

Dún Laoghaire-Rathdown County Council (DLR)

Submission to

The Joint Committee on Planning, Housing & Local Government

17th October 2018

Introduction

DLR welcomes the opportunity to make a submission to the Joint Committee on Planning, Housing and Local Government. This submission has been compiled having regard to the broader topic of appropriate use of public land with a specific emphasis on “Woodbrook/Shanganagh Lands, as circulated with the invitation to attend this meeting.

Future growth/Land Use

Dún Laoghaire Rathdown is spatially the smallest County in the State at approximately 12,700 hectares which represents only 12% of all lands within the Metropolitan Dublin Area. DLR’s population of 218,000 (census 2016) equates to approximately 16% of the population of the Dublin Metropolitan Area. (1,345,000). The Regional Planning Guidelines for the Greater Dublin Area 2010-2022 forecasts a population of approximately 240,000 in DLR by 2022. This equates to the provision of circa 1,500 homes per annum over a period of 6 years. With the National Planning Framework informing the drafting of the Regional Spatial and Economic Strategies this figure may be recalibrated in the coming months. To offer some context 3,052 units were delivered in the County during the peak year of 2007 however, following the decline in the building sector, the number of housing completions dropped down to 175 units in 2012, increasing to 651 homes in 2015 and 1388 in 2017. ¹

The Q2 2018 DLR Housing Task Force Returns (for sites greater than 10 homes) show that in DLR there are 41 active sites that account for circa 1,300 homes currently under construction. In terms of developments in the pipeline in the first 8 months of 2018, 3790

¹ Completion numbers based on ESB connections

homes have been granted permission in DLR. This compares to 1,153 homes granted permission in 2017 and 1,480 homes granted permission in 2016.

The primary challenge for DLR is providing the infrastructure required to open up our new growth areas of Kilternan/ Glenamuck, Woodbrook Shanganagh, Cherrywood, Stepside and Sandyford.

DLR Land bank

DLR Council has a limited land bank comprising 55 hectares (ha) of which 42 ha are available for housing; including the Shanganagh Castle Site (11.2 ha of which 8.7 ha are for residential purposes). One third of the portfolio is classified as urban infill and is served by public infrastructure and facilities necessary to provide housing. However, a significant proportion of the land portfolio is located on un-serviced land. The Southern part of the County and adjoining areas in North Wicklow has major water supply and foul drainage network deficits. Proposals in relation to new water supply and sewerage network schemes are being progressed through Irish Water. Old Conna/Rathmichael and adjoining areas in North Wicklow have major water supply and drainage deficit. These lands will be serviced as part of the future implementation of the Old Conna/Woodbrook Water and Drainage Schemes that will unlock the development potential of the area. It is expected that the foul drainage network analysis will be completed in late 2020. Irish Water has already lodged a planning application (D18A/0606) seeking permission to construct the Ballyman Reservoirs and associated trunk main.

DLR has already maximised the use of the bulk of its viable serviced lands, in particular smaller infill developments of 2-50 homes in conjunction with a downsizing campaign. With an 80 per cent demand for smaller homes 1 bed (48%) and 2 bed (32%) it made sense to build smaller units and encourage downsizing, than to provide larger homes for growing families. A total of 58 Tenants will have downsized by the end of 2018, providing greater flexibility in provision.

Since 2015 a total 121 homes have been completed, with a further 4 sites (129 homes) currently on site. DLR is at tender stage with a further 19 homes and at feasibility stage with

a further 729 homes (including Shanganagh Castle site). In addition DLR is working in partnership with 3 Approved Housing Bodies to develop a further 208 homes.

DLR is now commencing development of its larger sites which are located mainly in the Southern part of the County. Larger sites will naturally take longer to build out, however in addition to infrastructural deficits, there are necessary rules and procedures in terms of planning, environmental, financial & economic that must be adhered to, that DLR does not have to contend with on smaller sites.

Considerable progress on the delivery of the Shanganagh Castle Site has been made, including the Woodbrook/Shanganagh LAP, appointment of an integrated design team and Financial & Economic Planning including engagement with the National Development Finance Agency (NDFA).

Shanganagh Castle Lands

The Shanganagh Castle lands are located on the Southern side of Shankill. The Local Area Plan (LAP) adopted in July 2017, cleared the way for detailed master planning in the area. Residential development is being supported by the provision of substantial new road and rail transport infrastructure under the Local Infrastructure Housing Activation Fund (LIHAF) and by the National Transport Authority. Woodbrook-Shanganagh is also a Major Urban Housing Delivery (MUHD). The Woodbrook Shanganagh LAP requires the delivery of a new DART station at Woodbrook (mid-way between Bray and Shankill) with a cost between €4m - €5m. The NTA's Transport Strategy 2016-2035 includes the provision of a rail station at Woodbrook. In terms of road 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 NTA Core Bus Corridor Study.

