



# Irish Council for Social Housing

## *Submission to the public consultation for 'Ireland 2040'*

30<sup>th</sup> March, 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 which, 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.

For further information, contact:

Karen Murphy

Irish Council for Social Housing  
50 Merrion Square East  
Dublin 2

[www.icsh.ie](http://www.icsh.ie) / [REDACTED] / @icsh\_ie

## 2. Introduction

The ICSH welcome the opportunity to make a submission to the strategic planning and development framework, 'Ireland 2040, our plan' (henceforth the NPF). Housing associations work across the country, in urban and rural areas contributing to the local economy, providing and managing homes and services.

This submission draws on the experience and vision of ICSH members and focuses on the role of housing in supporting the development of sustainable communities. The NPF should underpin a twin-track approach to planning and housing so that place-making and the development of sustainable neighbourhoods are key principles contributing to social and economic gain and better quality of life outcomes.

## 3. Key principles for Ireland 2040

The ICSH recognises that demographic trends, employment, services and transport will impact on future housing need and its location and collectively, these considerations will determine the shape of communities of the future. In relation to housing specifically, the NPF Issues Paper states the following:

*it is timely to examine the relationships between housing demand, supply, location and supporting infrastructure as part of a strategic, long term national approach to planning for people and place. This will require a strategic view of likely housing demand and land supply at a national level to support coordinated investment across a number of departments and agencies.*

It is imperative that the NPF recognises the key role of housing in meeting both social and economic requirements for the population. The NPF should deliver a housing system that provides:

- an adequate number of housing units per population (bearing in mind demographic patterns of population growth and decreasing household size);
- housing that is located close to employment, education, services and transport; and
- housing stock that meets the needs of households of different composition.

With these in mind, the ICSH proposes the following broad recommendations.

## 4. Scope of the Nation Planning Framework

**Alignment with Existing Strategic Plans:** It is important that the NPF incorporates and is aligned with existing strategies such as: *Housing Policy Statement (2011)*<sup>1</sup> and *Rebuilding Ireland (2016)*<sup>2</sup>. Other important strategies such as the *National Positive Ageing Strategy (2013)*<sup>3</sup> and *The National Housing*

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<sup>1</sup> Department of the Environment, Community and Local Government. "Housing Policy Statement." 2011. <<https://www.housingagency.ie/Regulation/Housing-Policy-Statement-2011.pdf>>.

<sup>2</sup> Government of Ireland. "Action Plan on Housing and Homelessness" 2016. <[http://rebuildingireland.ie/Rebuilding%20Ireland\\_Action%20Plan.pdf](http://rebuildingireland.ie/Rebuilding%20Ireland_Action%20Plan.pdf)>.

<sup>3</sup> Department of Health. "National Positive Ageing Strategy" 2013. <[http://health.gov.ie/wp-content/uploads/2014/03/National\\_Positive\\_Ageing\\_Strategy\\_English.pdf](http://health.gov.ie/wp-content/uploads/2014/03/National_Positive_Ageing_Strategy_English.pdf)>.

*Strategy for People with Disabilities 2011–2016*<sup>4</sup> must also feed into the NPF document. However, it is important that the NPF operates as a long-term overarching strategy (unlike previous short-term strategy documents) that is subject to modification, but not overwritten.

**Legislative Basis:** There is recognition that the strategy is not a ‘wish list’ and will involve hard choices. As such, the NPF must underpin and act as a benchmark for regional, county and local development plans. As the NPF Issues Paper asserts, the previous national spatial strategy wasn’t adequately supported by the political or local government systems and did not have legislative backing leading to unsustainable, dispersed and fragmented development. The ICSH welcomes the commitment to a Framework that is implemented on a statutory basis.

## 5. Delivery

**National Policy on Land Use:** *Rebuilding Ireland* identifies the National Planning Framework (NPF) as the vehicle for strategic national planning and development policy on housing. The ICSH supports the Oireachtas Committee on Housing and Homelessness recommendation for a national policy on land use that addresses quantity, mix of housing, different tenure and size<sup>5</sup>. It is important that the NPF facilitates the development of such a plan, that takes into consideration evolving housing activation measures such as a vacant housing tax, a reduction in the minimum size for undeveloped sites, and compulsory purchase order measures.

