



Sustainable and Compact Settlements Guidelines for Planning Authorities- Proposed Policy Approach

Introduction

The Simon Communities of Ireland welcome the opportunity to make a submission to the proposed policy approach towards sustainable and compact settlement guidelines for planning authorities. Long-term sustainable planning of our communities is vital. The Simon Communities of Ireland believe that housing supply and development needs to be carefully considered and placed at the centre of the guidelines being developed for Local Authorities. The focus of this submission will be on housing availability and standards needed to ensure adequate housing is available to meet the needs of our growing population, to ensure the provision of stable and affordable housing, and to provide housing options for people experiencing homelessness and housing exclusion.

Long-Term Housing Planning: the Right Housing for the Right People

The policy approach rightly highlights the need for quality housing as it can play a significant role in improving health and wellbeing, and can contribute to development and quality placemaking. As well as planning the standards of housing, this document provides an opportunity to look at the holistic needs of current and future communities and the types of housing needed to facilitate healthy communities. The Simon Communities of Ireland are keen to see sustainable housing solutions delivered that will support the Government's commitment to end homelessness by 2030. Long-term housing solutions laid out below are recommended to be considered by the department in conjunction with density and development standards for housing.

Compact Urban Growth: Compact Urban Growth is recognised as a key area within the Proposed Policy Approach. The role and position of housing needs to be considered here in relation to thriving and sustainable communities. The Simon Communities of Ireland support the consideration of the low-rise medium-density housing model referenced within the Proposed Policy Approach. According to the RIAI, the low-rise medium-density housing model would increase public open space by 15% and would reduce construction complexities and cost.¹ This housing model should be considered, particularly in central urban areas where housing is in high demand. In addition to the consideration of the potential to increasing supply, ensuring affordability needs to be central to its implementation.

One-bedroom housing: There is a high demand for high quality and affordable one-bedroom properties in Ireland. Future planning needs to facilitate this. This is in line with the trend towards smaller average household size as recognised within the proposed policy approach.

While we are waiting for figures from the latest Census, in 2016, there were 355,649 couples without children living in the state; a 3.1% increase since 2011. Along with that, there were just

¹ RIAI *Low-Rise Medium Density Housing*, Available at: <https://www.riai.ie/uploads/files/general-files/High Quality Low-Rise Medium Density Housing.pdf>

under 400,000 people living alone.² In terms of homelessness and households experiencing housing insecurity, demand for one-bedroom properties is high. The latest Summary of Social Housing Assessments³ shows that single adults and couples with no children account for 35,089 or 59% of all households in need of social housing. Single bedroom properties are also necessary for the success of programmes such as Housing First, which aims to eliminate homelessness for people who have been sleeping rough or who have been long-term homeless. The success of this model is based on the availability of suitable properties. The Simon Communities of Ireland recommend that, in developing these guidelines, there is an active inclusion and planning for the availability of one-bedroom units.

Universal Design: One of the most recent changes in the nature of homelessness has been increased presentations of those aged over 60 at risk of homelessness from the private rental sector.

The proposed policy approach highlights the forecasts for a growing population. We recommend that the changing demographics of this growing population is also taken into consideration when planning for housing and balance regional development. We have an ageing population. According to Age Action, people aged 60 or older now represent one in four adults in Ireland and 48% of older persons do not have adequate housing as defined by the UN standard.⁴

13.5% of our population also has a disability. This is also something that needs to be considered in itself and in relation to our ageing population, as the number of people with disabilities is likely to increase. Disability rates increase sharply above the age of 70 years and the number of people aged over 65 years with a disability increased by 20,319 between 2011 and 2016.⁵ A lack of suitable housing options cannot be a barrier to older persons or people with a disability to integrating into a community.

According to the Disability Federation of Ireland, as well as being more likely to reside in communal establishments, people with disabilities and people with mental health difficulties feature disproportionately among the homeless population.⁶ 2018 research shows that more than one-in-four homeless people in Ireland have a disability and experience high risks of discrimination, environmental and housing deprivation.⁷ A lack of suitable housing can increase the risk of housing exclusion for a person in homelessness with a disability.

