



Housing Agency submission on relevant planning issues for the National Planning Framework

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Introduction

This submission, by the Housing Agency, provides suggestions and comments on the sort of place Ireland should be in 2040 and what we need to do to achieve this. The submission focusses on issues relating to housing, planning and the creation of sustainable communities.

The Housing Agency vision is to enable everyone to live in good quality, affordable homes in sustainable communities:

- **quality** - good quality housing to meet identified needs in places people want to live.
- **affordability** – housing that is affordable to those with a median household income.
- **sustainability** -- meeting the needs of the present without compromising the ability of future generations to meet their own needs¹.

Lessons learned about housing and planning

Before commenting on what might happen in the future, it is instructive to examine recent developments in housing and planning in Ireland.

A housing bubble coupled with the international financial crisis of 2007 caused the collapse of the Irish banking and economy requiring a loss of national economic policy sovereignty in 2010.

This resulted in a legacy of significant housing-related issues that included a decline in housing value of over 50%; tens of thousands of houses in ‘ghost estates’, a peak of over 140,000 residential mortgages in arrears, almost 200,000 vacant houses and a subsequent severe shortages of housing for sale or rent in areas of greatest demand and a related homelessness crisis.

The most fundamental cause of this collapse was the provision of housing in areas of little or no demand – coupled with a disconnection between the price and the affordability of housing.

Poor planning and incentives for housing played a significant role in creating the conditions for this collapse by facilitating housing provision in areas that had no housing need – in the mistaken belief that the provision of housing would lead to subsequent economic development. In reality, this over-provision of housing caused the greatest hardship to occur in the weakest economic regions.

A future framework must contain housing provisions to prevent future over and under supply of housing – as well as safeguarding against forces that give rise to unaffordable and inappropriate housing provision.

1. Ireland 2040, Issues and Choices, Chapter 2 (Ireland 2040)
2. Rural Renewal Tax Incentives Scheme to encourage developers to build in smaller towns and rural areas further from Dublin, in counties including Cavan, Longford and Roscommon

The **two** fundamental lesson from this are:

1. That any future framework must assiduously protect against the excess provision of housing in areas without reasonably foreseeable need. In particular, any plan must contain safeguards against plans or incentives to artificially support housing provision in the absence of demand.
2. That future planning frameworks must ensure that housing provision – and associated social, transportation and utility infrastructure are primarily concentrated in areas that can be reasonably foreseen to be of greatest likely demand.

The Housing Agency now have the responsibility to prepare an annual “National Statement of Housing Supply and Demand” to advise on the existing, emerging and future areas of housing demand.

This reflects the reality that housing, at its essence, is a demand-led phenomenon – that can never be supply driven. This is because housing accommodation responds to a wide variety of social, economic, and cultural ‘drivers’ that are difficult to predict and to control in an open, democratic, market-led society.

The Planning Framework, therefore, will need to make provision for where people are likely to choose to live – rather than where they ought to live.



What will Ireland be like in 2040?

Where we live, the sort of places we create and the type of housing we make, needs to take account of recent social and economic development patterns, the consequences of business as usual, and the following relevant housing objectives noted in Ireland 2040³ that must be included, to enable improved performance and make a difference at a national scale, over the coming years:

- facilitate improvements to people’s quality of life and well-being;
- encourage population growth closer to where employment is located and is likely to be;
- identify measures to encourage both rural and urban regeneration to address decline;
- achieve effective regional development;
- manage the planning and development process so that the right development occurs in the most suitable places and at the right time, ensuring sustainability and best use of scarce resources.

Vision

The Housing Agency vision of housing for 2040 is to manage the provision of housing to meet the needs of a diverse population, in a way that makes our urban areas, towns and villages good places to live now, and in the future, and that protects and enhances our rural and historic heritage.

In order to ensure this vision is realised the following **principles for housing development** are proposed:

1. That **affordability** to buy, rent and use housing is a significant criterion for the types, mix, location and servicing of all housing.
2. That we plan to achieve **quality** of life as well as environmentally and socially sustainable housing and place-making through integrated planning and a consistently, excellent standard of design in our public realm and our buildings.

