016). However, central to its failure was the decision at the last minute to add various small towns and hubs to the strategy (Morgenroth, 2018), none of which had the infrastructure and human capital to feasibly attract mass foreign direct investment following piecemeal allocations of state largesse. Furthermore, the NSS was implemented parallel to a separate policy of decentralisation, announced in 2003, that redistributed civil service jobs around the country with no reference to the aims of the NSS, supposedly Ireland’s first holistic strategy for urban development (ibid). It is a clear example of how clientelist local politics interacting with a centralised planning system fundamentally undermines attempts to effectively distribute resources and investment among cities.

Singapore, as a city state lacking hinterland, does not suffer from these dynamics. Unlike Ireland, centralised resources and planning permission are allocated strictly according to national planning principles as articulated, for instance, in iterative Concept Plans developed by the Urban Redevelopment Authority. Such an effective centralisation of planning authority has not yielded perfect results, with some criticising it as ‘cookie cutter’ (Yuen, 2009: 381), but it has prevented the ineffective distribution of largesse and wasted development opportunities present under Ireland’s metrophobia. Additionally, it has prevented the congestion, overcrowding and pollution characteristic of many other Asian cities (Healy, 2021).

#### *The intersection of institutions and culture*

Although Alesina & Giuliano (2015) question the conceptual coherence of ‘informal institutions’, there are areas where the well-defined rules of the game and non-explicit cultural preferences interact. Two spheres where this bears upon Dublin and Singapore’s land and housing policy are the relationship between developers and planners, and the role of the constitution. In both cases, there is a mutually constitutive circle where the institutional context preconfigures cultural/political behaviour, which in turn reinforces institutions. In Ireland, this manifests as the relative power of developers over planners and legislative inertia in face of crisis; in Singapore it manifests as the opposite.

McGuirk (1994), discusses at length research showing that developers in Dublin see planners as ‘facilitators’ whose role should be limited to compulsory purchase orders and site assembly. Planners for their part see their leverage as limited to modest planning gain agreements, and in any case see their role as streamlining developer-led initiatives in derelict or priority areas. While the majority of planners would like to be more involved in the development process, institutional constraints are reinforced by a culture of restraint that doesn’t contemplate state-planning initiatives on the scale of Singapore’s housing system. Furthermore, there is a clear consensus among developers and planners that the circumventing of planning authorities via direct appeal to the central state - especially through the direct lobbying of cabinet politicians - is a normal process. Such a system - defined by discretion and an inconsistent location of authority - differs considerably from Singapore’s rules-based approach (Financial Times, 2017).

Crucially, the facilitative role of Irish planners is not defined in statute, nor is the process of developers appealing to central government defined as formal process. In this respect, such phenomena are not strictly institutional. Yet they are clearly intimately related to institutional factors, with distributions of power and structures of decision-making influencing what is accepted as the done thing.

Nowhere is this intersection of the institutional and cultural clearer than in the Constitution of Ireland's invocation by policy makers as an obstacle to housing reform. Hogan and Keyes (2020) identify numerous policies abandoned by the legislature in deference to perceived institutional limits. For instance, repeated attempts to increase vacant site levies have been opposed based on a concern for landlords' property rights, such as with the Derelict and Vacant Sites Bill 2017 and the Urban Regeneration and Housing (Amendment) Bill 2018 (ibid: 20-21). Crucially, these initiatives did not fail because they were struck down by the judiciary, but because legislators believed that they would be. As Senator Paudie Coffey put it, "The problem is the fact we have a Constitution that contains property rights. Whether we like it, under the Constitution as a free and democratic State, landowners and property owners have property rights" (cited in Hogan and Keyes, 2020: 21).

Much of this opposition is linked to a previous ruling, *Blake v Attorney General* 1982, which had struck down rent control legislation on the basis of articles 40.3.3 and 43 of the constitution, protecting the personal rights of the citizen and the institution of private property respectively. However, Hogan and Keyes (2020) convincingly suggest that the significance of this ruling has been overstated, given that it relied on highly specific criteria including the length of time since rent control criteria were updated, the total absence of needs-based consideration in determining rent control, and the absence of review mechanisms.

They point to other rulings as evidence that the constitution is not nearly as conservative as some legislators suggest. For example, rulings allowing legislation that demands property owners developing their land set aside 20% to local authorities for affordable housing or permitting reduced compensation to shareholders after the emergency takeover of a bank. In other words, while there are clear, direct institutional obstacles to the development of Singaporean style housing policy in Dublin and Ireland, the interaction of institutions with political culture is also fundamentally important.

### *Why do institutions matter?*

The institutional comparison of Singapore and Dublin should interest the charter cities movement as it reinforces the argument, core to the philosophy of charter cities, that institutions are fundamental. Firstly, we see that the relationship to the hinterland can be make or break for urban development, and that the centralisation of state largesse without attendant institutional structures to control planning is fatal. Secondly, we see that ambiguity about the power of institutions can prevent bold reform by dissuading political action. This is important for charter

cities and serves as a reminder that a mere absence of constraint is not enough, but that charter cities should be explicitly empowered to plan and use land effectively.

### ***5. Conclusion: Landlordism or Neoliberalism – The Most Fundamental Lesson?***

Beyond concerns surrounding the weight of history and the importance of institutions, a comparison of Dublin and Singapore offers a critique of accounts of crisis that gesture vaguely towards neoliberalism. Many of the works cited do this. Hearne (2020: 11) cites neoliberalism and the Irish government's decision to treat housing as an investment rather than a need as at the core of the crisis. McGuirk (1994) preempts much post-2008 discourse by suggesting that the most salient feature of Dublin's planning system is that it is 'becoming facilitative of the demands of capital'. Breathnach (2010) sees the Irish Republic as defined by a contradiction between an old 'Fordist' model of national industry, and a new 'Post-Fordist' model where global capital acts directly through localities, without the mediation of the state. In other words, all these accounts fixate on typical features of neoliberalism as key to understanding the spatial development of the city.

Yet in comparing Singapore and Dublin, it becomes clear that the role played by land rather than by capital is more important for explaining the crisis. Singapore, like Dublin, treats the world as its hinterland and facilitates the demands of capital. Singapore has also gradually transitioned away from Fordist support of national industries. Yet it does not face the same crisis because, culturally and institutionally, it has a different relationship with land. It is, in the words of Haila (2015), a 'property state.'

In the face of many derisive accusations that charter cities are 'neoliberal viagra' (Fernandez: 2013), 'Thatcher's Paris Commune' (Wetherell, 2014), or a manifestation of 'pull yourself up by your bootstraps' philosophy (Perkins, 2014), it makes sense to emphasise this distinction. In considering the failures of Dublin and the success of Singapore, those promoting charter cities are forced to confront the core Georgist truism about the difference between land and capital but are also empowered to rebut facile accusations of neoliberalism.

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