

Cork Planning Authorities Joint Housing Strategy

**Managers' Joint Report on the
submissions received and issues raised.**

June 2013

Introduction

This is a joint report which reviews the submissions received during the public consultation period 7th of January – 4th March 2013 on the Draft Joint Housing Strategy. This report comprises 3 sections:

Section 1: Submissions formally received to the Joint Housing Strategy

Section 2: Main Issues and Recommendations

Section 3: Next Steps

Section 1: Submissions formally received to the Joint Housing Strategy:

1. Tim Porter, Regional Director South Clúid Housing Association
2. Cork Social Housing Forum
3. South West Regional Authority
4. *Cork Environmental Forum (submitted to the housing strategy email address but more relevant to the draft County Development Plan so not included in the summary below)*

Other Submissions received to the County Development Plan but that are relevant to the Joint Housing Strategy:

5. Construction Industry Federation (Cork Branch)
6. O'Flynn Construction
7. Sherkin Island Development Society
8. West Cork Islands Community Council
9. Bere Island Projects Group

Submission Reference	Interested Party	Summary	Draft Managers' Opinion
JHS/2013/1	Tim Porter, Regional Director South Clúid Housing Association	1. This submission notes that 5.32 suggests the setting up of a multi agency group to look at accommodation for the elderly- and states that Clúid would welcome the opportunity of being involved in that group. 2. The submission also queries whether the strategy should deal with setting out the actual housing needs numerically in the different needs groups- particularly social housing.	1. Noted. 2. Where possible the draft Joint Housing Strategy has included the most up to date requirements for the different needs groups. Following the current review of the assessment of housing needs in Cork City and

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		<p>3. It also queries whether it would be worthwhile mentioning Capital Advance Leasing Facility (CALF) which is the Department of Environment's proposals for mixed funding delivery of social housing.</p>	<p>County, it may be necessary to set out the most up to date position on the different needs groups if required.</p> <p>3. It is intended to include reference to CALF in the final document.</p>
JHS/2013/2	Cork Social Housing Forum	<p>1. This submission states that it is critical that a formal Strategic Forum be developed, outlining its potential roles, membership, frequency of meetings etc.</p> <p>2. The submission also notes that in the area of Homelessness, such a model has been adopted through Cork Homeless Forum and the South West Regional Homeless Forum.</p> <p>3. The submission also welcomes the suggestion in the Draft Joint Strategy to establish a 'Joint Housing Strategy Stakeholders' Forum, suggesting that the purpose of the Forum would be to provide adequate, appropriate and sustainable social housing in Cork.</p> <p>4. The submission also provides detail on what Part V has actually</p>	<p>1.- 3. As set out in policy 4.2 under Principle 4 of the draft Joint Housing Strategy, it is intended that the Cork Local Authorities will facilitate the establishment of a Joint Housing Strategy Stakeholders' Forum as required, to include representatives of the main stakeholder groups dealing with housing issues in Cork. It is intended that this group would be set up when required to discuss and formulate policies on particular areas of local or national importance. It is proposed that the first of these Stakeholder Groups will focus on our aging population. The County Council is setting up a stakeholder group to address issues in relation to an aging population.</p> <p>4. The methodology used in the Strategy</p>

Submission Reference	Interested Party	Summary	Draft Managers' Opinion
		<p>contributed in terms of housing units and states that the actual number of households in need is likely to be multiples of the 15,018 figure published in the strategy.</p> <p>5. The submission concludes that when the actual need is compared with the amount of housing delivered through Part V over the years that it is folly to view Part V as having the potential to deliver a meaningful quantity of Social Housing into the future.</p> <p>6. The submission requires that the transfer of Rent Supplement to Local Authorities takes place as quickly as possible. It is also noted that if the Housing Assistance Payment is strictly enforced that this could help make the private rented sector a viable and attractive option for people with a social housing need. The submission notes that the RAS has proved a useful source of social housing – however it notes that the properties delivered under the scheme to date significantly is lower that what was first envisaged.</p> <p>7. Finally the submission notes that the social housing leasing initiatives may well offer some potential but that there is no information on the success or otherwise of these schemes to date.</p>	<p>Model is based on the requirements of the future population's housing needs. The 15,018 figure set out in the strategy relates to the households who are currently on the housing list.</p> <p>5. The Housing Strategy Model follows the methodology set out in the Departments Guidelines, the delivery of Social Housing into the future is dependent on other external factors.</p> <p>6. Noted.</p> <p>7. Should additional information become available (on social housing leasing initiatives), it is intended that it would be included in the final document.</p>
JHS/2013/3	South West Regional Authority	1. This submission welcomes the basis of the Joint Housing Strategy outlined in Section 2.13 whereby it is proposed to "introduce a number of planning policy measures in order to bring the	1. See the next section for a detailed review of this issue.

