



Statement on Housing Mix

Proposed Residential Development at Scholarstown House, Scholarstown Road, Dublin 16.

Client: Emmaville Limited

May 2023

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Introduction

1.1 Report Context

This updated report has been updated by HW Planning on behalf of Emmaville Limited in response to RFI item no. 4 of a planning application for the construction of 70 no. apartment units and the retention/conversion of the existing Scholarstown House to provide 2 no. residential units, demolition of existing sheds to the rear, landscaping and all ancillary site development works at Scholarstown House, Scholarstown Road, Dublin 16. This housing mix statement should be read in conjunction with the enclosed site layout plan, house type plans and schedule of accommodation prepared by C+W O'Brien Architects which accompany this application.

H1 Objective 12 of the South Dublin Development Plan 2022 - 2028 states that applications for multi-unit residential developments shall provide a minimum of 30% 3-bedroom units, but a lesser provision may be acceptable where it can be demonstrated that:

- *'there are unique site constraints that would prevent such provision; or*
- *that the proposed housing mix meets the specific demand required in an area, having regard to the prevailing housing type within a 10-minute walk of the site and to the socio-economic, population and housing data set out in the Housing Strategy and Interim HNDA; or*
- *the scheme is a social and / or affordable housing scheme.'*

This housing mix statement demonstrates that a lesser provision of 13.5% is appropriate in this instance based on the specific housing demand in the area.

The structure of this statement includes the following dedicated sections:

- Proposed Development.
- Policy Context.
- Assessment.
- Conclusion.

It concludes that the proposed scheme has considered and fully complies with relevant national and local policy and guidance.

Proposed Development

The subject site of c. 0.79 hectares in area is situated on the junction of Scholarstown Road and Orlagh Grove in Dublin 16, c.350m from the M50 motorway. The site contains Scholarstown House, a detached three-bay, two-storey house, which is a protected structure (RPS ref. 322) and also listed on the National Inventory of Architectural Heritage (NIAH). The area is well provided for in terms of residential services and amenities, with St Colmcille's Community School to the east and a range of local shops and services to the south.

Following an assessment of the evolving local housing market and engagement with local auctioneers, it is recognised that a development providing for 13.5% of 3-bed units would better respond to the local housing demand in the Scholarstown area and also provide a more diverse development, positively contributing to a greater housing mix which is consistent with the aim of H1 Objective 12 of the South Dublin County Development Plan. This is a view which was also accepted by the Planning Authority during discussions had at S.247 pre-application stage.

2.1 Housing Mix

Proposed Development

The following table provides a breakdown of the proposed housing mix. As referenced previously, the consideration of housing mix has been advanced on the basis of auctioneer feedback, local demand, the salability of units and the viability of their construction. The scheme comprises the development of 10 no. 3 bedroom units alongside 31 no. 2 bedroom units and 30 no. 1 bedroom units.

No. Bedrooms	Proposed Development	Mix %
1	30	42%
2	32	44%
3	10	14%
Totals	76	100%

Table 01: Breakdown of Proposed Housing Mix

A key objective of the proposed development is to provide a variety in housing scales across the site. Following feedback from local auctioneers¹ it has been established that

¹ Refer to accompanying letter prepared by CBRE, Valuer & Property Consultant which accompanies this Statement of Housing Mix

the provision of 30% of 3 bedroom dwellings at the site, would be in excess of the local market demand for such units and result in issues of salability. The proposed reduced number of 3 bedroom dwellings at the site represents a more appropriate development responsive to the specific and evolving housing market in Scholarstown.

Despite the market analysis indicating that there is limited demographic justification for 3 bedroom or larger dwellings in this area, the proposed development retains a strong proportion of 3 bedroom units in view of the residual impact of the Covid-19 pandemic on market demand, reflecting units with the benefit of extra room space that can cater for home working. These units have been designed for flexible use reflective of current demand for home working environments.

