

Forthcoming Review of Dublin City Council's Housing Strategy (2016-2022): Context, Key Issues and Outline Approach

Paper for consideration by Dublin City Council Housing Strategic Policy Committee
July 5th 2018

Summary

This paper provides context and identifies key issues for the forthcoming review of Dublin City Council's housing strategy and sets out an outline approach for same. It gives an introduction to summary details on Dublin city's overall housing strategy to 2022 as adopted under the Dublin City Development plan 2016-2022. It details the role the housing strategy plays in helping determine planning and investment decision-making for urban residential development in Dublin city as well setting out the principles that inform and guide the overall core strategy of the development plan related to housing.

The paper then presents a short assessment of the outputs achieved to date by Dublin city as a housing authority under its housing strategy before then giving an overview of the core content set out in the housing strategy. Following this, the paper then turns to the issue of the planning framework and spatial policy issues impacting on residential development in Dublin.

Given the complexities that can arise when interrogating the scope and scale of the legislative, policy and spatial planning frameworks that impact, direct and support Dublin city's housing strategy, the paper proposes to distil three distinct 'headline thematic issues' to allow for the forthcoming review of the housing strategy to proceed successfully. These headline thematic issues are mutually interdependent and supporting. They are proposed in order to allow for the introduction of new thinking and new evidence that can be brought to bear in the decision-making process that will be required at the conclusion of this review period for Dublin city's housing strategy. These are as follows:

- Thematic issue 1: Land for Housing
- Thematic issue 2: Making Places for People
- Thematic issue 3: New Affordable Housing

Under each thematic issue, a set of core questions are posed to allow for investigation and evidence to be collated and returned to elected members in order to support decision-making arising from the review of the city's housing strategy.

The paper concludes with suggested approaches to undertaking this review including new primary data analysis on Dublin's demography and population projections and on housing affordability issues in rental and owner-occupied housing tenures. The newly established Dublin Housing Observatory (DHO) will work collaboratively with Housing and Planning departments and members of the Housing and Planning Strategic Policy Committees to support the review. It will lead on key tasks of data and analysis as required to deliver a successful and timely review.

1. Introduction to Dublin’s Housing Strategy to 2022

Quality, affordable housing provision plays a key role in underpinning and maintaining economic growth and competitiveness for Dublin city. Significantly, there is a pressing need to ensure a speedy, effective and sustainable step-up in future housing supply to catch-up with the overheating segments of Dublin’s housing market and thereby reduce price inflation in owner-occupied and rental housing tenures. Additionally, the scale of unmet housing needs has grown over the period of the previous and current city development plan and requires an increase in housing output for social rental. The experience of homelessness in Dublin has also broadened over the period as the extent of demand for emergency accommodation deepens and strengthens.

The provision of Dublin’s housing also requires attention to the policies and core strategy of the development plan. These policies advanced the delivery of quality dwellings at higher densities to help create and help maintain a consolidated urban form that fosters the development of compact city neighbourhoods. In turn compact neighbourhoods help ensure a critical mass that contributes to the viability of local residential infrastructure, particularly as it relates to local social, economic, amenity, cultural and transport infrastructures.

The Dublin City Housing Strategy 2016 – 2022 has three core principles that inform and guide the overall core strategy of the development plan related to housing. These are:

1. To ensure the provision of good quality housing across owner-occupied and rental housing tenures in sustainable communities,
2. To ensure the planning and building of housing and residential space in the city contributes to sustainable and balanced development, and
3. To ensure adequate provision of social rental housing for households unable to afford housing from their own resources.

In addition to these core principles, Dublin’s Housing Strategy will support the overall implementation of the core strategy of the Dublin City Development Plan 2016 – 2022 by:

- Supporting the regional settlement strategy which seeks to re-balance future growth in the region and consolidate development in the metropolitan area;
- Providing for an appropriate quantity and quality of residential accommodation incorporating sustainable densities and designs;
- Engaging in active land management through the Dublin Housing Supply Co-ordination Taskforce and working closely with key stakeholders, including NAMA;

- Providing for a variety of housing typologies and tenures which are adaptable, flexible and meet family needs and the changing needs of people throughout their lives;
- Providing for the right quantity of appropriate housing in the right locations that is accessible and affordable for all residents of the city through the implementation of the housing strategy;
- Providing for the creation of attractive mixed use sustainable neighbourhoods which benefit from the phased delivery of supporting infrastructure.

2. Outputs to date under Dublin’s Housing Strategy

Since the adoption of the city’s housing strategy under the overall City Development Plan 2016-2022, in-roads towards tackling Dublin’s housing crisis have been made and progress achieved. Data presented to Dublin City Council earlier this year (February, 2018) confirms a year-on-year increase over the period 2015 to 2017 in our provision of housing options that have resulted in lettings to eligible households on our social housing waiting list. Over the reference period, provision of lettings rose from 1,689 (in 2015) to 2,415 (in 2016) and to 4,373 (in 2017). The total for lettings over the period is 8,477 households (see Table 1).