Submission Reference	Interested Party	Summary	Draft Managers' Opinion
		<p>pattern of population growth into closer alignment with the South West Regional Planning Guidelines. The aim will be not to limit growth in the towns but to manage growth in the rural areas more efficiently.”</p> <p>2. In addition, the submission notes that Table 2 of the Draft Joint Housing Strategy provides detail on population, number of households and net number of new units that will be required for Cork City and County to 2022. The submission states that these figures confirm that the total housing supply (92,399 units) significantly exceeds that of the total new units required from 2011-2022 (78,035 units) and that the oversupply is located within the Cork County area.</p>	<p>2. In Cork County, the calculation of the gross land requirement has yielded a supply of 7.9 years which is in line with the requirements of the Development Plan Guidelines. This figure is similar to the Housing Land Availability figure recently published by the Department of Environment. There is sufficient land to meet the population targets set out in the SWRPG for 2022.</p>
S11/2013/1614	Construction Industry Federation	<p>This submission to the draft County Development Plan raises three issues relevant to the Draft Housing Strategy:</p> <p>1. Firstly, Part V: It is submitted that it is inappropriate for the Part V requirement to be based on the need for affordable housing when no affordable housing programmes are supported and the requirement for Part V should be based on the proportion of new households likely to require social housing which is estimated as being in the region of 8%.</p> <p>2. Secondly, the discharge of Part V:</p> <p>2. (i) The options for the discharge of Part V obligations are contrary to the planning legislation and case history and should be amended to include the transfer requirements as provided for within the Planning and Development Act 2000 (as amended).</p>	<p>1. See the next section for a review of this issue.</p> <p>2 (i) It is intended to include the default requirement for the transfer of land as provided for within the Planning and Development Act 2000 (as amended).</p>

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		<p>2. (ii) Any objective to explore the option of the transfer of land or units at no cost should be aspirational, and conditional on whether or not a developer is willing to enter into such an agreement, and it is acknowledged that developers may be willing to enter into such an agreement for the transfer of fewer units at no cost and support an objective to that effect.</p> <p>3. Thirdly, Population Distribution: the submission requests that the Cork City population should be readjusted in terms of its timeline and that the County Metropolitan area should be restored to the original target of 231,500 by 2022.</p>	<p>2 (ii)The wording of this objective is taken from the Circular Housing 11 / 2012 from the Department of Environment which states that Authorities are now advised that, pending the outcome of the review, in negotiating agreements under section 96, Part V obligations should be discharged through mechanisms that place no additional funding pressures on local authorities.</p> <p>3. See the next section for a detailed review of this issue.</p>
S11/2013/1653	O'Flynn Construction	<p>1. This submission to the draft County Development Plan raises issues relevant to the Draft Housing Strategy. The submission states that the Part V strategy has not worked effectively and social housing delivery should be under Government / Local Authority control.</p> <p>2. It also proposes a levy on private residential units as a funding mechanism; however it states that it is important that the sum of the levies / contribution being charged by the Local Authorities does not act as a deterrent to development.</p>	<p>1. Noted.</p> <p>2. This proposal is outside of the scope of the current legislation regarding Part V as set out in the Planning and Development Act 2000 as amended.</p>
S11/2013/1651	Sherkin Island Development Society	This submission to the draft County Development Plan raises issues relevant to the Draft Housing Strategy. This submission raises the issue of access to social and affordable housing	See the next section for a review of this issue.

