

# Dundrum Draft Local Area Plan

## Background Paper

### Policy Approach for Age Friendly Housing / Housing for people with a Disability

May 2023

## 1. Introduction

Principally, this paper provides an overview of the national, regional, and local planning policy guidance that has informed the policy approach for age friendly housing and housing for people with disabilities, as contained within the draft Dundrum Local Area Plan, 2023 (hereafter, the DLAP). On the basis of this policy guidance and on demographic trends observable within the DLAP lands, this paper concludes by listing the policies and objectives that are included in the draft DLAP and a summary rationale for same.

## 2. Policy Context

This section provides extracts from national, regional and local policy documents and guidance with regard to housing options for older people and people with a disability. All of the documents listed have been hyperlinked to provide access to the entire document.

### 2.1 [National Planning Framework \(2018 - 2040\)](#)

The NPF is the overarching policy and planning framework for the social, economic and cultural development of Ireland. Local Authorities are required to demonstrate consistency with the NPF in their Development Plans and section 19 of the Planning and Development Act sets out that Local Area Plans must also be consistent with the NPF and the RSES.

The NPF sets out a number of National Planning Objectives (NPO's), those relative to housing options for older people and disabled people include:

- NPO 4: *“Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.”*
- NPO 30: *“Local planning, housing, transport/accessibility and leisure policies will be developed with a focus on meeting the needs and opportunities of an ageing population along with the inclusion of specific projections, supported by clear proposals in respect of ageing communities as part of the core strategy of city and county development plans.”*
- NPO 34: *“Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time”.*

### 2.2 [Regional Spatial & Economic Strategy \(2019-2031\)](#)

The RSES sets out a number of Regional Planning Objectives (RPO's), those relative to housing options for older people and disabled people include:

- RPO 9.1: *“Local authorities shall ensure the integration of age friendly and family friendly strategies in development plans and other relevant local policy and decision making, including provision for flexible housing typologies, buildings and public spaces that are designed so that everyone, including older people, disabled people and people with young children can move around with ease, avoiding separation or segregation.”*
- RPO 9.4: *“Design standards for new apartment developments should encourage a wider demographic profile which actively includes families and an ageing population.”*
- RPO 9.12: *“In Planning policy formulation and implementation local authorities and other stakeholders shall be informed by the need to cater for all levels of disability, through the appropriate mitigation of the built environment, and in particular for the needs of an ageing population”.*

### 2.3 Section 28 Guidelines

There is no specific Section 28 guideline that deals specifically with the provision of housing for our ageing population or disabled people.

### 2.3.1 'Sustainable Residential Development in Urban Areas' (2009), and associated design manual

With regard creating high quality places, these guidelines promote social integration and the “*provision of accommodation for a diverse range of household types and age groups*” and further states, “*for a residential development to be considered inclusive, it should include provision for housing of different types, sizes and tenures*”.

With regard to universal design, these guidelines state “*developing sustainable neighbourhoods should be guided by the principle of universal design. Universal design is the design of an environment so that it can be accessed, understood and used to the greatest extent possible by all people regardless of their age, size, ability or disability.*”

While housing mix, adaptability, and access for all, as promoted within these guidelines will offer a range of units that may be suited for older / mobility impaired residents, the Sustainable Residential Development in Urban Areas guidelines don't provide any specific guidance with regard to the size, layout or location within a scheme with regard to units designed to accommodate specific needs.

### 2.3.2 Sustainable Urban Housing Design Standards for New Apartments Guidelines for Planning Authorities (2022)

Section 3 of the apartment guidelines sets out design criteria for apartment developments with SPPR 3 detailing the minimum floor areas for apartments.