Table 1: DCC housing provision resulting in lettings to eligible households, 2015 to 2017

Year	2015	2016	2017	Total for Period
1. New Build incl. Part V & Rapid Build	565	558	820	1,943
2. Renovation/Retrofit of Existing Public and Private Housing ¹	1,012	975	934	2,921
3. Leasing/Letting of Existing Private Housing for HAP ²	112	882	2,619	3,613
Summary Total	1,689	2,415	4,373	8,477

¹ Includes 3 private properties in 2017 under the *Buy and Renew* Scheme. The balance remaining are all DCC properties brought back into use.

The primary source of new lettings is private rental housing registered under the Housing Assistance Payment (HAP) Scheme. This represents 42 percent of all lettings over the period and demonstrates the extent of continued reliance on Dublin’s private rental sector to

deliver a social housing option for households in need. The remaining balance comprises 34.5 percent of lettings being social tenancies in renovated and retrofitted public housing units restored to use and 23 percent of lettings being social tenancies in new build public housing units arising from Part V agreements, our Rapid Build Housing programme and completions of new developments in each respective year over the period. Notably, only one in four of the total 8,477 lettings achieved over the period were for a newly constructed social housing dwelling

Future housing supply is picking up, but in terms of increased effective demand supply remains slow. This can be illustrated by the large gap between the quarterly total of permitted residential developments in Dublin City since 2016 and the rate of commencements. Table 2 (below) gives data for the period quarter 1, 2016 to quarter 4, 2017 as collated by the Dublin Housing Taskforce.

Table 2 Large Scale Residential Developments as returned to the Dublin Housing Taskforce

	Total Number of Permitted Units		Total Number of Units Built to Date		Total Number of Units Under Construction		Total Permitted but not Commenced	
	Houses	Apartments	Houses	Apartments	Houses	Apartments	Houses	Apartments
Q1 2016	1870	3688	104	18	420	675	1346	2995
Q2 2016	1823	3916	383	100	288	820	1152	2996
Q3 2016	2169	4608	438	62	288	901	1443	3645
Q4 2016	2285	5011	421	48	341	843	1523	4120
Q1 2017	2245	5769	439	48	611	1313	1195	4408
Q2 2017	1958	5791	193	48	670	1248	1095	4495
Q3 2017	1976	6196	289	48	682	1643	1005	4505
Q4 2017	1911	7051	365	48	599	2004	947	4999

*Source: Returns to the Dublin Housing Taskforce
This data does not include permissions under 10 units, part 8 proposals, voluntary sector or student housing.*

Under the provisions of Part 8 of the Planning and Development Act (2000) (as amended) a total of 455 new social residential units have also been permitted alongside 7,055 student bed-spaces have been permitted (see Tables 3 and 4). In addition, over the period since 2016 a total of 179 'Rapid Build' units of housing have been delivered.

Table 3: Part 8 residential units permitted

2015	89 (0 new, all amalgamations)
2016	112 (102 new)
2017	374 (353 new)

Table 4: Student Bedspaces Permitted

2015	1378
2016	3934
2017	1743

The most recent data for quarter 1, 2018 from the Dublin Housing Taskforce shows a continued but slow improvement in near future supply of residential development. For example 2,042 houses and 8,885 apartments were permitted for Dublin city during quarter 1, 2018 while 486 houses and 87 apartments were completed and 676 houses and 2,019 apartments were under construction¹.

Dublin's near future housing supply therefore remains inadequate and imbalanced. There is not yet sufficient affordable housing provision for rental or for owner occupation. Dublin needs to boost its affordable housing supply across all tenures and work to fast-track its planning and its provision using today's new construction methodologies that can speed development and housing delivery to the quality standard required. Dublin also needs to deliver greater access to affordable housing across all housing tenures. These issues will be to be fore as we undertake the review of the city's housing strategy².

3. Overview of the key content in Dublin City Development Plan 2016-2022 in relation to the Housing Strategy to 2022

Dublin's Housing Strategy contains a substantial range of policies and objectives to be achieved over the period to 2022. In sum, a total of 35 policy objectives are articulated by the Housing Strategy (these are set out in full in Annex A). In addition, the city's housing strategy contains the following key content:

- The legislative and policy content for Dublin's Housing Strategy:
The provision of quality homes which provide for the needs of the city's population and which contribute to the production and maintenance of

¹ Not included in this data are sites where a planning permission has been lodged with Dublin city and is not yet decided upon, or is within the permitted period of 4 weeks of the date of the decision of the planning authority, or is the subject of an appeal to An Bord Pleanála.

² Dublin City Council notes the important work of the *EU Committee of the Regions and Housing Europe* (amongst others) who continue to argue for a review of the EU Commission's decision of 2012/21/EU that will allow for a broadening of access to social housing beyond "disadvantaged citizens or socially less advantaged groups".

sustainable, affordable, accessible and connected neighbourhoods is a key priority of Dublin's development plan. The social and economic context for the delivery of this key priority has changed and evolved over the period since 2008. Consequently, so too has the relevant legislative basis and policy framework. This section identifies the key legislative and policy instruments relevant to the delivery of Dublin's housing strategy.