Submission Reference	Interested Party	Summary	Draft Managers' Opinion
		<p>for potential permanent residents on the Islands. It notes that there is no zoned land or development boundaries relevant to the islands and therefore the local authority cannot avail of the provisions of the Part V of the Planning and Development Acts. It requests that other opportunities and mechanisms to provide social and affordable housing on the islands should be explored. It notes the requirements under the Housing Act 1988 to provide for the preparation of a housing audit and states that such an audit would confirm the condition and age of the stock as well as providing detail on the extent of the use of the dwellings and identifying potential for renovation and occupation.</p>	
S11/2013/1645	West Cork Islands Community Council (Very similar to Sherkin Island submission above)	<p>This submission to the draft County Development Plan raises issues relevant to the Draft Housing Strategy. This submission raises the issue of access to social and affordable housing for potential permanent residents on the Islands. It notes that there is no zoned land or development boundaries relevant to the islands and therefore the local authority cannot avail of the provisions of the Part V of the Planning and Development Acts. It requests that other opportunities and mechanisms to provide social and affordable housing on the islands should be explored. It notes the requirements under the Housing Act 1988 to provide for the preparation of a housing audit and states that such an audit would confirm the condition and age of the stock as well as providing detail on the extent of the use of the dwellings and identifying potential for renovation and occupation.</p>	See the next section for a review of this issue.
S11/201313/1635	Bere Island Projects Group	<p>This submission requests that the following 2 objectives from the West Cork Islands Integrated strategy be included: Objective PD14: To provide housing for permanent occupation in a sustainable</p>	See the next section for a review of this issue.

Submission Reference	Interested Party	Summary	Draft Managers' Opinion
		<p>manner appropriate to the islands</p> <p>Objective PD15: To improve the availability of affordable housing on the islands and to recognise and address the differing circumstances between island and mainland housing needs.</p> <p>In addition, the submission also requests that a number of housing actions and policies are developed. Some of the actions most relevant to the housing strategy include:</p> <ul style="list-style-type: none"> • Develop and implement innovative island-specific housing policy initiatives; • Investigate the potential for a voluntary housing association for the islands; • Increase the provision of permanent housing on the individual islands in a sustainable manner; • Maintain an island specific approach to housing policy regarding sale of local authority properties on islands; • Review island housing waiting lists; • Investigate other alternative solutions to the provision of social and affordable housing, such as use of Compulsory Purchase Order (CPO) under Derelict Sites Acts; • Consider the needs for small-scale sheltered housing on the islands. 	

Section 2: Main Issues and Recommendations

In addition to the draft opinions set out in the previous section, this section seeks to further discuss some of the more complex issues which are broadly speaking categorised into three main areas, Population, Part V, and West Cork Islands.

Issue One: Population

1. Summary of the main proposals set out in the Draft Joint Housing Strategy:

Summary of Population for Cork City and County to 2022			
Strategic Planning Area*	Census 2011	SWRPG Population Target for 2022	Joint Housing Strategy Proposed Population Target for 2022
Cork City	119,230	150,000	150,000
Total County Metropolitan	170,509	231,500	213,891
Total CASP Ring	118,418	113,500	131,882
Total North	50,498	56,343	56,012
Total West	60,377	69,243	68,837
Total Cork County	399,802	470,622	470,622
Total Cork City and County	519,032	620,622	620,622

2. Summary of the Principal Issues Raised in Submissions:

- a. The submission requests that:
 - i. The Cork City population target of 150,000 should be readjusted in terms of its timeline and
 - ii. That the County Metropolitan area should be restored to the original target of 231,500 by 2022.
- b. The County Council have received broad (but not exhaustive) support for the introduction of a number of planning policy measures which will bring the pattern of population growth into closer alignment with the South West Regional Planning Guidelines.

