

Public

Environmental and Social Data Sheet

Overview

Project Name:	CEGELOG AFFORDABLE HOUSING & ENERGY EFFICIENCY
Project Number:	2019-0721
Country:	FRANCE
Project Description:	The project consists of the energy efficiency renovation of part of the French Ministry of Defence's housing stock as well as the construction of new social and affordable housing units under a 35-year concession framework.
EIA required:	no
Project included in Carbon Footprint Exercise :	no

Environmental and Social Assessment

Environmental Assessment

The Project includes the refurbishment of 7,968 rental affordable housing units and the construction of 1,380 of rental social and affordable housing units during 2022-2028. The Project is located in several cities in France. The housing units will be occupied by the employees of the French Ministry of Armed Forces.

France, as an EU Member State, has harmonised its environmental legislation in line with the relevant EU Directives: EIA Directive 2011/92/EU, SEA Directive 2001/42/EC and Habitats Directive 92/43/EEC, Birds Directive 2009/147/EC and Energy Performance of Buildings Directive 2010/31/EU.

In addition, for the construction of buildings, the French legislation (Décret n° 2011-2019 du 29 décembre 2011 portant réforme des études d'impact des projets de travaux, d'ouvrages ou d'aménagements) requires an EIA :

- For any project of more than 40,000 m² or 10 ha,
- On case-by-case analysis for project between 10,000 m² and 40,000 m² or 5 ha and 10 ha.

In line with the French legislation, the housing constructions will be required to have the relevant building permits in place before the construction. This means that EIAs and relevant assessments under the Habitats and Birds Directives, if required, will be completed before.

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However, this is not expected as the constructions will take place in existing urban areas and refurbishments will not need an EIA.

Environmental Competent Authorities in France have put in place monitoring requirements under the EIA and protected areas.

The Project is located in urban developed areas. The housing constructions and refurbishments will be implemented by an experienced Promoter (concessionaire), selected after a public tendering process.

The project will also contribute to the redevelopment of existing brownfield and under-used sites.

The Project will have an impact in the environment during construction, e.g. increasing noise and vibration levels, and will impact groundwater and air quality. Adequate mitigation measures will be considered together with the enforcement of good practices. The Project's impact at the implementation stage will be short-lived and reversible, at a level which is deemed acceptable.

At operation stage, the Project, via the element of energy efficiency rehabilitation, will have a positive impact in environment reducing the energy consumption and therefore contributing to mitigate climate change by way of reducing greenhouse gas emissions.

In addition, the operation will help to extend the useful life of the buildings, which improves the condition of the residential stock overall and minimises construction waste in the long term. Overall, the operation should lead to energy savings of about 121 GWh per year, which will avoid annual greenhouse gas emissions of approximately 19,593 tCO₂e. This project element will also be consistent with the Energy Performance of Buildings Directive (EPBD) 2018/844/EU amending 2010/31/EU and the Energy Efficiency Directive (EED) 2018/2002 amending 2012/27/EU.

Social Assessment, where applicable

The Project aims to provide affordable housing to medium income households in areas where rents are currently too high. This will contribute to promote social diversity in these areas and to avoid urban sprawl (where such households could find lower rents). The Project is expected to bring important social benefits for households.

The Project will not entail involuntary resettlement. Land will be generally provided by the State or through urban development process and up to date, no major issues regarding land acquisitions have been raised.

The Promoter has developed a Social and Environmental Responsibility policy, which is controlled through an annual audit (performed by the consultant Vigeo).

Overall, the social impact is expected to be positive, as the program will improve living conditions of citizens.

Public Consultation and Stakeholder Engagement

Public Consultation was or will be carried out as part of the planning and urban process, in conformity with EU Directives and French Legislation. Complaints, suggestions and remarks

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received (both from public and private stakeholders) have to be reflected in the final design of each Project.

Conclusions and Recommendations

The Project includes the refurbishment of 7,968 rental affordable housing units and the construction of 1,380 of rental social and affordable housing units during 2022-2028. The Project is located in several cities in France. Therefore, sub-projects will be embedded in the respective urban strategies, which have their Strategic Environmental Assessments (SEA) in compliance with the EU SEA Directive 2001/142.

Given the location of the housing units and the relative size of the individual schemes (cost generally below EUR 50m), most of them are unlikely to be subject to EIA in line with the EU Directive 2011/92/EU. However, should any scheme fall under Annex II of the EIA Directive and is screened in by the Competent Authority, the Promoter shall deliver the EIA to the Bank.

The Project is located in urban areas and is not expected to be in the vicinity of any protected sites including Natura 2000. In any case, the Competent Authority has to provide evidence of the compliance with the Habitats (92/43/EEC) and Birds (79/409/EEC) Directives (Form A/B or equivalent).

The overall environmental and social impact of the framework loan is positive. The Project will be implemented in existing brownfield and under-used sites and will contribute to expand the affordable housing stock throughout areas where the rents are currently too high. The Project will include energy efficient measures for the refurbishment that will lead to low energy consumption. Therefore, socio-economic benefits in terms of urban development, energy efficiency and climate change mitigation are expected.

Although the selection of the concessionaire has not been finalised yet by the contracting authority, after the pre-qualification process, the institutional capacity of the Promoter to manage the environmental and social issues is deemed good. Therefore, subject to conditions mentioned above, the Project is acceptable for the Bank in environmental and social terms.