- Dublin's population trends:

This section reviews the changes in Dublin's population and includes findings on the change in Dublin population over the period since 1991 to the present. It notes that while Dublin city's overall share of the population in the Greater Dublin Area (GDA) has declined, the inner city of Dublin has seen strong population growth. It notes that Dublin has a higher old-age dependency ratio than the GDA average and the lowest young-age dependency ratio. Also noted is the fact that Dublin has a smaller average household size than the GDA average while approximately one third of Dublin's households are comprised of child dependents.

- Dublin's changing housing trends:

This section reviews changes in Dublin's housing tenure patterns and takes account of how owner-occupation is in decline while a parallel growth in the number of households who rent is underway. The dynamics of housing supply over the period since 2000 are considered here as too are changes in Dublin's mortgage market during the period up the great financial crisis in 2008 and the subsequent post-crisis period to present. Analysis of the trends in zoned land and planning permissions for new housing supply in Dublin is also included.

- Projection of new housing requirements for Dublin to 2022:

This section contains the projected housing demand in Dublin city over the lifetime of the city development plan. The projection is based on data derived from the Regional Planning Guidelines for the Greater Dublin Area 2010 – 2022 as well as data from the CSO and other relevant sources. An enhanced version of the standard housing affordability model established under Department of Housing, Planning and Local Government guidelines is relied on to provide projections for net social housing requirements. The City Development Plan Core Strategy has a target to provide 4,200 new housing units per annum up to 2022, plus up to 3,000 social rental units.

- Extent of social housing requirements and options for delivery in Dublin to 2022:
This section contains details on the extent of social housing requirements and options for delivery. The extent of social housing required in Dublin is illustrated by the number of households who have been assessed as being eligible for social housing under Dublin City Council’s scheme of letting priorities. Notably, this section contains a ‘stock-flow’ analysis that estimates how the provision of new dwellings can be combined with casual lettings from within existing stock to illustrate how the projected extent of unmet social housing need is impacted by future planned new housing supply.

4. Dublin city’s housing strategy in context of recent legislative, policy and spatial planning changes

Government’s existing action plan for housing and homelessness, *Rebuilding Ireland* (July 2016) commits to increasing overall housing supply to an annual baseline level of 25,000 by 2020. Yet in order to address the supply deficit built up since 2010, this output will now be required to increase to between 30,000 and 35,000 units annually from 2020 to 2027. Consequently, under Ireland’s new National Development Plan (NDP) 2018-2027 (launched in February 2018) housing and sustainable urban development is the primary strategic investment priority.

Under the new NDP, public capital expenditure amounting to €14.5 billion is committed to support the delivery and location of these new homes. Of this, at least €11.6 billion will be provided for investment in social housing to deliver 112,000 new social housing units. In addition, €2bn is allocated for an Urban Regeneration and Development Fund to promote co-ordinated investment in the renewal and redevelopment of urban space. Alongside this, the NDP recognises that the co-ordinated and efficient provision of enabling infrastructure and services on publicly owned sites is central to leveraging the value of the land to provide for mixed-tenure and mixed-income housing.

Ireland’s NDP is accompanied by a new National Planning Framework (NPF) to 2040 (together known as Project Ireland 2040). More compact, higher-density residential urban spaces are required under the NPF. This means local authorities must set down the housing land requirements to provide for delivery of sufficient public and private housing in the locations and of the types that people need and at prices and rents people can afford. Importantly, the NPF recognises how the majority of social housing need arises in cities and towns. It also recognises how housing provision requires integration with high quality public and sustainable transport systems and supporting amenities. The NPF brings a particular

focus on brownfield and infill development, targeting derelict and vacant sites that have fallen into disuse. This includes public land zoned for housing and for urban regeneration.

Both the NDP and NPF reinforce that central to achieving compact growth is the management and building up of a reserve of development land for public and private housing, for transport infrastructure and for supporting amenities. This is especially relevant for Dublin City Council where our active land management is key to using and developing land in public and private ownership that will embed affordability into housing supply and allow land value capture to help fund infrastructure.

Figure 1 (below) gives an overview of the Irish planning system and allows us locate the city's housing strategy within this overall context. Under the overall National Planning Framework an important 'next tier' is the Regional Spatial and Economic Strategies (RSES). This is being developed and delivered for the Dublin area by the Eastern and Midland Regional Assembly (ERMA) and is due for adoption by the 38 members of the EMRA by end of 2018³.

Figure 1



³ The 38 elected members of the Regional Assembly are predominantly nominated by their local authorities to represent the region. One of their key tasks is to prepare a new Regional Spatial and Economic Strategy (RSES) to replace the existing Regional Planning Guidelines (RPGs) with additional functions requiring an economic strategy to be combined with the spatial strategy. The RSES will support the implementation of national government policies such as the emerging National Planning Framework (NPF) and will also set the framework for local economic development and spatial planning in each of the 12 local authorities in the region. The process for making the new Regional Spatial and Economic Strategy has now begun with the publication of the Issues Paper to inform the initial consultation period. See here for more information <http://emra.ie/rses/>

The RSES will support the implementation of Project Ireland 2040 - National Planning Framework (NPF), by the Department of Housing, Planning and Local Government's (DHPLG) and will set out a long-term spatial planning and economic framework for the Region in accordance with the economic policies of the Government and the proper planning and sustainable development of the region for a period of 12 to 20 years.