3. Managers' Opinion

- a. One of the principal aims of planning policy for the Cork region, originating in CASP/NSS and confirmed more recently in the SWRPG 2010, is to support the continued growth of the Cork 'Gateway' through the coordinated development of Metropolitan Cork including both the City Council area and the County Metropolitan Area.
- b. CASP, the NSS and the SWRPG 2010 anticipated that future population growth in this critical location would be broadly shared between the City and County areas.
- c. The City Council have focussed their efforts to promote population growth on proposals for the redevelopment of the docklands areas to the east of the city centre, and the other key developments areas of Mahon, Blackpool and the City Centre as well as intensification in existing areas. Growth in population occurred in the city centre and the south-east of the city resulting in a stabilisation in city population over the last 5 years. However, the significant growth envisaged in the Docklands area has not taken place due to a variety of factors, so the population growth targets for the city have not been achieved.

- d. Cork City is considered the best location for sustainable development and higher densities in the Gateway due to the potential for sustainable transport and access (public transport, walking, cycling) and reuse of brownfield land. It is also the most attractive location for an inwardly mobile population necessary to fuel growth in the economy. The Docklands, the city centre and other key development areas as (outlined in local area plans), have the potential to provide population growth and higher densities.
- e. The SWRPG 2010 sets out a population target for the Cork City Council area of 150,000 up to 2022, which will form the basis of the City Council's Core Strategy and consequentially the Joint Housing Strategy.
- f. A range of measures will be required to stimulate growth including significant investment in infrastructure (in particular public transport and flood protection in Cork City and water services and roads in Cork County), measures to increase the attractiveness of the city for residential development as well as greater controls on development in the CASP ring. It is considered that reducing the population target and extending the timeline would detract from achieving the objective for strengthening the core of the Gateway.
- g. Since the 1970's, the population of the County Metropolitan area has risen consistently and this trend appears to be largely resilient to cyclical economic variation. Average annual rates of population change in the County Metropolitan Area have been in the range of 2.04% – 2.69% consistently over the last 40 years. The population target proposed by Cork County Council represents an average annual rate of growth of 2.08% - at the lower end of the range experienced over the last 4 decades. In contrast, the population target proposed in the SWRPG 2010 assumes an average annual rate of growth of 2.82% - a higher rate than that experienced in the 2002-2011 period.
- h. The need to adjust the County's population targets has arisen primarily because of the rapid acceleration in population growth experienced in the CASP Ring area during the last decade. The new 2022 population target proposed for the CASP Ring area of 131,882 is broadly accepted as a reasonable approach to the issues that the area faces.
- i. The effect of the global economic downturn on patterns of migration makes the reliable forecasting of future population difficult. There is no clear evidence in the 2011 census to indicate whether or not there will be a significant or lasting downturn in the future growth of the County Metropolitan Area. The CSO is conducting a review of National population forecasts but this is unlikely to be concluded before the new City and County Development Plans come into effect. Government has also indicated the intention to review the NSS but this also is unlikely to be completed in time to inform the new CDPs of both authorities.

4. Managers' Recommendation

- a. Accordingly, the view is to retain the population target for
 - i. Cork City at 150,000 and
 - ii. County Metropolitan Area at 213,891, as proposed in the Joint Housing Strategy.

- b. However, in order to acknowledge the uncertainties that exist for the city and county, a review of the need to further revise the CDP respective targets will be carried out in consultation with the SWRA, during the lifetime of the plan taking into account:

The intended review of the NSS

The review of the SWRPG (due to be complete in 2016)

The CSO review of National population forecasts

The outcome of the 2016 Census of Population

- c. Each of the respective development plans will identify key infrastructure requirements and set out policies and objectives which will facilitate the delivery of this infrastructure.

Issue Two: Part V

1. Summary of the main proposals set out in the draft Joint Housing Strategy:

The draft Joint Housing Strategy proposes that the Councils will have a requirement of 14% of units on all land zoned for residential uses (or for a mix of residential and other uses) to be reserved for the purpose of social housing and specialised housing needs (as provided for under policy 1.1 of the JHS). This figure is arrived at following a lengthy analysis of the current housing market, future house prices for Cork, future incomes for Cork and interest rates. This process included close consultation with the Department of the Environment, Community and Local Government, the CSO and the Central Bank and followed the methodology as set out in the Department's Guidance on Part V of the Planning and Development Act 2000 Housing Supply, A model Housing Strategy and Step by Step Guide.

