HOUSING ACCESS FOR ALL?

An Analysis of Housing Strategies and Homeless Action Plans

Executive Summary

Focus Ireland Simon Communities of Ireland Society of St Vincent de Paul Threshold

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FOREWORD

Concerned with the increasing housing need and problem of access to appropriate and secure accommodation for all people, the four voluntary organisations, *Focus Ireland, Simon Communities of Ireland, Society of St Vincent de Paul and Threshold* came together to carry out a major research project, the first of its kind, analysing the Homeless Action Plans and Housing Strategies. The research examined the 33 housing strategies and 20 homeless action plans available as of June 2002, emphasising what these documents revealed about the housing and accommodation problems faced by disadvantaged social groups and the policies proposed in response.

We believe that the analysis of these critical social issues and policies are particularly important at this time in view of the rapidly deteriorating housing and homelessness situation confronting people on low incomes over recent years. With rents escalating and local authority waiting lists lengthening, low-income and vulnerable households are being forced into inappropriate, often sub-standard accommodation or into homelessness.

We certainly welcome initiatives such as the production of *Homelessness – An Integrated Strategy* and Part V of the Planning and Development Act, 2000. However, our research revealed many worrying housing trends and policy inadequacies, which must be addressed. It is clear that the problems of housing need and homelessness have become more urgent after recent years of escalating rents and inadequate programmes of social housing, while related concerns with social integration and sustainability emphasise the complexity and scale of the policy challenge. Local authority housing strategies taken together fail to reduce waiting lists for social housing significantly as the level of investment will not cope with existing need plus anticipated future need. The homeless action plans for the most part fail to deal adequately with the need for a continuum of housing options, such as sheltered, assisted and permanent accommodation, or with the fundamental question of prevention.

Other concerns arising from the research include the absence of a statutory basis for the homeless action plans (raising concerns regarding the priority afforded this issue); the inadequate resources available at local level to research, develop, co-ordinate and implement the plans; the failure to set targets or clear commitments; the apparent tendency to plan for housing-led rather than integrated development; land prices and the adequacy of public land banking programmes and uncertainty regarding the implementation of the 20 per cent provision under Part V, and in particular its use as a social housing mechanism.

Finally we believe that the research findings are even more critical in today's context of fiscal restraint and slower economic growth and the upcoming opportunities to review the strategies and plans. Taking into account our core concern for those experiencing housing disadvantage, we four organisations call for certain key actions. We attach particular urgency to the recommendations listed on the following pages, which arise from the main research report. *It is our view that a prompt and constructive response to these recommendations would substantially relieve the housing problems experienced by many of the most vulnerable in Irish society.*

PRIORITY RECOMMENDATIONS FOR EARLY ACTION¹

- 1. Government must redouble efforts to at least achieve the social housing investment set out in the National Development Plan, especially given the slippage expected in 2002 and 2003. The housing strategies, which were prepared after adoption of the NDP, indicate that local authority waiting lists nationally will decline by less than 1,400 households a year, making lengthy waits by households in need a chronic feature of Irish society. If the government fails to deliver the output promised by the NDP, the situation will become even worse. (Details on page 11)
- 2. Government should put **homeless action plans on a statutory basis** immediately. This measure should enable the timely delivery of future plans, meaningful implementation and monitoring of actions in the plans, and the integration of the homeless action plans with the housing strategies and Traveller Accommodation Programmes. (pages 12, 18)
- 3. The Minister for Housing and Urban Renewal should initiate an **independent** review of *Homelessness An Integrated Strategy*, to be completed by the end of 2003. A Joint Select Committee of the Oireachtas on Homelessness should be established to receive this review and recommend actions based on its findings. (page 25)
- 4. The **Homeless Fora** created under *Homelessness An Integrated Strategy* **should be continued** in any reformulation of the homeless action plans. The fora should be resourced to create targeted, specific plans and should include statutory actors of sufficient seniority to ensure the mainstreaming of the actions within the plans. (pages 12, 20)
- 5. The Department of the Environment and Local Government (DoE&LG) together with the local authorities must take urgent action to **improve the quality and timeliness of their information about the extent and nature of housing need, including homelessness**, for example by tracking flows of individuals in and/or out of homelessness, by reporting age, family status and other characteristics of people who are homeless, and by adopting appropriate information technology. The prompt implementation and adequate resourcing of the integrated information technology package for local authority housing departments, currently being developed by the Computer Services Board, will be important in this regard. (pages 21-22)
- 6. Government must **resource local authorities and health boards** so that they have the expertise and funding mechanisms to develop, co-ordinate and implement the housing strategies and homeless action plans to help ensure housing access for all. (page 19)
- 7. All local authorities and their partners should incorporate specific commitments into their homeless action plans regarding the provision of

¹ The ordering does not imply ranking in importance.

accommodation and services to reflect the continuum of care needed from crisis through move-on accommodation to settlement. (page14)

- 8. In keeping with the National Anti Poverty Strategy, by the end of 2002, local authorities, under guidance from DoE&LG, should set targets for the maximum time that households can expect to spend on the waiting lists for social housing, and the targets should be incorporated into the housing strategies and homeless action plans. (page 17)
- 9. Before March 2003, DoE&LG should provide local authorities with detailed **guidelines for conducting the review of their housing strategies** so that they are based on consistent and reliable information and methodology. (page 21)
- 10. On the basis of the tri-annual social housing needs assessment this autumn DoE&LG should **announce the next programme of social housing starts for 2004-2006** to facilitate planning and a meaningful review of the housing strategies in 2003. (page 11)
- 11. DoE&LG should retain the 20% provision in Part V of the Planning and Development Act, 2000. It has the potential to promote integrated and sustainable housing for those on low incomes. However the Department should issue guidance to local authorities giving social rental housing priority over affordable purchase housing where there exists unmet social need. (page 14)
- 12. Local authorities in reviewing their housing strategies must look beyond the spatial dispersion of social housing tenants to a more careful linking of the transport, service, amenity, economic and other elements of sustainable, integrated development in order to avoid the limitations of housing-led development. (page 14)
- 13. DoE&LG must organise effective and transparent monitoring of the implementation of the Part V provisions, including detailed case studies to learn the impact on social inclusion and sustainable development, as well as monitoring of output, relief of need, costings and other basic data. (page 26)
- 14. DoE&LG should establish, by July 2003, an **expert inquiry to revisit the findings of Justice Kenny's report** of 1973, and recommend reforms to control land prices for residential development in an efficient and equitable manner. (page 22-3)
- 15. Government must release without further delay a robust National Spatial Strategy so that sustainable development patterns are achievable at local level. (page 15)

Concluding Comment

These various recommendations touch on a range of critical social issues and challenges for public policy. The current and projected levels of housing need and homelessness are alarming in themselves, but it is equally important to keep in view the actual implications, both immediate and into the future, facing those for whom inadequate housing, insecurity and exclusion are everyday realities. Shelter is a basic human need, which means that housing is a central component of developmental processes in human terms. General access to suitable and appropriate housing for all, regardless of social status, must be made the central priority, which in turn demands due attention to the practical steps needed to realise this vision in terms of homeless provision and social need.