Another sub-RSES 'tier' in the spatial planning hierarchy is forthcoming and imminent and arises from national policy objective 67 of the NPF 2040. This states that:

*“Provision will be made for **Metropolitan Area Strategic Plans (MASPs)** to be prepared for the Dublin, Cork, Limerick, Galway and Waterford Metropolitan areas and in the case of Dublin and Cork, to also address the wider city region, by the appropriate authorities in tandem with and as part of the relevant Regional Spatial and Economic Strategies”*

This new tier for spatial planning (MASPs) will align with and inform national-level sectoral investment plans to guide and co-ordinate investment within the metropolitan areas. In line with the RSESs, the MASPs will be provided with a statutory underpinning to act as 12-year strategic planning and investment frameworks for the city metropolitan areas, addressing high level and long term strategic development issues. Each MASP will set out a clear and concise strategy to:

- Identify the key change parameters for the city in question i.e. population, employment,
- housing, retail, travel patterns and key renewable, development and amenity areas;
- Work out a sequence of infrastructure prioritisation, delivery and co-ordination; and
- Deliver compact regeneration and growth

The MASP plan making process offers an opportunity for enhanced spatial coordination of land use planning and strategic infrastructure delivery across the seven local authorities in the Dublin metropolitan area. It is anticipated that the preparation of a development strategy for the Dublin MASP will support the relevant City and County Development Plans to address infrastructure deficits and unlock the growth potential of key strategic development sites within the metropolitan area, in line with overall population and employment targets as set out in the accompanying RSES and NPF.

The Dublin MASP will be prepared in tandem with and as part of the plan making and adoption process for the RSES, which is a reserved function of the elected members of the Regional Assembly. It is anticipated that a draft MASP for Dublin will issue for consideration by elected members from September 2018.

The next 'tier' below the MASP for Dublin is the established city development plan. The core strategy aims of Dublin's city development to 2022 which relate to new housing and population (i.e. settlement strategy) are generally delivered through revisions to land use zoning and also Strategic Development and Regeneration Areas (SDRAs). There are 18 SDRAs overall in Dublin's current city development plan. In some cases the SDRAs overlap with and include Local Area Plans (LAPs) and Strategic Development Zones (SDZs) – both of which have a statutory profile with the overall city development plan. The focus of SDZs is on fast tracking delivery of higher density development in sustainable locations i.e. close to higher frequency public transport and quality amenities. Dublin has 3 SDZs namely Poolbeg West, Grangegorman and North Lotts/ Grand Canal Dock.

Other important statutory plans attached to the city development plan is Local Economic and Community Plan (LECP) 2016-2021 adopted by Dublin City Council in 2015 and the Homeless Action Plan 2017- 2020 (HAP)⁴. The HAP is led by the Dublin Region Homeless Executive (DRHE) and is region wide in scope taking account of the needs of the homeless population in all Dublin's local authorities and setting out the strategic aims and action areas on homelessness for Dublin's local authorities⁵.

5. The 'headline thematic issues' proposed for inclusion in the review of Dublin city's Housing Strategy.

Given the complexities that arise when interrogating the scope and scale of legislative, policy and spatial planning frameworks that impact, direct and support Dublin city's housing strategy, it is proposed to distil three distinct 'headline thematic issues' to allow for the review of the housing strategy to proceed successfully. These headline thematic issues are mutually interdependent and supporting. They are proposed in order to allow for the introduction of new thinking and new evidence that can be brought to bear in the decision-making process that will be required at the conclusion of this 'review period' for this city's housing strategy.

Under each thematic issue, a set of core questions are posed to allow for investigation and evidence to be collated and returned to elected members in order to support decision-making arising from the review of the city's housing strategy.

⁴ See here: <http://www.dublincity.ie/LECP>

⁵ The Homeless Action Plan for the Dublin Region for the next period is under finalisation among partners and statutory agencies and is due for presentation and adoption by the Dublin local authorities in quarter3, 2018. See here for more: <https://www.homelessdublin.ie>

Thematic issue 1: **Land for Housing**

The total zoned land for Dublin City Council area is currently 10074 hectares (ha). Within this 3,793 ha are zone Z1 for residential development (general) and 693 ha are zoned Z2 for residential development (conservation areas), giving a total of 4,486 ha or approximately 44.7 percent of all zone land. In addition, there are a number of land use zonings summing to 2,624 ha that also allow for residential development to some extent (i.e. either permissible or open for consideration in certain circumstances). These include the following zonings:

Z3 Neighbourhood Centres	61 ha (0.6 percent of total)
Z4 District Centres (mixed use)	199 ha (2 percent of total)
Z5 City Centre (mixed use)	243 ha (2.5 percent of total)
Z6 Employment/ Enterprise (light)	607 ha (6 percent of total)
Z8 Conservations Areas (40 percent commercial use)	85 ha (0.8 percent of total)
Z10 Inner Suburb (mixed use)	60 ha (0.6 percent of total)
Z12 Institutional Land	108 ha (1.1 percent of total)
Z14 Strategic development and Regeneration Areas (mixed use)	501 ha (5 percent of total)
Z15 Institutional and Community Land for Long-term Institutional Use	760 ha (7.5 percent of total)

Land use zonings for industrial use where no residential development is allowed amounts to 971 ha (9.5 percent of total).