2. Summary of the Principal Issues Raised in Submissions:

The submission raises a number of issues regarding the proportion of Part V;

The submission argues that the estimate of 14% households who will be unable to meet their housing needs through the purchase of an owner occupied house on the open market and does not equate with the need for social housing. Not all households who cannot afford to purchase a house on the open market will either desire or are eligible for social housing.

It notes that it is inappropriate for the Part V requirement to be based on the need for affordable housing when no affordable housing programmes are supported at local or national level, stating that basing the Part V obligation on these estimates places a planning gain burden on new housing developments which is over and above the proportional requirement for social housing generated by the development and any estimate of the requirement for Part V should be based on the proportion of new households likely to require social housing.

The submission puts forward two possible options to estimate demand;

- a) Consider the historical provision of social housing or
- b) Consider the Proportion of Households on the Waiting List

The first of these options (a) takes the total Cork Housing Stock (227,675) and divides by the Social Housing Stock (16,152) which estimates 7% of total housing stock.

The second looks at the households on the Waiting List, that total households in Cork (188,464) and divides by the households on the Housing Waiting List (15,018) which estimates 7.9% of households. The submission argues that this is a truer reflection of the proportional social housing demand that will emanate from future residential developments in Cork.

3. Managers' Opinion

The point that the estimate of 14% households who will be unable to meet their housing needs through the purchase of an owner occupied house on the open market and does not equate with the need for social housing as not all households who cannot afford to purchase a house on the open market will either desire or are eligible for social housing, is recognised. In recent years the broadening of social housing supports, including the introduction of the RAS and the Social Leasing Initiatives acknowledges this and the Joint Housing Strategy must provide for all of those new households.

As set out in detail in the draft Joint Housing Strategy document, it is estimated that 14% is required both for social housing and also for specialised housing needs. The Authorities took guidance from the Department in their Housing Policy Statement where affordable housing schemes were stood down and did not make an allowance for those schemes in the methodology (as provided for in the legislation as the submission points out).

The Authorities used the methodology set out by the Department's Guidance on Part V of the Planning and Development Act 2000 Housing Supply, A Model Housing Strategy and Step by Step Guide.

Both options put forward in the submission do not take the requirements of future population / households into account. As this element forms the basis for the strategy's methodology it is therefore considered that these options cannot be considered as providing an accurate account of future requirements.

The review of Part V by consultants on behalf of the Housing Agency and the Department of the Environment, Community and Local Government is ongoing. The consultation document prepared by the consultants to inform the Part V review was sent to the DECLG in December last (2012) and they are now preparing a response to the findings reported in the document. On completion they will present the report and response including the next steps to Minister Jan O'Sullivan for her approval.

4. Managers' Recommendation

It is recommended that until the review of Part V is approved and any subsequent legislative measures are put in place, that the local authorities adopt the requirement for 14% social housing

and specialised housing requirements based on the best available information and the Department's Methodology.

Issue Three: West Cork Islands

1. Summary of the main proposals set out in the draft Joint Housing Strategy:

Currently, the Joint Housing Strategy does not set out specific requirements for the West Cork Islands.

2. Summary of the Principal Issues Raised in Submissions:

This submission raises a number of specific points in relation to the Draft Joint Housing Strategy.

1. Firstly, the issue of access to social and affordable housing for potential permanent residents on the Islands, requesting that other opportunities and mechanisms to provide social and affordable housing on the islands should be explored.

2. It notes the requirements under the Housing Act 1988 to provide for the preparation of a housing audit and states that such an audit would confirm the condition and age of the stock as well as providing detail on the extent of the use of the dwellings and identifying potential for renovation and occupation.