Policy Context

3.1 National Planning Framework (NPF)

Section 6.5 of the NPF identifies the need to effectively reconcile future housing requirements with demand in local areas and increase supply. This is formalized under National Policy Objective 37 which requires each Local Authority Area to undertake a 'Housing Need Demand Assessment' to provide robust evidence to support decisions about housing supply:

"A 'Housing Need Demand Assessment' (HNDA) is to be undertaken for each Local Authority Area in order to correlate and accurately align future housing requirements".

3.2 South Dublin County Development Plan 2022 – 2028 (CDP)

It is the policy of the Council to improve a balanced range of dwelling type and sizes throughout South County Dublin. Specifically, Objective H1 Objective 12 of the CDP provides for the following:

- *'Proposals for residential development shall provide a minimum of 30% 3-bedroom units, a lesser provision may be acceptable where it can be demonstrated that:*
- *there are unique site constraints that would prevent such provision; or*
- *that the proposed housing mix meets the specific demand required in an area, having regard to the prevailing housing type within a 10-minute walk of the site and to the socio-economic, population and housing data set out in the Housing Strategy and Interim HNDA; or*
- *the scheme is a social and / or affordable housing scheme.'*

Appendix 11 of the CDP includes the South Dublin County's Housing Strategy and Interim Housing Need and Demand Assessment (HNDA) 2022-2028. It should be noted that this HNDA has been prepared using the 2016 Census data due to the delay in the CSO progressing a new Census in light of the Covid-19 Pandemic. A new Census was carried out in 2022, however only limited data is currently available. Based on the quantum of extant planning permissions for one and two-bedroom units, the HNDA recognises the need to provide more family type housing within new apartments, especially in regeneration areas².

The HNDA notes that a future downward trend in household size is considered appropriate in South Dublin as the population becomes more urban.

² The subject site is not located in a defined regeneration area.

Assessment

4.1 Compliance with Policy

National policy in the form of the NPF recognizes that local housing markets are complex, and that related demand varies from place to place reflecting the nuances of such areas. It is critical that the provision of new homes is tailored to meet local demand. A failure to do so will result in provision of inappropriate types of housing stock and an ineffective use of development land. This is reflected in the national policy objective requirement for local planning authorities to prepare a '*Housing Need Demand Assessment*' to provide robust evidence to support decisions about housing supply.

Furthermore, ministerial guidance in the form of the 'Sustainable Urban Housing: Design Standards for New Apartments' acknowledge that statutory development plans have full discretion to address different housing needs in different urban areas, but that it has become a standard practice for some to specify an across-the-board mix of unit types/sizes in policy objectives. The guidelines recognize the need for greater flexibility in approach.

While South Dublin County Development Plan includes a Housing Strategy and Interim Housing Need and Demand Assessment (HNDA) 2022-2028, these did not have the benefit of the 2022 Census data and are therefore based on 2016 data, which is 6 years out of date, this is discussed in detail below.

Future trends in housing requirements are influenced by market dynamics and demographic demand. The following sections of this statement review these salient characteristics of the local housing market.

4.2 Demographic Analysis

Methodology

This report focuses on the Census Small Areas (SAs) that overlap a 1 kilometre offset (c. 10-12 minutes walking) of the subject site which encompasses 64 no. Small Areas (SAs). These are listed in Appendix 1 and included in Figure 03. The site is located in Small Area No. 267085008.

Census data for each of these aggregated SAs was reviewed to inform this assessment and is compared with National and County averages across a number of data sets.

This unit mix rationale primarily relies upon a review of data on:

- Population trends;
- Population by age cohort and household composition;
- Existing and permitted housing stock.

4.3 Population Trends

Migration

The HNDA in Appendix 11 of the CDP sets out to provide an evidence-based analysis of demographic and housing data trends, and a statistical estimate of all current and future housing needs in terms of types and sizes which are reflective of the current local context. However, the timing of the delayed 2022 census has resulted in the HNDA being based on 2016 Census data rather than 2021 Census data. Unfortunately, the preliminary 2022 Census figures, published by the CSO in June 2022, have not been taken into consideration in the HNDA, it being a document that was prepared prior the availability of this data.