3. That **collaboration** between all stakeholders will be required for the growth of our cities, towns and villages and rural areas.
4. That **choice** of housing location, types, tenure and accommodation will be facilitated and respected.
5. That **integration** is required between plans for housing (market and social), employment, public transport, education, open space, services and infrastructure.
6. That the **management** of existing housing stock – occupancy levels, vacancy and obsolescence – is accorded equal attention to the development of new housing in all plans.
7. That **evidence** guides decisions about housing type, tenure, mix and location so that we build for existing, emerging and future trends in how we live, work and spend our leisure time.
8. That **wise use** is made of our existing spaces and buildings, while protecting and enhancing our historic and natural heritage through continued and efficient use.
9. That **inclusion** is a hallmark of all housing and communities and includes the creative participation and accommodation of all including the new Irish, older people, the travelling community, young adults, children, and those with special needs in how we plan for the future. We need to ensure that the places we create and housing we build suits their needs now and into the future.

3. Ireland 2040, Issues and Choices, Chapter 2 (Ireland 2040)

01 Where we live: planning for the future

Housing considerations

Future residential development must be facilitated to achieve social, economic and environmental sustainability. The issue of where housing is located cannot be addressed in isolation. How we plan for housing, and for our expected growth in population, requires a co-ordinated approach, underpinned by evidence and by sustainable principles that consider the locations where there is available, or reasonably foreseeable employment, transport and other infrastructure.

Economically - we need to create a strong, responsive, competitive economy. The provision of affordable housing, in the right location, should support our economic objectives.

Socially – we need to create strong, vibrant and healthy communities. To do this, we require housing to meet the needs of present and future generations and a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being.

Sustainably – we need to protect and enhance factors that have contributed to Ireland's economic, social and cultural success – ideally making wise and best use of existing buildings, infrastructure and serviced land.

Environmentally - we need to manage patterns of growth in ways that protect and enhance our country's natural environment, that minimise waste and pollution and that mitigate and adapt to climate change including moving to a low carbon economy.

The above economic, social, sustainable and environmental considerations suggest **an integrated pattern with housing, employment and services located close to each other and with the majority of the population living in areas of sufficient density to support efficiencies in the provision of social services and infrastructure.**

Traditionally housing has mostly been considered in terms of new buildings. However, as we mature, as an increasingly urbanised society, there will be an increased emphasis on the management of housing stock. This means that the issues such as dealing with obsolescence, vacancies and under-utilisation will need to play an increasing role in plan-making. In this context, the NPF aim of providing 500,000 new homes may need to take account of making targets to meet substantial parts of this figure by using existing buildings and under-utilised sites.

As noted in Ireland 2040, the population of Ireland is expected to increase by three quarters of a million people to 5.6 million or more; there will be more people who will be more diverse and older. To accommodate projected future growth in a sustainable way, we need to make best use of our existing urban and suburban areas, towns and villages.

This means:

- **increasing density through planning and management of housing** ⁴;
- **optimising use of our existing building stock in both urban and suburban areas and in our towns and villages;**
- **facilitating additional housing in inner urban areas to become dominantly medium to high density developments;**
- **consolidating and densifying suburban areas, existing towns and villages as an alternative to new building on green field sites;**
- **improving utilisation of existing installed physical and social infrastructure through improved connectivity.**

Growth patterns

Dublin and its hinterland has become Ireland's Primate City ⁵ – in a pattern similar to countries across the EU, such as the UK, France, Austria and Hungary. Population growth occurring predominantly in the Mid-East and Dublin is a long-standing feature of the pattern of settlement across the country, with counties in the West and Border regions generally experiencing the lowest levels of population growth and sustained decline in some areas. For instance, people living in Dublin, Kildare, Meath and Wicklow accounted for just over one third of the population in 1966; preliminary figures from Census 2016 indicate the people living in these counties now account for 40% of the entire population. The cities of Cork, Galway, Limerick and Waterford have also grown faster than their surrounding counties. Over the same period, the share of the population living in Sligo, Roscommon, Mayo and Leitrim fell from 8.8% to 6.1% of the total number of people living in the State. Alongside this increase in the proportion of the population living within a 50 kilometre radius of Dublin City, household sizes have declined steadily and this trend appears likely to continue in the years to come. These patterns are very typical of urbanising areas all over the world.