Section 3.8 of the apartment guidelines states:

*“In the interests of sustainable and good quality urban development, these Guidelines should be applied in a way that ensures delivery of apartments not built down to a minimum standard, but that reflect a good mix of apartment sizes. Accordingly, it is a requirement that the majority of all apartments in any proposed scheme of 10 or more apartments exceed the minimum floor area standard for any combination of the relevant 1, 2 or 3 bedroom unit types, by a minimum of 10% (any studio apartments must be included in the total, but are not calculable as units that exceed the minimum by at least 10%).”*

Section 4.5 of the guidelines states:

*“Communal rooms may be provided in apartment schemes, particularly in some larger developments.”*

## 2.4 Relevant Government Policy and Strategies

### 2.4.1 Housing Options for our Ageing Population – Policy Statement (2019)

The policy statement sets out 6 principles with regard to housing options for older people:

- Ageing in Place
- Promoting Sustainable Lifetime Housing
- Supporting Urban Renewal
- Using Assistive Technology
- Staying Socially Connected
- Working Together

A number of actions are set out in the policy statement. Those most relevant to the provision of housing units for older people include:

- Action 1 – Housing Options for or Ageing Population:
  - Action 1.3: “Provide a high-level blueprint for AHB’s, Co-Operatives, Local Authorities and private developers that will include:
    - a) Design templates for the purpose of constructing new older person housing developments or refurbishing existing facilities
    - b) A guidance manual on the funding mechanisms to deliver these developments

- c) guidance on early engagement and planning processes with relevant agencies regarding health and social care services; and
  - d) The findings of the evaluation of Dublin City Age Friendly Housing with Support Model, when available”.
- Action 4 – Delivering Choice:
  - Action 4.4: *“ensure that 50% of apartments in any development that are required to be in excess of minimum standards are suitable for older people/mobility impaired people and develop a template layout guide for same.”*
  - Action 4.6: *“... to ensure that over a five year period delivery is increased to ensure that 30% of all new dwellings are built to incorporate universal design principles to accommodate our ageing population.”*

#### 2.4.1.1 Commentary with regard to Action 4

Section 12.3.5.5 in the County Development Plan 2022-2028, requires the ‘majority’ (or a minimum of 51%) of apartment units in schemes with more than 10 units to be a minimum 10% larger than the minimum floor area set out in the SPPR3 of the 2022 apartment guidelines and S.12.3.5.5 in the development plan.

It is considered that the 50% of apartments suitable for older / mobility impaired people referred to in Action 4.4 of the policy statement relates to the ‘majority’ of larger apartment units within a development of 10 or more units. In this regard, I considered it reasonable that Action 4.4 of the policy statement infers that a minimum of 25% of apartment units within a scheme of 10 units or more apartments should be designed in a manner that is suitable for older / mobility impaired people.

The specific ‘template layout guide’ referred to in Action 4.4 that would provide guidance to private developers and planners in assessing such schemes appears to be addressed in the [‘Final Report of the Implementation Group on Housing Options for Our Ageing Population 2 June 2022’](#) which states:

*“This Action is included in the Design Manual for Quality Housing produced by the Department of Housing Local Government and Heritage and which was the subject of extensive consultation in early 2021. The Design Manual is now at a final draft stage with publication anticipated by the end of 2021. Once finalised the inclusion of the 50% requirement in the manual will achieve the objectives of this Action.”*

I note that that Action 4.6 in the policy statement refers to 30% of all new dwelling being built to incorporate universal design principles. With regard to Action 4.6, the final report of the implementation of the policy statement states that a Cost Benefit Analysis of Universal Design is being carried out by the National Disability Authority and that this analysis will provide:

- *“A robust economic appraisal of UD homes through the development of a comprehensive set of CBA key performance indicators.*
- *A clear specification of the main technical issues that arise in terms of estimating the costs and benefits of UD housing.*
- *A clear specification and appraisal of the UD housing model and the implications for all stakeholders of extending this to all new housing”.*

#### 2.4.2 Housing for All - A new Housing Plan for Ireland (2021)

Section 2.4.1 ‘Expand the Housing Options for Older Persons’ of ‘Housing for All’ states:

*“Under Housing for All, we will increase the housing options available to older people to facilitate ageing in place with dignity and independence, including policies and operational supports for older people considering right-sizing to smaller housing homes. We will be informed in this regard by the work of the national Implementation Group on the Housing Options for our Ageing Population Policy Statement and its reports. Housing Delivery Action Plans (see section 2.2.2) will set out how dedicated social housing provision appropriate to the needs of older people will be delivered, matching the scale and extent of housing need for older people identified. ... It is*

