

## 6. Housing Strategies: The Local Housing Situation

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### Introduction

What picture emerges from the strategies regarding local housing trends and problems? What policies are proposed to deal with the critical issues identified? How are these to be implemented? This part of the report brings together information from the 33 housing strategies prepared by local authorities in 2001, as required under the Planning and Development Act, 2000. Following from the Act itself and the published guidelines, the strategies could reasonably have been expected to engage with a broad sweep of housing issues and policies. The aim in producing housing strategies is to ensure that the 'proper planning and sustainable development of the area of the development plan provides for the housing of the existing and future population' Section 94(1)(a). This strategy must take account of the following.

Local housing situation:

- Existing/projected housing requirements
  - *General population*
  - *Private demand (ownership/rental)*
  - *Affordable needs/pent-up demand*
  - *Social needs*
  - *Special needs (low incomes, homeless, elderly, disabilities, etc.)*
- Housing provision
  - *Market trends (development patterns, pressures, blockages)*
  - *Serviced land availability, zoning requirements*
  - *Housing types*
  - *Non-market systems (local authority, voluntary, public land banking, etc.)*
  - *Development pressures/residential patterns*

Strategic objectives and actions:

- Access/provision
  - *Facilitating development (e.g. zoning, servicing land, planning permissions)*
  - *Ensuring access to housing for households on low incomes*
  - *Housing provision to match varying social needs*
  - *Affordable housing (Part V, other models)*
  - *Social housing (Part V, Multi-annual Programme, Homeless Action Plan, Traveller Accommodation Programme, etc.)*
  - *Sources of land for Social Housing (e.g. public land banking, Part V)*
  - *Active role of Voluntary Sector*
  - *Role of Private Rented Sector*

- Socio-environmental/sustainability
  - *Counteract undue social segregation*
  - *Spatial planning, density, design, location*
  - *Social inclusion agenda*

As is clear from the above, the analysis and discussion must engage with various aspects of the local housing situation (local trends and concerns in housing needs and provision) and strategic objectives and policies (priorities and actions proposed). Within both of these categories, a range of issues will arise (ownership, affordability, general access, operation of different tenures, the land question, sustainability, social integration, etc.), touching on different dimensions of the housing system (market supply and demand, non-market systems, social need, socio-environmental processes and patterns, etc.). However, the trends in housing need and provision and policies relating to housing access for low-income and other vulnerable households are given particular emphasis in this report, in line with the contextual material and research focus set out earlier.

The following sections examine the view of critical local housing issues emerging from the final strategies, while the next chapter examines the resultant policy proposals. The discussion is based on tables of quantitative data, summary typologies, indicative comments from the documents themselves and interview data. By and large, the content and analysis contained in the strategies are similar<sup>15</sup>, replicating a number of points emphasized in the Act and the guidelines. However, these sources highlight common concerns as well as some notable qualitative variations in issues raised and policies proposed, reflecting different orientations and priorities.

## **Housing requirements**

### *General and affordable needs*

In estimating broad housing requirements, including general population and proportion of social/affordable, the strategies generally replicate the step-by-step guide. An analysis of recent demographic trends, house completions, household formation and size provides the basis for projecting year-on-year household formations up to the end of the strategy period. Affordability problems were calculated by projecting from recent trends in income distribution and house prices. Income calculations were based on household budget data from the CSO and ESRI disposable income projections. Income “deflators” were used on national income data to reflect regional inequalities. House price calculations were based on DoE&LG statistics, information on local housing markets from auctioneers and estate agencies<sup>16</sup>, mortgage interest rates and national house price models, such as those in the third Bacon report. Using a standard “annuity formula” from the guide, it was then possible to derive maximum “affordable” house prices (i.e. the upper limit which households can reasonably pay towards the purchase of a house is based on the assumption that repayments should absorb no more than 35 per cent of disposable income). From this, the authorities were left with estimates of housing

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<sup>15</sup> Sometimes hauntingly similar where the same consultants were contracted to produce the report

<sup>16</sup> While surveys of local sources do not appear to have met with much success, generating limited response rates or few useful inputs, they gave some guide on local house price levels.

requirements over the period of the strategy and, critically, an assessment of the extent of unaffordability likely to arise.

