PRIVATE AND PUBLIC HOUSING SUPPLY REPORT

July 2016



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1. Introduction

The challenges facing housing supply - both nationally and locally - are complex and varied and interlinked. The overall issue of supply in the housing market is caused by issues in both the private market and social and public housing. Issues of raising adequate capital for the private sector, raising mortgages for individuals, particular issues of affordability in Dun Laoghaire Rathdown, inadequate supply in the rental market and delivery in the provision of social housing all contribute to the situation.

This report is a high-level synopsis of the existing state-of-play vis-á-vis housing supply within the County generally and progress of delivery of public housing. It will put forward some measures which enable the Planning Authority to respond to expedite development and will also set out proposals for social and public housing provision. The report is in 2 sections – the first dealing with housing supply within the private sector and the second dealing with public housing provision. There is overlap in the report particularly in terms of Part V provision and infrastructure issues in areas where both the Council and private developers have sites for development.

Part I

Supply by the Private Sector

2. Challenges

DLR is the smallest County in the State at approximately 12,700 hectares which represents only 12% of all lands within the Metropolitan Dublin. DLR's population of 206,000 equates to approximately 16% of the population of the Dublin Metropolitan Area. The Regional Planning Guidelines for the Greater Dublin Area 2010-2022¹ forecasts a population of approximately 240,000 in DLR by 2022.

That 2020 population target is based on the overarching assumption that DLR will maintain **16%** of the population within the Dublin Metropolitan Area (240,000 out of 1,464,200). To achieve this 'target' DLR will have to deliver approximately **3,300 units per annum**. To offer some context, DLR delivered **3,052 units during the peak year of 2007** which equates to just less than 4% of total housing delivered throughout the State. However following the decline in the building sector the number of housing completions in DLR in 2012 was: 175 units, 2013: 260 units, 2014: 713 and 2015: 651² units. This pattern is reflected throughout the Dublin Region and, indeed, the wider State.

¹ The Dublin and Mideast Regional Assembly aim to produce a Regional Spatial and Economic Strategy (RSES) for the Region during the course of 2017. This will include revised population forecasts for DLR. The content, and indeed, the timing of the RSES is largely dependent on the publication of the National Planning Framework (NPF).

² Completion numbers are estimated based in ESB connections data.

In terms of affordability, DLR is historically one of the most expensive parts of Dublin, and indeed the State, in which to purchase a residential unit. Latest figures detail that only **27% of all properties purchased in DLR were below €300,000** which is a significantly lower percentage than other Dublin based Local Authorities of Fingal (69%), Dublin City (63%) and South Dublin (67%)³ (See Appendix 1 Fig.1).

Only 4.5% of properties purchased within the Dublin Region for less than \in 300,000 were located in DLR which is again is considerably lower than Dublin City (27%), Fingal 15% and South Dublin (11%).

The primary challenge facing DLR in terms of housing supply is to maintain 16% of the growth rate within the Dublin Metropolitan Area through increased supply of housing units to circa 3,300 units per annum. By meeting the challenge of increasing supply, the growing affordability issue may also be addressed.

The sections below summarise issues such as Land Availability and Infrastructural Deficits. However, it is important to note at this juncture **that the zoning and servicing of land is not, in and of itself sufficient to restore housing supply to necessary levels**. It will take time for the impact of the recession on the property development and construction sectors to recover.

³ Property Price Register Data from 01/01/2014 - 01/11/2015

3. Land Availability – County Development Plan Core Strategy.

The County Development Plan and specifically the Core Strategy, estimates that there are approximately **640** hectares of **undeveloped zoned land** available for residential development within the County

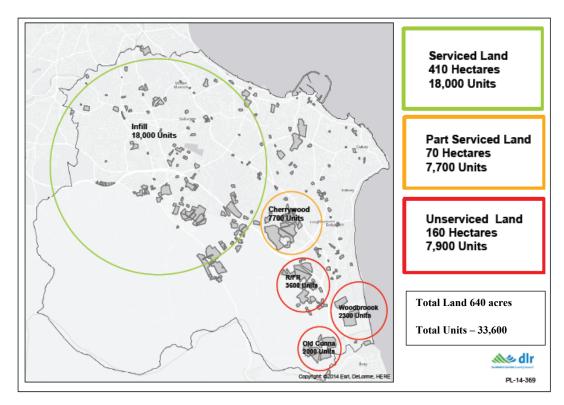
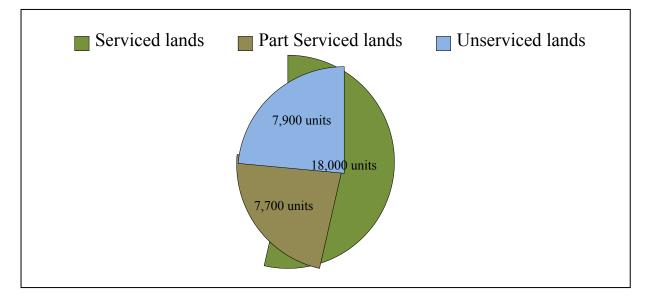


Fig 1 – County Development Plan Core Strategy

It is estimated that this overall quantum of zoned residential land (both serviced and unserviced) has development potential for approximately **33,600 units**. There are three distinct and separate type of lands contained within the DLR Core Strategy:





(i) Serviced Lands

410 hectares of serviced lands which are ready for development and which could potentially deliver approximately **18,000 units.** These lands include areas such as Sandyford, Dundrum, Stepaside/Kiltiernan and indeed all other small scale suburban infill within the County.

(ii) Part Serviced Lands

The Cherrywood area represents the most significant and strategic development node in DLR which includes approximately **70 hectares** with the potential to supply approximately **7,700 units** (See Section 4 (ii) and 7 (vii) for more detail on Cherrywood SDZ).

(iii) Unserviced Lands

Approximately **160 hectares in southern part of the county** with potential to provide for approximately **7,900 units**. These lands include the areas of Woodbrook/Shanganagh, Rathmichael/ Ferndale Road, Old Conna and Little Bray

4. Infrastructural Deficits

The potential delivery of circa 17,000 residential units on residentially zoned lands in the southern part of the County is dependent on the delivery of infrastructure for water and drainage, public transport and roads. The infrastructural deficits within these areas are not insurmountable but will require a significant degree of capital investment and it is hoped that the Governments Local Infrastructure Activation Housing Fund will address with some of the issues

It should be noted that there is an element of repetition within the area-specific sections detailed below as there are overarching infrastructural deficits - such as water supply – that are common to some or all of the priority growth areas.

(i) Kiltieran/Glenamuck (2,500 units)

The Kiltiernan/Glenamuck Local Area Plan (LAP) incorporates a sequencing and phasing arrangement which is heavily reliant on the delivery of the **Glenamuck District Distributor Road Scheme** (GDDRS) (including attenuation pond network). This road scheme is intended to supplement and reinforce the local road network. DLRCC is currently in dialogue with developers/landowners regarding a possible reduction in land acquisition cost for the road corridor but linked to the undergrounding of the high voltage overhead transition lines that traverse the area. Final resolution of the cost of this road and funding for its delivery would release a major new housing area in a 'high demand' part of the Metropolitan area that otherwise has good water and drainage services and established social and community infrastructure.

The **requirement to underground 220KV and 110KV overhead ESB lines** which transverse the Kiltiernan/Glenamuck area is being advanced in conjunction with ESB Networks and Eirgrid. The review of the Section 49 Levy Scheme will take these matters into account and will contribute to the unlocking of the lands.