4. Manage Housing to increase Density using:

- Less Vacancies [more units in Use]
- Less obsolescence [more units fit for use]
- Less Under-utilisation [More people per unit]
- Plan Housing to Increase Density using; -
- Less Land Wasted [Better organised Edges and Open Space]
- More Connectivity [More people near what they need – less roads and parking]
- Better Mixing [More types and More Tenure per project]
- More Multi-storey/ Multi-tenant [More height]

5. A primate city is the largest city in its country or region, disproportionately larger than any others in the urban hierarchy. [Goodall, B. (1987) *The Penguin Dictionary of Human Geography*. London: Penguin.] Paris, Budapest, Dublin, Kuala Lumpur, Lima, Mexico City, Seoul, and Vienna have also been described as primate cities within their respective countries.[Pacione, Michael (2005). *Urban Geography: A Global Perspective* (2nd ed.). Abingdon: Routledge. p. 83.]

Where we live: planning for the future

Recommendations

	Recommendation
1	Actively manage patterns of housing growth, to ensure that all decisions on future growth are guided by evidence of need and by the principles of economic, social and environmental sustainability.
2	Use population density targets – instead of numbers of dwellings. Regularly review existing density requirements and ensure they are based on evidence of local circumstances / regional differences. Consider whether higher densities than are now currently permitted may be appropriate in some areas.
3	Accommodate variation, change and choice – especially at regional level by incorporating sufficient flexibility, autonomy and responsiveness within the planning system.
4	Develop a national active land use strategy , based on projected population growth, to ensure that sufficient serviced land is available at the right place and at the right time.
5	Set out a housing implementation strategy that co-ordinates development and infrastructure requirements.
6	Ensure strategic use of state lands to leverage optimum social and affordable housing provision in partnership with private land owners.
7	Create planning partnerships between neighbouring regional areas, cities, towns and villages to allow for the sharing of services and amenities.
8	Ensure the necessary housing expertise exists at central and local level to ensure excellence in housing design and management is embedded in the planning system.

02 What places we create: planning for the future

Housing considerations

We should aim for our urban and suburban areas, towns and villages to be accessible, vibrant, attractive, inclusive, healthy and safe places to live that respond to local circumstances and have their own distinct identities.

Connected Environments

Connectivity of housing to amenities, services, transportation and social services is a critical factor for social inclusion and environmental sustainability. This will become increasingly important as more and more of the population choose to live in apartments.

Encourage the assessment and enhancement of 'Five Minute City'⁶ levels of permeability and connectivity for pedestrian, cycle and public transport connection between existing and future housing areas and their related amenities and services.

Attractive Environments

The quality of life offered by areas is emerging as one of the most important pre-requisites for international competitiveness. It is necessary to provide and sustain well-being, prosperity and positive mental health for our society. This is a very important for an open economy, like Ireland, that is dependent on inward investment and international trade. What makes a

place attractive can be difficult to define and will, to some extent, differ from person to person, but is likely to centre on the quality of life of its users.⁷ Attractive places serve our practical needs well, are aesthetically pleasing, and are environmentally sustainable and promote physical and mental health.

Environmental sustainability

The value of green spaces in housing areas for health and well-being is widely recognised especially as more of the population choose to live in apartments. Urban green spaces provide environmental benefits through their effects on negating urban heat, offsetting greenhouse gas emissions, and attenuating storm water. **Encourage the use of existing resources and buildings and ensure developments support low carbon outcomes. Actively promote usage of energy from renewable and low carbon sources.**

Environments that promote physical and mental health

Open spaces also have direct health benefits by providing urban residents spaces for physical activity and social interaction, and allowing psychological restoration to take place. **Plans will need to take local circumstances into account, if they are to respond to the opportunities to achieve environmental sustainability in particular areas.**

6. Maas Winy, Five Minutes City: Architecture and (Im)mobility, Forum and Workshop Rotterdam 202, Ram Distribution, February 1, 2007.

7. <http://researchonline.ljmu.ac.uk/467/1/Urban%20Design%20Intro%20-%20Attractive%20places%20to%20live.pdf>

Consideration of the following will contribute to creating an environment that is environmentally that supports health and well-being:

- good quality public space within walking distance of residential developments;
- layouts that enhance existing walking and cycling routes and optimise walking/cycling links to existing centres and services;
- permeability (walking and cycling) of developments – reduce car dependence, safe well-lit walking and cycling routes to local services – shops//schools etc.
- access to sport’s facilities/nature;
- plan for safety, and carry out safety audits on all proposed developments;
- layouts to encourage social interaction;
- layouts to discourage anti-social behaviour.