Core questions:

1. In Dublin City Council, is there sufficient land for housing development over the period of the city development plan (to 2022) and further out to longer-term horizons as envisaged under the MASP (12 years) and the NPF (to 2040)?
 - 1.1 What changes in land use zoning can be identified that would increase land for residential development in Dublin within sustainable distances from employment and community facilities?
 - 1.2 What changes in land use policy for residential development in Dublin will ensure quality densification and compact growth for Dublin?

Thematic issue 2: **Making Places for People**

The provision of quality, affordable housing in places that are sustainable connects Dublin's ambitions to be a great place to live, work and learn with a wide range of fundamental policies and issues, for example:

- To our ability to deliver social rights;
- To our ability to accelerate our energy transition to low carbon and near zero energy dwellings that help tackle the drivers of climate change;
- To our ability to produce greater cohesion in our societies and to reduce social segregation;
- To our ability to deliver better and more public services in an integrated and sustainable way that ensures access and prioritises quality, and;
- To our ability moderate large macro-economic imbalances in our economy caused by housing boom bust cycles and thereby improve our competitiveness.

Making places for people means we need to unlock housing investment in general and in particular towards secure, quality affordable housing so that we can reduce the worst aspects of our dysfunctional housing market. We can reap the rewards that cascade from the established economic return on our housing investment where it has been shown that for every €3 we invest to improve housing conditions the return on investment is €2 in terms of secondary benefits arising from employment and economic growth.

Making places for people does require meeting the 'Living City' challenges of residential development that produces mixed tenure development accompanied by mixed income communities where scale, standards and density are maximised within statutory limits. For example, Dublin's apartment standards set out in the Development Plan have been superseded by the DHPLG 'design standards for new apartments Guidelines for Planning Authorities' issued in March 2018. These reduce the floor area requirements, and alter the mix allowable. Also included here is guidance on new 'build to rent' and 'shared accommodation' (or 'co-living') developments⁶. A notable specific requirement in relation to 'housing mix' in our future city development plan is the Department of Housing's Specific Planning Policy Requirement 1 that states:

Apartment developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms. Statutory development plans may specify a mix for apartment and other housing

⁶ <http://www.housing.gov.ie/planning/guidelines/apartments/design-standards-new-apartments-guidelines-planning-authorities-march>

developments, but only further to an *evidence based Housing Need and Demand Assessment (HNDA)*, that has been agreed on an area, county, city or metropolitan area basis and incorporated into the relevant development plan(s). (our emphasis)

Core questions:

2. In Dublin City Council, do we have the correct suite of ‘Living City’ toolkit criteria to evaluate and assess future residential development and ensure all residential development delivers sustainable places for people to live in on a mixed tenure and mixed income basis?
 - 2.1 Are there community benefit and development clauses that we can rely on to provide beneficial local outcomes from residential development?
 - 2.2 Can we better deliver housing market renewal based on mixed tenure and mixed income residential developments in certain low-demand areas?⁷
 - 2.3 Can we better realise a Decent Homes Standard for all Dublin’s public housing tenants as a core driver of our estate regeneration programmes?
 - 2.4 Can we better protect the public asset that is delivered under Part V (Planning and Development Act, 2000) (as amended) arrangements for social housing provision in new private residential development?
 - 2.5 Do we have the appropriate variety and mix of residential units for our future population and should this be varied for different parts of the city?

Thematic issue 3: **New Affordable Housing**

Affordable housing is at the heart of sustainable places to live in. The pivotal determinant of affordable housing in owner occupation and rental relates to purchase prices and rent levels demanded to use and occupy the dwelling in terms of how much of a household’s net income is required to meet this cost. However, equally important are the long-term costs of residing in the dwelling provided. Therefore we must ‘build in’ affordability over the lifetime of a dwelling’s use but also in terms of the lifecycle stages that its residents move through from working households, to households with families to elderly households. We must also ensure affordability relates to how a dwelling works in terms of its design and adaptability.

Dublin City Council is placing an emphasis on options for the public housing finance model required to produce new affordable housing for purchase and rental and to renew and renovate its existing public housing stock. This includes the challenges of financing the conversion of existing commercial and/ or industrial built environment to residential use

⁷ For example recent Planning Department analysis and research suggests that two Local Area Plans (LAPs) in progress for Ballymun and Cherry Orchard respectively are not being adequately supported or engaged with by key housing market actors.

