

IPI Response to Housing for All

The Irish Planning Institute (IPI) is the largest professional membership body for spatial planners operating on the island of Ireland. Some 900 Members work right across the planning system – in planning consultancies, for developers, in Planning Authorities, semi state organisations, An Bord Pleanála, and Central Government.

3. Having regard to the housing objectives set out in the Programme for Government, what other key objectives should be considered? How should these objectives be prioritised?

- A. *There is a requirement for a systemic understanding of the housing crisis and an appropriate systemic response.*

A systematic change in land management, urban development and housing delivery is required. Incremental change in one part of the system will not, in itself, achieve a sustainable, affordable and equitable housing policy or resolve the housing crisis.

- B. *The prioritisation of affordable homes (the building blocks of sustainable compact growth)*

A large part of the housing crisis is a problem around affordable purchase homes and access to affordable rental. The crisis in affordability has been apparent for a number of years, if not decades and arguably, pre-dates the Economic Crisis. Unsustainable commuting patterns were firmly established during the Celtic Tiger era as urban workers sought affordable homes in the broad hinterlands of Dublin and the provincial cities. The central role of private market supply in housing policy is recognised in the Programme for Government, which seeks to address challenges in the sector including viability, access to finance, land availability, the delivery of infrastructure, building quality, building standards and regulation. An increase in market housing supply alone will not solve the housing crisis, given the acute shortage of affordable housing in the right locations and at the right time.

- C. *Expedite Land Reform*

Affordability should be delivered through the large-scale provision of both affordable purchase homes and cost rental homes especially in larger urban areas where the affordability crisis is greatest. The delivery of affordable homes in Ireland to date has demonstrated that land input costs in many locations must be zero or close to zero. The IPI believes land reform is a foundation policy on which affordable homes will be delivered. The IPI supports a systematic review of land to cover land pricing, betterment, management and activation (drawing from experience and practice since the seminal Kenny Report of the 1970s).

In the shorter-term, taxation measures should be applied to assist in land speculation, hoarding and inactivation. This includes a reintroduction of windfall tax provisions on the uplift of land valuations through planning, and the site value taxation targeted at land-hoarding. Windfall and site value tax can encourage the more sustainable use of land by encouraging development of under-utilised, serviced, zoned and accessible lands in urban area, thereby promoting consolidation in line with national policy (NPF).

- D. *Ramp up Publicly-Financed House Building Programmes*

The IPI advocates for a ramping up of publicly-financed building programmes to deliver at scale affordable housing comprising cost rental homes, social and affordable purchase homes in mixed tenure and mixed-income communities within mixed-use neighbourhoods. Affordable housing is the

foundation stone of sustainable communities and is the building block that will realise the compact growth targets of the NPF.

E. Provide a level playing field between greenfield and brownfield development while ensuring full utility of the national building stock

Sustainable city, town and village centres are dependent on appropriate use of their building stock and, in particular, the reactivation of vacant and under-utilised and vacant spaces. Refurbishment and reuse of vacant and under-used properties will provide an excellent opportunity for Local Authorities to provide housing, including social housing, within existing town and village centres, as well as providing an alternative to greenfield and dispersed rural housing. Housing is key to vibrant and safe urban centres. Housing on urban infill and brownfield sites will be critical in meeting the National Strategic Outcome of compact growth. It is essential that a 'level playing field' in the market, between refurbishment and reuse, the development of infill sites and brownfield lands, and the development of greenfield lands for housing should be created. This will require a range of targeted fiscal measures and supports to incentivise the development of urban infill lands and to address current market reluctance and bias.

F. Achieve sustainable rural housing through the provision of serviced sites in towns and villages

Sustainable alternatives to the construction of one-off housing in the countryside must be put in place. The IPI supports the delivery of affordable, appropriately-configured serviced sites for self-build in our towns and villages as one of a number of alternatives to one-off housing in the countryside.

4. What are the main obstacles to delivery of housing across tenures (e.g. social, affordable, private rental and private homeownership) and household types (e.g. single person households & families)? What short or long-term actions should be taken to increase the scale and speed of delivery and improve approaches to delivery of housing?

Housing is an integral component places and communities. Housing development is planned and delivered through the planning system. It should, therefore, be guided by the same fundamental principles that underlie the planning system, i.e. the objectives of sustainable development, the collaborative plan-led approach, clear decision-making and proactive implementation, monitoring and review.