On a significantly positive note, the **whole area drains to the new Shanganagh WWT facility** which has significant spare treatment capacity - thereby obviating further stress on Ringsend WWT plant.

(ii) Cherrywood (7,700 units)

The SDZ Planning Scheme incorporates a comprehensive sequencing and phasing arrangement which links overall quantum of development in the 1st/2nd/3rd Growth Areas of the scheme with delivery of specific internal roads, water services and community infrastructure.

It is acknowledged that a suite of infrastructure and services are required to deliver the full development of the Planning Scheme. The cost of Strategic Common Infrastructure cannot be borne solely by the landowners and options on how best to secure funding of strategic infrastructure is currently being examined in conjunction with relevant stakeholders. An informed cost estimate for the delivery of Common Infrastructure will be in excess of \notin 100,000,000 for construction. Commensurate delivery of local 'internal' infrastructure is to be provided by developers/landowners.

An additional Section 49 Levy Scheme for Cherrywood is being developed and will be presented in September which will bring certainty to the landowners. In the meantime recent legislative changes with regard to SDZs have been introduced. The Development Agency is currently assessing the interpretation of the Planning and Development (Amendment) Bill 2015 and the New Apartment Guidelines with regard to an Amendment to the Scheme.

In terms of hard infrastructure, Irish Water (IW) completed a Strategic Study in 2015 to determine medium-to-longer term water and wastewater network plans and shorter-term phasing options for the development of the South Dún Laoghaire-Rathdown/North Wicklow area - including Cherrywood. The recently published IW Capital Investment Programme (2017-2021) includes **commitment to the Old Conna/Woodbrook Water and Drainage Schemes** which will help unlock the full development potential of the Cherrywood /South DLR/North Wicklow area and so optimise the use of the significant spare treatment capacity available at the recently commissioned Shanganagh WWT plant.

(iii) Woodbrook/Shanganagh (2,000 - 3,000 units)

The Southern part of the County – inclusive of Woodbrook/Shanganagh and adjoining areas in North Wicklow has a **major water supply deficit** There are proposals - the Old Conna/Woodbrook Water Supply Scheme and the Old Conna/Woodbrook Sewerage Network Scheme (which will drain to the new Shanganagh WWT facility) to 'unlock' development lands not only in Woodbrook / Shanganagh but also in Old Conna and the major development node in Fassaroe (north Wicklow). However, **these lands still remain unserviced in terms of adequate water and drainage** infrastructure.

The recently published IW CIP (2017-2022) includes commitment to the implementation of the Old Conna / Woodbrook Water and Drainage Schemes which will unlock the development potential of the South DLR/North Wicklow area and so optimise the significant spare treatment capacity available at the recently commissioned Shanganagh WWT plant.

The sequencing and phasing arrangements of the Woodbrook/Shanganagh LAP (due to expire this November with a new LAP to being developed currently) **requires the delivery of a new DART station at Woodbrook** (mid-way between Bray and Shankill). The NTA's Transport Strategy 2016-2035 includes the provision of a rail station at Woodbrook.

In terms of roads infrastructure, there are localised improvements/upgrades required to **the Dublin Road Corridor between Wilford Interchange and the Woodbrook/Shanganagh LAP lands** which will be informed by the outcome of the TII's on-going South-East Corridor Study.

(iv) Old Conna/Rathmichael (5,600 units)

The Southern part of the County – inclusive of Old Conna/Rathmichael and adjoining areas in North Wicklow have **major water supply and drainage deficit**. These lands will also be serviced as part of the recently published IW CIP (2017-2022) which **includes commitment to the implementation of the Old Conna** / Woodbrook Water and Drainage Schemes which will unlock the development potential of the South DLR/North Wicklow area.

In terms of public transport, the Old Conna area is ultimately to be served by an extension of the Luas Line B2 from Cherrywood- to-Bray Environs. However, while awaiting funding for this project the NTA have committed to assessing interim bus-based or alternative sustainable public transport-based travel solutions to serve the area.

In relation to roads infrastructure, the NTA/TII will investigate the potential **upgrading the Wilford Interchange** to provide improved connectivity to lands west of M11 corridor – including Old Conna. Any such improvements will be informed by the outcome of TII's ongoing South East Corridor Study. In addition, there are **substantial local road network upgrades necessary** to facilitate any significant development investment by landowners/developers.

5. Housing Supply Performance Indicators

The primary 'performance' indicator available to assess the issue of housing supply is the Dublin Housing Supply Coordination Taskforce (DHSCT) data - of which DLR contributes on a quarterly basis. The Taskforce was set up as an Action under 'Construction 2020' with an immediate focus on monitoring trends in the supply of viable and market-ready approved developments and responding to those trends where supply is believed to be below what is required.

It should be noted that the potential for growth rates within DLR is somewhat limited in comparison to the other Dublin Local Authorities due to:

- a) The County is geographically and spatially relatively small in comparison to South Dublin, Dublin City and Fingal.
- b) Land costs and residential unit prices have been historically, and remain currently, significantly higher in DLR than South Dublin, Fingal and large areas within Dublin City.
- c) The fine urban grain of the existing built-up area translates into a higher than average proportion of developments between 4-9 units which are not included for calculation purposes in the Household Taskforce data. The data utilised within the Household Taskforce is limited to capturing developments with planning permission for 10 or more units.
- d) infrastructural constraints and phasing agreements as outlined above in 'Infrastructural Deficits' Section

(i) Analysis of Q1 2016 data

DLR	10+ Sites with PP	Active Sites	Inactive Sites
Q1 2016	62 Sites – 6366 Units	34 – 4176 Units	28 – 2190 Units
Q1 2015	50 Sites – 5701 Units	17	34

There are currently 62 sites in DLR with planning permission for 10+ residential units. This represents a **24% increase** on the 50 sites with planning permission in Q1 2015. In terms of construction activity, there are 34 'Active' sites and 28 'Inactive' sites

(ii) Analysis of Active Sites Q1 2016

An active site us one which has a commencement notice. 34 Active sites with planning permission for 4,176 units. As a snapshot in time, there were 1,921 units out of the 4,176 under construction at the end of Q1. This equates to 46% of units on Active sites being under construction.

The number of active sites has effectively doubled since Q1 2015 when there were 17 to 34 no. in Q1 2016. **This represents a 100% increase in Active Sites over a 12 month time period**. Even from a relatively small baseline of 17 Active sites, the speed and volume of growth is considered exceptional by normal standards. *(See Appendix 1 Fig 16)*

(iii) Analysis of Inactive Sites Q1 2016

28 Inactive sites with planning permission for 2,190 units. The number of Inactive sites is, however, decreasing quarter-on-quarter with 34 recorded in Q1 2015 and 28 recorded in Q1 2016. This represents a c18% decrease in Inactive Sites. (See Appendix 1 Fig 17)

(iv) Analysis of Applications within the Planning System Q1 2016

This category refers to planning applications which are **awaiting a final decision** from either DLR or An Bord Pleanála (ABP). There has been a significant increase in both the number of planning applications and the number of residential units within the system over the last 18 months. There has been a **44% increase** in the number of planning applications within the system since Q1 2015 (25 No.) to Q1 2016 (36 No.). Similarly there has been a **100% increase** in the number of units within the system from Q1 2015 - 974 units – to Q1 2016 – 1,938 units.