These social issues and policy concerns are critical in general terms and require committed and imaginative responses at every level if those already disadvantaged by structural inequality are not to face further marginalisation and exclusion within the housing system. However, their importance is heightened in view of recent tendencies in the immediate environment, including the prospect of a slowing economy and fiscal austerity measures alongside continuing crises of housing need and homelessness. In view of this importance, we the sponsoring organisations urge action on all of the key points highlighted above and throughout the research report, a summary of which follows.

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HOUSING ACCESS FOR ALL?

REPORT SUMMARY

Research Objectives

The over-riding objective was to determine what contribution the planning documents made at a local level to ensuring access to housing² for all. While the local authority housing strategies responded to a number of directives, the research emphasised the evaluation of the extent and character of existing and future need for subsidised and supported rental (i.e., social) housing, and how the strategies addressed this need over the planning period. In brief, the aim was to learn and to assess the housing prospects for vulnerable people across Ireland as presented in the strategies.

The homeless action plans were examined to establish the proposed responses to homelessness, including the structures to be created to manage the response as well as to assess the adequacy of the response, for example in providing health services.

Methodology

Assessment of the housing strategies involved extracting from each document statistics on housing requirements, need and sources of supply as well as qualitative information, such as the nature of social need, socio-environmental and sustainability issues and the public land banking situation. Where strategies provided incomplete information, estimations were necessary to generate a national picture. Alternative estimates, based on historical statistics published by the Department of the Environment and Local Government (DoE&LG), were also calculated for comparative purposes.

Following examination of the documents, interviews were conducted with housing and planning officers of a targeted sample of local authorities to gain their views about the initiative, especially about implementing the strategies.

Each homeless action plan was interrogated under a number of categories taken from Homelessness - An Integrated Strategy, a report developed by an interdepartmental team that formulated the Government's response to homelessness. As of June 2002 (one and a half years after the government's original deadline for completion) there were still ten homeless action plans outstanding, which therefore could not be included in the analysis.

The research benefited from the feedback provided by the project advisory group. Experts from DoE&LG, Trinity College Dublin, a local authority, a health board and a user group participated in the discussions and contributed to the analysis. In addition a seminar was held at Trinity College in April 2002 to review the preliminary findings.

² In this report, we intend a broad definition of the term "housing" to include the wide range of accommodation options required to meet the full spectrum of different needs, which may exist in any local area or community.

The Research Report

The research report is available on the following websites: <u>www.threshold.ie</u>, <u>www.focusireland.ie</u>, <u>www.simoncommunity.com</u> and <u>www.svp.ie</u>. The report is organised into four parts. The first sets the theoretical and planning contexts and outlines the research questions and methods; the second focuses on the housing strategies, reviewing how the plans were produced, what they revealed about the local housing situation and about strategic objectives and policies. Part C analyses the homeless action plans with regard to the implementation structures for delivering the local plans, the commitment (if any) to increased accommodation provision, and the commitment (if any) to increasing access to and the types of support available to people who are out-of-home. Part D sets out the research findings and recommendations directed to central government, local authorities or others. This last part (Part D) is reproduced on the following pages.

Overview and Recommendations

The following sections draw together the various lines of analysis in the research report to provide an overview of the main policy issues and make recommendations. The context is set by briefly reviewing the intended purpose and content of the strategies and action plans. Broadly, the recommendations that follow relate to the local housing issues identified and proposed policy responses, the strategic objectives underlying the whole exercise, the process involved in developing and finalising the plans and implementation issues. The contention here is that there are necessary changes and advancements in each of these areas, which should be considered at the review phase in 2003, if the next round of housing strategies and homeless action plans are to respond more adequately to housing needs and homelessness, thereby helping to ensure general housing access for all.

Context

The recent decision to implement a system of housing strategies and homeless action plans at local level, covering every local authority area, was a welcome departure. The housing strategies, a requirement under the Planning and Development Act, 2000, made the housing needs of the community a material consideration of planning. This move, initiated at central level, had the potential to broaden the remit of planning authorities beyond the traditional confines of implementing land-use controls and facilitating private sector development. It also provided an impetus for building stronger institutional linkages between housing and planning sections within local authorities, as well as evolving more effective consultative routings with voluntary and private agencies involved in housing.

This was an ambitious initiative, in short, incorporating a comprehensive range of local housing issues into the planning system, including housing need and provision, affordability, land, residential patterns and pressures and a range of social inclusion, integration and sustainability considerations. An alternative source of social and affordable housing was also created³ with the introduction of a provision whereby up to 20 per cent of a development on land zoned for residential use or mixed use where there is a residential element could be reserved for such purposes, if there was an identified need.

³ This 'Part V affordable' scheme is introduced alongside the traditional model of direct provision of social rental or (a more recent concept) affordable home ownership. See Appendix for details about the range of housing policies.

The drafting of *Homelessness – An Integrated Strategy* was a further useful step, as it began the task of initiating, for the first time, a fully comprehensive response to this critical social issue. It required plans to cover all geographic regions, touching on the multi-faceted dimensions and complexities of the problem and involving all the key service providers, notably, local authorities, health boards and voluntary agencies.

It must be noted at the outset that these new approaches to planning for housing and homelessness were put in place over similar periods, and when the Traveller accommodation programme was also in process. There is no doubt that the practical challenges for local authorities and others involved were considerable. The introduction of director of housing posts and extra support from the Department, through seminars and funding assistance for consultants helped, but staff shortages locally were sometimes a problem. Nevertheless, the resultant strategies and plans provide a useful picture of housing trends at local level in a period of rapid development pressures and a crisis in housing need and affordability, as well as increasing problems of homelessness. The resultant policy responses are also wideranging and touch on a diversity of important points.

