

**Property  
Industry Ireland**  
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# Property Industry Ireland Recommendations for New Housing Design Standards

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# Summary

Viability is key to delivering affordable housing. Before a home can be constructed the cost to deliver it to market must be less than the purchase price.

Housing design has a big impact on the viability of housing construction. Government has a key role in setting out the design of housing in our cities, towns, villages, and rural communities through the introduction of new National Housing Standards by Ministerial direction to local authorities. Property Industry Ireland (PII) believe the introduction of new National Housing Design Standards based on a critical examination of our quantitative development standards is required to facilitate low-rise medium density housing. The application of qualitative standards can have significant positive impacts on the ability to create compact residential developments and to improve the affordability and supply of quality accommodation into the Irish housing system.

This submission specifically seeks an update to Government's Guidance for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns and Villages), published in May 2009. That document addresses inter alia appropriate locations for increased densities from city and town centres to outer suburban/greenfield sites. We seek a specific review of this Guidance and the introduction of new Housing Design Standards.

Standards that are appropriate to modern day requirements means more homes, designed to suit the needs of the future occupants, can deliver quality, sustainable and affordable living conditions. This change will also provide for a balance between public and private spaces, but which are functional and provide for the needs of people at all stages of their lives.

PII are of the view that the proposed introduction of new Housing Design Standards will allow for the provision of more own-door housing, which is affordable for the consumer, viable to build for the developer and will significantly reduce the necessity for unsustainable government subvention. Without introducing these requirements, Government will fail not only in delivering the quantum of housing required but will not be providing the type of housing that is needed now or into the future. New residential communities based on new forms of own door housing set amidst innovative open space have the potential to be a key component in resolving the challenges arising from the current housing crisis.

The introduction of new National Housing Standards has the potential to act as a key catalyst for the creation of sustainable compact communities and neighbourhoods providing homes for our growing population and appropriate to the needs of Irish society for the twenty first century.

Adapting the proposed housing design standards will bring about a number of benefits:

1. It will allow a mix of own-door units that do not require the inclusion of apartments. This will aid viability and delivery, particularly in suburban locations.
2. A housing scheme built under the proposed design guidelines will have more private open space than a scheme under the current guidelines.
3. There will be better use of public open space.
4. Density will improve, increasing from approx. 32 houses per hectare to 40 houses per hectare without the necessity to construct duplexes or apartments. This represents a 25% increase in number of houses on a site – all of which are own-door.
5. Analysis has shown that the proposed standards will allow the delivery of homes that are more affordable for buyers.

## PII SECTORS



# Introduction

**Viability is key to delivering affordable housing. Before a home can be constructed the cost to deliver it to market must be less than the purchase price. This is the case for both public and private housing unless a serious financial support from Government is provided.**

Housing design has a big impact on the viability of housing construction. Government has a key role in setting out the design of housing in our cities, towns, villages, and rural communities through the introduction of new National Housing Standards by Ministerial direction to local authorities.

Many of the features of our housing design standards date back to the period following the First World War when the UK Tudor Walters Report and the principles of the Garden City Movement gained worldwide acceptance in the Anglophone world including Ireland. These design standards were appropriate at a time when Ireland's population was less urban, had a closer connection to agriculture, and the threat of climate change and need for sustainable construction was not a priority. However, some of these standards are unsuited to the objective of achieving the compact cities and towns of a modern interconnected society and unnecessarily add to the cost of home-building. Alternative solutions need to be found to deliver on these objectives.

Whilst the UK similarly adopted such principles for some time, changes to Government guidelines allowed for the construction of several award-winning UK housing schemes which would not comply with Ireland's more formulaic and inflexible standards. Ireland needs access to low-rise medium density housing that is facilitated in other jurisdictions.

It is imperative that Government provides clear guidance of its policy on these new Housing Standards to Local Authority Planning Departments to ensure certainty for project design. The Planning process is long and costly and architects, planners and homebuilders need clarity to ensure that what they propose on any given site will be acceptable under the Local Development Plan.

While Government has recently held a stakeholder engagement session on Sustainable and Compact Settlement Guidelines, we believe that the level of engagement on this important topic has not been sufficient.

**Property Industry Ireland calls on Government to directly re-engage with the property industry.**

**Architects and Planning Consultants to review where our current housing design guidance is no longer delivering a sustainable housing solution. Considerable work was carried out by PII, RIAI, CIF, SCSi among others in 2018 and 2019 on the subject of new housing standards.**

**This consultation needs to be brought to a conclusion by the introduction of new National Housing Design Standards.**

# What needs to change?

**Because of our increasing population, and to limit our impact on the environment, communities need to live in a more sustainable manner with living arrangements in line with their needs.**

It is imperative that we optimise the use of zoned and serviced lands in locations that are desirable to live in. At present, the solution to the optimisation of land use has been to propose traditional apartment construction rather than housing alternatives based on European best “practice” which consider consumer need or demand.

