



YOU'RE NOT ALONE

ALONE Submission on Exempted Development
Provisions in Relation to Older People
Department of Housing

26 August 2025



ALONE is a national organisation which enables older people to age at home. ALONE welcome the opportunity to provide a submission to the Department on the current 'exempted development' provisions. We are pleased to have coordinated our response with Threshold, the organisation preventing homelessness by providing free expert advice to people in housing difficulty and campaigning for a fairer housing system.

Last year, ALONE supported almost 44,000 older people across all our services. Of these, almost one third experienced housing difficulties, with the majority requiring support to adapt their homes to remain accessible to them.

ALONE welcome consideration of proposals for exempted development relating to detached habitable accommodation and subdivision of dwellings. We suggest exploring ways that measures could further support a range of housing options for older people, while also addressing the wider, systemic challenges in housing and care access. Specifically, ALONE calls for:

- 123,000 additional smaller units by 2040 as part of overall housing stock.
- 82,500 social housing units built to Universal Design standards for older people by 2040 – 25% of the 330,000 that are needed.
- 17,215 supportive housing units, 5,656 co-housing and retirement village units, and 1,721 housing with support units to be delivered by 2040 (See <https://alone.ie/library/policies-for-ageing-well-at-home-in-ireland/> for more details).

Providing a greater choice of housing options would enable older people who wish to rightsize to do so while maintaining their quality of life.

While we recognise that dwellings created under exempted development provisions offer a helpful solution for some households, we are concerned that, for others, unrestricted use of garden dwellings could result in a long-term reduction in living standards, rather than serving as a short- or medium-term solution. As we age, we often require enhanced accessibility of our homes, additional design features, and additional space, if those homes are to be appropriate to enable ageing in place. **For these reasons, we present the following recommendations, which we believe should be prioritised ahead of any additions to exempted development provisions. Implementing these measures would enhance this policy change and help mitigate potential adverse impacts on older people.**

- **Develop and implement national safeguarding legislation:** At present, there is no national adult safeguarding legislation. It is ALONE's concern that older adults may be at added risk of financial abuse or coercion by family members as a result of the proposed exempted development provisions. While we welcome that new elder abuse laws and the national policy on adult safeguarding are at "an advanced stage", it is crucial that development exemptions do not come into place before the relevant safeguarding legislation is progressed by the Department of Health. It is also vital that older people are provided with access to organisations which can provide advocacy, advice and support for an older person who is at risk of experiencing abuse or coercion, and that these organisations are adequately signposted and resourced.

- Provide examples of unit ‘types’ to inform safe and sustainable development:** Provision of design templates for the purposes of constructing detached habitable accommodation suitable for older persons, which meet accessibility requirements and are within the maximum size guidelines, would better enable households and suppliers to develop and provide units which meet the needs of older people. As planning permission will not be required for such units there is an associated risk of poor-quality developments. It is our belief that the development of such templates should be the responsibility of the Department of Housing. Important features when designing housing for older people include nonslip floor surfaces; adequate storage for walking aids, wheelchair etc; widened doorways; bathroom aids (such as a walk in shower, grab rails, toilet adaptations); and ramps. Other features include alarm and surveillance systems, outside lights and intercoms (see ‘Housing for Older People – Thinking Ahead’, published by the Housing Agency in 2016). Design templates for units which provide these features at different sizes, within the maximum size guidelines are vital to show that it is possible to provide such units, while also providing acceptable living and accessibility standards. This will also support suppliers to ensure that units of this nature are made available to older people.

In implementing this policy change, we also believe these areas should also be considered:

- Communication:** We encourage the Department and Government representatives to present the proposals for exempted development related to detached habitable accommodation and subdivision of dwellings as one of several approaches to addressing the current housing and care challenges faced by older people. Other housing options, including Housing with Support, also offer important and potentially more sustainable long-term solutions.
- Minimum standards:** In the case of subdivision of units, it is vital that minimum building standards are enforced, as outlined in Appendix 1 to the consultation and consisting of parts A-M of the building regulations. ALONE agrees with the position set out by Threshold, whereby minimum internal space standards should be introduced and enforced for all detached habitable dwellings; that units must comply fully with the Housing (Standards for Rented Houses) Regulations 2019 where they enter the private rental market; and that informal licence agreements should be prohibited in fully self-contained units. In ALONE’s view, it is particularly important that the position in relation to licenses is established, given rising numbers of older renters who may be at risk of living long-term as licensees in unsuitable garden accommodation.
- Adaptability:** The Department should establish and set out that the Housing (Adaptation Grants for Older People and Disabled People) Regulations 2024 pertain to detached habitable dwellings to avoid uncertainty on this matter. In addition, it would be helpful if the Department could consider the impact of Local Authorities providing housing adaptation grants more than once to the same person or household, on the basis that they have moved from a larger, adapted home, to detached habitable accommodation. The ramifications of this may include additional demand for housing adaptation grants. This policy could be strengthened if the Department outlines guidance for Local Authorities for situations where

an older person who has previously received a grant moves to detached habitable accommodation, ensuring that they can access the grants on the same basis as any other applicant.

- **Transparency:** The challenges posed by additional pressure on local amenities and resources caused by the addition of detached habitable dwellings may need to be addressed. A registration requirement for homeowners who are developing a detached habitable dwelling would provide opportunities for Local Authorities to have visibility of new developments, and support better planning of local amenities. This would also provide an opportunity for the homeowner to be provided with relevant information and materials on advocacy organisations, and design templates for units.
- **Measurement of new home completions:** New completions are measured by proxy of ESB domestic connections. The CSO states that it is accepted that this dataset overestimates new dwellings. It is important that measurement of new home completions differentiates between those that are new builds and those are detached habitable dwellings, and the Department could work with the ESB to ensure that this will be the case, to avoid overestimation of new home completions.