Significant changes have occurred in the County Dublin population in the 2016 – 2022 intercensal period. Table 12 of the HNDA indicates that between 2011 and 2016 the population of County Dublin rose by 74, 290 persons, which was accounted for by an 87% natural increase and only 13% by migration. However, based on the preliminary Census 2022 figures (ref. Table 02), the rate of population growth in Dublin was much greater at 103,342 persons, with migration accounting for 45%. It is reasonably assumed that this trend has to some extent been reflected in South County Dublin.

Statistic	Persons	%
Population 2016	1,347,359	
Population 2022	1,450,701	
Change in population since previous census	103,342	
Natural increase	56,783	55%
Estimated net migration	46,559	45%

Table 02 – Preliminary 2022 Census Figures (CSO June 2022)

This dramatic alteration in the migration component that underpinned the population growth directly impacts trends predicted in the HNDA and the consequent conclusions of the future housing mix requirement.

The CSO notes that almost two thirds of all non-Irish immigrants in 2016 were between the ages of 20 and 34, while 67.7 per cent were single and 27.9 per cent were married. Overall, only 21% had children. The implications of this are evident in Table 03.

Area	% Population over 15 Years who are Single
Non-Irish Migrants	68%
State	41%
South Dublin	42%
County Dublin	46%

Table 03 – 2016 Census Figures – Marital Status of Over 15 Year Olds

It can be seen that the average number of single adults in South Dublin in 2016 was 42%, significantly lower than that of the 67.7% non-Irish migrant population, who are largely single and represent an increasingly significant element in the population growth profile of Dublin.

This dramatic increase in the cohort of young single adults with no children has not been predicted in the HNDA and therefore has not been catered for. As Figure 1 indicates the population pyramid that the HDNA was based on shows a marked decline in the South Dublin Area between 2006 and 2016 of persons between the ages of 20 and 34. However, this is the exact age cohort that equates to the majority of the immigrant component of the population that has experienced significant growth in 2022.

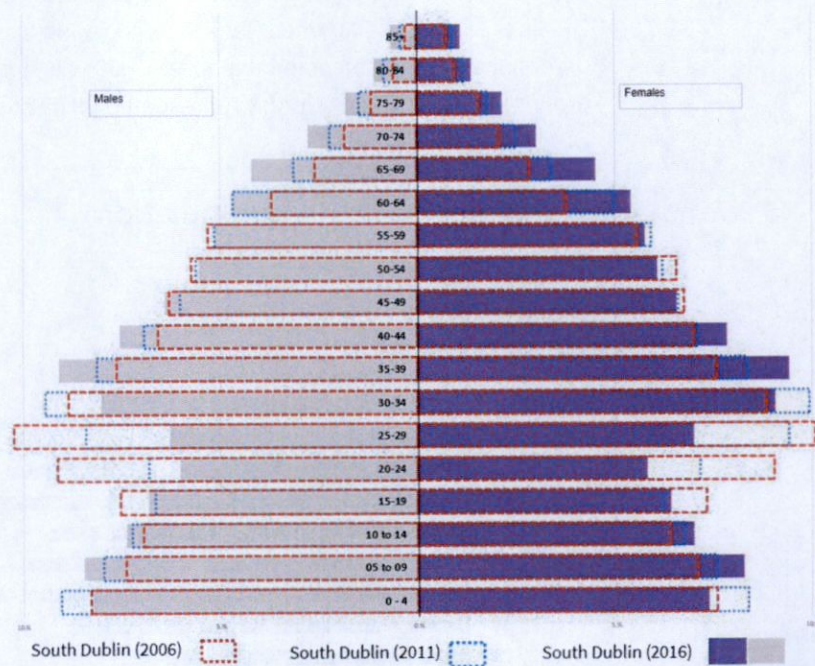


Figure 01 - Population Pyramid comparison in South Dublin for 2006 – 2016 (Based on Figure 6 of HNDA)

4.4 Age Cohort & Household Composition

South Dublin

In general, it can be noted from Figure 01 that in South Dublin, between 2006 and 2016 there was an increase in the population aged between 35 and 44 and an associated increase in children between the ages of 5 and 9 years. The HNDA concludes, based on 2016 Census figures, that in South Dublin the early school and pre-adolescent family group percentage was higher than that in Dublin, EMRA and the State.