*imperative that we plan for our ageing population. ... Local Authorities must also consider the needs of older people in the wider planning process. In this regard, the new HNDA Framework, published in April 2021, specifically requires consideration of the housing needs of older people.*

*“... We must also work to deliver housing for older people in line with Age Friendly and Universal Design principles. The Age Friendly Homes website, a joint initiative of the DHLGH, DoH, the Housing Agency and Age Friendly Ireland, provides a central hub for resources, guidance and information on the provision of homes for older people – from Local Authorities and AHBs to architects, other construction professionals and the wider public.”*

Section 2.4.2 ‘Increase Housing Supports for People with a Disability’ states:

*“Under the guiding principle of Housing for All and underpinned by the new Strategy, we must work to deliver appropriately designed and specified housing for people with a disability, in line with the vision and principles of universal design.”*

As per Section 2.4.1, Section 2.4.2 refers to the local authority Housing Delivery Action Plans for dedicated social housing and the need for consideration of housing needs in the wider planning process through the HNDA process.

Housing for All sets out a number of housing policy objectives and actions. Those most relative to housing for older and disabled people include:

- HPO 6 - Increase and Improve Housing Options for Older People  
Action 6.2: *“Local Authorities will consider the housing needs of older people through the Housing Need and Demand Assessment Framework and feed that into their Housing Strategies as part of their Development Plan process.”*
- HPO 7 - Increase and improve housing options and supports for people with a disability  
Action 7.3: *“Local Authorities will consider the housing needs of people with a disability through the Housing Need and Demand Assessment Framework and feed that into their Housing Strategies as part of their Development Plan process.”*

### **2.4.3 Design Manual for Quality Housing, (2022)**

As set out on the Department of Housing, Local Government and Heritage [webpage](#) introducing the design manual for quality housing, this document *“seeks to provide guidance on the design of Social Housing developments in respect of site layouts and the internal layouts of individual dwellings, principally to local authorities and Approved Housing Bodies (AHBs), and their consultants.”*

While this manual is primarily aimed at local authorities and AHB’s, *“the design principles should be equally applicable to any residential development.”*

Section 5.3.3 of the design manual refers to age-friendly housing and provides example layouts for age friendly apartments which may be helpful in both the design and the assessment of age friendly and universally designed homes.

### **2.4.4 National Housing Strategy for Disabled People 2022-2027**

This strategy sets out the vision for the delivery of housing and support services for people with disabilities. Chapter 9 sets out the vision for the strategy which is:

*“To facilitate disabled people to live independently with the appropriate choices and control over where, how and with whom they live, promoting their inclusion in the community. To further enable equal access for disabled people to housing with integrated support services.”*

In order to realise this vision, chapter 9 sets out an overarching approach and 6 themes aimed at facilitating independent living.

Section 9.3.1 sets out ‘Theme 1 – Accessible Housing and Communities’ which “*focuses on the provision of accessible housing for disabled people and the promotion of accessible communities and universally designed homes.*”

The outcomes of theme 1 are primarily focused on social housing schemes, however, it is considered that the outcomes could be taken into consideration in any new residential community through the provision of universally design homes that offer a housing option for people with a disability.

## 2.5 Local Policy and Guidance

### 2.5.1 Dún Laoghaire-Rathdown [County Development Plan 2022-2028](#)

The following policy objectives and guidance on Housing for All and the Age Friendly Strategy are contained in the County Development Plan 2022-2028. In addition, the relevant standards for apartment developments set out in Chapter 12 of the development plan are also set out. In each instance the Policy Objective wording is set out below together with relevant text in relation to housing options and/or associated policy or guidance:

#### 2.5.1.1 [Chapter 4](#)

- **Policy Objective PHP14: Age Friendly Strategy:**

*“It is a Policy Objective to support and facilitate the implementation of the Dún Laoghaire Rathdown Age Friendly Strategy 2016-2020.”*

- **Policy Objective PHP27: Housing Mix:**

*“It is a Policy Objective to encourage the establishment of sustainable residential communities by ensuring that a wide variety of housing and apartment types, sizes and tenures is provided throughout the County in accordance with the provisions of the Housing Strategy and Housing Need Demand Assessment (HNDA) and any future Regional HNDA”.*

