1. Introduction

The overarching framework for development provided by the National Development Plan has been a positive experience for the country and one that should be built on further in this next NDP.

There is a need to emphasise the benefit of investment in social infrastructure, which underpins the growth and stability of the economy as outlined in the NESC Strategy 2006. There is an historical deficit in this, in particular in relation to provision of social housing, which we must overcome and realise that there is a negative cost associated with not doing this.

The social housing programme will support and underpin the horizontal issues of achieving balanced regional development under the National Spatial Strategy and promote social inclusion in the most practical and effective way through encouraging stability for marginalised households. This also underpins other national strategies such as the Disability Strategy, the National Action Plan on Social Inclusion.

2. Background to Irish Council for Social Housing

The Irish Council for Social Housing (ICSH) is the national federation of housing associations in Ireland. The ICSH has over 290 affiliated member housing associations providing accommodation for families, single people, the elderly, homeless people and people with disabilities.

Housing associations provide accommodation for people who are disadvantaged in both rural and urban areas. The type of accommodation varies according to the category of housing. There are a number of different types as follows:
Irish Council for Social Housing

Submission to National Development Plan 2007-2013

March 2006

- General family type accommodation
- Hostels
- Refuges
- Transitional accommodation
- Long term supported accommodation
- Group homes for persons with disabilities
- Group housing schemes with low support for elderly
- Sheltered housing schemes for elderly

The provision of accommodation is linked with care and support services, depending on the type of scheme. For example, sheltered housing schemes would have a support service in place for the residents to allow for assisted independent living.

Tenants of housing associations are allocated tenancies from the waiting list maintained by the relevant local authority. In some special needs schemes tenants may also come from other sources, such as referral from health services.

The Irish Council for Social Housing is a member of the Community and Voluntary Pillar of Social Partnership and is a member of the Housing Forum.

3. Analysis of NDP 2000-2006 for Social Housing

The NDP was the first of its kind and many of the lessons learned will be useful in framing the next NDP.

In terms of the experience of social housing there were a number of positive and negative factors. The fact that specific targets were established for the sector was very helpful in determining overall level of supply and influencing expansion of the capacity of the sector.

On the flip side, the linking of appropriate levels of funding to any targets set would be crucial as the funding for the voluntary housing sector did not keep pace with the targets set. It was seen in the previous NDP that the level of funding provided at the start of the plan became the actual scale of funding throughout. So that each year there was an incremental increase but as the targets became higher, the funding did not increase sufficiently to match this. As a result, the targets became unachievable and as such irrelevant.

In order to achieve an expanded stock of social housing delivered to some extent by this sector, the difficulties (in addition to funding) in reaching targets should be dealt
with. It was the case in the first NDP that spiralling costs, the problem of land/sites and administrative delays inhibited the level of output.

**Key Principles for NDP 2007-2013**

- Funding should be clearly linked to targets and established within the capital envelopes.
- The next NDP should take account of structural and economic factors that will change over the course of the seven years and make commitments to deal with these through lead departments.
- The development of targets for sites for the voluntary housing sector needs to be included otherwise the output will not be sustained. This will be achieved through land from local authorities, subsidised sites, Part V sites, access to state land.
- Lead departments should undertake to ensure measures are in place that support the aims of the NDP such as administrative measures to support supply etc.
- Focus direct-provision of housing on those most in need. This NDP should focus on those living in disadvantage and most in need of accommodation in the social housing sector and through this meet aims such as eliminating long term homelessness.

**Output by housing associations in National Development Plan 2000-2006**

<table>
<thead>
<tr>
<th></th>
<th>Housing Associations output</th>
<th>NDP Target output</th>
<th>Percentage actual</th>
</tr>
</thead>
<tbody>
<tr>
<td>2000</td>
<td>951</td>
<td>1000</td>
<td>95%</td>
</tr>
<tr>
<td>2001</td>
<td>1253</td>
<td>1250</td>
<td>100%</td>
</tr>
<tr>
<td>2002</td>
<td>1360</td>
<td>1500</td>
<td>90%</td>
</tr>
<tr>
<td>2003</td>
<td>1617</td>
<td>1750</td>
<td>92%</td>
</tr>
<tr>
<td>2004</td>
<td>1607</td>
<td>2750</td>
<td>58%</td>
</tr>
<tr>
<td>2005 *(Jan-Sept)</td>
<td>*891</td>
<td>3250</td>
<td></td>
</tr>
</tbody>
</table>

4. **Priorities for Housing in NDP 2007-2013**
The overall stock of social housing in Ireland has fallen to an insufficient level and given that demand will not diminish due to demographic, economic and social factors, an ambitious programme of delivery for social housing is required through this NDP.

While there is no official measurement of the housing stock in Ireland, total ESB connections suggest a stock close to 1.6 million dwellings or 400 per 1,000 population. The EU average is 450 per 1,000.

It is estimated that there are approximately 127,000 units of social rented accommodation between local authorities, voluntary and co-operative housing associations. According to the CSO, social housing stock as a percentage of the national housing stock accounts for 7.2%.