In addition, Section 6.3 of the HNDA notes that:

'The Census 2016 results specify South Dublin's average household size to be 2.99. This is higher than the state figure of 2.75. The previous Regional Planning Guidelines, 2010, suggest that by 2022, average household size would be 2.24 providing a 2016 figure of 2.49 for South Dublin. This household formation has not taken place.'

The increase in family groups with early school and pre-adolescent and the relatively large household size has led to the HNDA specifically identifying the need for accommodation for young families and children in the County, resulting in such

policy objectives as H1 Objective 12 of the CDP, which sets out to establish a minimum of 30% 3-bedroom units, unless a reduction can be justified.

We note however, that the HNDA acknowledges that a future downward trend in household size is considered appropriate in South Dublin as the population becomes more urban.

Study Area

Figure 02 demonstrates that the age profile of the population within 1km of the subject site, based on 2016 Census Small Areas, is relatively evenly distributed across age cohorts between 0- 4 and 55-59, with the exception of the 25 – 29 age cohort. This population age distribution is in marked contrast to the aggregated data for the South Dublin area (Figure 01), where families with young to adolescent aged children predominate. It can be noted that the 15 – 29 year age groups and the over 50 year age groups are much more strongly represented in the study area population than in South Dublin as a whole.

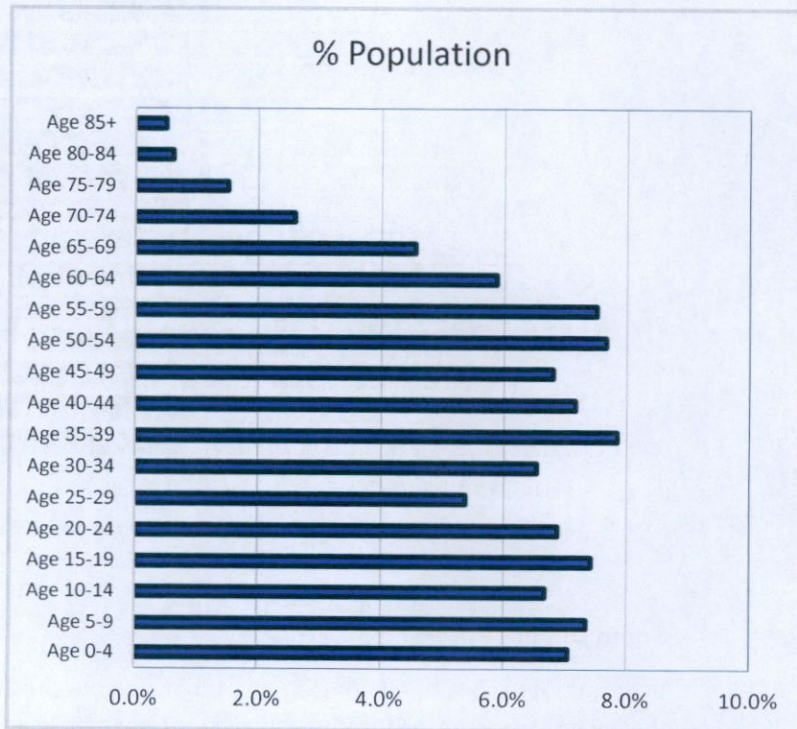


Figure 02 – Bar Chart of 2016 Census Small Area Population within 1km of Subject Site

Family Cycle

In Table 4, the family cycle classified as 'adult' is where the oldest child in the household is aged 20 years and over. With 31% of the households in the study area having adult children still living at home, this corresponds with national data that shows a trend towards more working adults continuing to live in the family home. However, it should be noted that in the study area the figure for this category is 5% higher than for County Dublin. Conversely, the number of pre-family households, generally indicating younger adults living away from home, is lower than the Dublin County average, again by 5%. Both of these linked statistics can be attributed to the difficulty in securing appropriate one and two bedroom housing due to lack of supply, and the resultant lack of affordability. While these are national trends, they appear more pronounced in the study area.