3. In addition, the submission also requests that a number of housing actions and policies are developed. Some of the actions most relevant to the housing strategy include:

- Develop and implement innovative island-specific housing policy initiatives;
- Investigate the potential for a voluntary housing association for the islands;
- Increase the provision of permanent housing on the individual islands in a sustainable manner;
- Maintain an island specific approach to housing policy regarding sale of local authority properties on islands;
- Review island housing waiting lists;
- Investigate other alternative solutions to the provision of social and affordable housing, such as use of Compulsory Purchase Order (CPO) under Derelict Sites Acts; and
- Consider the needs for small-scale sheltered housing on the islands

3. Managers' Opinion

The West Cork Islands present a unique challenge for the provision of social housing and should be recognised as having a specialised housing requirement.

The West Cork Islands Interagency Group set up and supported by Cork County Council to address island issues in a co-ordinated manner has a key role to play in particular through the implementation of the housing actions set out in the West Cork Islands Integrated Development Strategy (Aug 2010).

In order to address the difficulty of second / holiday homes forcing up the market price of housing, the County Council in its draft development plan are revising rural housing policies generally and are giving consideration to the needs of the West Cork Island communities.

4. Managers' Recommendation to insert the following text into the Housing Strategy;

The unique characteristics of living on the West Cork islands requires a specialised housing response and it is proposed to include the following text and policy in the Draft Joint Housing Strategy;

Insert the following under "Specialised Housing Requirements" in Section 5

Accommodation on the West Cork Islands:

In terms of providing further social and affordable housing on the islands, there is no zoned land or development boundaries and local authorities therefore cannot avail of the provisions of Part V of the Planning and Development Acts to facilitate such needs on the islands.

Given the ageing population profile of the islands, small-scale provision of sheltered housing for the elderly should be considered. There are a small number of local authority owned housing properties on the islands, with the largest provision comprising a six-unit development on Sherkin Island. Cork County Council operates island-specific housing policies and there is merit in retaining these policies, which recognise the special circumstances of the islands.

Other opportunities and mechanisms to provide social and affordable housing on the islands should therefore be explored such as a voluntary housing association for the islands, or the local authority using its powers under the Derelict Sites Act.

However Cork County Council's ability to assist by way of direct provision of housing is severely restricted due to cuts in Capital Funding. Indirect support in the application of policies and schemes introduced in recent times and assistance to groups who are working towards these goals are options which may be put forward as measures of assistance in the shorter term.

New Policy under Principle 2: To provide housing for permanent occupation in a sustainable manner appropriate to the islands and to recognise and address the differing circumstances between island and mainland housing needs through the work of the West Cork Islands Interagency Group.

Section 3: Next Steps

It is suggested that the Draft Cork Planning Authorities Joint Housing Strategy not be finalised until the City and County Development Plans are adopted. This approach would have the following benefits;

- Avoid a possible conflict arising between the population targets set out in the Planning Authorities Joint Housing Strategy and the Core Strategy proposed in the County Draft Development Plan,
- Allow the maximum amount of time for incorporation of any proposed changes arising from the current Government Review of Part V and
- Avoid the possible necessity to carry out a Variation to the current City and County Development Plans in order to incorporate the approved Housing Strategy into the Plans.

Therefore it is suggested that the following steps be taken with the aim of finalising the Strategy at the same time as the City and County Development Plans are adopted.

- Issue to the City, County and Town Council Members on Tuesday 4th June 2013 for their consideration.
- Elected members consider the report over an appropriate period and are asked to approve the report. It is suggested that Cork County Council members would approve this report between the Development Committee Meeting on *Friday 21st June 2013* and the *8th of July 2013*. The Cork City Council and Town Council members would also be asked to approve the Joint Report by the autumn.
- Therefore by the autumn the agreed “Revised Draft Cork Planning Authorities Joint Housing Strategy” would be in place and this would then be used to inform the respective Draft City and County Development Plans.
- Any final material changes to the Draft Strategy would need to be known by the time the Managers Report on submissions to the Draft Plans had been completed. In the case of the County Development Plan this date is the 22nd May 2014.
- The Draft Joint Housing Strategy will then be finalised after the Amendment stage and would be formally approved at the same time as part of the adoption of the City and County Development Plans.