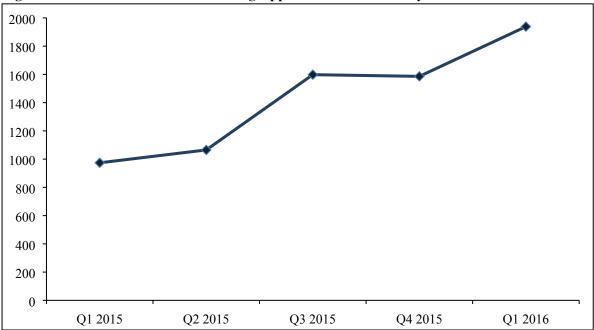


Fig 3 -No of Units contained in Planning Applications within the System

(v) Comparative Analysis

The analysis above illustrates a strong return over the last 5 Quarters in terms of both planning activity and on-site construction within DLR. However, a comparative analysis with the three other Dublin Local Authorities is required to assess how DLR is performing in regional terms.

30% of the total number of Active sites within the Dublin Metropolitan Area are in DLR See Fig. 4 Below. This is against a backdrop of the issues set out at the start of this section. It is also worth noting that the level of units (1,921) under construction in DLR is also making a significant contribution to the regional picture. In this regard, 1,921 of the 4,532 units under construction within the Dublin Region are in DLR. This equates to 42% of all units under construction within the Dublin Region being located within DLR

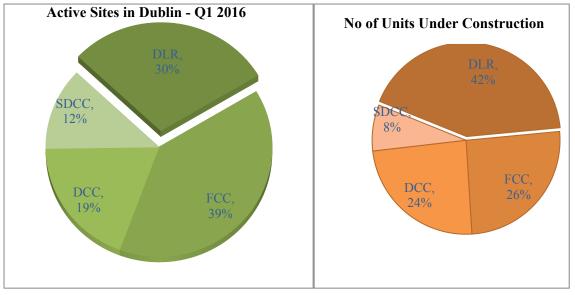




Fig 5 – Comparative Analysis – No of units under construction

In terms of housing completions, 651 units were completed in DLR in 2015 which represents 22% of the 2,981 completions within the Dublin Metropolitan Area. While it is recognised that the number of completions within DLR in 2015 is still too low to meet housing demand; however, contributing 22% of completions within the Dublin Metropolitan Area is considered positive as it is beyond the 16% growth rate within the Dublin Metropolitan Area and therefore signifies the ability to grow expediently.

(vi) Planning Activity Q2 2016

This report was drafted prior to the collation and analysis of the Q2 data(April 01^{st} – June 30^{th}). However, indications of increasing planning activity from the weekly planning lists and pre-planning applications are positive.

In this regard, there has been significant amount of planning and pre-planning activity in terms of student accommodation. The most significant of these is a pre-planning application for 3000+ student accommodation complex in UCD⁴. It should be noted, that a planning application for 3,000+ student beds would be one of the largest student accommodation planning applications lodged in the State⁵. It is envisaged that the scale of this forthcoming planning application - along with other pre-planning proposals for student accommodation across the County - have the potential to free up 'mainstream' housing units by facilitating students in accommodation which meets their needs and possibly reducing competition in an already overheated private rental market in the Dublin Metropolitan Area.

In terms of large-scale planning applications, DLR recently granted permission for 410 units on a site at Clay Farm, Kilgobbin Road, Ballyogan which is currently on appeal with An Bord Pleanála. This application for 410 residential units represents the largest most significant residential application granted by DLRCC over the last 7/8 years.

⁴ Permission was sought and granted by UCD to use this pre-planning information.

⁵ The commentary on this pre-planning application will not prejudice the performance of the Planning Authority in terms of the decision making process as set out under the P&D Act. Any application lodged will be assessed in accordance with the provisions of the Planning and Development Act and any National, Regional or local guidance documents.

(vii) Analysis and Conclusions from Housing Supply Performance Indicators

The most salient and positive performance indicators are based on DLR providing:

- ▶ 42% of units under construction within the Dublin Region (Q1 2016)
- ➢ 30% of Active Sites within the Dublin Region (Q1 2016)
- > 22% of all completions within the Dublin Region (2015)

It can be clearly ascertained from the above analysis of housing supply data that DLR is performing above Regional, and indeed, National forecasts and expectations

However, the significant mismatch between supply and demand within DLR remains. There is still a 'target' to deliver 3,300+ units per annum but exponential growth in the number of completions from a low baseline of only 651 completions in 2015 is not forecast.

6. National Enabling Actions

The last 18 months has seen the enactment of various legislative measures to tackle the issue of housing supply. These changes are primarily on foot of various actions contained within both 'Construction 2020' (2014) and 'Stabilising Rents, Boosting Supply' (2015).

The changes include the introduction of the Urban Regeneration and Housing Act (UR&H Act) 2015. The UR&H Act aims to incentivise urban regeneration with a view to facilitating increased activity in the housing construction sector. It included the introduction of the Vacant Site Levy, changes to Part V agreements and the retrospective implementation of Development Contributions.

The Planning and Development Amendment Act 2015 also brought forward a range of changes including the introduction of mandatory apartment standards under Section 28 of the Act and the streamlining of the SDZ process.

Central Government also introduced the 'Development Contribution Rebate Scheme' under Circular PL 13/2015. The scheme attempts to increase the number of homes under construction in both Dublin City and Cork City. It aims to incentivise the build-out of affordable starter-type homes – within schemes of 50+ units - which are required below the price levels of \in 300,000 *(Dublin)* and \notin 250,000 *(Cork)*.

The section below offers some detail on how some of these 'National Enabling Actions' are impacting at a local level within DLR.

(i) Introduction of the Vacant Site Levy

There can be situations where landowners with land zoned for development hold back the release of key sites to the detriment of the progression of wider Development Plan objectives, e.g. in relation to the timely supply of new housing in line with housing strategies or the delivery of new retail space in line with retail strategies.

The Vacant Site Levy was introduced to incentivise the use and development of such vacant and underutilised sites in urban areas

DLRCC are currently undertaking an initial assessment and quantification of the number and location of potential vacant sites within the County and there will be a focus on a number of the larger vacant sites in the county. The Vacant Site Register must be in place in January 2017

(ii) Changes to Part V

The enactment and commencement of the Urban Regeneration and Housing Act 2015 introduced amendments to the operation of Part V of the Planning & Development Act 2000. The revisions to Part V took effect from 1st September 2015 and included the following changes:

- ▶ Reduction from 20% Social and Affordable to 10% Social requirement
- Exemptions from Part V increased from 4 or fewer units to 9 or fewer units.
- Emphasis on <u>direct transfer</u> of completed Social Housing units
- > Introduction of long term leasing as an alternative to acquisition
- Removal of the cash-in-lieu of housing option

The Part V provisions took effect from 1st September 2015. To date within DLR there have been:

- 7 Part V Agreements signed or agreed in principle which provides for 128 Social Housing Units
- 10 Part V Provisional agreements which are subject to confirmation of valuations and costs. The indicative number of 37 Social Housing Units may increase or decrease depending upon the validation of these valuations and costs
- 6 planning permissions subject to Part V conditions which have the potential to deliver c. 24 units

From the above information it can be clearly be seen that the provisions of the UR&H Act are being implemented and the Housing and Planning Departments are proactively engaging and negotiating with developers in accordance with the Act. The potential to supply Social Housing units through Part V is clear, however, the quantum of units is very much dependent on the number of applications for 10+ units within the County.