Family Cycle	Dublin County	Study Area
Pre-Family	13%	8%
Empty Nest	8%	10%
Retired	10%	9%
Pre-school	11%	10%
Early school	11%	11%
Pre-adolescent	10%	10%
Adolescent	11%	12%
Adult	26%	31%

Table 04 – 2016 Census Figures Family Cycle

The Central Bank of Ireland's 2019 publication 'Population Change and Housing Demand in Ireland', identifies this trend in relation to a declining headship rate, which is the proportion of individuals in an age cohort that list themselves in the census as 'head of household'. Recent trends show younger age cohorts are delaying new household formation. The report states:

"...the younger 25-29 and 30-34 age cohorts recorded the largest declines in headship, reversing the upward trend in headship rates for these groups evident up to Census 2011 (see Byrne et al., 2014). The fall in headship in the 2016 Census is consistent with individuals in these younger age cohort delaying the formation of independent households by remaining in the family home or continuing to live in multi-person households for longer than at the time of Census 2011.

The collective analysis appears to identify that undersupply of housing and lack of affordable units for sale and rental accommodation is having a marked impact on the capacity of young people, including working adults, to move outside the family home.

4.5 Existing & Permitted Housing Stock

Existing Housing Stock

In the 2016 Census the number of rooms in all occupied dwellings was captured (excluding circulation spaces, bathrooms and storage rooms). For example, a studio apartment/bedsit would have 1 room, a 1 bedroom apartment could have 2-3 rooms,

and a 2 bedroom apartment could have 3-4 rooms. In Table 04 we have juxtaposed the household size figures for the study area, South Dublin and County Dublin with the number of rooms per dwelling in each. It can be seen that the number of 1 and 2 person households in the study area is less than in South Dublin and County Dublin, significantly so in the case of 1 person households. Alongside this the number of dwellings with 1-4 rooms in the study area is also less than the South Dublin and County Dublin figures.

Conversely, there are more 4-5 person households in the study area than in either South Dublin or the County. There are also more larger dwellings with 6 rooms or more. This would appear to indicate a trend where there is under-provision in the study area, and to a lesser extent in South Dublin, of smaller housing units, resulting in an under-representation of small 1 – 2 person households.

These statistics are shown graphically in the map series depicted in Figure 03. This demonstrates that within 1km of the study area there are very few Census Small Areas where 2 room dwellings occur, with the exception of the existing apartment development located to the north of Scholarstown Road and the White Pines development to the south of the M50. The pattern is similar for 3 room dwellings, with increased numbers of units located in the same locations. There appears to be relatively few 4 room dwellings. However, there is a significant number of 5 and 6 room dwellings in the study area.