A. The relationship between land and diverse and affordable housing

There is a shortage of land for affordable and social housing. The existing public sector land bank is finite. The Land Development Agency (LDA) has the capacity to deliver integrated housing including market, affordable and social homes at scale within mixed-use and sustainable residential communities on strategic urban lands through a flagship programme of projects nationally. The LDA will be an exemplar of participative area-based planning with a holistic methodology of urban regeneration. Critically, Local Authorities should be further empowered and resourced to acquire land for shorter-term and strategic housing development. With depressed market values in many urban centres and problems of dereliction, vacancy and underuse, this is an ideal time for Local Authorities to increase levels of public land and property ownership in urban centres.

B. The role of Integrated Local-level Planning in achieving mixed-tenure and typology diversity in housing delivery

Arguably, the role of the planning system is to channel change to realise public policy goals, including integrated housing delivery (market, affordable & social homes), to achieve a sum of physical, economic, social and environmental objectives greater than their individual parts. The achievement of 'shared visions' effecting transformative urban regeneration and new place making in greenfield locations are evidenced in Local Area Plans and Strategic Development Zone (SDZ) Planning Scheme implementation. More detailed and comprehensive local level planning provides the certainty of outcomes needed for all stakeholders in delivering housing along with the necessary social and physical infrastructure and services. SDZ planning schemes have been a model of such plans, where a shared vision of place and certainty of outcomes are set out (for example around housing numbers, mixture, typologies and location) and provide a robust means for decision-taking at development stage.

C. Potential new local-level plan for housing delivery

With the expiry of the development management provisions for Strategic Housing Development in 2022, and the appropriate return of decision-making to Local Authorities, there is potential for a new plan instrument for Local Authorities for similar scale developments. This would take the form of a more detailed and integrated, local-level, planning scheme or masterplan for appropriately designated strategic development areas. These would clearly set out the location, density, mixture and qualities of housing, along with all other social, environmental and physical infrastructural and service needs for sustainable communities. A plan instrument such as this will provide the certainty of outcomes needed for public and private providers of housing, for infrastructural and service providers and the community. It will also set out the framework for high quality, sustainable places based on a coherent, shared vision. In addition, later development management processes could be streamlined, on the basis of consistency with, and absolute commitment to, the agreed and detailed plan.

D. Co-ordination and alignment of housing delivery

To increase housing output there must be greater coordination between bodies such as Transport Infrastructure Ireland, Irish Water and Local Authorities as well as more funding for essential infrastructure. Historically inadequate investment in wastewater and water infrastructure is causing difficulties in framing County Development Plans and in some cases is limiting options for the sustainable development rural villages and smaller towns. The IPI favours investment in delivering wastewater and water service infrastructure for villages and rural towns which can contribute to balanced regional development and provide sustainable and attractive places to live and work, within a compact development model.

5. What actions should be taken, in order of priority, to ensure that housing is available for all sectors of society, including our ageing population and people with disabilities?

The implementation of housing policy must be pro-actively managed at local level (down to the level of the street and the infill development site) to achieve a diversity of housing typologies to accommodate singles, couples and families with children, our ageing population and people with disabilities in mixed tenure and mixed-income affordable homes. The planning system must be adequately resourced, in terms of staffing and budgets, to deliver the quantum of housing, services and infrastructure required to support sustainable communities.

Housing delivery will need to be supported by appropriate planning guidance for development management. The recently issued (April 2021) guidelines and toolkit for Housing Need and Demand Assessments (HNDA) to support Housing Strategies, should be rapidly deployed across Local Authorities. HNDA requires assessment of specialist needs, for example for older people and those with disabilities. These needs should be appropriately provided for in the Housing Strategy and Planning Policy of City and County Development Plans and the lower-level Local Area Plans and SDZ Planning Schemes.

The *Housing for All* policy and action plan should articulate and set out a coherent approach to the development of a greater suite of options for housing our ageing population and people with disabilities.

6. Do you have any further comments on the development of the Housing for All policy and action plan that you would like to add?

The Programme for Government proposes *Housing for All* as its housing mission. Affordable housing can be a key building block for compact growth.

A mix of housing typologies and mixed tenure options including, affordable ownership, cost rental, social and market homes, will support the social and economic function, and consolidation of urban centres and inner suburbs. It will also provide choice of home and address the established unsustainable market trend towards suburban and peri-urban home formation (which may be intensified post-pandemic working and living arrangements).

A 'shared vision' approach combining sustainable urban planning (that is collaborative, plan-led and area-based) and state-led housing affordability, will support the underlying objectives of sustainable development.