Universal design is a regulatory policy that allows for long-term planning within our housing system. It is referenced within a number of Government policies and publications including Housing for All and the National Housing Strategy for Disabled People 2022-2027 that commits to promoting Article 4.1 (f) of the UNCRPD:

'To undertake or promote research and development of universally designed goods, services, equipment and facilities... which should require the minimum possible adaptation and the

² CSO Census of Population 2016 - Profile 4 Households and Families, Available at: <https://www.cso.ie/en/releasesandpublications/ep/p-cp4hf/cp4hf/fmls/>

³ Available at: <https://www.gov.ie/pdf/?file=https://assets.gov.ie/251070/08141c16-61e0-4686-9e72-02a57da5507d.pdf#page=null>

⁴ Age Action, *Reframing Ageing - The State of Ageing in Ireland 2022*, Available at: <https://www.ageaction.ie/reframing-ageing-state-ageing-ireland-2022-1>

⁵ Available at: https://www.disability-federation.ie/assets/files/pdf/the_right_home_the_housing_needs_of_people_with_disabilities.pdf

⁶ Ibid

⁷ ESRI and IHREC, *Discrimination and Inequality in Housing in Ireland*, Available at: <https://www.ihrec.ie/app/uploads/2022/08/Discrimination-and-Inequality-in-Housing-in-Ireland..pdf>

least cost to meet the specific needs of a person with disabilities, to promote their availability and use, and to promote universal design in the development of standards and guidelines'

The Simon Communities of Ireland recommend that this proposed policy approach is adapted and incorporated to the proposed Sustainable and Compact Settlements Guidelines for Planning Authorities.

Consider the role of Innovative Construction Systems: Given that this strategy seeks to ensure economic prosperity for all, environmental sustainability and climate action across all regions, the role of modular and other innovative building techniques to provide homes needs to be considered. The development and roll out of innovative building solutions have an important role to play in meeting the housing crisis. As an example Modular built housing requires less labour, produces housing units faster than traditional methods and can be 10-20% cheaper.⁸ The carbon footprint of these houses is smaller than traditional houses due to less waste and higher energy efficiency.⁹ Innovations such as Modular construction need to be supported and promoted in the context of building sustainable and healthy communities with proper consideration of community facilities, supports and services.

Social Housing: The proposed policy document references Housing for All's recognition of the need to plan for a more diverse and socially inclusive society. The inclusion and provision of social and affordable housing for low- to medium-income households is a central part of this. Currently, there are approximately 120,000 households in need of social housing¹⁰ with 57,862 households on the social housing waiting list plus an additional 59,250 households who qualify for social housing and are accessing social housing support through the private rental market under the Housing Assistance Payment (HAP). Social Housing and HAP are vital housing solutions for those experiencing homelessness and housing exclusion, but an undersupply means that 22.3% (12,913) households qualified for social housing have been waiting for over seven years to have their housing needs met. Despite exceeding record levels of housing built in 2022¹¹, social housing targets were missed. New-build social housing targets have been missed since 2018. Prioritising the delivery of social housing through stringent planning process will ensure that targets are met and surpassed. The Simon Communities of Ireland recommend that the provision of social housing is actively integrated into this policy.

About Simon Communities

The Simon Communities support over 22,000 men, women, and children. We have 50 years of experience providing homeless, housing and treatment services to people facing the trauma and stress of homelessness. We are a network of independent Communities based in Cork, Dublin, Dundalk, Galway, the Midlands, the Mid West, the Northwest and the Southeast, responding to local needs and supported by a National Office in the areas of policy, research, communications and best practice. We share common values and ethos in tackling homelessness and, informed by our

⁸ *Offsite construction supply chain strategies for matching affordable rental housing demand: A system dynamics approach*, Available at: <https://www.sciencedirect.com/science/article/abs/pii/S2210670721003760>

⁹ *Economic sustainability benchmarking of modular homes: A life cycle thinking approach*, Available at: <https://www.sciencedirect.com/science/article/pii/S0959652622009209>

¹⁰ 57,862 households currently waiting for social housing according to the [Summary of Social Housing Assessments 2022](#) plus ~59,250 households on HAP

¹¹ Housing for All Progress Report, available at: <https://www.gov.ie/en/press-release/1792c-housing-for-all-q4-2022-progress-report-published/>

grassroots services, we campaign for more effective policies and legislation regionally, nationally and at European level.

Whatever the issue, Simon's door is always open for as long as we are needed. For more information, please visit www.simon.ie

Services include:

- Early Intervention, Homelessness prevention, tenancy sustainment and resettlement.
- Street outreach, emergency accommodation and harm reduction
- Housing with support and Housing First services
- Homeless specific health and wellbeing services (counselling; addiction treatment and recovery; and mental health supports)
- Personal development, education, training, and employment services
- Food banks, drop-in centres and soup runs.