What places we create: planning for the future Recommendations

	Recommendation
1	Ensure that our place-making is plan-led with specific sites/urban areas, towns and villages identified and plans prepared that are linked to population growth/ economic development and sustainability principles.
2	Encourage provision of Integrated Masterplans setting out visions and policies for the delivery of transportation, amenities, services and shopping in high quality housing schemes and to provide planning certainty and ensure the timely and integrated provision of high quality sustainable communities.
3	Town centres should be targeted by policies and plan to encourage their revitalisation using residential as well as commercial use. This can include the conversion of existing vacant commercial buildings to residential use where there is a recognised demand for housing.
4	Actively encourage and monitor plan implementation to promote a mixture of tenure types combining social, affordable and private housing to support the creation of integrated communities

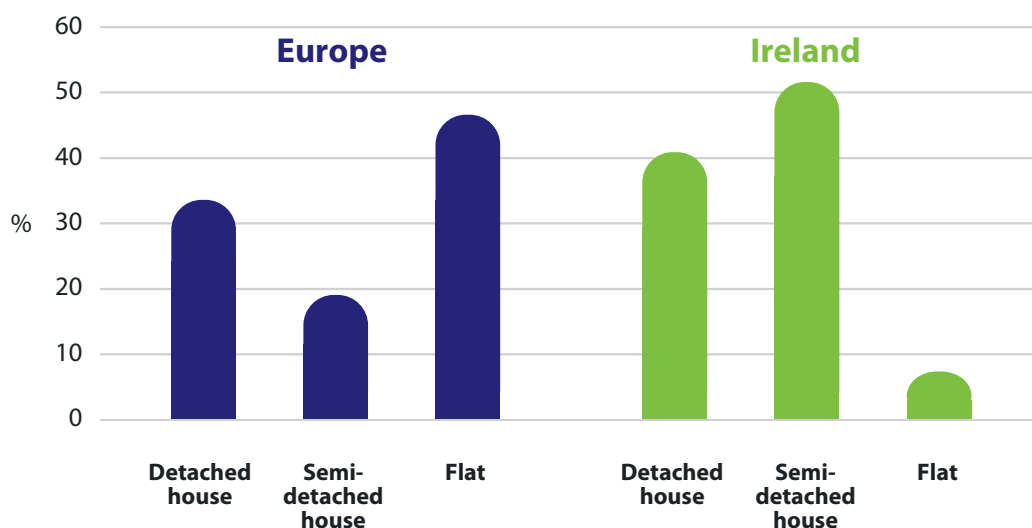
03 The type of housing we will need: planning for the future

Housing considerations

Currently, 7 out of 10 households in the state consist of three people or less.⁸ Based on current demographic projections, it is expected that three-quarters of all homes required over the coming years will be for households with three people or less.⁹ Against this background, the plan for 2040 must address the challenge of supplying affordable housing that is appropriate to household size and needs in the areas where it is most required. In trying to meet this objective consideration should be given to the following factors:

1. The stock of housing in Ireland is heavily weighted toward detached and semi-detached houses with three and four bedrooms. For many smaller households that want to live in areas of high demand this type of housing is too big and is often unaffordable. **Policies aimed at increasing the share of apartments in the total stock of housing would be a step toward better catering for the accommodation needs of smaller households and would promote enhanced use of urban spaces.**

Figure 1: Overview of the types of building in the housing stock ¹⁰



8. Ibid

9. Future Analytics (2017) Housing Supply Requirement in Ireland's Urban Settlements 2016-2020

10. EU-SILC survey (2015) ilc_lvho01

2. Looking to 2040 we should aim to create a rental sector that is a viable and attractive long-term option for a wide-range of households across the life cycle. A vibrant rental sector is associated with a more efficient use of accommodation – both a lower vacancy rate and better use of space within a home – and can support the demands arising from a more dynamic labour market.