In order to overcome this shortfall the NESC (representing the Social Partners) has recommended increasing the total stock of local authority, voluntary and co-operative housing to approximately 200,000 units by the year 2012\(^1\).

Social housing output, including new build, Part V and acquisitions, added approximately 6,000 units to the stock each year over the period of Sustaining Progress. However, the sale of local authority units through tenant purchase accounts for approx 1500 units per annum. Therefore the net gain of social housing units to the total social housing stock is in the region of 4,500 units per annum. A total of 4,414 social rented dwellings were sold to tenant purchasers during the years 2002 – 2004.

It is therefore estimated that an average of over 10,400 additional rental housing units are required each year to the year 2012 to reach the NESC target.

**Demand for social housing**

There is a persistent backlog of outstanding social housing requirements in both urban and rural areas, as reflected in the March 2005 Local Authority Assessments of Social Housing Needs. This shows that 43,684 households were deemed to be in need of social rented housing.

The DoEHLG data also shows that over 36,000 (84%) of these applicants have incomes below €15,000 per annum and 60% of the applicants were on the waiting lists for over one year. The increase of 16.8% of households not being able to meet the costs of existing accommodation makes a strong case for more social housing with differential rents.

While the current numbers of homeless households is at present unknown the last assessment in 2002 revealed a total of 3,773 homeless households.

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Each year there is approximately 3,500 casual vacancies. In addition to new lettings this brings the total annual lettings to in the region of 10,000. However the results of the 2005 assessment show that 40% or 17,667 were added to the waiting list during the year. This points to annual new demand well in excess of annual lettings.

Other demand factors include:
- Demographic trends indicate the need to ensure an adequate supply of social rented housing within the new population parameters moving towards 4.5 million and beyond.
- Achieve appropriate and adequate responses to the needs of those elderly, the homeless and persons with disabilities who require suitably designed housing with various levels of on-site care and support.
- Impact of the numbers seeking housing no longer limited under the Habitual Residency Condition.

In relation to setting targets for the voluntary housing sector the following provides a framework under which voluntary housing associations could contribute to meeting the NESC targets in partnership with local authorities.

<table>
<thead>
<tr>
<th>Year</th>
<th>Units</th>
</tr>
</thead>
<tbody>
<tr>
<td>2007.</td>
<td>2300</td>
</tr>
<tr>
<td>2008.</td>
<td>2500</td>
</tr>
<tr>
<td>2009.</td>
<td>2750</td>
</tr>
<tr>
<td>2010.</td>
<td>3000</td>
</tr>
<tr>
<td>2011.</td>
<td>3200</td>
</tr>
<tr>
<td>2012.</td>
<td>3300</td>
</tr>
<tr>
<td>2013.</td>
<td>3500</td>
</tr>
<tr>
<td>Total</td>
<td>20,550</td>
</tr>
</tbody>
</table>

The achievement of balanced regional development with particular reference to the framework set out in the National Spatial Strategy can be adhered to through the framework of the social and affordable housing action plans.

Promotion of Social Inclusion;
• The provision of social housing to disadvantaged families, people with special needs such as the homeless, persons with a disability, elderly will provide stability to households to enable them to access services such as health care, education, childcare and promote their inclusion in society.

• The inclusion of child care facilities in certain projects will assist the aims of promoting access to affordable childcare to enable workforce participation.

• The provision of accommodation with support services for people with disabilities and the elderly will provide sustainable communities for marginalised groups in a cost effective setting, reducing the dependence on more expensive models such as nursing homes or institutions.

5. Infrastructure

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

General organisational capacity

There were over 40 housing associations which in 2006 will have developed and completed new social housing projects in the voluntary housing sector. Although many housing associations would be characterised as community/locally based organisations and generally develop a small number of housing projects, the cumulative impact of such projects is considerable and in the period of the first NDP 2000-2006 will have provided 50% of the total housing association output throughout the country. In addition, there are larger housing associations with an ongoing building development programme which provide social housing over a number of locations. The number of active housing associations has increased by twofold since the inception of the last NDP 2000-2006 and this has resulted in an increase of 60% in housing association output between the years 2000 and 2006.

Therefore, due the higher base line of current housing association output and also the progressive increase in output between 2000 and 2006, the housing association sector would be confident that the sector is working well below its full capacity and significant existing resources to allow for further expansion.

At the onset of previous NDP 2000-2006, housing associations invested in a number of specific capacity building measures including recruiting specialist staff in the area
of housing development and management in the expectation of significantly increased development activity and an increased stock of housing to be managed.

**Housing Development**

One of the new instruments to increase supply of social housing from an operational aspect was the introduction of Part V of the Planning and Development 2000-2002. This was only introduced in the early part of 2000-2006 National Development Plan and therefore the impact of this Part V mechanism was negligible in last NDP in the provision of social housing by housing associations.