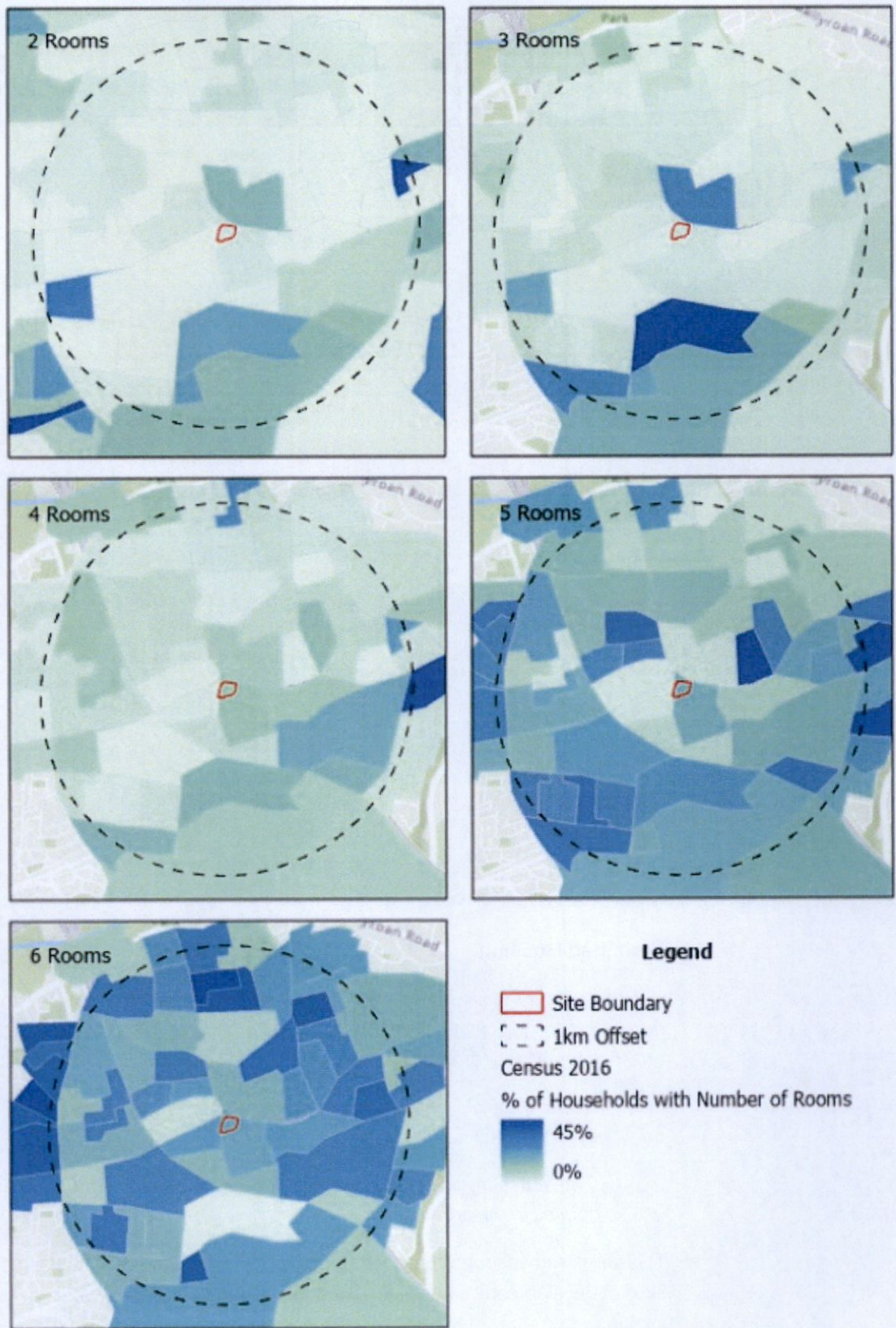


Figure 03 – Maps Showing % of Dwelling by Number of Rooms within 1km of Subject Site (from 2016 Census Small Area Population)

Type of Households	Study Area	South Dublin	County Dublin	Households Dwelling Size	Study Area ³	South Dublin	County Dublin
1 person households	14%	17%	23%	1 room dwelling	0%	3%	3%
2 person households	26%	27%	30%	2 room dwelling	2%	4%	9%
3 person households	19%	20%	18%	3 room dwelling	6 (9)%	6%	14%
4 person households	24%	20%	16%	4 room dwelling	7 (10)%	9%	13%
5 person households	13%	10%	8%	5 room dwelling	20 (19)%	15%	21%
6 person households	3%	4%	3%	6 room dwelling	24%	14%	15%
7 person households	1%	1%	1%	7 room dwelling	21%	15%	9%
8 or more persons households	0%	1%	0%	8 or more room dwelling	18%	27%	9%
Not stated					3%	7%	7%

Table 05 – 2016 Census Figures Household Size and Number of Rooms Including the Number of Rooms Proposed as Part of Two Oaks Development (see brackets to show increase in %)

Permitted Housing

Ardstone Homes was granted permission for the strategic Housing Development of 594 no. residential units to the north of Scholarstown Road (ABP-304381-19). The unit mix provided for 9% 3 bedroom units.