### *Social need*

In all cases the 1999 tri-annual assessment is used as a baseline, with varying levels of detail provided regarding categories of need, household size, etc. These are updated to 2001, generally using trends in applications and data from the current lists. Most strategies did not attempt to project social need (as distinct from overall social/affordable – i.e. below the 35 per cent affordability threshold). Special needs were also examined, most commonly touching on issues affecting the homeless, elderly, disabled and Traveller populations. Less commonly, refugee and asylum seeker accommodation needs are raised. All areas have experienced increasing social need in recent years, reflected in increasing waiting lists and a perception in some cases that “housing need throughout the County is at crisis point” (Monaghan, p. 12).

A number of observations also arose in interviews regarding social need and homelessness. One shared concern referred to the rate at which social need had been increasing in recent years and the likely continuation of this trend. In spite of the multi-annual programme and the provisions under Part V (which all are assuming will be *additional* social housing – see below), serious problems would persist – “even with the 20 per cent we were projecting to standstill”. Similar trends in homelessness were noted, including some of the predominantly rural authorities, where the complete absence of dedicated emergency facilities or other accommodation meant increasing dependence on B&Bs (at escalating costs) or the movement of homeless people to facilities in neighbouring counties.

### *Changing nature of social need*

A related concern raised was in the changing nature of social need in recent decades, linked to broader societal shift. First, from the 1980s onward, processes of industrial restructuring denuded many traditional sources of working-class employment, leaving many households jobless and on low incomes and undermining the economic base of many communities housed by local authorities. Subsequently, problems of long-term unemployment and dependency have persisted, and local authority areas have become further residualised due to the surrender grant and because the scheme of letting prioritises the most marginalized (in contrast to more mixed/general needs social housing policies on the continent, a possible model raised by three interviewees). Some areas have since become difficult to let, having a poor living environment and bad image, as well as anti-social behaviour. However, such problems are quite general really and not restricted to one area or tenure.

The strategies also highlight more recent qualitative shifts in the nature of social need, reflected in the most prevalent categories. Notably, more people are being admitted onto the list on the grounds of financial hardship than historically was the case, while categories such as unfit housing are declining in prevalence (see Table 6.1). As one direct consequence of this trend, the income profile of people on the list is such that social housing is seen as the only viable option, very few having sufficient resources to enter

into subsidised affordable options, while low-cost private rental accommodation has become increasingly scarce. This has the further implication that the residualisation of social housing is continuing, being reserved almost entirely for the poorest households, and this raises strategic questions regarding the role of social housing and its continuing stigmatisation.

**Table 6.1 Predominance of Low-Income Households on Waiting Lists: Indicative Comments**

<b>Local Authority</b>	<b>Indicative comments on low-income social need</b>
Carlow	Majority of applicants' incomes < £6,000 – affordable not an option  “The considerable percentage of households eligible for social housing due to financial hardship are unlikely to be able to enter into affordable housing options due to the vast gap between their incomes and even the cheapest housing available” (p.17)
Cork	Incomes very low: 94% below £12,000 (1999)
Donegal	Only 2.5% of applicants had incomes above £16,000 – no option but to seek social housing
Dublin City	Almost 90% of applicants have a gross income less than £10,000  “Such people are thus entirely dependent on the Corporation for adequate housing; for the vast majority, ‘affordability’ of private housing is not relevant, since their low income levels disqualify them from ever purchasing their own housing” (Dublin, p. 55)
DL/RD	Almost 80% of LA applicants had gross incomes of less than £8,000 p.a. in April 1999
Galway City	Over 60% had incomes below £6,000; 0% had incomes of £14,000 or more (2001)
Galway Co Co	Low-income and unlikely to qualify for affordable: 76% £4,000 or less; only 7% £10,000 or more
Laois	Generally from the lowest income categories
Leitrim	90% on the list with incomes below £10,000; 0.8% had incomes over £16,000
Limerick County Council	87.7% have an income below £10,000  “The vast majority of people (87.7%) have a total annual income of less than £10,000. This has implications for their tenure options. It is unlikely that these households will be in a position to enter the private housing market, or that they will be able to avail of the affordable housing option” (p. 47)
South Dublin	Almost 81% of SH applicants have incomes below £10,000  “It should be noted that 95% of those qualifying for social housing indicated that their preferred housing option was local authority accommodation. It is clear therefore that the provision of social housing directly by the local authority or voluntary / cooperative housing in conjunction with the local authority, is the only realistic option for most of the applicants on the Housing List” (South Dublin)