In short, the first round of housing strategies and homeless action plans represents a welcome and ambitious departure in local policymaking and planning. The local authorities, health boards and other contributors are to be commended for their pioneering work in preparing the documents. However, some gaps and concerns remain, and these are worthy of careful attention, given the urgency of the issues at hand for those in housing need as well as the broader developmental implications.

Policy issues

Crisis of social need

The projected levels of unaffordability recorded in the strategies raise questions regarding the ability of the traditional dominant housing model⁴ to respond to all housing needs efficiently and equitably. Uneven development produces profound inequalities across different social groups and areas, leaving many households economically vulnerable (e.g. low-paid workers, those in part-time or temporary employment, unemployed, marginalised groups) and unable to compete in the market, except perhaps at the lower end of the private rental sector.

- It is projected that 33 per cent of new households will not be able to afford to become home owners, based on the calculations prescribed under Part V; that figure rises to 42 per cent in urban areas, compared to 32 per cent in rural.
- This anticipated pressure adds to the concerns arising from the under investment in social housing that occurred during most of the 1990s.

A significant proportion of those priced out of the private market will require social housing, due to low or insecure incomes or a range of other 'special' needs, including those of the homeless, elderly, disabled, lone parents, refugees and asylum seekers,

⁴That is, where ownership rather than rental is supported as the dominant tenure and the majority of households are expected to compete for housing in the private market, non-market provision being afforded a residual and limited role

Travellers, etc⁵. For such households, subsidised home ownership has no relevance. The strategies indicate some important trends.

- There have been significant increases in the scale of social need in recent years, reflected in steadily lengthening waiting lists (the waiting lists contained in the strategies suggest that close to 59,000 households in 2001 had applied for local authority housing).
- Many households face long waiting periods for social housing, frequently over a year and much longer in some cases.
- The most prevalent category of social need (that is, of households accepted onto waiting lists as being in social need) relates to financial hardship. Moreover the reported household income data indicate that social housing (local authority or voluntary) will be the only realistic option for the vast majority of households on waiting lists.
- This reflects the continuing residualisation of the sector, social housing being increasingly marginalised to a welfare role (or a tenure of last resort), serving the poorest households. This contrasts with historic periods of major public construction for general needs.

While the scale and complexity of housing need and homelessness deepens, there are parallel problems in devising and implementing appropriate and adequate responses through the housing strategies and homeless action plans.

- To varying levels of detail, the intentions (or expectations) under the multiannual social housing investment programme are set out in the housing strategies. This includes a reasonable attempt at mapping in a number of cases, setting out plans for different housing types by location.
- However, the strategies indicate there will be persistent social housing shortages nationally, despite the increased rate of provision under the National Development Plan. The estimates and projections in the housing strategies, when added together, indicates that waiting lists will only be cut by about 1,400 households nationally each year (see table below). In other words, the spectre of families trapped in inappropriate temporary accommodation and the broader problems of unmet need will not be properly addressed.
- These social housing shortages/unmet needs are more apparent in some areas of the country than others. However until the quality of the information underlying the projections is improved and standardised, interpretation of those differences is problematic.
- The housing strategies note that planning for a range of special needs as well as low-income households in general, will require greater diversity in housing design and broader service planning and provision than characterised traditional social-housing developments. It is uncertain as to how such sustainable approaches are to be achieved in many instances, however.
- The involvement of the voluntary sector is widely acknowledged, but there is uncertainty as to the scale or nature of its role.

 $^{^{5}}$ As argued in the main report, the categorisation of some people's legitimate housing needs as "special" (as distinct from the "normal" housing needs of the rest of the population) is unsatisfactory as it is in some senses a false distinction and one which may lead to stigmatisation. In reality, these are needs to which the housing system does not respond well, which is a matter for good policymaking to rectify. However unsatisfactory, the term is used here for analytical purposes to highlight particular housing problems.

- Although its importance is widely acknowledged, there is little detail on what role the private rented sector is expected to play in low-cost housing (or more generally as an alternative to social or private ownership). There are no clear policies as to its future strategic role (e.g. should it be seen and supported as a temporary or a long-term social housing solution?).
- Possible alternative models to deal with the residualisation of social housing and related problems were not investigated in the housing strategies. For instance, non-profit provision of cost-rental housing on a general needs basis could be considered as a way of diversifying the rental system and developing an integrated social housing sector, which was not stigmatised as last-resort housing. The associated "rent pooling" in a mature stock would provide a stronger funding stream for management and further construction.

Housing Strategies. Aggregated i letare for Social Housing i rovision							
	2000	2001	2002	2003	2004	2005	
	Number of households/housing units						
Estimated average annual addition social need		9238	9238	9238	9238	9238	
Projected average annual social supply available		10605	10605	10605	10605	10605	
Projected cut in the aggregated waiting lists		1367	1367	1367	1367	1367	
Adjusted waiting lists by year end	58789*	57422	56055	54688	53321	51954	

Housing Strategies: Aggregated Picture for Social Housing Provision

* Estimate; official needs assessment statistics to be released by the DoE &LG in the autumn 2002.

Recommendations: Tackling Housing Need

- Responding to unmet needs and providing social housing should be the priority concern of local authorities, and the Department of the Environment and Local Government (DoE&LG) should reflect this priority in its housing policies. The affordability problems in the market for home ownership is a market failure; it should not be left to local authorities to deal with it through their building programmes, particularly at a time of escalating social need.
- Government must redouble efforts to at least achieve the social housing investment set out in the National Development Plan (NDP), especially given the slippage expected in 2002 and 2003. The housing strategies, which were prepared after adoption of the NDP, indicate that local authority waiting lists nationally will decline by less than 1,400 households per year, making lengthy waits by households in need a chronic feature of Irish society. If the government fails to deliver the output promised by the NDP, the situation will become even worse.
- To facilitate planning and a meaningful review of the housing strategies in 2003, DoE&LG should announce the next programme of social housing starts for 2004-2006 on the basis of the tri-annual housing needs assessment (to be published in autumn 2002).

Homelessness

As an extreme instance of unmet housing need and exclusion, the trends in homelessness are of critical importance. However, it is only recently that

homelessness has been recognised as a social problem. Until the 1980s homeless people were largely regarded as a marginal concern to the Irish administrative and political system. The provision of services and accommodation to out-of-home families and adults has been characterised by fragmentation and a poor co-ordination of effort.

