

Environmental and Social Data Sheet

Overview

Project Name:	HFA IRISH SOCIAL & AFFORDABLE HOUSING PROGRAMME
Project Number:	2021-0015
Country:	IRELAND
Project Description:	The proposed Framework Loan to the Irish Housing Finance Agency (HFA), is for financing the retrofitting of existing rented social housing and the new construction of energy-efficient social and affordable housing throughout the country in the period 2021-2025. In the main, final beneficiaries will be municipal authorities and approved housing providers.
EIA required:	Although the indicated investment schemes do not currently require an EIA it is possible a determination will be made by the competent authorities under Annex II of the EIA Directive depending on the precise nature and location of the investment
Project included in Carbon Footprint Exercise ¹ :	no

Environmental and Social Assessment

Environmental Assessment

The EU SEA and EIA Directives (respectively 2001/42/EC and 2011/92/EC as amended (e.g.: 2014/52/EU)) are incorporated in Irish law under the Planning and Development 2000 (as amended) and associated regulations. The Habitats Directive 92/43/EEC and Birds Directive 2009/147/EC have also been transposed into Irish law. In addition, both the EIA and SEA are subject to their own separate regulations (European Communities (Environmental Impact Assessment) Regulations, 1989 (S.I. No. 349 of 1989) and Planning and Development (Strategic Environmental Assessment) Regulations 2004 (S.I. No. 436 of 2004)). It is a requirement that Environmental Impact Assessments, Screening Opinions and SEAs carried out in Ireland are made available for viewing by the public at the office of municipal authorities or purchase at a fee not exceeding the reasonable cost of making a copy.

The approximate 1,300 new social housing schemes will be carried out in accordance with the relevant local development plans, which are informed by the SEA process as a matter of law, and will be subject to an EIA if they are 'screened in' by the competent authority. Schemes are expected to be located outside the vicinity of any protected area, having no effect, potential or likely on them.

¹ Only projects that meet the scope of the Pilot Exercise, as defined in the EIB draft Carbon Footprint Methodologies, are included, provided estimated emissions exceed the methodology thresholds: above 100,000 tons CO₂e/year absolute (gross) or 20,000 tons CO₂e/year relative (net) – both increases and savings.

The construction stage of each new build housing scheme is likely to generate some adverse impact on the environment in terms of noise and emissions but these are expected to be temporary and reversible, and mitigated by appropriate measures that are typically a condition of permission by the competent authorities to build. Given the increasing emphasis within the Irish urban planning system on concentrating new development within existing areas it is likely that the investments will result in a more compact urban form and hence minimise the consumption of greenfield land.

The retrofitting of existing social housing units is anticipated to deliver savings in primary energy consumption approximately in accordance with the national target for existing dwellings of 48KWh/m²/y.

Social Assessment

The investment in social housing will improve social inclusion by helping lower the income barrier to living in urban areas particularly in the Greater Dublin Area and other major Irish urban centres, where affordability is a significant issue. It is also possible that the Project will cater for elderly tenants by funding housing schemes dedicated to providing bespoke accommodation for this sector of the population, including on-site care.

The final beneficiaries (municipal authorities and approved social housing providers) have a long track record in resettling people. The resettlement process is of a very participatory nature and in line with applicable law.

Public Consultation and Stakeholder Engagement

Public consultation is provided for under the Irish building (planning) approval process, giving members of the public the right to view and make formal observations on development proposals. Irish legislation also requires the relevant authorities to undertake consultation with the population during the preparation of spatial plans, which are instrumental in guiding the location of social and affordable housing, and take any observations received into account before the plans are approved.

In addition, where they are required, EIAs must be circulated to statutory consultation bodies and made available to the public for comments. The EIA, together with any comments, must be taken into account by the competent authority, e.g. municipal authority, before it may grant consent.

According to the information provided by HFA, to date there are no major complaints on-going related the resettlement process. The probability of having further major complaints is low.

Conclusions and Recommendations

Overall, the net environmental impact is expected to be positive. In addition, the Project should bring about social benefits by regenerating affected urban areas and helping to reduce the shortage of social housing, improve the quality of such housing, and create better living conditions for eligible households with below-average income

The Promoter will be required to act according to the provisions of the relevant EU Directives, including SEA (2001/42/EC), EIA (2011/92/EU) and subsequent amendments (e.g. 2014/52/EU), Habitats (92/43/EEC) and Birds (2009/147/EC) Directives as transposed into national law. Regarding project schemes that are deemed to require an EIA, the Promoter will



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be requested to deliver the full ESIA, and the NTS to the Bank before Bank funds are allocated.

Schemes will be located outside protected areas including Natura 2000. Nevertheless, the Promoter has to provide evidence of the compliance with the Habitats and Birds Directives (if applicable) before the Bank funds are allocated.

The institutional capacity of the Promoter (HFA) to manage the environmental and social issues is deemed very good. Therefore, given the nature of the operation and the procedures concerning EIA and nature protection put in place by the competent authorities in Ireland, subject to the conditions mentioned above, the Project is acceptable in environmental and social terms.