### **Housing provision**

The question of housing provision requires analysis of various aspects of market and non-market systems and a range of related socio-environmental concerns. In the strategies, house completions are examined, highlighting private sector output and trends in planning permission approvals. Some problematic development patterns and market

pressures also emerge, raising issues such as urban sprawl, ribbon development, one-off housing, urban-generated rural housing, commuter housing, as well as more general pressures resulting from house and land-price escalation. Attention is also given to development opportunities and constraints, including land availability (serviced/unserviced, zoned/unzoned) and infrastructure.

#### *Development pressures and patterns*

Part V for the first time places an obligation on local authorities to ensure that adequate land is zoned residential in order to meet the housing requirements in their areas. It is important to note that outside of the major urban areas, land-use zoning has not been carried out to any great extent. The strategies make it clear that a significant proportion of residential development has taken place (and continues to take place) on unzoned land. Furthermore, in many counties, development pressures are most pronounced in the countryside: “the pressure for development in regard to house completions has been more focused on rural areas where the uptake of planning permissions has been at a far greater rate than in urban areas” (Sligo, p. 3-5). Rural authorities also emphasise increasing problems and conflicts deriving from unmet housing need and provision locally and development pressures linked to holiday and second-home development. In short, there is a problematic tension between local housing need and emerging demand patterns in rural areas deriving from these various forces and trends. A related issue arising in all the rural authorities is that of one-off housing:

*It is important to note that the number of one-off planning permissions in rural areas is increasing at a more significant rate than the number of housing units in urban areas. The continuation of this trend is likely to result in increased pressure for rural development and is indicative of the increasing level of speculative planning applications in rural areas in recent years (Waterford County Council).*

The issues of urban-generated housing in the countryside and unsustainable commuting patterns also emerge very strongly, most obviously in the Dublin region, though the issue is affecting all regions (e.g. Waterford County comments that villages and towns in the west of the county are beginning to develop as satellites of Cork City). Many authorities raise the problem of Dublin’s ever-expanding commuter zone, reflecting the depth of the city’s housing crisis and the extent to which its displacement effect has reached. While this is clearly a major issue across the eastern region, the effects are highlighted as far afield as Westmeath, Longford and Cavan:

*The ripple effect spreads up the N3 from Dublin and affects land availability and land prices (and) thus the cost of housing provision. It also creates development patterns that have overwhelmed the normal organic housing growth in the area which would be essentially locally generated rural housing based on the agricultural and service sector” (Cavan).*

### *Development capacity and limits*

On the surface, development capacity is considerable, there being no shortage of serviced development land in quantitative terms. For instance, in the view of local auctioneers, there is enough land zoned and available to meet housing requirements in Tipperary South for the next 30 years.<sup>17</sup> Furthermore, a number of strategies note that there is no shortage of building labour or skills (e.g. Carlow, Galway City and County, Laois, Offaly).

There are, however, other development constraints. These include a spatial mismatch between land availability and demand. Most obviously, some heavily urbanised areas have very limited development capacity but considerable housing need. A further constraint is the lack of control over whether available land is brought forward for development. A considerable degree of “land holding” is expected by all authorities, and this is reflected in the common assumption that a parcel of land greatly in excess of requirements will have to be zoned: “...it is recognized that an additional amount of land will need to be zoned to allow for choice in the market and the inevitable holding back of land” (Carlow).

One final striking trend emerging is the volume of latent planning permissions, something reflected in the “construction lag” – the considerable gap between the number of units for which planning permissions have been granted and the number of houses actually under construction. A surprising number of planning permissions have not been taken up, a trend reported in many areas, both rural and urban. For example in Dublin City, it is reported that as of June 2000, construction had started on 2,300 units, but full permission exists for a further 2,000 units. There were also 4,000 units at various stages in the planning system. Also indicative of the trend is Carlow, where construction on 44 per cent (1,641) of planning permissions granted since 1996 had yet to begin.