At present renting tends to be for lower income households and adults in the 18 to 35 age bracket. Average annual household income after tax and social transfers is €7,850 lower for renters sourcing accommodation in the private sector compared to the mean household income for owner-occupiers.¹¹ This difference in part reflects the labour market status of individuals in the private rented sector and the tendency for renters to be younger than those that own their own home.¹² However, despite an increase in the share of households renting over the past 25 years, there remains a widespread preference among those in the sector to leave rented accommodation as soon they are in a financial position to buy. A survey conducted on behalf of the Housing Agency in 2014 found 7 out of 10 respondents were renting because they could not afford to buy a property and only 17 per cent of households renting at that time were happy in the sector.¹³

With this in mind, policies should promote the development of a stable, economically attractive rental sector that facilitates a good quality of life for tenants of all ages and income levels, while meeting the needs of investors.

The type of housing we build generally should be evidence based and allow for regional variations, this means taking account of demographic data such as average household size, population age profile and tenure choices and the presence of local compensating amenities. For example, the growth of houses with more rooms, in conjunction with smaller family sizes, has meant that, in Ireland, the average number of persons per private household had fallen from 4.48 in 1926 to 2.7 by 2011. The average number persons per private household in the European Union and Euro Areas (2015) is 2.3 persons per household.

Apartments, particularly for smaller households, afford the most sustainable solution to urban living and are therefore best placed to be the dominant form of new urban housing – there is a need for planning policies that will help to make apartment living affordable and attractive for everyone, including single people, couples, families, young adults, older people, whether they choose to buy or rent.

Housing for an ageing population

As noted Ireland 2040, the number of people over 65 will double to well over a million. A representative survey of people aged over 55 found that 88% were very happy in their current homes. The reasons for this contentment had less to do with their dwelling and much more to do with an attachment to location, community, friends and family.

Whereas most older people will live independently a variety of housing typologies are required to suit personal choice and to ensure that varying levels of support, both social and physical, are available.

Housing needs for people as they age can be viewed as being on a spectrum of care alternatives with older people moving from the family home onto the next home, depending on their needs and the availability of different types of housing.

Figure 2 below highlights the lack of alternatives for those in the middle group i.e. those requiring new homes with differing degrees of attendant services. Research indicated that the four most important features for older people were; an independent house or apartment; to feel secure and safe; to be near shops and to have a nurse on site.

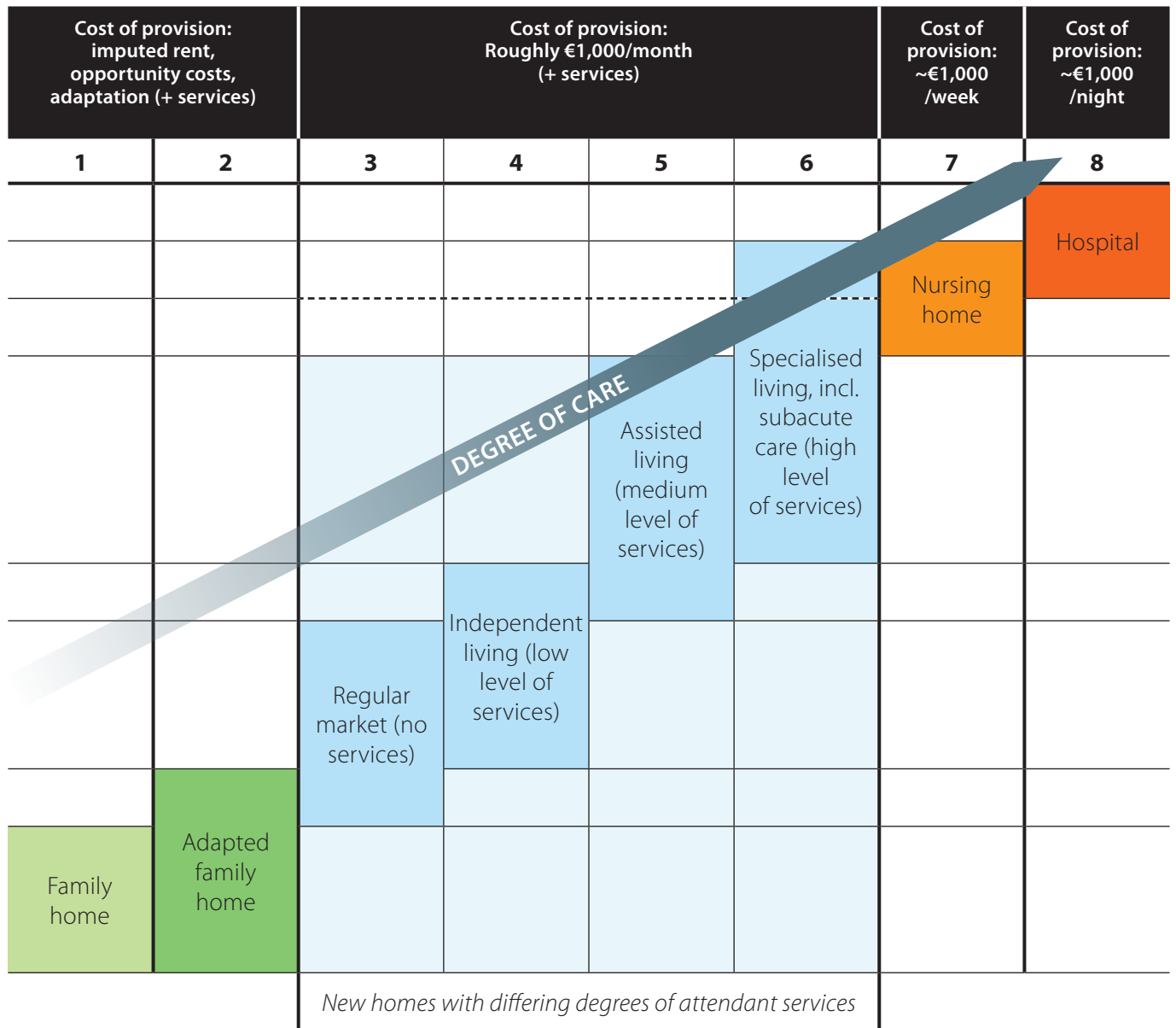
The reports' authors estimate that there is potential demand for up to 100,000 'independent homes with support' in Ireland, representing €25 billion of unmet need.