- Despite limited data of questionable quality, it is apparent that levels of homelessness have increased steadily in recent years. All of the homeless action plans which reported figures used independent sources rather than the official needs assessment; these sources revealed a much more extensive problem than the tri-annual figures would suggest.
- Although homelessness is most dramatically evident in urban areas, the problem affects all areas in some form. It is unsure, for instance, as to the extent of "invisible" housing need in rural areas and the movement of people from some counties due to the lack of homeless provision.
- Service provision to homeless adults and families has in the past been characterised by fragmentation and poor coordination. The development of the homeless action plans by local homeless fora present excellent opportunities for increased co-ordination and communication.

The convening of the Cross-Departmental team on homelessness and the subsequent *Homelessness – An Integrated Strategy*, published in 2000, have both been important milestones in the statutory response to homelessness and have, perhaps for the first time, provided statutory and voluntary sector providers with an opportunity to coordinate activities and provide co-ordinated quality services to this most vulnerable group of people. The advantages of the Homeless Fora and their role in developing local responses to homelessness are clear, in that the action plans show a relatively sophisticated understanding of the nature and complexity of the problem in all of its facets. However, some policy areas were relatively weakly developed or overtly aspirational or conditional.

- In the action plans, details on homeless provision vary, and while there are some commitments to emergency and temporary provisions, the critical need to build systems and processes to help people move into permanent accommodation is not dealt with.
- The need for a range of health and social facilities for homeless is recognised in the plans as per the Integrated Strategy, but specific proposals for action are either weakly developed (at many points, they seem to be plans for enablement or partnership more than direct provision) or absent altogether.

Recommendations: Tackling Homelessness

- Government should put the homeless action plans on a statutory basis immediately. This measure should enable the timely delivery of future plans, meaningful implementation and monitoring of actions in the plans, and the integration of the homeless action plans with the housing strategies and Traveller accommodation programmes.
- The Homeless Fora created under *Homelessness An Integrated Strategy* should be continued in any reformulation of the homeless action plans. Fora should be resourced to create targeted, specific plans and should include statutory actors of sufficient seniority to ensure the mainstreaming of the actions within the plans.

Part V Social/Affordable

The Part V approach of allocating up to 20% of new residential (or mixed) developments for housing the less well-off promises a better deal for some households on local authority waiting lists, and the provision should be retained but reshaped to reflect priority needs and supplement traditional social housing programmes. The more or less formulaic calculation of projected affordability problems, leading to a conclusion that the authority can justifiably retain the full 20 per cent under Part V for social/affordable needs, is typical of the strategies. However, the commitment to using the 20 per cent mechanism to address social need and expand social provision tends to be more equivocal. At present the housing strategies too readily view the 20 per cent component as a subsidised route into home ownership for mid-income households.

- The introduction of the concept of "affordable housing", essentially a policy whereby local authorities compensate for market failures by providing a subsidised routing into home ownership for middle-income households, has tended to obscure the critical issues of social need/non market provision by conflating them with concerns about affordability in the market.
- There is uncertainty as to how the 20 per cent provision under Part V will be used to meet social need as opposed to subsidised ownership. Few strategies commit to taking a particular proportion specifically for social housing. Some offer no indication as to the intended social/affordable ratio, while elsewhere a variable policy is adopted, which could leave the implementation (and the ratio achieved in practice) open to challenge.
- It is now clear that this Part V component for 2002 at least will provide no net additional social housing but will instead function as an indirect mechanism for delivering existing programmes/ commitments (e.g. multi-annual programmes).

Recommendations: Part V as a source of social housing

- Provision under Part V should be based on a careful assessment of social need (existing and projected) rather than on estimates of unaffordability alone; where levels of social need are particularly acute, a majority, if not all, of the 20 per cent should be used for social housing.
- However, given the uncertainties associated with provision via the market (in terms of phasing and location of proposed development), robust programmes of direct provision by local authority and voluntary providers must be maintained.

Socio-environmental/sustainability issues

Under Part V, broader social and spatial concerns were also factored into the process, such as "sustainable development" and avoiding "undue segregation". At local level, this latter central directive has, in turn, been interpreted as a key point, linking housing and social inclusion/integration concerns. Historic patterns of segregation were noted in some strategies. There is also a sense that high concentrations of public development continue to occur, most obviously in built-up areas, partly due to limitations in public land banks, but also arising from pressures against social housing or homeless provision in high-cost, high-class locations.

- The segregation of social housing is quite marked in many areas, and the resultant social geography is seen as a factor that tends to reinforce broader inequalities.
- Patterns of segregation have been reinforced by market trends and local political pressure against social development (housing, homeless facilities, traveller accommodation, etc.).
- The residualisation of social housing to a welfare role is also a factor in segregation, as the stock is now largely accessible only to the most marginalised. This is also a contributory factor to its stigmatisation.

Policies to deal with these issues are generally weak, however:

- In practice the "avoiding undue segregation" directive has translated into a policy of social mixing in responding to social need. Other than this "spatial fix", there are few strong policies for integrated development (e.g. service provision, transport, amenity, design). Yet successful infill local authority schemes in Dublin's inner city (e.g. City Quay) provide models for integrated development of social housing.
- Geographic dispersal on its own is insufficient to ensure integration/sustainability. Plans for service provision, amenities, social facilities and transport are central to integrated development in a real sense, as well as design considerations, estate management and access to economic opportunities.
- The failure to develop policies to assist homeless people into permanent accommodation and the slow progress under the Traveller Accommodation Programme raise concerns about the real commitment to "integrated" development/social inclusion.

Recommendations: Integrated Development

- DoE&LG should retain Part V of the Planning and Development Act, 2000. It has the potential to promote integrated and sustainable housing for those on low incomes. However the Department should issue guidance to local authorities giving priority to social rental housing over Part V affordable purchase housing in areas with unmet social need.
- Local authorities in reviewing their **housing strategies** must look beyond the dispersion of social housing tenants geographically to a more careful linking of the transport, service, amenity, economic and other elements of sustainable, integrated development in order to avoid the limitations of housing-led development.
- Planning for integrated development in **housing strategies** must also focus on mixing house types to meet different social needs (singles, lone parents, elderly, etc.) rather than simply focusing on the location of one particular tenure.
- All local authorities and their partners should incorporate into their **homeless action plans** specific commitments regarding the provision of accommodation and services to reflect the continuum of care needed from crisis through move-on accommodation to settlement.

The strategies also provide striking evidence of general problems in development patterns and pressures, raising additional critical socio-environmental concerns. These highlight emerging unsustainable spatial patterns and other planning challenges.