**Table 6.2 Development Limits: Indicative Comments**

<b>Local Authority</b>	<b>Indicative comments on development limits</b>
Carlow	Construction lag: high proportion of latent planning permissions: construction on 1641 (44%) granted since 1996 yet to begin
Cork	Sufficient land zoned to meet housing needs, but consideration should be given to the rate at which land is coming on stream at different locations: C. 50% of undeveloped zoned land could be developed at relatively short notice, but the market demand in some areas may exceed immediate supply
Dublin City	Construction lag: June 2000: Construction commenced on 2,300 units; 2,000 outstanding planning permissions
Galway City	Construction lag: Latent planning permissions: 1,929 units
Galway Co Co	Construction lag – significant difference between level of planning permissions and house completions
Laois	Construction lag: 1996-2000: 8485 permissions/2754 houses completed – if the rest of these were completed it would cover total need over the life of the strategy

<sup>17</sup> The DoE&LG inventory of serviced land (last held in June 2001) indicates that there is ample stock of serviced building land available. For example, Dublin City and County currently has about 2,200 hectares (5,400 acres) of serviced zoned residential land, with an estimated yield of 91,400 housing units.

<b>Local Authority</b>	<b>Indicative comments on development limits</b>
Leitrim	Construction lag: notes latent planning permissions
Limerick City	128 ha available in the City/3,800 units; however, assumes only 50% will be developed due to the “constraints of current ownership”
Monaghan	Construction lag: significant divergence between planning applications and permissions and completions; developers purchasing land but not developing
Offaly	Evident construction lag in the disparity between planning permissions granted and completions – suggests that developers previously speculated on land values and are now becoming more cautious about completing developments
Sligo	161 ha/1025 units of zoned residential available; however a “significant amount may not be developed due to servicing, ownership or purely economic reasons” Uptake of rural planning permissions far greater than urban; approximately 1,163 units with planning permission in urban areas that have yet to be constructed
Tipperary NR	Adequate zoned land, but geographic mismatch with demand Lack of and inadequate capacity of existing sanitary facilities in towns and villages is a serious obstacle to sustainable development and a contributing factor to one-off housing
Tipperary SR	Over 3,000 units with planning permission have yet to be developed
Westmeath	Construction lag: Low ratio of completions to planning permissions – evidence of “speculative and investment planning permissions that have been granted in recent years”
Wexford	185 ha available for residential development/6121 houses – just about sufficient for projected need, but still inadequate since it is unlikely that all of it will be brought forward for development
Wicklow	Sufficient zoned and serviced land, but unlikely to all become available for development, thereby creating a shortfall in effect

Finally, the provision of private rental accommodation is also raised in most cases, though detail is minimal, usually highlighting the failure to regulate the sector, low levels of registration and rent escalations. In general, the brevity of comments on this sector could be read as an admission of not really having any clear picture as to what is going on. The only other consistent comments involve summary points drawn from the report of the Commission on the Private Rented Residential Sector and a broad endorsement of the recommendations arising, as well as largely aspirational statements regarding the importance of this sector in the local housing system.

#### *Non-market systems*

Generally, the public authority has been and remains the major player within local non-market housing systems geared to meet social need, while voluntary agencies have been marginal. To varying levels of detail, the strategies provide profiles of current social stock (quantity, condition), casual vacancies, trends in completions, activity under the multi-annual programme, and current involvement of the voluntary sector (active associations, units, target group, units in progress, units planned). While data on existing stock, completions and the multi-annual programme are reasonably detailed, reviews of current social housing stock standards are limited, generally involving a broad statement of the age of the stock and an acceptance of the need for (or in some cases a commitment to) field research into the standards or condition of this housing. Data on the important question of over-crowding/under-occupancy is also weak in most cases. Homeless and

Traveller accommodation are covered in varying levels of detail, in most cases through reference to the relevant action plans.