(where feasible and permissible) and the re-use of vacant and derelict brown-field sites where land is zoned for residential development and/ or urban regeneration.

Dublin City Council is also recognizing how the dynamics of housing market changes are creating increased demand for rental housing and in particular a form of rental housing that meets the needs of renter households who do not qualify for social housing but who also do not choose to enter owner occupation. The number of households in this 'intermediate' or 'mid-market' rental segment is expanding in Dublin as more working households rent for longer periods. It is also where some of the more acute affordability and tenure security challenges are to be found in Dublin. To address this need Dublin City Council is seeking to innovate towards the delivery of cost-rental housing available on a general needs basis that will deliver a 'living rent' for the Living City.

Core questions:

3. In Dublin City Council, do we have an adequate assessment and understanding of the overall housing need and effective demand for affordable housing for rental and for purchase and how to respond to meeting this need?
 - 3.1 Can we continue to innovate to deliver affordable purchase schemes on public land that 'builds in' affordability over the lifetime of the dwelling and that secures the land as a public asset?
 - 3.2 Can we enable innovative partnerships among non-profit, private housing companies (i.e. Approved Housing Bodies, Trusts, Housing Cooperatives) to deliver quality cost-rental (i.e. 'mid-market') housing schemes on public land?
 - 3.3 Can we deliver shared equity options within cost-rental provision that do not interrupt security of tenure or lead to large-scale tenant purchase (e.g. 'SSIA'⁸ type scheme for tenants equivalent to 'rent-to-buy' mechanisms)
 - 3.4 Can we ensure 'joint ventures' between public landowners (e.g. HSE, CIE, OPW), NAMA and other land holding interests (e.g. institutional lands) to maximize residential development for affordable purchase and social and mid-market rental on lands where social infrastructure, transport, health and education services are planned?

⁸ Special Savings Incentive Allowance

6. Implementing and reviewing Dublin’s Housing Strategy to 2022

The implementation and achievement of the stated objectives of the Dublin Housing Strategy continues to have regard to the provisions of the city development plan and its core strategy.

However, in order to reflect emerging trends in the housing market as well as changes in national housing and spatial planning legislation and policy (noted in section 4 above), it is also recognised how it is essential for the housing strategy be kept up-to-date. To this end the current city development plan contains policy objective QH02 that states Dublin City Council will ‘undertake a review of the DCC housing strategy as part of the mandatory 2-year review process’⁹.

While this mandatory review process for the overall city development plan will formally begin from November 2018, as significant changes in Dublin’s housing market and in spatial planning policy have occurred, Dublin City Council is prioritising the review of its housing strategy and is initiating the process of review from July 2018.

The review will be led by a dedicated team in the newly established Dublin Housing Observatory¹⁰. The team will work to produce a new analysis of the most recent data available in order to better comprehend today’s key drivers of, *inter alia*, overall housing need, effective housing demand, housing supply and its tenure and housing affordability issues across both rental and owner occupied tenures (see Annex B for outline details of selected forthcoming analytical work).

⁹ Section 15 (1) and (2) of the Planning and Development Act 2000 (as amended) states:

- S15 (1) “It shall be the duty of a planning authority to take such steps within its powers as may be necessary for securing the objectives of the development plan”; and,
- S15 (2) “The manager of a planning authority shall, not more than 2 years after the making of a development plan, give a report to the members of the authority on the progress achieved in securing the objectives referred to in subsection (1).”

Section 95 (3) (a) and (b) of the Planning and Development Act (2000) (as amended) further refers:

- S95 (3) (a): “The report of the manager under section 15 (2) shall include a review of the progress achieved in implementing the housing strategy and, where the report indicates that new or revised housing needs have been identified, the manager may recommend that the housing strategy be adjusted and the development plan be varied accordingly.”
- S95 (3) (b): “The manager of a planning authority shall, where he or she considers that there has been a change in the housing market, or in the regulations made by the Minister under section 100, that significantly affects the housing strategy, give a report on the matter to the members of the authority and, where he or she considers it necessary, the manager may recommend that the housing strategy be adjusted and the development plan be varied accordingly.”

¹⁰ This team is led by Dr Dáithí Downey, Head of Housing Policy, Research and Development.

The Dublin Housing Observatory (DHO) team will work closely with the city's Planning and Housing Departments and will establish working groups as required to ensure coherence with all relevant legislative and policy requirements for housing provision in Dublin.

Secondly, the team will support information exchange and policy development workshops with members of both Dublin's Housing and Planning Strategic Policy Committees (SPCs). A key task will be to consider the spectrum of the 35 housing policy objectives articulated by Dublin's City Development Plan 2016-2022 (see Annex A) to ensure their overall coherence and relevance to the requirements of the housing strategy.

Another key task will be to ensure SPC members have a comprehensive and up-to-date understanding of all relevant recent legislative, policy and spatial planning changes adopted since 2016 and that impact on Dublin's housing strategy.

It is envisaged that policy development workshops will occur from September 2018.