*“The Planning and Development Act 2000, as amended, requires Development Plans to take into account the need to ensure that an appropriate mixture of house types, sizes and tenures is developed to reasonably match the requirements of different categories of households and the demographics of an area.”*

*“... Schemes should contain an acceptable proportion of larger flexible housing units to ensure that such developments provide suitable and viable long term adaptable options for families. Housing mix in any new development should also have regard to the provisions of ‘Housing Options for Our Ageing Population, Policy Statement’, (2019) and seek to provide suitable accommodation for older people. For Council own Part 8 or Part 10 schemes, the Planning Authority shall have regard to the needs of the social housing list of the Council when assessing mix requirements. The concept of lifetime adaptable and/or multi-generational homes will be promoted in all new residential developments. Such dwellings can be readily adapted to suit the changing needs of the resident(s) and/or facilitate multi-generational living arrangements within one building envelope.”*

- **Policy Objective PHP30: Housing for All:**

*“It is a Policy Objective to:*

- *Support housing options for older people and persons with disabilities/mental health issues consistent with NPO 30 in the NPF, RPO 9.1 and 9.12 of the RSES.*
- *Support the provision of specific purpose built accommodation, including assisted living units and lifetime housing, and adaptation of existing properties.*
- *Promote ‘aging in place’ opportunities for ‘downsizing’ or ‘right sizing’ within their community.*

*(i) Housing for Older People*

*“... the Department of Housing, Planning and Local Government and the Department of Health published a Policy Statement in 2019 – ‘Housing Options for Our Ageing Population’. The Council will facilitate the implementation of the Policy Statement and promote the appropriate provision of housing for older people in Dún Laoghaire-Rathdown.”*

*“... The Council will place a strong emphasis on developments that will encourage the older population the County to downsize, while being also afforded the opportunity to live in their community.”*

*(ii) Housing for Persons with a Disability*

*“... It is an objective of the Council to encourage the provision of suitable housing for people with a sensory disability, mental health disability, physical disability and intellectual disability.”*

*“... In all cases, development must be in accordance with the principles of Universal Design and the National Disability Authority’s publication ‘Building For Everyone: A Universal Design Approach’ and shall have regard to the Government’s ‘National Disability Inclusion Strategy 2017-2021.’”*

- **Policy Objective PHP36: Inclusive Design & Universal Access:**

*“It is a Policy Objective to promote and support the principles of universal design ensuring that all environments are inclusive and can be used to the fullest extent possible by all users regardless of age, ability or disability consistent with RPO 9.12 and 9.13 of the RSES.”*

*“... All proposals for development shall have regard to the provisions of the National Disability Authority’s document ‘Building for Everyone: A Universal Design Approach – Planning and Policy’ (2012) in order to ensure that access and movement through the development is available to all users of the development.”*

### 2.5.1.2 Chapter 12

- Section 12.3.8.1: Age Friendly Housing:

*“Having regard to the current and future demographic conditions and the ageing demographic of the County, it is an objective of the of DLR to promote an age friendly approach by ensuring that both existing and proposed residential developments are future proofed for an ageing population.*

*In accordance with the principles of the Policy Statement ‘Housing Options for Our Ageing Population’ 2019, the Planning Authority will advocate age-friendly thinking with respect to new developments in the County in particular at pre-planning stage. Developers should consider an Age-friendly approach, with facilities and materials inclusive of an age-friendly community/society in line with the above guidelines”.*

- Section 12.3.5.5 sets out the minimum floor areas for apartments which accords with SP3R 3 in the [Apartment Guidelines 2022](#). S.12.3.5.5 requires the ‘majority’ of apartments in a scheme to be at least 10% higher than the minimum floor area. This requirement applies to all developments of 10 or more units.

Note: as a minimum, ‘majority’ translates to 51% of units in a scheme, i.e. in a scheme of 100 apartment units, at least 51 of these units must exceed the minimum floor area by at least 10%.