In the An Bord Pleanála Inspector's Report (24th June 2019), the Council's Submission is noted as stating that:

'The house mix is acceptable given the predominance of three bedroom houses in the area already.'

This tallies with feedback received from the Council at the pre-planning meeting for the subject development, namely that a reduction in the 30% figure would be justified at this location.

³ Figures in brackets ()% reflect the change in number of rooms per dwelling when compared to the 2016 Census which is the most up to date data available for this assessment given the 2022 Census data in this regard has not been published at the time of updating this report.

	Apartments of % of Housing Stock
Dublin City	38%
Dún Laoghaire-Rathdown	24%
Fingal	19%
South Dublin	15%

Table 06 – Apartments as Percentage of Existing Housing Stock (CSO 2016)

As identified in Table 06, apartments account for only 15% of the total housing stock in South Dublin, with the remaining 85% comprising houses. Apartment development in this area is below that in all the other Local Authority areas in County Dublin. It is considered therefore that there is a need for the type of apartment development that can accommodate the levels of population growth occurring in expanding suburban areas such as the subject site in accessible locations close to the Dublin City Centre.

Despite the overall increase in the number of apartment-type developments on a national level as a proportion of the dwelling completions, from 15% in 2017 to 25% in 2021, the proportion of apartments still remains well below that of traditional housing types.

While County Dublin in general accounted for the largest proportion of apartment units (75.2%) completed in Q4 of 2021, this does not address the shortfall of apartment completions in recent years required to address the clear demand for this type of accommodation.

4.6 Housing Market Analysis

Affordability and Availability

The Daft.ie 2021 Q4 Rental Report highlights that the most acute shortages of housing in Ireland are for housing in or close to the main cities, and for smaller households (of one- to two-persons). Rent pressure is a direct result of supply deficit.

In the Dublin 16 area, where the proposed development is located, the 2022 Q2 report prepared by Daft.ie indicates the average rental price for 1-bedroom and 2-bedroom properties stands at €1,440 and (6.6% quarterly increase) and €1,741 per month respectively. However, there were just 292 homes listed for rent in the entire Dublin market on August 1st 2022, one fifth of the average level for the same date in 2015-2019 and the lowest level of availability in August going back to 2006.

The CSO house price data for Dublin 16 as of July 2022 indicates that the median price for properties in this Eircode Routing Key is €560,000, significantly over the national median price of €295,000 and above the South Dublin price of €380,000. From Figure 04 it is evident that since 2020, the element of the housing market accounted for by new dwellings has considerably declined.