While apartments are a viable option for some locations – our core city centres as just one example – there are many communities, particularly the suburban areas of our cities and towns, where apartment living is not the optimal choice. In addition, the cost of building an apartment is not viable in many such locations. As identified by the SCSI Report (January 2021) on the cost of apartment construction, the cost of delivering an apartment to market exceeds the sales price for many apartment types in many areas with high housing demand.

While the need for greater urban density is accepted, without viability not enough homes will be built in these locations if new housing standards are not introduced.

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**It is imperative that we optimise the use of zoned and serviced lands in locations that are desirable to live in.**

**A new approach to designing our communities is needed.**

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A new approach to designing our communities is therefore needed. PII recommend that new national Housing Standards be introduced to incorporate the following key measures:

**Reduce separation distances between opposing rear first floor rooms.**



**Address the inequity of housing types regarding private open space.**



**Achieve greater densities through change of standards - providing scope for entirety of a scheme to be own-door.**



**Prioritise and reward quality over quantity for common public open space.**



## What needs to change:

# Reduce separation distances between opposing rear first floor rooms.

The current 22m separation between two rear first floor rooms, with its origins in the Tudor Walters 1919 post-war standards, is designed to provide privacy from overlooking based on the random estimation of early twentieth century planners who were advocates of the Garden City Movement for typical densities of 10 to 12 per acre, approx. 25 to 30 per hectare. These standards are rigid, excessive, and restrictive and militate against a flexibility necessary to achieve the most efficient land-use that underlies the creation of sustainable communities.

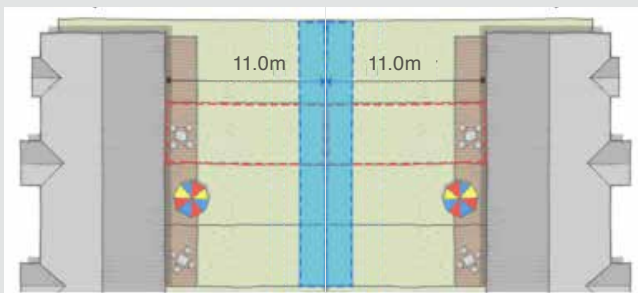
Current housing design standards are in effect manifestos for typical characterless urban sprawl. Much of the suburban housing patterns produced as a result of typical current local authority standards is dominated by road systems and car parking and lacks a sense of place.

On the contrary it is notable that many of the most favoured residential communities in our cities and towns - Ranelagh, Rathmines, Phibsborough, Stoneybatter

in Dublin and Montenotte in Cork - were designed and constructed prior to the introduction of the Tudor Walters standards. These communities, which have short back gardens, defined space between public realm and house front are favoured and attractive precisely because of the compact density and fine urban grain they achieve. They are a more relevant reference for the urban form of our new residential communities than the theories and standards of the Garden City Movement.

Current guidance acknowledges that the 22m separation can be limiting, can be avoided, and can be disregarded within certain circumstances. However, the examples provided in the Guidance of where this is possible is far too restrictive and limited. The application of the Design Manual for Urban Roads and Streets (DMURS) permits lower front separation distances between two opposing windows at the front of houses and so the rigid adherence to a 22m back-to-back separation is illogical as it stands in contrast.

Housing illustrated with mandatory 22m back-to-back distance between opposing 1st floor windows.



Housing illustrated with 16m back-to-back distance.



**Current guidance acknowledges that the 22m separation can be limiting.**



The 22m separation limit is unfortunate because land in an urban setting is a valuable resource, and should not be squandered unnecessarily. Indeed, providing this separation distance increases garden lengths, reflecting the early 20th century low density Garden City movement priorities and objectives. However, these most frequently underutilised areas are less a priority for modern time-poor home buyers, providing only marginal benefit for householders. The accumulated totals of the rigid 22m standard mitigates against innovative housing layout design, compromising opportunities for more sustainable land use and sustainable housing densities as well as adding to the overall cost of housing provision and limiting scheme design options unnecessarily.



Layout is constrained by the mandatory distance limiting densities to max 32/Ha

These brief extracts from housing design layouts illustrate the potential for improved land use through a more flexible approach to private open space – in the latter matching the DMURS standards.

**PII recommend that new quantitative standards in respect of separation distances be based on a qualitative approach. At a minimum the current approach to front-to-front separation distances should be considered.**

This change could deliver significant and substantial benefits. It will allow the provision of own-door housing of at least 40 units per hectare.



Layout unconstrained by mandatory distance allows increased densities

**HOUSE TYPES:** 🏠 3 Bed Semi Detached 🏠 3 Bed Terrace 🏠 2 Bed Terrace

**The accumulated totals of the rigid 22m standard mitigates against innovative housing layout design.**

## What needs to change:

# Address the inequity of housing types regarding private open space.

One direct impact that separation distances have on housing developments is the inequitable provision of private open space between housing types.

For row housing the 22m separation distance results in long, low-utility gardens. However, there is a clear divergence between the limited open space associated with apartments and duplexes for which the requirement is 5, 7 or 9 sq metres of open space, and those long-large gardens provided for houses whose private open space may be 55 sq metres or over, arising from the mandatory 11m length multiplied by house width.