- There are significant development pressures on unzoned lands a majority of development occurs on unzoned land in many of the predominantly rural authorities.
- Existing and emerging residential patterns may be unsustainable; the strategies provide abundant evidence of increasing tendencies towards ribbon development, one-off housing, second and holiday homes and urban-generated rural housing (deriving from expanding commuter belts around the main urban centres).

However:

- Spatial strategies to ensure sustainable residential patterns are very weak. Little is being put forward beyond vague aspirational statements.
- Reflective of the weakness of many local policies, the actual patterns unfolding on the ground (urban sprawl, commuting patterns stretching across the midlands, etc.) directly contradict the aspirational statements. In short, there is an apparent gulf between the sustainable development goals and the ability to undertake effective action to actually realise such goals.
- The unsustainable commuting patterns already established cannot be resolved without facing up to the continuing housing crisis in the urban centres. This will require in particular the development of a much more robust rental sector (social and private), which can provide security and reasonable rents, thereby providing people with real tenure choice and easy access to employment.
- A related point is the need to ensure a greater mix of land uses, thereby reducing the need for long-distance movement between different functional areas and providing the opportunity to work/recreate closer to home (re-forging the link between economic base and community).

Recommendations: Housing Strategies for Sustainable Residential Patterns

- Local authorities must design sustainable spatial strategies that curb pressures from second/holiday homes and allow rural communities to develop and maximize the use of existing services/facilities. Social housing and co-operative models can play a central role in these processes (e.g. in rural resettlement, village renewal, special needs).
- The Government must release without further delay a robust National Spatial Strategy so that sustainable development patterns are achievable at local level.
- DoE&LG must renew its efforts to promote a healthy rental (public and private) sector, by measures such as resourcing vigorous enforcement of the minimum standards.

Mapping a new vision for housing at local level

With some exceptions, the plans do not articulate a clear vision or strategic objectives or commit to specific targets. Reflective of the traditionally limited roles and powers afforded policy makers or planners at local level, the documents tend merely to restate central policies, and specific proposals remain largely prescriptive or aspirational. Critically, there remains a relatively weak commitment to prioritising problems of exclusion and marginalisation in the housing system, reflected in the very late production of homeless action plans in some cases and the uneven or equivocal attention to social objectives in a number of strategies.

This represents a lost opportunity. The production of housing strategies and homeless action plans offers a channel for mapping a vision for an inclusive and sustainable housing model. Clarity on these points is also important in order to provide some kind of yardstick for selecting and prioritising policies, as well as designing evaluative systems. A clear statement of vision and objectives will also help to ensure transparency and to guard against the very real possibility that conflicts of interest and political pressures can lead to a dilution or a diversion of policies and energies in one way or another.

Recommendations: Strategic Objectives

• The housing strategies and the homeless action plans need to start from a clear statement of vision and related objectives in order to provide broad guidelines, clarity and transparency, and to clarify some simple questions: What is the point of the exercise? Where do we want to be in five years time?

The precise nature of the stated vision and objectives will vary across different plans. However, the following are examples of some core principles, which could underpin local housing strategies and homeless action plans:

Recommendations: Basic Principles

- Housing is a fundamental right: everyone should have access to suitable accommodation. Homelessness is the most fundamental violation of this principle and should be eliminated.
- Housing is a basic human need and a central developmental concern. It should not be treated in the same way as non-essential commodities for speculation; public intervention is necessary to ensure that the housing system facilitates general housing access and the sustainable development of residential communities.
- The housing needs of the most vulnerable should be the clear priority for local authorities.
- Tenure neutrality and choice should be encouraged; an expanded and vibrant rental system (social and private) is necessary to ensure the availability of broader housing options/choice in all geographic areas.

Objectives and principles of this kind must be stated clearly at the outset. This should provide the basis for a local vision for housing, against which proposed policies and actions can be assessed and indicators for evaluation and monitoring can be designed. More specific targets should also be set.

• Only sixteen authorities attempted projections of additional social need; a further six set targets for reducing waiting lists; however, eleven authorities did not use

the development of the strategy to map the future housing prospects for families and individuals in need.

The need to set targets against which to measure any progress during the lifetime of the homeless action plans is also essential if the work of the homeless fora in preparing the homeless action plans is not to remain a paper exercise. One potentially effective way in which to frame targets for tackling and ultimately eliminating homelessness is to build on those set out on housing and accommodation in the *Review of the National Anti-Poverty Strategy: Framework Document* (though not included in the final report). Key targets set out in the *Document* reflect the concerns expressed in this analysis of the homeless action plans regarding the lack of specific commitments for the provision of a variety of housing and accommodation types and the support services to people experiencing homelessness.⁶

Recommendations: Setting Targets in the Housing Strategies

In keeping with the National Anti-Poverty Strategy, by the end of 2003 local authorities, under guidance from DoE&LG, should set targets for the maximum times that households can expect to spend on the waiting lists for social housing, and the targets should be incorporated into the housing strategies. The targets should include:

- A maximum length for the waiting list
- A maximum time that priority need categories can expect to wait for suitable accommodation
- A maximum time that other households on the list can expect to wait for

Recommendations: Setting Targets in the Homeless Action Plans

- DoE&LG should set an explicit interim target on the reduction of homelessness by the end of the action plan period. The targets on housing and accommodation in the *Framework Document* of the NAPS Review should inform any target set to reduce and ultimately eliminate homelessness.
- Those local authorities without targets in their homeless action plans must ensure that output targets for homeless provision are developed during any review period after the publication of the 2002 homeless and housing need assessment. For example, sheltered accommodation output should be specified, especially given the numbers with mental health difficulties who currently occupy the greater number of emergency places.

Producing the plans

Drawing up the plans and strategies is necessarily a complex and gradual process, requiring effective mechanisms for resourcing, collaboration, data collection and analysis. However, the research highlighted a number of concerns regarding the

⁶ The *Framework Document* of the NAPS Review targets on housing and accommodation include the need for homeless people to remain in emergency accommodation for not longer than 6 months and to ensure that suitable transitional accommodation and long-term supported and permanent housing and accommodation will be available as required, while suitable accommodation and care will be available in relation to youth homelessness.

nature of the planning systems and methodologies involved. Long-term concerns regarding the structural weakness of local government and planning are also relevant here, including the limited funding streams available, narrowly defined role and limited powers afforded local government in Ireland. The traditional remit of local planning authorities involves the regulation of land use, essentially through zoning and the imposition of certain controls. One of the interesting (and potentially valuable) effects of Part V is that it begins to broaden this remit to include much wider socio-environmental concerns, while also forging stronger links between local planning systems and housing concerns. Similarly, *Homelessness - An Integrated Strategy* introduces a requirement that local authorities, in collaboration with other key service providers, develop more explicit programmes for dealing with one of the most extreme forms of social exclusion facing contemporary society. Much remains to be done, however, to ensure that this movement proves effective and practicable in the long term.