(iii) Development Contribution Rebate Scheme

Expressions of interest were sought from builders/developers – for sites within DLR - for participation in the Development Contribution Rebate Scheme. Eligibility, however, is confined to developments of a minimum of 50 units which are completed and sold at a price below \in 300,000 during 2016 and 2017.

The DLR data collated and analysed as part of the Household Taskforce includes only 8 developments of 50+units which have not yet commenced to date. Given the high land/unit values within DLR there is a strong indication that this initiative – which may prove successful in other LAs due to lower land/unit values – may not prove as effective in DLR. To-date there has been no uptake of the Scheme within DLR.

(iv) Central Government's 'Action Plan for Housing'

It is envisaged that Central Government's 'Action Plan for Housing' - will incorporate a range of actions, measures and potentially legislative reforms to address the housing supply issue.

As part of this process DLRCC are actively working with the Department of Housing, Planning and Local Government on the recently announced LIHAF – Local Infrastructure Housing Activation Fund. This fund presents a potential opportunity to progress local infrastructure projects that are currently hampering delivery of units particularly in the southern part of the county.

7. Dún Laoghaire-Rathdown Specific Enabling Actions

This section includes various actions and initiatives which are specific to DLRCC. These actions are in accordance with the National response to the housing supply issue but are being driven primarily by DLR.

(i) Review of Kiltiernan/Glenamuck Section 49 Scheme

The Kiltiernan/Glenamuck Section 49 scheme was originally estimated at requiring c. \in 125-130m in 2008 with 90% of total cost land acquisition. This cost is to be recovered by means of a localised Section 49 Levy Scheme. Efforts are on-going to try to significantly reduce the cost of this Levy. DLRCC are currently reviewing the Section 49 Scheme with the intention of potentially recalibrating and reducing the levies through an alternative land cost arrangement. This could potentially 'unlock' approximately 2,500 units within the LAP lands.

(ii) Exemptions within the 2016-2020 Section 48 Development Contribution Scheme

The recently adopted DLR Development Contribution Scheme 2016-2020 contains several measures that will encourage development throughout the County including:

- > Freezing of existing development contribution rates up to the end of 2017.
- Change of use of existing premises is exempt which will assist in optimising the potential of existing development.
- Car parking in commercial developments which provides for basement car parking within the footprint of the commercial development is exempt.

Of particular import – in this instance – is the exemption for the change of use of existing premises. It is anticipated that this measure will actively encourage the re-use of existing premises. The scheme only came into force on 31^{st} December 2015 yet already **there are examples of instances where**

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exemptions to levies appear to be stimulating the redevelopment of sites. One such example is the Adelphi Centre in Dún Laoghaire which was recently granted permission for a change-of-use from a 5 storey office block to a residential development incorporating 22 units. In accordance with the recently adopted Development Contribution Scheme no levies were attached to the grant of permission.

(iii) Establishment of "Developing Areas" Planning Team

There has been a recent restructuring of the Development Management (DM) Teams with the establishtment of a Team focused solely on the **primary growth areas of Cherrywood, Sandyford and Kiltiernan/Glenamuck** comprising one Senior Planner, one Senior Executive Planner and four case Planners. This internal sub-team allows the continual efficient handling of large scale planning and pre-planning applications in these targetted growth areas.

(iv) Improved Pre-Planning Process

In 2015, the Planning Authority developed and introduced a dedicated in-house cross-departmental pre-planning process to enable the Planning Authority to efficiently meet pre-planning requirements as set out under Section 247 of the Planning and Development Act 2000 (as amended). All pre-planning enquiries are submitted to a dedicated pre-planning facility. Very specific advice is given as to what is required in accordance with the provisions of the County Development Plan and any other relevant National, Regional and Local guidance documents. This dedicated system allows for the transparent and effective processing of pre-planning queries with case planners endeavoring to process the majority of queries within three working weeks. There were 319 Pre-Plannings lodged between 1st January and 27th June 2016.

(v) Active Land Management

The Planning Authority is continually engaged in dialogue with key stakeholders involved in various facets in the process of delivering residential accommodation. These stakeholders include the Department of Housing, Planning and Local Government, NAMA, Irish Water, the NTA, TII, developers, infrastructural providers such as EirGrid and adjoining Local Authorities. This has resulted in real evidence of progress. For example, the recently published Irish Water Capital Investment Plan includes a commitment to the Old Conna/Woodbrook Water and Drainage Schemes. The Planning Authority are also in communication with NTA with regard to the provision of a new train station at Woodbrook, the Metro South Luas line capacity upgrade and the extension of the Green Luas line from Brides Glen to Bray.

The Planning Authority also submits a quarterly 'Critical Infrastructure Report' to the Housing Supply Coordination Taskforce which details the requirements for capital investment in hard infrastructure

(vi) Local Area Plan Woodbrook / Shanganagh

The existing Woodbrook/Shanganagh Local Area Plan (LAP) was adopted in 2006 within the lifetime of the LAP being extended in 2011 until November 2016. The undertaking of this LAP has taken on increasing significance given the following:

- IWs recent commitment through IW CIP (2017-2021) to the implementation of the Old Conna/Woodbrook Water and Drainage Scheme
- The inclusion of a DOGUIDIENT PORCE RAGE to The Strategy 2016-2035

The review process in relation to the Local Area Plan will be commencing shortly.

(vii) Cherrywood Strategic Development Zone

The Cherrywood SDZ will be the single largest contributor to the alleviation of the housing supply issue in Dublin as it will provide for 7,700 units. Since the approval of the Planning Scheme, the DLR Development Agency (DA) has progressed the following key work streams

- Druid's Glen Road (Q P3) Part 8 being advanced by dlr Road Projects;
- The preparation of an Access and Movement Stragegy in consultation with the National Transport Authority (NTA) and Transportation Infrastructure Ireland (TII);
- The Part 8 design preparation for the Bride's Glen to Shankill scheme being advanced by dlr Roads Projects;
- An Area Wide Travel Plan agreement with NTA and TII;
- Cost estimation for the construction of the Common Infrastructure and associated land costs is well advanced to inform funding options;
- Town Centre the Urban Form Development Framework (UFDF) The DA's preparation of the Plan is well underway in collaboration with the relevant landowners *(ref page 67 of the Cherrywood Planning Scheme)*. It should be noted that the preparation of the UFDF is a pre requisite to the approval of any planning applications for the Town Centre;
- The junction of Cherrywood Avenue/Cherrywood Avenue extension was opened on 29th April to facilitate access to Cherrywood Business Park for buses and access paid parking on the public roadway

Planning Applications

The responses for *Further Information* for the three planning applications were received on 16th June:

- 1. Roads and Infrastructure Phase 1 (DZ15A/0813),
- 2. Tully Park (DZ15A/0813),
- 3. Beckett Park (DZ 15A/0814)

Date for Pre planning meeting for Ticknick Park has been agreed

The nature of an SDZ required approval for a quantum of infrastructure followed by a quantum of development. All of these planning applications relate to specific pieces of infrastructure which require approval prior to any grant of development (to include housing).

Stakeholder Engagement

The delivery of the Scheme is complex requiring a number of stakeholders to engage and dlr Development Agency is actively promoting the implementation of the objectives of the approved Planning Scheme through collaboration and engagement with all relevant stakeholders. Ongoing meetings are being held with landowners and bi monthly meetings with key agencies are being led by the DA to include the NTA and TII.

Hines Real Estate Ireland has built a 3 - D timber scaled model of the entire Cherrywood SDZ area. The DA will be leading in arranging sessions with the Elected Members in August to facilitate viewing of the model which provides a comprehensive overview of the entire development and associated infrastructure provision.