Some of the city councils emphasise the historic importance of non-market activity within the local housing situation, local authority housing having contributed 40 per cent of all stock in Limerick, for instance. Other notable points relate to the historic scale of public housing and the geographic patterns and trends. The spatial concentration of the remaining stock is also an issue, leading to the problem of social segregation, and this is most evident in the urban areas. Dun Laoghaire/Rathdown's strategy notes, for instance, that 35 out of 69 DEDs in the county have no social housing. Such segregation derives from a range of forces and processes, including the tendency of the market to sift and sort housing areas by social class (residential differentiation), as well as pressure from private interest groups against social housing, hostels and other low-income housing in defense of neighbourhood "image" and exchange values.

The current contribution of voluntary providers is outlined in the strategies. The voluntary sector has traditionally played a minor role in social housing, though this is set to expand. The sector has played a more central role in some special needs provisions, and this is usually noted. This includes housing for disabled and elderly people and homeless facilities in existence (though often lacking outside of the city councils) or planned under the Homeless Action Plan. In many of the rural areas, most voluntary activity has involved community-based provision, usually for "local" needs such as elderly or disabled people. These are small-scale (perhaps one or two developments of less than a dozen units), but considered an important local resource, not just in terms of physical housing but also as a contributory factor in rural regeneration and the sustainability of communities. Some of the larger national voluntary housing agencies (principally Respond and Cluid) have been active to varying degrees, though in most strategies it is clear that such involvement is set to increase.

#### *Public land banking*

The land question is also central to non-market systems of provision, raising in particular the issue of public land banking. This is a critical concern, given that the allocation of what is a scarce resource has an obvious bearing on the ability of different housing providers across the market/non-market continuum to achieve their aims. Immediate issues arising include the scale of the current public land bank, development pressures on such land (arising from the increased activities under the multi-annual programme and demand from voluntary housing providers), the likely situation at the end of the current housing strategy, and problems in further public acquisition of land for residential development, particularly in a climate of relative scarcity, high demand and escalating prices (e.g. sites costing £40-50,000 in Westmeath). Table 6.3 highlights some of the key issues emerging.



**Table 6.3 Public Land Banking: Indicative Comments**

<b>Local Authority</b>	<b>Indicative comments on public land banking</b>
Carlow	Land bank will be exhausted by 2004
Clare	Lack of available serviced land for social housing and land acquisition costs
Dublin City	Sufficient land bank for 1,200 dwellings over life of strategy Little scope to acquire any significant lands for housing
Fingal	Council currently has in its ownership sufficient serviced/serviceable land for 1800 units
Galway City	Land bank: 45.4 ha.; almost all reserved for social (LA or VS) and affordable; will be exhausted by end of strategy without further public land banking
Galway Co Co	187 acres in county; 3.079 ha. in Ballinasloe Council had difficulty securing sites in some areas due to rising land prices Voluntary housing associations do not have a land bank and generally purchase on the market or from LA
Kerry	Land bank: 78 hectares (162 acres) Shortage of land available to purchase frustrates ability of LA/vol. to provide social and affordable housing; what is available tends to be too expensive
Kildare	Lack of affordable land in the market
Kilkenny	Public land bank will be exhausted by 2002 Kilkenny Corporation has no remaining land bank; capacity for 111 units elsewhere, but will be exhausted under MAP
Laois	Current land bank: 149.95 acres serviced; 36.85 unserviced
Leitrim	Land bank: 16 ha. (39.6 acres) – enough for three years of social housing programme (MAP)
Louth	Substantial deviation between demand and supply – difficult to purchase land for social housing purposes
Monaghan	Inadequate public land bank

These various issues relating to need and provision highlight important general dimensions of market and non-market systems and the local housing situation as revealed by the 33 strategies and in interviews. The following section examines in more detail the specific projections of housing need and supply, in order to provide an aggregate picture of what the strategies are saying about trends in needs and the ability of local housing systems to meet such need. Local and global data from the strategies are provided to build this discussion.

### **Projections of housing need and supply**

This section first looks at the projections of total additional housing required over the five years between 2000 and 2006. It then focuses on the projections of the housing requirements of households unable to pay market rates for accommodation. This consists of affordable housing need, as defined in Part V of the 2000 Act, and its sub-component, social housing need. The tables that follow give information about the future housing situation described by each strategy. At the outset it must be noted that the analysis is limited due to the problems encountered in extracting information from the documents, notably differing LA interpretations of concepts and information gaps.<sup>18</sup>

<sup>18</sup> Chapter Five provided an overview of the limitations, and the Appendix 1 describes these problems in some detail and looks at the assumptions used by the local authorities in making their projections.