**Data Use:** The requirement that planning and policy reform is underpinned by the use of a robust and coherent spatial data infrastructure across all public sector organisations that enables effective data collection and harmonisation should be clearly articulated in the NPF. The introduction of the postcode as a unique identifier, for example, as well as the *All-Island Research Observatory* evidence-based mapping tools are positive measure here<sup>6</sup>. In terms of data collection, the Framework should also be guided by the National Statistics Board Strategy document 2015-2020<sup>7</sup> and recognise the role of the Statistician Liaison Group in promoting the exploitation of administrative data to inform policy<sup>8</sup>.

**Public and Private Investment:** As is stated in the NPF Issues Paper, it is important that the NPF is aligned to all public and private investment decisions. At the same time, the NPF must have the overarching authority to override any ‘business as usual’ investment proposal that undermines the policy and planning direction of the NPF. It is important, therefore, that the ‘spatial’ or place-based focus required of investment is driven by a community-led ‘bottom-up’ engagement model.

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<sup>4</sup> Department of the Environment, Community and Local Government. "National Housing Strategy for People with a Disability 2011-2016." 2011. <<http://www.inclusionireland.ie/sites/default/files/attach/basic-page/1015/national-housing-strategy-people-disability.pdf>>.

<sup>5</sup> Houses of the Oireachtas. "Report of the Committee on Housing and Homelessness." 2016. <<http://www.oireachtas.ie/parliament/media/committees/32housingandhomelessness/Final-Report-.pdf>>.

<sup>6</sup> "National Planning Framework." All-Island Research Observatory. Web 29 Mar. 2017 <<http://airo.maynoothuniversity.ie/mapping-resources/national-planning-framework/national-planning-framework>>.

<sup>7</sup> National Statistics Board. A World Class Statistical System for Ireland: Strategic Priorities for Official Statistics 2015 – 2020." 2015 <[http://www.nsb.ie/media/nsbie/pdfdocs/NSB\\_Strategy\\_2015-2020.pdf](http://www.nsb.ie/media/nsbie/pdfdocs/NSB_Strategy_2015-2020.pdf)>.

<sup>8</sup> "Formal Statistician Liaison Group." Central Statistics Office. Web 29 Mar. 2017 <[http://www.nsb.ie/media/nsbie/pdfdocs/NSB\\_Strategy\\_2015-2020.pdf](http://www.nsb.ie/media/nsbie/pdfdocs/NSB_Strategy_2015-2020.pdf)>.

## 6. Housing Strategy

**Social Housing:** The requirement for social housing remains a key challenge and will continue to do so as the National Economic and Social Council (NESC) projects that between one-quarter and one-third of the population will require assistance in meeting their housing needs<sup>9</sup>. This needs to be adequately reflected though the NPF and in particular through the use of Part V to the greatest extent possible.

We now have a reliable evidence base to guide the expansion of the social housing stock across the state. And lands in public ownership that have now been GIS mapped by the Housing Agency can and should be identified as sites for the provision of social housing, to be developed by local authorities and housing associations.

**Affordable Housing:** In terms of land management, there is a case for re-examining the 'Kenny Report'<sup>10</sup> and, in particular, the recommendation that building land should be compulsorily acquired by local authorities for 25% above its agricultural value. This should be reflected in a national policy/strategy on land use underpinned by the planning and policy direction of the NPF.

The *Rebuilding Ireland* rental strategy commits to advancing projects providing additional rental accommodation for middle-income households. It is important therefore that cost rental and affordable rental housing solutions are considered integral to the NPF goal of reversing dispersed development by identifying regeneration sites in cities and towns. Adequate supply of affordable housing is key to improving labour mobility for workers and attracting employers particularly foreign direct investment in a continuous manner.

**Housing Type:** Demographic data provide robust evidence of a shift towards smaller households. It is important that the NPF guides a national land use policy that is informed by evolving national patterns of household composition. The NPF is also an opportunity to invite a national consultation and discussion on housing design informed by locality, community and sustainability considerations.