### 2.5.2 Dún Laoghaire Rathdown Age Friendly Strategy 2022

- **STRATEGIC PRIORITY 1 : Strengthening dlr as a dynamic place where people will experience a good quality of life throughout the lifespan.**

*Objective “1.3 Provide an appropriate continuum of lifetime-adaptable housing choices and solutions, directly and in partnership, which enable older people to live independently and safely for as long as possible.”*

*Key Performance Indicators - How will we know it has been achieved?*

- *Improved housing choice for older persons.*

*“Objective 1.1: Develop, maintain and promote a supportive public realm that facilitates social interaction and healthy lifestyles.”*

*“Key Performance Indicators - How will we know it has been achieved?”*

- *Age-Friendly policy objectives within the County Development Plan 2022-2028, Local Area Plans and all other policy documents.*
- *Planning applications & Part 8’s incorporate universal access for all, including age friendly accommodation.”*

## 2.6 Other relevant guidance / toolkits

### 2.6.1 [Universal Design Guidelines for Homes in Ireland \(2015\)](#)

The non-statutory ‘Universal Design Guidelines for Homes in Ireland’ (2015) was prepared by the Centre for Excellence in Universal Design in conjunction with the National Disability Authority. One of the purposes of the document is to assist in the design of universal homes. A number of example floor plans are set out in Section 5 of this document.

### 2.9.2 [Age Friendly Homes](#)

The Age Friendly Homes website was established in collaboration with ‘Government of Ireland’, ‘The Housing Agency’ and ‘Age Friendly Ireland’ and contains links to a number of resources for the provision of age friendly homes, which includes the adaption of existing homes and in relation to universal design.

The ‘Age Friendly Planning and Design’ – ‘Universal Design’ section of the website states:

*“Universal Design is about creating homes and environments that are easy for people to use and reflect the fact that all people experience changes in their abilities as they progress through the different stages of life. It is important for designers to take all potential users of the home into account throughout the design process in order to avoid creating a home that excludes certain groups from participating in normal everyday activities. Experience has shown that meeting the needs of people with disabilities or older people frequently generates design solutions which benefit a wider range of user groups, including people with young children in buggies, people with temporary injuries or carrying heavy luggage or furniture. ... However, Design Standards for New Apartments (2018) sets out the requirement that in developments with more than 9 apartments, the majority of the units need to be provided with 10% additional floor area. Accordingly, the opportunity can be taken within the mandatory increased target floor areas, for apartments to provide internal layouts suitable for households who may develop age related decreasing mobility, entirely consistent with Universal Design principles, but with little additional cost. Such larger apartments can provide good accommodation for the widest variety of tenants.”*

The ‘Age Friendly Planning and Design’ – ‘Age Friendly Housing Technical Advisor’ section of the website states:

*“A key principle underpinning the Government housing policy is to support older people to live in their own home with dignity and independence for as long as possible. The aim is to ensure that older people will have greater choice by developing a range of housing options that are suited to their needs, so they can plan ahead and, insofar as possible, choose the right home for themselves.”*

It is noted that, at the time of writing, the Age Friendly Housing Technical Advisor in Dún Laoghaire-Rathdown County Council is Edwin Johnson, Architects Department.

### 2.9.3 [Age Friendly Ireland](#)

Age Friendly Ireland have prepared a number of non-statutory toolkits and guidance that could be used by both developers and planners in assessing units to determine if they are suitable for older / mobility impaired people.



One such document is the '[Age Friendly Principles and Guidelines for the Planning Authority, 2021](#)'. Its introduction starts with the following statement:

*"If you design for the young you exclude the old, but if you design for the old you include everyone" (Glenn Millar, Canadian Planner, Canadian Urban Institute)*

Additional toolkits that may be of use in designing and assessing age friendly homes might include:

- "[Ten Universal Design Features to include in a Lifetime Adaptable and Age Friendly Home](#)"
- "[Age Friendly Homes Rating Tool June 2021](#)"
- "[Age Friendly Principles and Guidelines for the Planning Authority, 2021](#)"
- "[A guide to right-sizing, 2021](#)"

### 3. Policy approach for DLAP

As set out within the 'Demographic and Housing Analysis' background paper for the DLAP area, demographics show a trend towards an ageing population in the area. Per the 2016 census<sup>1</sup>, 13.6% of the population within the DLAP area were aged 65+ with approximately 15% of the population were aged 50+. Having regard to the demographic analysis carried out, it is considered that the percentage of older people, that being aged 65+ will rise over the lifetime of the DLAP and beyond (See population and demographic background paper). In addition, given the fact that future development is likely to skew more to towards more compact typologies and apartments there is a real need to provide for age friendly units in new developments so as to allow right sizing by way of freeing up more traditional 3 and 4 bed house for larger households types who are at earlier stage of family formation.