Planning

In line with the EIA Directive (85/337/EEC as amended by 97/11/EC certain developments must be assessed for likely environmental effects before planning permission can be granted. Planning applications under P.10 go directly to An Bord Pleanála. This applies to

the Shanganagh Castle Site as it has more than 500 dwellings. Tenders for the Masterplan to prepare for a scheme for compliance with the EIA directive in preparation for P10 planning were sought in quarter 1, 2018. The Integrated Design Team has commenced their work. The preparation for this stage which is expected to take at least 9 months, includes the following: Topographical Surveys, ground investigations, flood risk assessment, storm water impact Assessment, Energy Statement, Design Statement, Landscape Design Rationale, Method Statement, Assessment of potential landscape and visual impact, Archaeological Impact Assessment and Method Statement, Conservation Plan, Architectural Heritage Impact Assessment, Road Safety Audit Road User Audit Accessibility Audit, Travel Plan, Traffic and Transport Assessment, Construction Management Plan, Preliminary EIAR. While the Executive is working with the NDFA, it was agreed that DLR would expedite matters and would proceed with the appointment of an Integrated Design Team for stage 1 Masterplan, in advance of the Department Stage 1 approval process.

Public Spending Code

The Public Spending Code was introduced in 2013 and provides that all *“public bodies are obliged to treat public funds with care, and to ensure that the best possible value-for-money is obtained whenever public money is being spent or invested.”*² It introduced a set of rules and procedures for projects with a value over €20 million. If one assumes an average build cost of €250,000 then the Public Spending Code applies on sites over 80 homes. Under this code DLR is obliged to carry out a cost benefit/cost effectiveness analysis; must consider the option of a PPP and is obliged to engage with the NDFA to examine finance and apportionment of the risk and balance sheet considerations. The estimated cost of developing the Shanganagh Castle Site is approximately €132 million without any affordable subsidy. The Executive has been working with the National Development Finance Agency (NDFA) in respect of the Shanganagh Castle Site since January 2018.

As part of the development of the Project, the need to establish strong governance procedures and protocols is required. A Project Board is now in place to drive delivery. A

² Public Spending Code: <https://publicspendingcode.per.gov.ie/>

cross-party proposal for 200 social and 340 affordable homes was agreed at the Council meeting of the 4th September 2017.

A Cost Benefit/Cost Effectiveness Analysis in conjunction with a Multi Criteria Assessment (MCA) was undertaken on the proposal. The analysis was submitted as part of stage 1 approval. It highlighted that there were difficulties with affordability in particular in relation to Apartments.

Affordability

DLR has historically been and remains one of the most expensive parts of Dublin, and indeed the State, in which to purchase a residential unit. DLR has excellent transport links in both the LUAS and DART and this transport infrastructure is a key driver for premium prices. *“DLR saw the fastest surge in prices in the capital in July 2018, with prices up by 9.8 per cent. In contrast, South Dublin saw an increase of just 5.2 per cent. The median price for Dublin as a whole was €360,000 in July, while, in DLR, it was €527,000, compared with €320,000 for both Fingal and South Dublin.”*³ The affordability problem is therefore somewhat unique to DLR and it is extremely important that DLR seek to maximise affordability on its own lands. The Executive is working with the NDFA to examine affordability in relation to the Shanganagh Castle site, including consideration of a loan to finance the affordable element, in line with the cross party proposal.

Central Mental Hospital Dundrum - Land Development Agency

It is understood that the development of the Central Mental Hospital in Dundrum (circa 11.8ha) will be one of the first projects to be undertaken by the new Land Development Agency with more than 1500 homes being developed.⁴ This would provide in the region of 150 (10%) social and 450 affordable homes (30%) as well as 600 private homes. The Executive welcomes the prospect of additional social and affordable homes at this location and will work with the LDA as they develop this ambitious plan.

³ Irish Times Property price growth moderates to 10.4% in year to July - Sep 11, 2018

⁴ New State agency to free up land for '150,000 homes over 20 years' Irish Times – Sep 13,2018

Conclusions

DLR is actively managing its land bank and is now moving into the development of larger sites. The length of time taken to build out larger sites is not just dictated by the size and nature of the site, as there are additional, but necessary complexities in terms of planning, environmental, financial and economic considerations.

DLR has under-occupancy in its housing stock and is seeking to address this with a downsizing campaign, which has been very successful to date but needs greater numbers. It would be helpful if the Committee in their work would consider downsizing incentives to encourage tenants to move to accommodation that suits their needs and assist in making best use of housing stock.

The Public Spending Code was introduced in 2013 for projects over €20 million (approximately over 80 homes). The code provides important procedures for ensuring best use of public funds. However, given that the code was introduced in a very different time when the cost of building was much reduced, it would be helpful if the threshold was increased to reflect the higher cost of construction in 2018 enabling quicker developments on sites bigger than 80 homes.