The first concern relates to the systems put in place to produce the strategies and plans, including the forging of links between housing and planning units within local authorities and between the authorities and other service providers. There are few apparent linkages in the production or implementation of a number of recent strategies for housing, homelessness and traveller accommodation. The relative priority afforded homelessness in comparison to other housing issues is also at issue.

Recommendations: Planning Process

- Government should put the **homeless action plans** on a statutory basis immediately. This measure should enable the timely delivery of future plans; meaningful implementation and monitoring of actions in the plans, and an integration of the homeless action plan targets with local housing strategies and Traveller accommodation programmes.
- Planning for housing must be clearly informed by (and must itself feed into) the broader social inclusion agenda. This should include the work of county development boards, homeless fora and the National Anti Poverty Strategy.
- Housing strategies, homeless action plans and the Traveller accommodation programmes should feed into one another; these discrete but closely linked plans should become constituent parts of a single periodic process of local planning for housing and related services.

A second concern relates to resourcing in terms of financing the process and internal capacity and expertise.

- Questions arise regarding the adequacy of resourcing, particularly given the breadth of the task involved and the increasing complexity of the local planning environment over recent years as new roles and approaches are devised and introduced (often under the impetus of central agencies).
- Lacking the internal capacity, many local authorities had to rely on outside consultants to produce the strategies.
- Where the strategies were developed in-house, this placed considerable pressure on existing resources, possibly diverting energies from other tasks. There is also

a sense that new challenges and tasks of this kind, which are handed down to local authorities, must compete for a limited pool of resources.

• One immediate negative outcome of the resource limitations is that the homeless action plans were often given less urgent attention than the housing strategies, which are a legislative requirement. The inevitable result is that homelessness is moved even further back on the list of priorities.

Recommendations: Resourcing the Process

- Government must resource local authorities and health boards so that they have the expertise and funding mechanisms to develop, co-ordinate and implement the housing strategies and homeless action plans to help ensure housing access for all.
- The formulation and implementation of the **housing strategies** will require appropriate funding mechanisms for research and policy development at local level, including the employment of in-house professionals. In some cases it may be useful and practicable to explore routings for shared research resources between neighbouring authorities. The possibility of developing partnerships with third level or other research institutions is a possible approach, as well as ring-fencing current funding for dedicated personnel in-house.

A further concern relates to local political pressures and blockages.

- The geography of social housing need and provision is dynamic and stretches across local boundaries; this will increasingly be the case with continued urban expansion and pressures on city housing systems. There is a clear need to develop integrated responses across neighbouring jurisdictions. While there was much collaboration, especially between county councils and urban district councils, few managed integrated responses across city and county council areas or across county boundaries. There is particular resistance to developing integrated social housing responses, including joint waiting lists.
- Some social and environmental proposals also meet with local political resistance in the form of lobbying and pressure from private interest groups. There has been particular resistance to plans for social housing and homeless facilities in some areas (market forces for segregation, in effect) and to spatial strategies for sustainable development (e.g. to restrict urban-generated, one-off housing in the countryside).
- In some cases, pressures from within and outside local councils may have contributed to a 'slippage' in the aim and eventual orientation of the strategies. In effect, this meant that objectives under the social agenda were dealt with more equivocally or were given lower priority.
- A new deal for social housing may be necessary to begin to address its stigmatisation. This is already being addressed in part through more enlightened approaches to design; the possibility of broadening the role of this rental sector, e.g. to general needs provision, would also make a contribution to breaking down prejudices and social divisions.
- Clearer policies on the relative balance between social/affordable housing under the 20 per cent clause should be articulated. At both central and local level, there

should be a firmer commitment to its use as a social housing mechanism (e.g. as a general objective or principle of the strategy). At the same time, there must be a careful balance between guidelines and flexibility to allow for local variations and particular requirements. However, deviations from the guidelines should be permitted in specific and clearly stated circumstances and in a transparent manner.

• Achieving rational and sustainable residential development patterns also depends on implementation of the promised National Spatial Strategy.

Recommendations: Local Political Blockages

- Neighbouring local authorities will have to develop co-ordinated responses to social housing through effective joint **housing strategies**, possibly within the framework of broader regional plans or as a component within national, regional or sub-regional spatial development strategies.
- Local authorities should foster public debate and discussion through political and media channels about social need and provision, as well as the relevance of these issues to inclusive development, in order to build practical consciousness (and acceptance) of the nature of these housing problems and the role of social housing in ensuring housing access for all.

There are also concerns regarding the effectiveness of the consultation mechanisms in developing the housing strategies. This was envisaged as an integral part of the process from the outset (e.g. as stated in Part V of the Planning Act and the Guidelines), and it remains an important dimension, particularly given the necessary involvement of voluntary and private agencies in delivering various aspects of the strategies and the action plans. Effective consultation can also be used a valuable source of local expertise and information.

Recommendations: Consultation

- Consultation by local authorities must be transparent to be effective; inputs from various interest groups should be published, including comment on how/why the plans responded to particular suggestions.
- Various channels for consultation on the **housing strategies** should be developed (submissions, workshops, etc.); as well as providing useful inputs at planning stage, these practices help to encourage a sense of ownership and co-operation. This may be invaluable at implementation stage, which necessarily requires the willing support of various organisations and individuals.
- The Homeless Fora created under *Homelessness An Integrated Strategy* should be continued in any reformulation of the **homeless action plans**. Fora should be resourced to create targeted, specific plans and should include statutory actors of sufficient seniority to ensure the mainstreaming of the actions within the Plans.

A number of **methodological problems** also emerged from the analysis. All of these may potentially weaken the accuracy of some aspects of the plans and leave some provisions open to question.