Funding

It is acknowledged that a suite of infrastructure and services are required for the full development of the Planning scheme. As a Planning Scheme, infrastructural facilities and services that benefit the development can be funded by way of a supplementary levy scheme under Section 49 and /or an additional Section 48 levy scheme and /or a supplementary Section 48(2) (c) levy scheme as facilitated by the Planning and Development Acts 2000 - 2010 as amended. At the 14th December 2015 Council meeting, the Council provided for this to be progressed as part of the adoption of the Dun Laoghaire Rathdown County Council Development Contribution Scheme 2016 - 2020.

It is critical that a robust funding stream is established to ensure that infrastructure can be realised. This is a priority element of work presently underway by the DA. It is envisaged that a draft Section 48 Development Levy Scheme will be prepared by the DA and that a briefing session will be held with the elected members prior to the Draft Scheme being presented to the September Council Meeting.

Recent Legislation

The DA is currently assessing town planning particulars in relation to the Cherrywood SDZ to include the interpretation of the Planning and Development (Amendment) Bill 2015 <u>https://www.oireachtas.ie/documents/bills28/acts/2015/a6315.pdf</u> for an amendment of a Planning Scheme and, also the application of the new Apartment Guidelines 2015 <u>http://www.environ.ie/sites/default/files/publications/files/apartment_guidelines_21122015.pdf</u> as recently published.

8. Conclusions – Part I

DLRs 'performance' in relation to housing supply market can be synopsised as follows:

Primary challenge

Maintain 16% of the growth rate within the Dublin Metropolitan Area through increased supply of housing units to circa 3,300 units per annum. By meeting the challenge of increasing supply, the growing affordability issue may also be addressed.

Positive indicators

- ▶ 42% of units under construction within the Dublin Region (Q1 2016)
- > 30% of Active Sites within the Dublin Region (Q1 2016)
- 22% of all completions within the Dublin Region and above 5% of all completions within the state (2015)
- > The above indicators are all well above the 'target' 16% growth rate within the Dublin Metropolitan Area.
- Both National and DLR specific enabling actions to increase housing supply are being undertaken – positive impacts can be seen already
- Cherrywood SDZ is advancing

Concerning Indictors

- A clear and sizeable mismatch between housing supply and forecast need has emerged over recent years within DLR. DLR are providing above 16% share of growth within the Dublin Metropolitan Region but below the annualised 'target' unit numbers
- Affordability particularly in relation to the three Dublin-based Local Authorities remains difficult.
- > The southern part of the County remains either partially serviced or unserviced.

Potential Solutions

- Significant potential to deliver approximately 16,000 units within the partially serviced and unserviced lands. This potential will require significant capital investment in hard infrastructure
- Review of Cherrywood Planning Scheme and certainty on funding mechanisms
- > Use of mechanisms to drive delivery of 18,000 units on serviced land

Note: The housing supply issue is complex and multi-faceted and addressing one sector be it the construction sector, financial sector or indeed the Planning sector will not provide an all-encompassing solution.

PART II

Social / Public Housing Delivery

9. Social Housing Targets:

The Council's target under the Social Housing Strategy 2015 to 2017 is 681 units, with a current funding allocation of \notin 61 million. In order to meet these targets DLR works in collaboration with a range of partners and providers to support alternative tenures. This includes Approved Housing Bodies (AHBs) through Capital Assistance Scheme (CAS) and Leasing methods; Private Landlords through the Rental Accommodation Scheme (RAS), Leasing and Homeless Housing Assistance Payment (HAP) and with Private Developers through Part V Acquisitions and leasing. In addition the Council engages with the Department of Housing, Planning and Local Government in terms of direct build.

(i) Key Challenges:

The key challenges for DLR in reaching our targets are addressing the constraints of housing supply and the high rents and property prices which are particularly significant for this County. The average monthly rent of a 3 bed house in DLR in June 2016 is $\notin 2,291$ with only 83 of those properties advertised for rent on <u>www.daft.ie</u>. The average purchase price for a 3 bed house in DLR is $\notin 459,000$ (based on properties sold in DLR from January to May 2016.

These costs make it difficult for many people to find houses and the Council, in terms of acquisitions or rental through RAS / Social Leasing is competing for a very limited supply as are potential HAP applicants. Affordability, in general terms is an issue in this county. Looking across the Dublin the comparison on house purchase prices is as follows:

DLR	€498,510
Dublin City	€330,638
Fingal	€292,306
South Dublin	€277,000

There is a clear need for the introduction of an Affordable Housing Scheme for the Dublin Region and in particular in Dun Laoghaire Rathdown. In the meantime the Council should proceed with plans on its own lands to provide for affordable units with a view to a scheme following at a later time

(ii) Social Housing List:

The context against which housing need is demonstrated is the social housing list. Applicants for social housing may earn \notin 35,000 to \notin 42,000 depending on family circumstances. Applicants may also state a preference for up to 3 social housing areas and **this results in applicants being on lists in more than one county.** The number of people on the Council's Social Housing list as at June 2016 is 5733. It is worth noting that the figures for the same period in 2014 and 2015 were 4584 and 5375 respectively, highlighting that while the waiting list is increasing; the magnitude of that increase has reduced from 16% increase in 2014-2015 to 6% increase in 2015-2016. DLR currently has 66 families registered as homeless and 134 individuals.

The breakdown of social housing demand based on geographical location is outlined below:

Location	1 bed	2 bed	3 bed	4 bed	Total
Blackrock/Stillorgan	1377	829	589	41	2836
Dún Laoghaire/Dalkey	724	425	234	11	1394
Ballinteer/Ballyogan	364	360	303	27	1054
Ballybrack/Shankill	173	129	136	11	449
	2638	1743	1262	90	5733

Figure 6: Geographical breakdown of housing demand:

(iii) Housing Stock:

Within its direct portfolio of housing units the Council has tenants renting in properties as follows:-Figure 7: Breakdown of Housing Stock including owned by other bodies and tenanted by DLR

Tenure type	Number
Council Owned	4508
Leased from AHB	119
Direct Lease from Private Landlords	19
RAS tenancies	386
Total number of social housing units provided	5032

Figure 8: Age of Council Housing Stock

Age of Housing Stock	Number
Less than 10 years	704
10-20 years	749
20-30 years	623
30-40 years	730
40-50 years	584
Over 50 years	1118
Total number of social housing units provided	4508

While it is noted that over half of our housing stock is more than 30 years old, the overall condition of the DLR Housing stock is excellent. There has been a preventative planned maintenance programme in place for the last 10 years which includes window replacement, new heating, rewiring programme, exterior repairs and painting together with other energy works. These works have served to keep a common quality housing standard across the stock.

(iv) Stock Management

Voids

A unit is deemed void when it has been vacant for a period of 6 months. As a direct result of the planned maintenance programme it is only in very exceptional circumstances that there is a void in DLR housing stock. The average turnaround time taken to re-let dwellings in DLR is 12.1 weeks. However it should be noted that there are certain properties offered out up to 6 or 7 times; each time a prospective tenant is afforded some time to consider the offer. This has resulted in a limited number of properties taking as long as 5 months to re-let.

