



# Irish Council for Social Housing

## ***Consultation on the Draft National Planning Framework - Ireland2040***

10<sup>th</sup> November, 2017

### **1. About the Irish Council for Social Housing (ICSH)**

The Irish Council for Social Housing (ICSH) is the national representative federation for non-profit housing associations in Ireland (also known as Approved Housing Bodies or AHBs). The ICSH represents over 250 member organisations that, in addition to providing over 32,000 homes, also deliver a range of complimentary services to tenants including families, older people, formerly homeless households and people with disabilities.

The ICSH was established in 1982 to support and promote the work of housing associations and to develop their distinctive role in the Irish housing system to deliver high quality homes.

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## **2. Introduction**

The ICSH welcome this opportunity to comment on the draft National Planning Framework. This is a significant step in terms of the implications and opportunities provided by a guiding national statement that in tandem with the capital plan could have a transformative effect.

The ICSH welcomes the focus on housing as a key element of the framework. However, the ICSH is concerned that the level of housing supply identified is under representative of the actual amount that will be required. Also, the framework should provide some guidance or vision around the delivery of housing at an affordable cost. In order to strengthen the framework, we make the following recommendations:

## **3. Planning for Growth**

The National Planning Framework must support the integration of planning and housing policy at a strategic level, nationally, regional and locally. This will require a flexible plan, but one that helps steer those factors – economic, environmental and demographic – that influence settlement patterns.

## **4. An explicit proposal to develop a national land use strategy including the development of a land delivery agency**

The assembly of land is critical for the delivery of the housing aims that are centrepiece to sustainable development.

- Local authority land management strategies need to clearly state how land in state ownership will be utilised and include explicitly which sites will be developed by AHBs so that they can develop their pipelines and financial commitments accordingly.
- The Government should utilise the full rigours of policy at its disposal to ensure sufficient land is available and zoned for the common good, i.e. housing. This will include the use of CPO, vacant site levies and any other anti-speculative measures that can be adopted or devised to ensure the availability of land at reasonable cost.

## **5. Ensure the framework provides the tools for delivery of sufficient levels of social, private and rental housing**

The ICSH believe that we need to refocus housing strategies into clear guiding documents at local authority level that accurately forecast local housing, employment and public transport needs. The provision of social housing will be a significant percentage of the 550,000 homes required and the strategies should reflect this. In addition, affordability continues to be a significant problem for those above the social housing income criteria and the introduction of a cost rental approach must be included as was promised in the programme for government.

## **6. The delivery of additional homes should be focused through regeneration, densification of our towns and villages and the utilisation of vacant properties and infill sites where possible.**

To ensure balanced regional development and sustainable living cities that guarantee access to existing services for families and individuals, population growth must be targeted within the existing fabric of our cities, towns and villages through housing development that focuses on reducing obsolescence and ensuring the reuse of existing buildings and brownfield. These are important objectives within the framework.

### **7. The framework should explicitly commit to a clear strategy with specific supported housing projects that will be developed for older people and people with disabilities**

The framework also recognises the important of lifetime adaptable housing and the important role of accommodation specifically designed for older people and people with disabilities. These housing developments connect the housing and health objectives to meet the needs of our ageing population. Lifetime adaptable housing and universal design needs to be explicitly committed to in the framework.

### **8. Sustainable Development**

Our initial National Planning Framework issues paper submission called for the development of social housing to be underpinned by development principles that identify the transport, health and education services essential for social and environmental sustainability. The Framework should also reflect and make reference to Target 11 of the Sustainable Development Goals to ensure access for all to adequate, safe and affordable housing and basic services and also acknowledge commitments in the *UN New Urban Agenda – Habitat III*, that cities and human settlements are inclusive, safe, resilient and sustainable. It is important that a national strategy on land use (as mentioned above) provides for a local planning framework that delivers sustainable new development and infrastructure (including public transport infrastructure) with a commitment to good design and following a low carbon emission pathway. These measures will help minimise vulnerability and provide resilience to the impacts of climate change.

### **9. Conclusion**

The NPF cannot be implemented without the local and national government system working together with all agencies to strive towards achieving the goals of the framework.