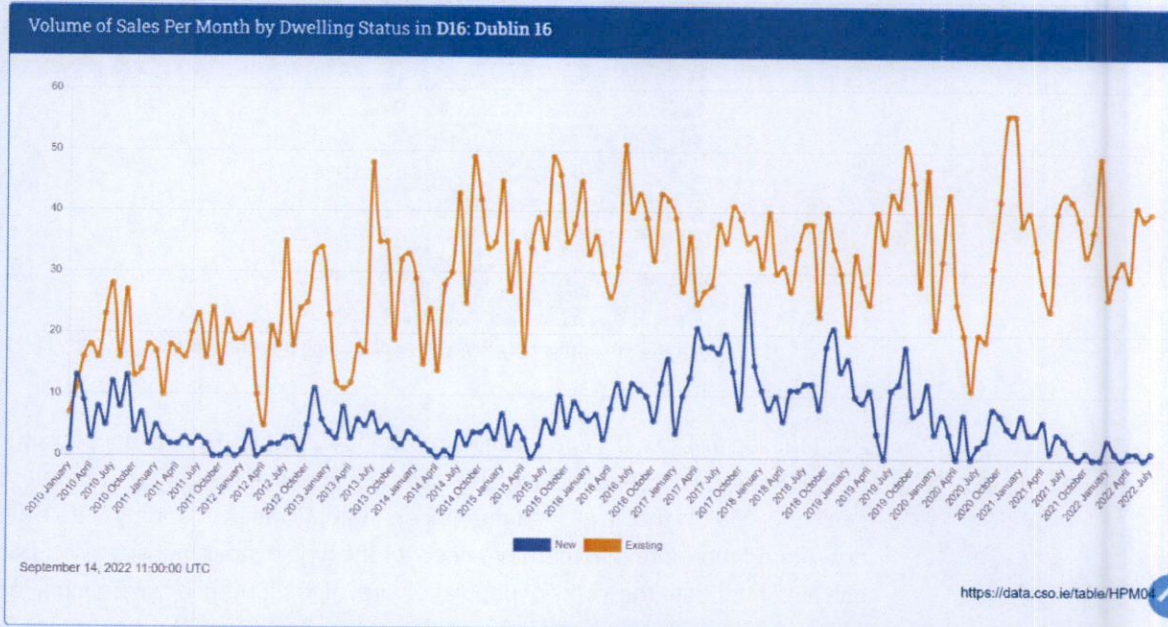


Figure 04 – CSO Housing Data - July 2022 – Volume of Sales by Dwelling Status.

The Central Bank's Loan to Income (LTI) requirements act as a mortgage constraint, particularly on young first-time house buyers. The combination of the cost of starter homes and these LTI requirements have caused an affordability wedge, with greater competition for a finite supply of urban housing. This has led to higher prices for both for sale and rental stock, which has made traditional options unaffordable for many cohorts, particularly younger occupants. Housing schemes such as the proposed development can enable single and young adults to enter into the property market, in addition to those looking to down-size.

Following feedback from CBRE, Valuer & Property Consultants, it has been established that the provision of 30% of 3 bedroom dwellings at the site would be in excess of the local market demand requirement at the subject location. (refer to accompanying letter prepared by CBRE in Appendix A).

Conclusions

5.1 Summary

The statement on housing mix has been prepared in relation to a proposed housing development at Scholarstown House, Scholarstown Road, Dublin 16.

H1 Objective 12 of the South Dublin Development Plan 2022 - 2028 states that applications for multi-unit residential developments shall provide a minimum of 30% 3-bedroom units, however the Council will have regard to the prevailing housing type within a 10-minute walk of the site. This document concludes that a lesser provision of 13.5% of 3-bedroom units is compliant with this objective. This is in view of the specific housing demand in the area as outlined in the accompanying letter prepared by CBRE, Valuer & Property Consultants, and having regard to the prevailing housing type within a 10-minute walk of the site and to the most recent CSO population and housing data.

Preliminary Census 2022 figures indicate that a significant proportion of the intercensal population growth in Dublin is attributed to an increased number of non-Irish migrants, who the CSO noted to be generally between the ages of 20 and 34, predominantly single, with no children. This dramatic increase in the cohort of young adults with no children has not been predicted in the Council's HNDA, which was based on the 2016 Census data and therefore has not been catered for in policy H1 Objective 12.

Notwithstanding the above, the assessment of the population within 1km of the subject site indicates that the population in the study area has a more balanced distribution across all age cohorts in comparison to the South Dublin population pyramid which indicates an increase in the population aged between 35 and 44 and an associated increase in children between the ages of 5 and 9 years. In the subject area there are more adult children living at home than in the wider administrative area. This trend is also evident in the smaller number of 1 and 2 person households in the area. An examination of the housing size in the immediate study area shows that the vast majority of the dwellings are larger houses comprising 3 bedrooms and above.

The limitations of the existing housing mix are reflected in the fact that South Dublin has the lowest percentage of apartments in all of the Dublin Council areas, with the housing comprising predominantly larger houses. This is exacerbated in the study area, which falls within Eircode Routing Key where there is a dearth of new houses on the market since 2020 and the median house price in July 2022 is €560,000, significantly over the national median price of €295,000 and above the South Dublin price of €380,000.

In this context, the proposed scheme mix, by delivering predominantly 1 and 2 bedroom units will positively contribute to the specific housing demand of the Scholarstown area and assist the entry of first time buyers and smaller family units into the property market, as well those wishing to downsize from larger family units even when the Two Oaks development which is under construction adjacent to the site, is taken into consideration.

Appendix A:

Letter from CBRE on Local Housing Market