The housing strategies are a first attempt, and neither their findings, nor this summary of aspects of them, can be accepted without reservation. Yet the exercise makes a valuable step forward in Irish housing analysis. Despite the flaws in the data, the housing strategies present a picture of how the housing situation is likely to develop in the coming years, and how the local authorities will influence it. Moreover they provide a good start towards developing a national housing strategy. This section indicates some of the information such a national strategy could contain.

To give a perspective on the changes anticipated by the local authorities, the projections are related to the existing number of households, the existing social housing stock and other benchmarks. Urban/rural differences are revealed by comparing the projections of a sample of mainly rural authorities with those for a sample of mainly urban ones.<sup>19</sup> The information in the individual strategies is cumulated to give a national picture or, if aggregation is impossible, a national estimate is made.

#### *Total additional housing requirement*

Each strategy document calculated the number of new households expected to appear during the term of the strategy.<sup>20</sup> On a nation-wide basis new households were expected to average over 40,000 per year.<sup>21</sup> Taking a standard five-year period, the number of new households would total 203,768 (Table 6.4). The number of households would increase nationally by about 3 per cent per year. The Department's Guide took the household formation projection to represent the level of housing demand that each strategy should address.

The demand pressure from new household formation is projected to be highest in neither the most urbanised nor the most rural counties, but rather in the commuter belt territory of Meath and Kildare and the south east coast.<sup>22</sup> Meath for example expects new household formation to increase on average by 9 per cent annually above the number existing in 2001.

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<sup>19</sup> The urban authorities included are Dublin, South Dublin, Dun Laoghaire-Rathdown, Limerick City; the rural authorities are Kerry, Mayo, Clare, Longford, Monaghan. The choice was determined by data availability.

<sup>20</sup> The housing strategies did not all have the same term. The statistics for this report are adjusted to give a common five-year period total by multiplying the annual average value for the actual strategy period by five.

<sup>21</sup> This projection exceeds other national projections as noted in Chapter 5.

<sup>22</sup> There was no difference between the rural and urban samples in their rate of household formation.

**Table 6.4 Housing Requirement Due to New Household Formation**

County	Projected new households annually as % of the number in 2001	Estimated new households over 5 years	Strategy time period	Estimate of number households in 2001	Average annual increase in households
	%	<i>households</i>	<i>years</i>	<i>households</i>	<i>households</i>
Carlow	4	3175	6	15200	635
Cavan	2	2110	5/6	18214	422
Clare	4	6565	5	35812	1313
Cork	3	19000	5	143500	3800
Donegal	2	4440	5/6	42517	888
Dublin Corporation	2	22000	4	189518	4400
Dun Laoghaire-Rathdown	3	8750	4	65529	1750
Fingal	4	12610	5	58629	2522
Galway Corp	4	4065	4	21224	813
Galway Council	3	6570	6	44272	1314
Kerry	2	4335	5/6	43606	867
Kildare	5	13540	5/6	51536	2708
Kilkenny	3	3335	6	26444	667
Laois	4	3775	6	17946	755
Leitrim	4	1835	6	10166	367
Limerick City	3	3300	5	19841	660
Limerick Co Co	2	4000	6	37960	800
Longford	3	1400	6	10892	280
Louth	4	6140	6	34852	1228
Mayo	2	4575	5/6	38402	915
Meath	9	17920	6	39832	3584
Monaghan	4	2900	5	18065	580
Offaly	3	2690	6	19791	538
Roscommon	2	1790	6	18092	358
Sligo	4	4025	6	21070	805
South Dublin	3	12700	5	73050	2540
Tipperary NR	4	4255	5/6	22388	851
Tipperary SR	2	3060	6	25793	612
Waterford Corporation	6	2013	5+	6314	403
Waterford	5	4445	6	19431	889
Westmeath	5	5595	6	24370	1119
Wexford			5		
Wicklow	4	6855	5	38520	1371
<b>TOTAL</b>		<b>^203768</b>		<b>+1290600</b>	<b>^40754</b>