- The many data problems raise concerns about the accuracy of projections and current needs assessments. This is reflected in the fact that the Homeless Action Plans did not rely on the tri-annual assessment of homeless numbers, looking to alternative sources and surveys instead. Furthermore, the tri-annual assessment is deficient in a number of ways, including the lack of detail on household types, the basis for "defining out" some categories of need, and the likely persistence of "hidden" need (including homeless) due to a perception that an offer of social housing will almost certainly not be forthcoming.
- Some of the assumptions made in the strategies are weak or questionable and some of the housing strategy information on social housing need and supply is incomplete or difficult to interpret.
- There was a failure to co-ordinate projections of housing needs across neighbouring authorities.
- There is no mechanism for generating credible national figures.

Recommendations: Methodology

Housing Strategies

Before March 2003, DoE&LG should provide local authorities with detailed guidelines for conducting the review of their housing strategies so that they are based on consistent and reliable information and methodology:

- The level of detail and frequency of needs assessment must be improved, including more regular assessments of need at local level using a standardised methodology. Assessments should also include data on length of time households are spending on waiting lists and detail on the character of the households and their requirements in terms of house size, location etc.
- There must be greater consistency in reporting social provision trends, including casual vacancies, voluntary housing and other sources of accommodation for low-income households, notably the private rental/SWA system and contributions under Part V.
- There is a need to generate aggregate estimates of need/provision across local authority boundaries (to correspond to housing 'regions') as well as global figures.
- The reviews should contain local authority projections of additional social need and the resultant numbers on the waiting lists during the strategy period, as some have done for this round.
- A stronger analysis of social inequality should be built into the process. For instance, information on income deciles provides a limited picture of housing need without a clearer analysis of social class, economic status, household size /composition, etc. (the available household budget figures provide breakdowns by these categories as well as income deciles and regions).

Homeless Action Plans

DoE&LG together with the local authorities must take urgent action to improve the quality and timeliness of their information about the extent and nature of housing need including homelessness.

- DoE&LG should refine further the data currently collated on homelessness to include the age of homeless persons, their family status, health needs, accommodation needs, duration of homelessness, current and last known accommodation. The data collection must respect the dignity of participants.
- The data should be comparable on a year-to-year basis, to track the progression of homeless people from their initial experience of homelessness through accessing services and into secure, stable accommodation.
- The prompt implementation and adequate resourcing of the integrated information technology package for local authority housing departments, currently being developed by the Computer Services Board, will be important in this regard.

Implementation

A number of recommendations can be made to support the successful implementation of these various social and environmental aims and policies. These relate to the critical questions of development land, Part V social housing, resources, the role of different sectors, the need for a national housing policy and monitoring and evaluation.

The land question

It is a truism to say that social housing cannot be provided without land, yet policies for public land banking are weakly developed. On the other hand, the most proactive action being taken is an extensive land re-zoning exercise to facilitate development, most of it for private ownership.

- In many cases, public land banking is limited, and current multi-annual programmes will exhaust much of what is available. Authorities also have concerns that releasing sites for voluntary providers will reduce their own capacity, given these limits. This can lead to tensions between providers in the public and voluntary sectors, which further constrain provision.
- The excessive price of residential development land, particularly close to or within existing urban developments (which are often the most appropriate locations for social housing due to service accessibility), makes it difficult to acquire adequate public land banks for future need. The current price of land is a major component of housing costs and limits the ability of social housing providers to achieve their aims.
- Sites for social development in peripheral or rural areas, while more economical in some cases, raise sustainability issues given the possibility of isolation and limited access to services in some areas.
- The most proactive policy involves a major re-zoning exercise with no attention being given to the betterment problem or other difficulties, which arose with similar rezoning exercises in the past. The recommendations of the Committee on the Price of Building Land, chaired by Mr. Justice Kenny, provided a model for dealing with this problem as far back as 1973, but these have never been adopted. The two central objectives in setting up this committee were to consider

measures to reduce or stabilise the price of serviced and potential building land and to ensure that the community acquired on fair terms the betterment element arising from works of local authorities (e.g. rezoning, servicing, designation, etc.). The principal recommendation, which has never been acted on, was that local authorities should be able to acquire potential development land designated by the High Court at existing use value (rather than the usually much higher "development" value) plus 25 per cent.

• The analysis reveals a significant level of "land holding", evident in zoned land not being brought forward for development and a high number of latent planning permissions (i.e. a significant proportion of planning permissions granted are not being brought to completion).

Recommendations: the land question

- Government must revitalise a programme of public land banking as an integral part of any housing strategy.
- Government should ensure that actions of the state on behalf of the community and in the interests of socially necessary development (e.g. land re-zoning, planning permissions, infrastructural provisions) do not result in significant gains to landowners.
- The "betterment" problem must be addressed. DoE&LG should establish, by July 2003, an expert inquiry to revisit the findings of Justice Kenny's report of 1973, and recommend reforms to control land prices for residential development in an efficient and equitable manner

Implementation of Part V

One criticism of the 20 per cent clause emerging from the analysis is that it is an indirect means of housing provision, making social programmes more rather than less dependent on market forces (and whatever spatial patterns or housing types they happen to throw up). A related implication is that at least some part of the social housing programme will become more vulnerable to the uneven rhythms and patterns of the residential market, which implies a lack of control over phasing or location; this in turn implies that at least some of the housing available under Part V will be in quite peripheral locations (e.g. peripheral estates around existing conurbations; newly rezoned lands under village or local area plans, etc.). These potential pitfalls need to be faced up to at planning stage in order to ensure that the social element is developed in a sustainable and inclusive manner.

Recommendations: Implementation of Part V

- Local authorities must ensure that plans for new residential housing, including a social and affordable element, cover all aspects of services, amenities, design, transport and management in order to ensure a genuinely integrated development.
- Some Part V housing will be relatively isolated, being on newly rezoned land on the periphery of existing cities, towns and villages; the issues of access and other supports must be included at planning phase to ensure any social housing is provided in a sustainable and inclusive manner.
- A robust programme of direct provision by local authority and voluntary providers must be supported and developed by DoE≶ Part V is a potentially useful additional source of social housing, but it cannot be relied on to replace traditional building programmes, given the uncertainties of the housing market in terms of output, phasing and geography.

Realising the strategies and plans

The research report emphasised at many points the structural weakness of local government and planning systems in Ireland, their role traditionally being limited to land-use regulations and acting as an "enabler" rather than taking on a more developmental approach. It is critical that local plans are properly resourced if they are not to remain purely aspirational and, therefore, powerless to make a difference in housing patterns, social inclusion and the quality of people's lives. As it stands, for instance, it not clear how many of the social inclusion and sustainability aspirations in the homeless action plans and housing strategies will be realised or even pursued. Indeed, one could argue that, without sufficient resources and real commitments, the plans will merely play a legitimating role, giving the impression of something being done about the serious socio-environmental problems in the housing system, but in reality achieving little. Resources, the role of different sectors and national guidelines are important in ensuring the plans are realised and can make a difference.