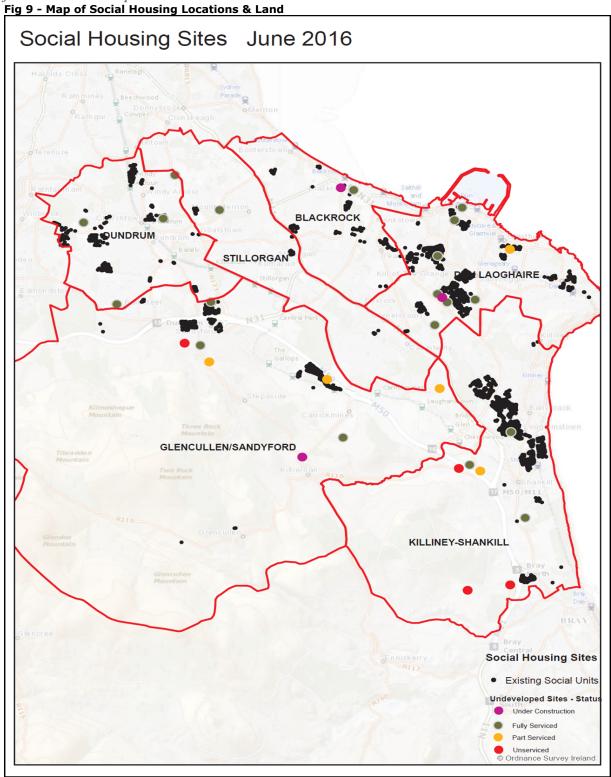
In an effort to maximise the efficiency of re-lets DLR plans to introduce a Choice Based Letting System (CBL) for specific hard-to let properties in quarter 4 of 2016. This will be advertised to all applicants well in advance of the CBL being introduced

Downsizing:

DLR has a total of 467 units that are occupied by 1 person over the age of 55 (201 x 2 bed; 260 x 3 bed; 5 x 4/5 bed). DLR is currently running a downsizing campaign which will enable people to occupy units more in line with their own needs and in conjunction with the refurbishment of 34 units at Rochestown House, Sallynoggin. This programme will continue as more one and two bed units come on stream.

(v) Social Housing Sites

This map sets out the sites which are in Council ownership and are designated for social housing. Some are unserviced and are therefore for long-term delivery to ensure the county is future proofed for accommodation provision



10. Delivery models available for those in need Publicly **Provided Housing**

10.1 Construction

DLR is currently active and on site building 53 units which will be delivered this year with a further 107 scheduled to be onsite in 2017. Building houses by a public body is a complex process and it takes considerable time. The minimum timeframe from project identification to the contractor handing over the units on site takes 2.5 years. An indicative timeline is outlined below:

Figure 10: Construction Process	
Process	Minimum Timeline
Site identification, Project Appraisal, Stage 1 DHPLG approval, Project Brief, Stage 2 DHPLG, Meeting Ward Councillors prior to Part 8	5 months
Meeting with Ward Councillors; to Public Consultation Process; preparation of report; presentation at next Council Meeting	3 Months
Procure Design Team	2 Months
Detailed Design and Preparation of tender documents; stage 3 DHPLG Approval	5 Months
Tender for contract and evaluation; stage 4 DHPLG approval	2 Months
Construction on site 12-18 months before handover	18 Months
Total time for average scheme:	35 Months

10.2 **Current Housing Construction Projects**

There are a number of housing projects currently underway and already in this process and are set out in the table below:-

Fig 11 - On Site Projects:

Location	No of units	Current Position	On site date	Scheduled Completion
Rochestown House P2	34	Construction in progress	November 2014	July 2016
Cromlech Close	15	Construction in progress	April 2015	August 2016
Clontibret	4	Construction in progress	December 2015	December 2016
Total	53			

Location	No of units	Current Position	Estimated on site date	Estimated Completion Date.
Fitzgerald Park	50	Out to tender	Q3, - 2016	Q4 - 2017
Rochestown House Phase 3	14	Tenders received - being reviewed	Q3 - 2016	Q4 - 2017
Rosemount Court	44	Design Team appointed Due to go out to tender	Q3 - 2016	Q1 - 2018
St. Michaels Terrace	4	Engaging Contractor	Q3 - 2016	Q2 - 2017
Broadford Rise	21	Tender documents being prepared	Q4 - 2016	Q1 - 2018
Site Adj 49 Sallynoggin Park	4	Tender documents being produced	Q4 - 2016	Q3 - 2017
Park Close, Sallynoggin	10	Tender documents being produced	Q4 - 2016	Q4 - 2017
Asst. Harbour Masters	2	Tender documents being produced	Q4 - 2016	Q3 – 2017
Total	149			

Fig 12 - Projects with Part VIII Planning approval and DECLG Approval

Fig 13 - Projects out on Public Consultation under Part VIII

<u>Location</u>	<u>No. of Units</u>	Current Position	<u>Estimated</u> <u>on site</u>	<u>Estimated</u> <u>Completion</u> <u>Date</u>
Temple Road	3	Part VIII	Q1 - 2017	Q4 - 2017
Pottery Road	4	Part VIII	Q1 – 2017	Q4 - 2017
Georges Place	12	Part VIII	Q1 - 2017	Q4 - 2017
-				

10.3 Rapid Delivery

The DHPLG target for rapid delivery for DLR is 50 units. The first 12 of these are to be delivered in Georges Place, Dún Laoghaire and the Part 8 is currently at public consultation stage. The provision of social homes through rapid delivery methods such as timber frame are now widely used in Ireland and the construction period is about half the traditional build method. This has the potential to reduce the 35 months by up to 9 months

10.4 Part V

Since the enactment of the Urban Regeneration and Housing Act 2015 all developments over 10 units provided after 1st September 2015 are subject to the provision of 10% for social housing. In the case of DLR the large size and cost of the units being built can prove challenging and in such cases negotiations take place for the provision of units off site. (from Part I)

- 7 Part V Agreements signed or agreed in principle which provides for 128 Social Housing Units
- 10 Part V Provisional agreements which are subject to confirmation of valuations and costs. The indicative number of 37 Social Housing Units may increase or decrease depending upon the validation of these valuations and costs
- 6 planning permissions subject to Part V conditions which have the potential to deliver c. 24 units
- > Further Part V units will be agreed as part of pre-planning procedures

The option being utilised of leasing of units under Part V has resulted provision of 124 units will be available for letting through an AHB in early 2017 – included in box above.

10.5 Approved Housing Bodies

DLR currently works in partnership with a total of 31 AHBs through leasing arrangements; acquisitions through CAS and also where AHBs manage blocks of apartments on behalf of DLR. AHBs can be funded off central government's balance sheet. They receive a maximum of 30% construction or acquisition costs funding from the State with the rest borrowed from the Housing Finance Agency or from banks to enable acquisition, design and build.

10.6 Rental Accommodation Scheme (RAS)

DLR has 386 tenancies provided under the RAS Scheme. The Council experiences difficulties securing rental properties under RAS as the demand for rental properties in DLR increases due to lack of supply. For example in 2015 a total of 178 contacts/negotiations took place with landlords/agents which ultimately yielded just 23 units. Similarly particular care and effort is expended to ensure that landlords renew RAS contracts which can be as difficult and protracted as securing a new tenancy. The rental limits in RAS are set at 92% of the market rent.