It is therefore required to set out specific objectives in DLAP in order to ensure that the ageing population of the area have housing options within new developments that meet their changing needs and that make new residential developments, in particular apartment developments, an attractive option allowing these existing residents to remain within their communities.

In order to achieve this, it is recommended that a specific age friendly housing objective, with a minimum standard and some guidance for developers & the DM section by amending draft Policy DLAP30 – Housing for all to simply reference the County Development Plan policy and add a more detailed objective.

Guidance available for age friendly housing is contained within the Government Policy Statement: Housing Options for Our Ageing Population. As PHP30 in the County Development Plan 2022-2028 states *"The Council will facilitate the implementation of the Policy Statement and promote the appropriate provision of housing for older people in Dún Laoghaire-Rathdown.*

Policy Objective PHP36 states that all proposals for development shall have regard to the provisions of The National Disability Authority's document 'Building for Everyone: A Universal Design Approach – Planning and Policy' (2012

[www.agefriendlyhomes.ie](http://www.agefriendlyhomes.ie) provides a suite of useful resources that can assist in both the design and assessment of age friendly housing units. This could be referenced for information to developers in designing their proposed residential schemes.

In order for such housing to be successful and to attract older / disabled people to live in a new residential development, the provision of a range of house type is only one element. The design of open space and the public realm that includes all users, regardless of their age or ability abilities is equally important. In addition, schemes that provide accessible communal facilities for use by residents, such as meeting rooms where social clubs and/or events can be hosted, will also add to the success of providing an inclusive community within any scheme. The provision of communal facilities is facilitated within Section 4 of the Apartment Guidelines.

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<sup>1</sup> Note: Census 2022 data for this area was not available at the time of preparing this paper.

### 3.1 Proposed policy objectives for the LAP

#### **Policy DLAP30 – Housing Options:**

It is policy to support and promote housing options for older people and persons with a disability within the DLAP area, including purpose built accommodation and housing options that meet specific needs in accordance with Policy Objective PHP30 in the County Development Plan 2022-2028. In this regard, new residential developments shall be required to incorporate an appropriate quantum of housing units that:

- promote aging in place opportunities for older persons to ‘rightsize’ within their community.
- take account of all abilities through the principles of universal design.
- facilitate adaptable layouts to suit changing needs.
- Any proposed development for purpose-built accommodation for a specific need or group shall demonstrate how this objective can be secured long-term.

#### **Objective H2 – Housing for All:**

It is an objective to ensure the provision of a range of housing options within the DLAP area, that take account of all ages and abilities as future residents progress through different stages of life, that all new residential developments of 10+ units shall include a minimum of 25% of the total housing stock that is designed to facilitate an ageing population / people with a disability. In this regard, the following provisions should be taken into account in the design and location of such units:

- Units should be designed having regard to the universal design homes principles.
- Insofar as possible, units should be located at ground floor level with own door access.
- Units should contain a minimum of 2-bedrooms.
- Ideally, units should be located where residents have a short walk to site entrances that adjoin public transport links and amenities within or adjacent to the proposed development.
- To assist with ease of access to public transport links and amenities, landscaping within any new development shall be designed having regard to ease of movement and legibility for all users.

#### **Objective H3 – Communal facilities:**

In line with the section 28 Guidelines “Sustainable Urban Housing: Design Standards for New Apartments” the Planning Authority will encourage provision of accessible communal rooms and/or facilities for the use of future residents in new residential apartment developments of 50+ units. Such communal facilities should have regard to the needs of all future residents of all ages and abilities. Where such facilities are to be provided details of the management shall be submitted and agreed by the planning authority at application stage.