Housing Strategies

- Social housing providers need to investigate ways of getting a better return for their investment. The betterment problem and reducing land prices is one element in this; alternative building approaches, which might offer good quality and value for money, should also be considered
- The roles of voluntary housing, co-operative models and the private rental sector need to be clearly set out in the housing strategies.
- A number of points raised throughout this report suggest the case for devising a *National Housing Strategy*. This could provide clearer guidelines for the implementation of all aspects of Part V, including the 20 per cent mechanism and other sources of social housing. It could co-ordinate estimates/projections of housing requirements, including social need, and otherwise function as a central research resource. The homeless action plans and Traveller Accommodation Programmes could be factored more effectively into strategic planning. It could provide broad parameters for cutting waiting times on housing lists. In tandem with the *National Spatial Strategy*, this could help to develop and implement rational social and spatial residential patterns. It could also provide a forum for debating/developing further innovations in rental housing (private or social) as well as a means of integrating housing and the National Anti-Poverty Strategy and other relevant policy fora.

Homeless Action Plans

- The Minister for Housing and Urban Renewal should initiate an independent review of *Homelessness An Integrated Strategy*, to be completed before the end of 2003. A Joint (select) Committee of the Oireachtas on Homelessness should be established to receive this review and recommend actions based on its findings.
- This review should address in particular the inadequacies of targets, costings, and timeframes in the local homeless action plans especially in relation to the recommendation in the *Integrated Strategy* that 'Each local authority will assess the homeless situation in its area and prepare an action plan to provide accommodation within three years for those assessed'. It should also investigate the lack of action locally, in particular by Health Boards, to meet the requirement in the *Integrated Strategy* for project funding on a three-year basis.

Monitoring and evaluation

Finally, monitoring and evaluation are also critical elements in implementation.

Recommendations: monitoring and evaluation

- DoE&LG must organise effective and transparent monitoring of the implementation of the Part V provisions, including detailed case studies to learn the impact on social inclusion and sustainable development, as well as monitoring of output, relief of need, costings and other basic data.
- More open monitoring of measures to **prevent homelessness** is needed. The six monthly reports made by the Health Boards to the Department of Health and Children on the implementation of measures and evaluation of the effectiveness of measures relating to persons leaving residential mental health services, acute hospitals and young person leaving care should be made available to the Joint (select) Committee of the Oireachtas on Homelessness.
- The six monthly reports made by the Probation and Welfare services and Prisons Service to the Department of Justice, Equality and Law Reform on the implementation of measures and evaluation of the effectiveness of measures relating to offenders should be made available to the Joint (select) Committee of the Oireachtas on Homelessness.
- The information technology development programme for local authorities must speedily be progressed to improve social need and homelessness monitoring.
- Appropriate funding mechanisms for local authorities to monitor and evaluate their **homeless action plans** in terms of meeting specific targets and objectives and measuring outcomes need to be put in place to ensure that the development of the plans is not merely reduced to a paper exercise.

Conclusions

The research findings highlight a number of important trends and weaknesses in the current housing systems and processes, as well as some deficiencies or limits in the policies, which have been formulated at local and central level thus far. The current and projected levels of social need and the continuing problems of homelessness are alarming, as are the increasingly unsustainable residential patterns, which are unfolding in all areas. With regard to policies, it is evident that, while the strategies have covered affordable housing (subsidised ownership) and the rezoning of land to facilitate development reasonably well, stronger commitments and policies are required to deal with the problems of social need and unsustainable development.

While the homeless action plans were a useful exercise in terms of consultation and beginning the process of tackling homelessness strategically, the outcomes were generally disappointing. The plans do achieve a relatively sophisticated understanding of the nature and complexity of the problem, but policies for dealing with the multiple social and health problems linked to homelessness, prevention and the transition to permanent accommodation are weakly stated or absent.

Overall, the housing strategies and homeless action plans make a welcome start in building a considered and comprehensive response at local level to problems of housing and homelessness, but much more is needed. A number of concerns need to be resolved, relating to various aspects of the planning process involved, the local housing problems identified, the nature and breadth of the planning and policy responses and the successful implementation and monitoring of the plans themselves. Tackling these limitations could make a real contribution towards responding to the issues of social need and homelessness and developing a more inclusive housing system.

The housing strategies and homeless action plans are critical building blocks for achieving housing access for everyone. Focus Ireland, Simon Communities of Ireland, Society of St Vincent de Paul and Threshold intend to make this an area of continuing priority in their research and policy work plans.

APPENDIX

Summary of Housing Issues and Policies*				
Housing Issue	Policies			
General market demand (ownership,	Various policies, such as servicing and rezoning land, and an array of fiscal measures, facilitate and encourage the market sector, but			
private rental)	with a bias towards ownership rather than renting			
Unaffordability	Affordable housing model (1): new houses provided by local authorities on land which they own to facilitate entry into home ownership for households priced out of the market Affordable housing model (2): under Part V, a proportion of houses in new developments may now be acquired for similar purposes Shared Ownership: a routeway into ownership for those unable to compete in the market, involving a number of stages. Eligible households acquire an equity in the house (at least 40%) and rent the remaining share from the local authority (60 per cent or less)			
Social Need/Unmet housing needs	PRS/SWA: some low-income housing is provided by subsidising households renting from private landlords Local authority housing: traditionally, most social need is provided for through direct provision by the local authority Voluntary housing: a relatively minor but expanding alternative source of social housing involves voluntary provision Part V Social: A proportion of houses, theoretically up to 20 per cent, in private developments on zoned land may now be acquired by the local authority to provide for social need			
Homelessness	Provision by local authorities, voluntary sector health boards and other agencies of services and housing options (ideally in a continuum from emergency to transitional to supported to permanent) <i>Homelessness – An Integrated Strategy;</i> Homeless Action Plans now required for all areas			
Socio- Environmental Concerns	Policies for sustainability and social inclusion Under Part V (Act/Guidelines), these include issues such as social integration, counteracting undue segregation and the proper planning and sustainable development of the area (commercial and community facilities, public transport, densities, urban concentration, etc.)			

* Aspects particularly relevant to this report are highlighted.