This can result in the incongruous situation of a family living in a 2-bed apartment having limited private open space compared to the same family living in a 2-bed house who could have excess space. Changing both the separation distances, and the minimum private open space requirement for own-door housing, would allow more homes to have access to usable private open space in a design that is functional.

**Changing both the separation distances, and the minimum private open space requirement for own-door housing, would allow more homes to have access to usable private open space in a design that is functional.**



## What needs to change:

# Achieving greater densities through change of standards - providing scope for entirety of a scheme to be own-door.

The current default is for large housing developments to include a substantial apartment or duplex element as part of its design to meet quantitative development standards whilst ensuring that minimum density requirements are achieved. However, this is not a practical or viable solution in the majority of locations in Ireland.

There are a multitude of reasons as to why this is the case. Current house prices vary considerably across the country. There can also be wide variation in income differentials and land availability. However, the primary factor is around the viability

of constructing apartment and duplex 'heavy' schemes. As highlighted in the SCSi report on the cost of apartment construction, such construction is costly, and indeed considerably more so than own-door housing construction. In certain locations, even where there is strong demand, even excluding the cost of land, it is not viable to construct an apartment development at current market prices without significant subvention from the state.

Secondly, apartment living is not desirable in all locations in the country and the provision of such would not be in keeping with the local built environment.



Private Open Space standards for row housing require the use of duplex houses and apartments - both with lower private open - and 15% public open space to achieve a density of 40/Ha space.



Reduction of back-to-back distances, provision of 40sqm private open space, quality in distributed, designed public open space permits a housing layout comprising all own door (with improved viability) at density 40/Ha.

**HOUSE TYPES:** 🏠 3 Bed Semi Detached 🏠 3 Bed Terrace 🏠 2 Bed Terrace

**By specifying new reduced back-to-back separation distances, all own door units in a scheme could have a minimum of say 40 sq m of private open space.**





## What needs to change:

# Prioritise and reward quality over quantity for common public open space.

The current approach to public open space involves providing a large open space designated by quantum (most commonly by a stated percentage of the overall development plot) as part of a housing development scheme. These spaces, while meeting an arbitrary quantum of space, are not the optimal way of using prime urban land. While open “playing-field” like spaces are needed, there is currently an overreliance on this for meeting the demands of the community. Such areas only provide for the needs of a limited cohort of our communities, and almost completely exclude the needs of the very young or elderly.

A more holistic and creative approach is recommended for the provision of public open space in our new communities, meeting the demands of all parts of society, and taking into account existing open space provision in the greater immediate area or neighbourhood.

**Public open space must not be an add-on but should be integrated into the layout design providing engaging spaces as part of the overall neighbourhood that can be appreciated and utilised to its fullest by all. Examples of what are needed are playgrounds, parks, public open-air gyms, roller parks, community gardens, and biodiversity areas.**

The experience of the Covid-related safety measures, restricting movement to immediate neighbourhoods, increased the appreciation of the

value of amenity spaces, particularly those with designated uses. The challenge for Local Authorities in determining public open space requirements is best addressed by reviews of neighbourhood areas. For example existing adequate provision of amenity spaces should permit a flexibility in quantum requirements that, for the purpose of equity, should enable them to require contributions in lieu of land that can be included in Development Plans. Examples might be where a development borders a significant amenity (beach or seashore, river, canal, existing park or the like). The provision of access through contributions towards infrastructure that enhance those amenities may be made in lieu of quantum of open space. Such provisions allow the Authority to plan at neighbourhood level rather than being restricted to the confines of a site. This also promotes improved land-use through higher net densities. In contrary cases where there may, overall, be inadequate amenity open areas the requirement should be capable of being of higher quality to promote new amenity through, for example, greater age-range amenity levels such as infrastructure for clubs and greater amenity.

**Public Open space within a new residential scheme should be functional all year round, be readily accessible to residents of a scheme and be favourably distributed across a scheme. PII recommend that a 10% public open space provision should be provided.**

**Improve land use through higher net densities.**



## Conclusion

Property Industry Ireland believe that the introduction of new National Housing Design Standards based on a critical examination of our quantitative development standards is required. The application of qualitative standards in relation to holistic site wide private open space, functional public open space provision and separation distances between rear first floor windows can have significant positive impacts on the ability to create compact residential developments and to improve the affordability and supply of quality accommodation into the Irish housing system.

By adapting housing design standards there will be a number of benefits:



**It will allow a mix of own-door units that do not require the inclusion of apartments. This will aid viability and delivery, particularly in sub-urban locations.**



**A housing scheme built under the proposed design guidelines will have more private open space than a scheme under the current guidelines.**



**There will be better use of public open space.**



**Density will improve, increasing from approx. 32 houses per hectare to 50 houses per hectare without constructing duplex or apartments. This represents a 25% increase in number of houses on a site – all of which are own-door.**



**Analysis has shown that the proposed standards will allow the delivery of homes that are more affordable for buyers<sup>1</sup>.**

# Scheme Layout Comparison





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