10.7 Housing Assistance Payment (HAP)

A pilot Homeless HAP is currently in place in DLR. Under Homeless HAP, DLR makes payments, subject to rent limits, on behalf of the Homeless HAP recipient directly to the landlord in respect of rent. The rent limits range from \in 525 per month for a single adult and up to \notin 1800 for a family including six or more children. The HAP recipient pays a differential rent to DLR. In 2016 to date 19 Homeless HAP have been provided. The general HAP scheme is expected to be extended to the Dublin Local Authorities including DLR in early 2017. Under HAP the prospective tenant identifies the property and the Council makes payments to the landlord. It should be noted that HAP enables the tenant to take up employment and have their rent adjusted in line with the differential rents scheme.

10.8 Social Housing - Leasing

Since the inception of the legislation for social leasing in 2009 no. 157 units have been provided to date with a further 66 currently under discussion. The constricted supply of units available for renting/leasing combined with increased general demand are specific challenges for DLR. Social Leasing, which is usually a 20 year agreement, is negotiated at commencement at 80% of market rent with rent reviews every four years provided for.

10.9 Acquisition of Existing Units

DLR acquires a limited number of units in the open market for social housing purposes. The high cost of housing in DLR and limited supply preclude us from securing large numbers under this model of provision. However, all efforts have been made where possible with 8 units acquired to date and a further 18 at sale agreed.

10.10 NAMA Units

Social Housing units are offered for purchase or leasing to AHBs, private sector and to Local Authorities through the Housing Agency. DLR considers any offers made with reference to value for money and community sustainability. It should be noted that while DLR may express an interest in a

particular property this does not imply that the Council will be successful in securing same. Table 5 below highlights the NAMA offers made to the Council through the Housing Agency.

Figure 14: DLR Social Housing Delivered through NAMAIdentified
by NAMAInterest
/ Demand
confirmedDeemed not
suitableNot available
as sold or
rented to
private sectorDelivered33214349140112

27 additional NAMA properties have been listed for DLR as potential offers. Of the 27 listed, the Council has expressed an interest in 20. The reasons for declining interest in the 7 properties are due to the high cost of properties and management charges associated with them and consequently the value for money of the units.

11. Local Enabling Actions to Speed up Delivery of Social Housing:

11.1 Changes in Part 8 Process

The Part 8 Process takes approximately 3 months -12 weeks. In order to speed up the timeframe of the Part 8 process it is proposed that briefings for Councillors take place outside of the fixed dates of Area Committee Meetings. The briefing would take the form of the current pre-meeting with Ward Councillors after which the Council would proceed directly to the Part 8 consultation process. A time saving of up to 4 weeks could be made through this change. It is anticipated that further time savings could come about as a result of discussions with the Department.

11.2 Purchasing Sites with Existing Planning Permission

Where sites are offered for sale with planning permission for housing units that would suit the housing need of DLR it is proposed that the Council should make offers on such sites. This will of course take into account value for money and community sustainability.

Sites with planning permission for developments of 1/2/3 bed units where construction has not commenced are being examined with a view to commencing discussions and seeking to acquire them with a view to building out social housing.

11.3 Compulsory Purchase Powers

The acquisition of blocks of new housing units which are suitable for social housing needs is considered a viable proposition. There are times where units are unsold and vacant. It is proposed to commence CPO procedures where a legitimate offer of the Council has not been accepted. The Council will continue to examine new housing coming to the market in this process. While value for money is still a consideration ultimately the decision of an arbitrator will determine the cost of the units.

12. Future Specific Housing Projects:

12.1 St. Laurence's Park/Leisureplex

Status: The project is at planning stage

The units at this location were discontinued as social housing offerings in 2012 on the basis that would form part of a larger development which would result in a significantly greater volume of social housing units. There are 16 maisonettes designated as senior citizen dwellings. Of the 16 only 3 residents are currently in situ. It was proposed to re-develop the entire site.

Recently the adjoining Leisureplex site was purchased The Council is currently in negotiations with the owners of the Leisureplex Site to consider a joint venture for the delivery of a considerable increase in the provision of high quality life-time units at this location. It is expected that social housing provision at this location will increase to approximately 50 units and that a proportion would also be developed as affordable units in the region of 25. There are however access and other issues to be addressed but ultimately it will be a more productive use of the site in which any of the remaining tenants will also be accommodated.

12.2 Enniskerry Road

Status: While this Project has a Part 8 the nature of the build out is at planning stage

The site at Enniskerry Road was initially transferred to the Housing Agency under the Land Aggregation Scheme, complete with **Part 8 approval for 155 units** of which 100 were social and 55 affordable. The Housing Agency has recently agreed to return the site to the Council. The detailed drawings for this site need to be updated to current building regulations and a cost plan is currently being prepared before proceeding to tender for that purpose. **It is expected therefore to be fully on site by December 2016** with delivery of units by the 3rd quarter of 2018. Although there is currently no affordable scheme in place for the 55 units, it is envisaged that a new scheme will be available by the time the units are built out.

12.3 Co-Op - Loughlinstown Wood (fronting open space near Cois Cualainn)

Status: This project has a live planning application

The Housing Department is working in partnership with a co-operative group and the Irish Housing Co-operative with an innovative approach to social housing delivery which will provide for a mixture of 8 co-operative owned units and approximately 22 social units to be delivered under the direction of an Approved Housing body. Planning permission for the 8 units has been submitted. The remaining units will come under a separate planning application.

12.4 Lambs Cross

Status: This Project has a Part 8 Agreed and subject to cost approval can be advanced

This site comprises 0.47 hectares and is situated at the junction of Sandyford Road/Hillcrest Road at Lambs Cross. Part 8 approval to construct 25 units was granted by the Council on the 13th November 2006 comprising 11 no 1-bed apartments, 8 no 2-bed apartments, 2 no 3-bed duplexes, 2 no 3-bed houses and 2 no 4-bed houses. However, the cost of the proposed units is higher than normal due to the nature of the site and the requirement for underground parking at this location. The Housing Department is working with the DHPLG with a view to progressing this scheme as soon as possible.

12.5 Abbey View House

Status: This project is being advanced by an Approved Housing Body

The Council's Housing Department is working with Cluid AHB who are advancing designs for the demolition of the existing house and the construction of approximately 14 apartments, a mix of 1, 2 & 3 bed units over 3 floors and Cluid will be applying for planning permission. The apartments will be available to social housing tenants nominated by DLR. Cluid expect to commence on site in Quarter 2 2017 subject to receipt of planning permission and DHPLG and private finance funding within set timeframes.

13. Rapid Delivery Projects

13.1 Georges Place

Status: This Project is on Part VIII Public Display

The first 12 units of social housing to be provided through rapid delivery methods will be built at Georges Place Dún Laoghaire. This site is zoned Major Town Centre (MTC) and is capable of delivering a rich mix of uses to support Dún Laoghaire Town. Plans for the proposed development of the remainder of the site are currently being examined and will be presented to the Council in September 2016. They will include a mix of residential and commercial space. The 12 units are currently on Part VIII Public Display.

13.2 Whitebarn Road, Churchtown

Status: This project is in the final stages of negotiation but will require a S 183 approval to advance

This site was originally acquired under a Part V provision and was recently set aside for delivery of 32 social homes through rapid delivery. Since then, negotiations have been taking place for a part land swap/purchase with delivery of 28 units on an adjoining site by February 2017 with an additional 2 units to be built out a later date. This alternative rapid delivery method is being pursued to speed up the provision of social housing.

13.3 Rockville Drive, Glenamuck

Status: This project is at planning stage

The Rockville Drive site comprises 0.33 hectares and became available for development when a septic tank serving the Glenamuck Cottages was decommissioned following the provision of main drainage the area. It is proposed to provide approximately 10 units through rapid delivery build on this site. Proposals for Part 8 are currently being developed.