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July 2nd 2018

Annex A

Housing Policies and Objectives of Dublin City Development Plan, 2016-2022

	Housing Policy Reference in Dublin City Development Plan
QH1	To have regard to the DECLG Guidelines on 'Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities' (2007); 'Delivering Homes Sustaining Communities – Statement on Housing Policy' (2007), 'Sustainable Urban Housing: Design Standards for New Apartments' (2015) and 'Sustainable Residential Development in Urban Areas' and the accompanying 'Urban Design Manual: A Best Practice Guide' (2009).
QH2	To have regard to the Regional Planning Guidelines for the Greater Dublin Area and make provision for the scale of population growth and housing allocations outlined in these guidelines taking account of the Central Statistics Office Regional Population Projections 2016 – 2031 and to have regard to any Regional Spatial and Economic Strategy that replaces the Regional Planning Guidelines.
QH3	(i) To secure the implementation of the Dublin City Council Housing Strategy in accordance with the provision of national legislation. In this regard, 10 percent of the land zoned for residential uses, or for a mixture of residential and other uses, shall be reserved for the provision of social and/or affordable housing in order to promote tenure diversity and a socially inclusive city. (ii) To engage in active land management including the implementation of the vacant levy on all vacant residential and regeneration lands as set out in the Urban Regeneration and Housing Act 2015.
QH4	To support proposals from the Housing Authority and other approved housing bodies and voluntary housing bodies in appropriate locations subject to the provisions of the development plan.
QH5	To promote residential development addressing any shortfall in housing provision through active land management and a co-ordinated planned approach to developing appropriately zoned lands at key locations including regeneration areas, vacant sites and under-utilised sites
QH6	To encourage and foster the creation of attractive mixed-use sustainable neighbourhoods which contain a variety of housing types and tenures with supporting community facilities, public realm and residential amenities, and which are socially mixed in order to achieve a socially inclusive city.
QH7	To promote residential development at sustainable urban densities throughout the city in accordance with the core strategy, having regard to the need for high standards of urban design and architecture and to successfully integrate with the character of the surrounding area.
QH8	To promote the sustainable development of vacant or under-utilised infill sites and to favourably consider higher density proposals which respect the design of the surrounding development and the character of the area.

QH9	To require that larger schemes which will be developed over a considerable period of time are developed in accordance with an agreed phasing programme to ensure that suitable physical, social and community infrastructure is provided in tandem with the residential development and that substantial infrastructure is available to initial occupiers.
QH10	To support the creation of a permeable, connected and well-linked city and discourage gated residential developments as they exclude and divide established communities.
QH11	To ensure new developments and refurbishments are designed to promote safety and security and avoid anti-social behaviour in accordance with the Safety and Security Design Guidelines
QH12	To promote more sustainable development through energy end-use efficiency, increasing the use of renewable energy, and improved energy performance of all new development throughout the city by requiring planning applications to be supported by information indicating how the proposal has been designed in accordance with the development standards set out in the development plan.
QH13	To ensure that all new housing is designed in a way that is adaptable and flexible to the changing needs of the homeowner as set out in the Residential Quality Standards and with regard to the Lifetime Homes Guidance contained in Section 5.2 of the Department of Environment, Heritage and Local Government 'Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities' (2007).
QH14	To support the concept of independent living and assisted living for older people, to support the provision of specific purpose-built accommodation, and to promote the opportunity for older people to avail of the option of 'downsizing'. To support the promotion of policies that will: <ul style="list-style-type: none"> • Encourage/promote full usage of dwellings units • Incentivise property owners of under-utilised dwellings to relocate to smaller age friendly dwellings. • Actively promote surrendering larger accommodation/financial contribution schemes without compulsion.
QH15	To require compliance with the City Council's policy on the taking-in-charge of residential developments.
QH16	To promote efficient and effective property management in order to secure the satisfactory upkeep and maintenance of communal areas and facilities in the context of the Multi-Unit Developments Act 2011, the Property Services (Regulation) Act 2011 and the establishment of the Property Services Regulatory Authority.
QH17	To support the provision of purpose-built, managed, high-quality private rented accommodation with a long-term horizon.
QH18	To promote the provision of high-quality apartments within sustainable neighbourhoods by achieving suitable levels of amenity within individual apartments, and within each apartment development, and ensuring that suitable social infrastructure and other support facilities are available in the neighbourhood, in accordance with the standards for residential accommodation.