It is anticipated that in the National Development Plan 2007-2013, the use of Part V will provide a positive fast tracking mechanism in the supply of social rented housing for housing associations. This should be undertaken by local housing authorities implementing their powers to nominate housing associations to manage and own Part V social housing projects. However, the number of eligible Part V developments which will have received planning permission and subsequently a Part V planning agreement should be considerable assuming local authorities are exercising the preferred option of transferring newly completed units, which should expedite the completion of newly completed social housing units.

In addition, housing associations in the next NDP will adopt a number of flexible procurement arrangements which would ensure greater speed of delivery of new social housing projects. These would include turnkey and design and build projects which can ensure a shorter time period in the ability to turn round new social housing projects than solely relying on the traditional form of procurement which has a greater lead in time.

**Housing management**

One core part of the operation of housing associations is the management of its social housing stock. The framework by which the management of housing stock is governed is established through the Department of the Environment Heritage and Local Government with compliance on various housing and development issues being the specific responsibility of local housing authorities. The housing association sector has considerable housing management expertise already in place and this is supported by the fact that the annual increase in social housing stock spread over a number of housing associations would not present a burden on existing resources.

**Overcoming blockages**
Support from local housing authorities. Housing associations ability to deliver an increased new build programme relies heavily on local authorities in four key areas:

- Confirmation of profile and scale of housing need,
- Applying for planning permission,
- Provision of low-cost sites,
- Administration of funding.

The role of designated officer appointed for housing associations is key to overcoming blockages. This includes having a direct impact on what role is envisaged for housing associations, implementing the targets in the action plans etc.

**Land intervention measures in order to ensure guaranteed supply of building land**

This is central to the ability of housing association to expand output under the National Development Plan 2007-2013. Local authorities have a key role in this respect as they have the powers designate to allocate building sites to housing associations. Between 2000-2006, there had been a significant fall in the supply of low-cost sites to housing associations with the consequence of housing associations having to primarily source land on the open market.

Therefore, a significant increase in the supply of low-costs sites by local authorities to housing associations is required from 2006 to ensure regular supply on an annual basis.

Also, a Land Management Plan to ensure 10,000 – 12,000 sites are designated for both voluntary and co-operative housing projects for the period 2006 – 2010 and the Local Authorities and the Affordable Homes Partnership should be enabled to provide a lead role in supplying these sites.

**New Financial and technical arrangements required for housing associations**

In order to ensure the maximum efficacy of the current process in approving and sanctioning the current two-tier technical approval system between the local authorities and the Department of the Environment Heritage and Local Government would need to resolved.

**Access to the HFA**

An additional instrument was included in legislation in the Housing Miscellaneous Provisions Act 2002 to allow housing associations to have direct access to the
Housing Finance Agency. This has not been achieved despite the fact this was a request from the ICSH in a submission to the previous NDP in 1999 as part of a recommendation on the need for streamlining the financing arrangements for housing associations through access to the HFA to facilitate the proposed expansion of up to 4000 homes per year by 2006.

**Adjustments to Funding Limits**

For the duration of the previous NDP, there was a long period between 2002 and 2006 when there were no adjustments made to the capital funding limits. The limits quickly became unrealistic due to building cost inflation. Any long period of non adjustment to capital funding limits for housing associations has a negative impact on the development process as it creates a stop-start scenario and reduces the increased momentum in the various elements in the development process. Therefore, in order to avoid this scenario within the context of the NDP 2007-2013, an annual review should be undertaken by the lead department - the DoEHLG.

The Social Housing Design Guidelines are a factor affecting delivery mechanisms in any future NDP and as such they should be updated and published as soon as possible. The have not been updated since 1999 and this is long overdue.

6. **All Ireland Dimension**

The voluntary housing sector is an example of all island approach in the cross border nature of some housing associations. Ten organisations working in the north are involved in social housing development cross-border having established separate housing associations in Ireland. Opportunities for cross border learning are being explored and partnerships are already working within the voluntary housing sector. Some of these housing associations have already been involved in providing new social housing projects and have contributed to housing association output in small but significant way particularly in rural communities in border counties.
7. **Summary of ICSH Proposals**

- In order to overcome the shortfall in social housing, the **NESC social housing target** of increasing the total stock of local authority, voluntary and co-operative housing to approximately 200,000 units by the year 2012 should be prioritised. It is therefore estimated that an average of over 10,400 additional rental housing units are required each year to reach the NESC target.

- **ICSH Proposals for NDP Target Output for Housing Associations** of 20,550 units over the seven year period.

- **Funding** should be clearly linked to targets and established within the capital envelopes.

- **Land intervention measures** in order to ensure guaranteed supply of building lands.

- The development of targets for sites for the voluntary housing sector needs to be included otherwise the output will not be sustained. This will be achieved through land from local authorities, subsidised sites, Part V sites, access to state land.

- Measures to **overcoming blockages** as detailed above

- **Support from local housing authorities** is key. Housing associations ability to deliver an increased new build programme relies heavily on local authorities in four key areas as outlined above.

- **New Financial and technical arrangements** required for housing associations.