**Existing Housing Stock:** Pillar 5 of *Rebuilding Ireland* sets out to achieve optimum occupancy of the existing housing stock, whether social or private housing. It is important that the recommendations (amongst others) around removing barriers to reuse of commercial properties for housing, the living city initiative, and the development of serviced in-fill sites in small towns and villages are incorporated into the NPF and accompanying national land use plan/strategy. It is also critical that local communities, as they know their own area, are fully engaged and lead in planning decisions around vacant sites and properties. In addition, given the long-term vision of the NPF, there is an opportunity to look at freeing-up existing housing stock by creating opportunities for an ageing population to downsize to smaller homes within their communities. This is addressed further under *social inclusion* below.

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<sup>9</sup> National Economic and Social Council. "Social Housing at the Crossroads: Possibilities for Investment, Provision and Cost Rental." 2014. <[http://files.nesc.ie/nesc\\_reports/en/138\\_Social\\_Housing.pdf](http://files.nesc.ie/nesc_reports/en/138_Social_Housing.pdf)>.

<sup>10</sup> Houses of the Oireachtas. "Report of the Committee on the Price of Building land." 1973.

**Brownfield over Greenfield Site Development:** Underpinned by a robust land use strategy, the NPF is an opportunity to shape a long-term vision that locates communities adjacent to their workplaces, reducing suburban sprawl and car dependence.

**Regional Development:** The NPF Issues Paper identifies the need to curtail Dublin sprawl. It is important that the NPF drives the regional roles of the four cities (Cork, Galway, Limerick and Waterford) and enhances the capacity of villages and towns to grow by restricting one-off houses and developing nuclear and walkable communities. Such an approach is also sympathetic to the needs of ageing populations with reduced mobility and access to transport. Housing associations have played a strong role in revitalising towns and villages and in urban regeneration schemes. There is a need for increased densification of key metropolitan areas outside Dublin, which should be associated with development zones to facilitate development. Outside these areas, policy on regional development should focus on interconnected development corridors and clusters of industrial development, such as along the border and cross-border with agriculture and tourism.

## 7. Social Infrastructure and the Built Environment

**Housing as a Social Good:** The NPF Issues Paper identifies a need to align development strategies with social strategies. It is important therefore that it reflects the need to re-establish housing as a social good, as recommended by the UN Special Rapporteur on Housing in her 2017 Report.<sup>11</sup>

**Social Inclusion:** The demographic projections for Ireland's ageing population will result in greater numbers of older people requiring housing with care in both urban and rural areas. Housing associations have a track record in providing supported housing for older people but often there is a lack of understanding among stakeholders on how best to develop this model. Supported housing should be facilitated in towns, villages and communities located close to appropriate services.

In terms of place-making and planning better neighbourhoods there is a need for the NPF to consider the planning requirements for age-friendly public spaces, as well as playgrounds for young children and public sports facilities for young people working in tandem with voluntary groups throughout the country.

**Sustainable Development:** The development of social housing should be underpinned by sustainable development principles with links to transport, health and education services essential for social and environmental sustainability. The Framework should also reflect Target 11 of the Sustainable Development Goals to ensure access for all to adequate, safe and affordable housing and basic services<sup>12</sup>. 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 that minimises vulnerability and provides resilience to the impacts of climate change as articulated in a proposal for a UK land use strategy<sup>13</sup>. The Draft National Mitigation Plan 2017 (just launched) seems

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<sup>11</sup> Human Rights Council. "Report of the Special Rapporteur on adequate housing as a component of the right to an adequate standard of living, and on the right to non-discrimination in this context." 2017.

<<http://daccess-ods.un.org/access.nsf/Get?Open&DS=A/HRC/34/51&Lang=E>>

<sup>12</sup> "Goal 11: Make cities inclusive, safe, resilient and sustainable." United National Sustainable Development Goals. Web 29 Mar. 2017 <<http://www.un.org/sustainabledevelopment/cities/>>.

<sup>13</sup> Campaign to Protect Rural England. "LANDLINES: why we need a strategic approach to land." 2017 <<http://www.cpre.org.uk/resources/countryside/item/download/4842>>.

to lack a big picture vision around housing, and refers to energy retrofitting rather than future sustainability measures. The inclusion of standards such as passive housing should also inform the NPF.

## **8. Conclusion**

Ireland 2040 plan must emphasise the benefit of investment in social infrastructure, which underpins the growth and stability of the economy. *Rebuilding Ireland*, and the role identified for housing associations within it, supports and underpins the horizontal issues of achieving effective regional development and social inclusion for communities through the provision of long-term, secure accommodation for households.