QH19	To promote the optimum quality and supply of apartments for a range of needs and aspirations, including households with children, in attractive, sustainable mixed-income, mixed-use neighbourhoods supported by appropriate social and other infrastructure.
QH20	To ensure apartment developments on City Council sites are models of international best practice and deliver the highest quality energy efficient apartments with all the necessary infrastructure where a need is identified, to include community hubs, sports and recreational green open spaces and public parks and suitable shops contributing to the creation of attractive, sustainable, mixed-use and mixed-income neighbourhoods.
QH21	To ensure that new houses provide for the needs of family accommodation with a satisfactory level of residential amenity, in accordance with the standards for residential accommodation.
QH22	To ensure that new housing development close to existing houses has regard to the character and scale of the existing houses unless there are strong design reasons for doing otherwise.
QH23	To discourage the demolition of habitable housing unless streetscape, environmental and amenity considerations are satisfied, and a net increase in the number of dwelling units is provided in order to promote sustainable development by making efficient use of scarce urban land.
QH24	To resist the loss of residential use on upper floors and actively support proposals that retain or bring upper floors above ground floor premises into residential use in order to revitalise the social and physical fabric of the city through measures such as the Living City Initiative and allowing scope for the residential development standards to be relaxed for refurbishment projects subject to the provision of good quality accommodation as outlined in the development standards. To proactively promote and market the Living City Initiative in Dublin city in order to attract and encourage investment in the city's valuable building fabric within the designated Living City Initiative area.
QH25	To encourage the re-introduction of residential use into the historic areas of the city, where much of the historic fabric remains intact (e.g. the Georgian and Victorian areas), provided development is consistent with the architectural integrity and character of such areas.
QH26	To promote the transformation of the key regeneration areas into successful socially integrated neighbourhoods including those on the Main Inner City Regeneration Areas Map and promote area regeneration in parts of the city which require physical improvement and enhancement in terms of quality of life, housing and employment opportunities, including the Docklands. It is recognised that the nature of some housing regeneration initiatives may warrant the demolition of existing dwellings before proposals for new or replacement dwellings are agreed.
QH27	To recognise the separate identity, culture, tradition and history of the Travelling people and to reduce the levels of disadvantage that Travellers experience.
QH28	To provide a range of accommodation options for Travellers who normally reside in the Dublin city area and who wish to have such accommodation in accordance with the Dublin City Council Traveller Accommodation Programme 2014 – 2018 and as updated during the life of the plan.

QH29	To support the implementation of the Homeless Action Plan Framework for Dublin and support related initiatives to address homelessness.
QH30	To ensure that all proposals to provide or extend temporary homeless accommodation or support services shall be supported by information demonstrating that the proposal would not result in an undue concentration of such uses nor undermine the existing local economy, resident community or regeneration of an area. All such applications shall include: a map of all homeless services within a 500 m radius of the application site, a statement on the catchment area identifying whether the proposal is to serve local or regional demand, and a statement regarding management of the service/facility
QH31	To support the provision of high-quality, professionally managed and purpose-built third-level student accommodation on campuses or in appropriate locations close to the main campus, in the inner city or adjacent to high-quality public transport corridors and cycle routes, in a manner which respects the residential amenity and character of the surrounding area, in order to support the knowledge economy. Proposals for student accommodation shall comply with the 'Guidelines for Student Accommodation' contained in the development standards.
	Housing Objectives in Dublin City Development Plan
QH01	To undertake a study to examine the potential for existing low- to medium-density residential development to accommodate additional residential development in a manner which optimises residential density whilst respecting residential amenities.
QH02	To undertake a review of the Dublin City Council Housing Strategy as part of the mandatory 2-year review process.
QH03	To instigate the design of a prototype block of age-friendly apartments for older people based on age-friendly design principles in conjunction with other bodies, as appropriate, in order to inform a model of good practice.
QH04	To undertake a review of private rented sector models serving various population cohorts to inform future planning policy and standards.

Annex B:

New Analytical work to support revision of Dublin’s Housing Strategy

Data Analytical Requirement 1:

Population Projection for Dublin City to 2028

This work requires an undertaking of population projection scenarios for Dublin up to 2028. This is achieved using “**Demographic Component Model**” (DCM), an internationally held best practice model for population projection that is used by the Central Statistics Office (CSO). The DCM methodology applies key assumptions in fertility, mortality and migration to project forward the population of an area per annum, per year of age and gender.

Data Analytical Requirement 2:

Housing Need and Effective Demand Assessment for Dublin City

This work requires we undertake an estimate of the housing supply required across all housing tenures and forms of provision for all income deciles in Dublin’s households. This will require an enhancement of the approach and methodology set out by the Department of the Environment and Local Government in its “**Housing Supply: A Model Housing Strategy and Step-by-Step Guide**” (commonly referred to as the Louth Model). Our approach and methodology will entail the separation of the modelling process into the “Owner Occupier / Social and Affordable Model” and the “Rental Model” The principal steps involved in the development and application of these models are as follows:

- Assessment of housing demand to accommodate a forecast population projection/target, and involves the following tasks:
 - Calculation of average household size and additional households required;
 - Estimated distribution of household disposable incomes;
 - Calculation of household disposable income distribution;
 - Assessment of average house prices/average private rental prices;
 - Calculation of projected house price bands/ private rental price bands;
 - Determination of annual income distribution of total households;
 - Determination of income distribution of annual additional households.
- Calculation of housing affordability, involving the following tasks:
 - Application of the affordability formula (enhanced ‘Louth Model’)
 - Distribution of annual additional households and calculation of house price affordability/private rental affordability.
- Calculation of anticipated affordable housing need in rental and owner occupation.