11. CSO (2017) Survey on Income and Living Conditions 2015 (SIA18)

12. NESI (2014) Homeownership and Rental: What Road is Ireland on? 14

13. DKM (2014) Future of the Private Rented Sector: Final Report, 30

Figure 2: A new taxonomy of housing and care needs of Ireland's Older Population



The type of housing we will need: planning for the future

Recommendations

	Recommendation
1	Housing Needs should be understood by local planning authorities to identify the size, type and tenure of housing that will be required over the period of their development plan and into the future. This understanding should be evidence based and include the need of all groups, including families with children, single people, couples, older people, the travelling community and people with disabilities.
2	Availability and suitability of land should be assessed and augmented by local authorities, on an on-going basis, to meet the needs identified under point 1 above. This should include an assessment of the suitability of existing housing stock and vacant properties in the area.
3	Facilitate the availability of a greater housing choice to meet the diverse needs of a growing, diverse, population.
4	Facilitate innovative housing standards and guidelines to accommodate new typologies to ensure that new developments consider a diversity of requirements - including supporting a range of live/work choices and flexible work practices.
5	Support housing research and planning guidance on new housing typologies that facilitate changing demographics, tenure types and life style. Innovation will also need to be supported to address special requirements such as designing higher density housing for families and ensuring housing for older people is suitably incorporated into new developments.
6	Multi-decade housing strategies are needed to anticipate and integrate emerging new demographic trends, housing patterns and health needs.
7	Ensure adequate age-appropriate housing is available to meet the needs of an aging population, regardless of income by increasing the supply, options and choices suitable for older people.
8	Development Plans should incorporate age-appropriate housing provision to supply a minimum requirement for age-friendly housing in both bespoke - independent and assisted living developments and in general accommodation, including apartment blocks.

National Planning Framework – Housing Policy

Key Recommendations



4. Ensure that the types of housing provided are aimed at current and future smaller household sizes; and that there is an openness to new housing typologies to address this requirement.



1. Ensure that where we locate housing, and associated infrastructure, addresses reasonable foreseeable need and safeguard against plans or incentives that artificially support housing provision in the absence of demand.



3. Ensure all future growth is **actively managed and evidence-based**.



2. Ensure that the principles of **economic, social and environmental sustainability** underpin all planning decisions.



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