14. Longer term Housing Projects

14.1 Shanganagh Castle

Status: This Project is at early stages of planning and subject to infrastructural requirements

The site at Shanganagh Castle comprises 11.2 hectares, of which 8.7 hectares is for Housing purposes and is capable of delivering in the region of 550 housing units. It is proposed to develop this site under a public private partnership with the intention of providing a mix of tenures to ensure the development of a sustainable community. This will include social, affordable, cost rental and private units. The site has infrastructural deficits in terms of water and drainage upgrades. However it has been identified as part of Irish Waters' Capital Investment Programme and it is intended to therefore proceed with drafting of plans for a Architectural / Construction Competition to ensure optimum delivery.

14.2 Rathmichael

Status: This is a long-term project requiring services

This site was acquired in 2000 for housing and for the South Eastern Motorway. The site is divided by the motorway, one part comprising 8.8 hectares and the other 7.9 hectares. Development is unable to take place until services are provided. These sites could deliver up to 200 to 250 dwellings in total when developed.

Conclusion Part II - Public Housing Provision

Primary Challenges

- Delivery of 681 social housing units through Construction, Rapid Delivery, Part V; Collaboration with Approved Housing Bodies; RAS, HAP; Social Leasing, HAP, Acquisitions; NAMA
- > Overcoming the affordability issues within Dun Laoghaire Rathdown for first time purchasers

Positive Indicators

- > All Part 8 Proposals presented to the Council have been agreed and advanced
- > There are 53 social units under construction at present
- > There are 149 social units through Part 8 and DHPLG Approvals
- 128 Social Units agreed through Part V with 10 Part V Provisional agreements subject to confirmation of valuations and costs. 6 planning permissions subject to Part V conditions which have the potential to deliver c. 24 units
- ▶ 8 acquisitions secured with a further 18 almost completed
- > 157 social units provided through Social Leasing
- Substantial progress is being made on all methods of delivery in relation to social housing
- > Small infill sites are continually being identified and utilised

Concerning Indicators

- There are a number of units which could be released through the provision of hard infrastructure
- Affordability in the county is both driving additional social housing demand and restricting social supply through acquisitions and rental / leasing schemes
- > There remains a 34 month process for delivery of social housing construction projects

Potential Solutions

- > The recently established Infrastucture Fund could address some of the infrastructure deficits
- Reduction in Part 8 Consultation Times could be further reduced at national and local level
- > The purchase of available sites with existing planning permissions would expedite delivery
- > The use of CPO powers where units are unsold and unavailable to the local authority
- Council owned sites can be used to kickstart the provision of an affordable housing model for the county

Appendix 1

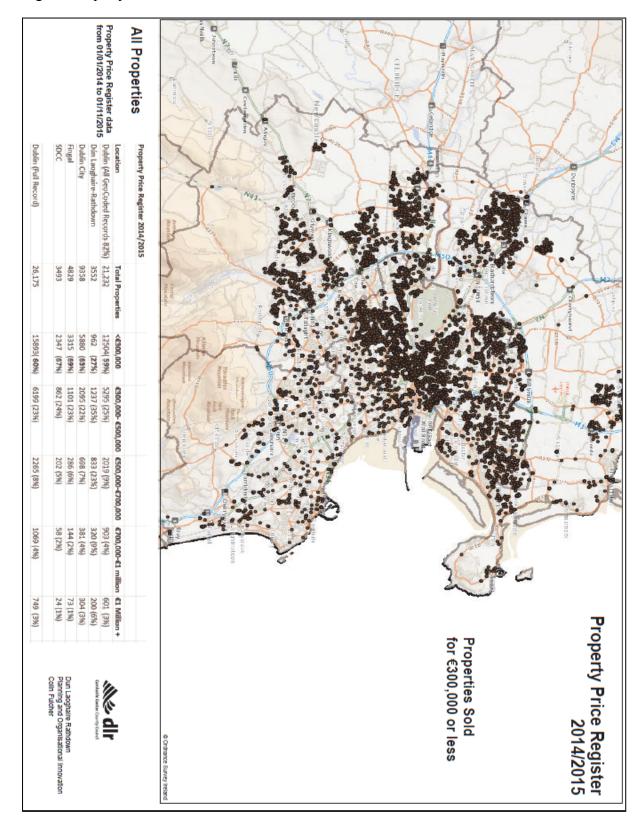
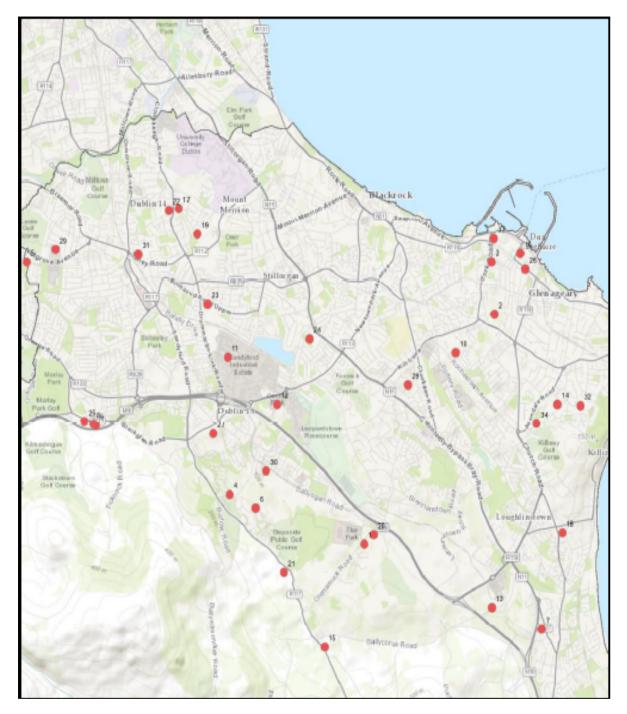


Fig. 15 Property Price Index Data 2014 – 2015

Fig. 16 Active Sites (34 No.) Q1 2016



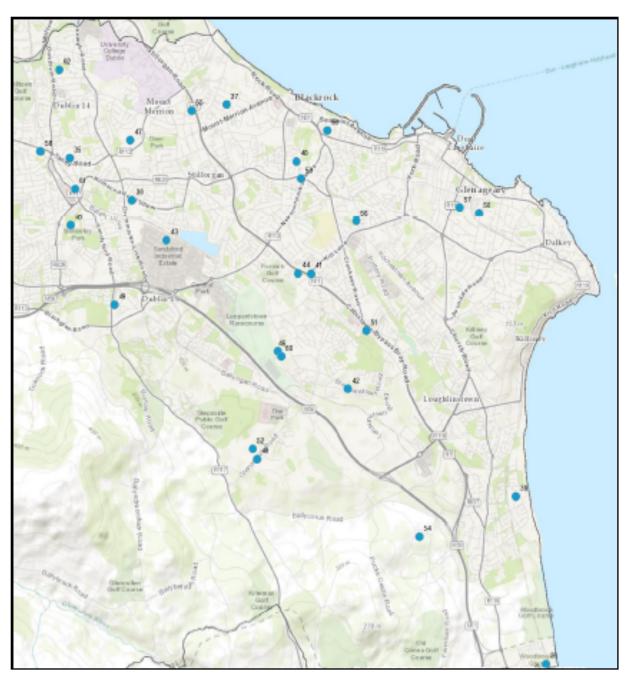


Fig 17 - Inactive Sites (28 No.) Q1 2016