+ CSO private households estimate in 2001

^ Household statistics missing for Wexford

## Social housing requirement

### *Existing unmet need*

The private market will be relied on to address much of the national housing requirement; however, some households lack the income to effectively demand and pay for the housing that they need. The local authorities, taken together, calculated that some 33 per cent of the households formed over their strategy periods would be unable to afford to buy a home, measured according to the instructions in the Guide. Local authorities differ in the extent of the anticipated problem, ranging from 10 per cent of new households falling within Part V affordability to more than 50 per cent (Table 6.6). The percentages for the five rural counties averaged out at 32 per cent while the average for the four urban ones was higher, at 42 per cent.

The number of households qualifying for 'social' housing is a subset of those with Part V affordability disadvantage, i.e., households lacking appropriate housing who cannot afford to rent or buy, even at a discount. The social need to which strategies must respond includes those already on the waiting list plus the additional households in need expected to appear during the strategy period.<sup>23</sup>

Existing unmet social need is one component of the calculation of the number of subsidised rental units required. The number of households on waiting lists, as reported by all the strategies in early 2001, totaled 58,789. This count is an estimate; the results of the March 2002 social housing needs assessment will become available later in the year.<sup>24</sup>

Households on waiting lists were equivalent to 59 per cent of the total local authority housing stock being rented out in 1999. The greater Dublin area was not disproportionately represented in the total number waiting. The four Dublin authorities accounted for 25 per cent of the total waiting list count while Meath, Kildare and Wicklow added another 13 per cent. The pressure due to a lengthy wait list was greatest in rural and semi rural counties such as Carlow, Laois, Leitrim, Wicklow and Longford. Waterford Corporation's strategy also implies a high degree of pressure, given the population statistic reported. These pressures were also reflected in the average length of time households could expect to spend on a waiting list, at least 12 months in the majority of cases, were reported. In the case of Limerick County, a majority were waiting for more than three years, while a significant number were waiting for more than four years.

Table 6.5 shows each waiting list as a percentage of the total number of households presently living in the area, a possible proxy for relative housing deprivation.<sup>25</sup> Table 6.6 presents affordable and social projections for each area.

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<sup>23</sup> The many concerns noted in Chapter 5 regarding the criteria for accepting households onto social housing lists and the accuracy of such sources as a true reflection of need should be kept in mind. The strategies themselves highlight the many problems

<sup>24</sup> If assessed need increased in 2000 and 2001 at the same rate as it had between 1996 and 1999, then the total count would have reached 47,009 households by March 2001, or 80 per cent of the aggregated estimates in the housing strategies.

<sup>25</sup> The waiting lists of the rural and urban samples each averaged 4 per cent of existing households.

**Table 6.5 Local Authority Waiting Lists in 2001**

<b>County</b>	<b>Waiting list (no. of households)</b>	<b>List as % total households in 2001</b>
Carlow	1216	8
Cavan*	974	5
Clare*	1005	3
Cork*	7500	5
Donegal	2295	5
Dublin Corporation*	7530	4
Dun Laoghaire-Rathdown*	2154	3
Fingal*	1545	3
Galway Corp	1303	6
Galway Council*	1257	3
Kerry	1797	4
Kildare*	3090	6
Kilkenny	1163	4
Laois	1618	9
Leitrim*	668	7
Limerick City	600	3
Limerick Co Co	982	3
Longford*	811	7
Louth	1923	6
Mayo	1938	5
Meath	1469	4
Monaghan	716	4
Offaly	770	4
Roscommon	586	3
Sligo	1252	4
South Dublin*	3515	5
Tipperary NR*	626	3
Tipperary SR	901	3
Waterford Corporation*	1106	18
Waterford	513	3
Westmeath	754	3
Wexford*	2201	
Wicklow*	3011	8
Subtotal for 16 LAs*	39288	5^
<b>TOTAL</b>	<b>58789</b>	<b>5^</b>

^ Excludes Wexford

Source LA housing strategies and CSO for total number of private households in 2001.

**Table 6.6 Projected Growth in Part V Affordable and Social Need and Supply**

	Average annual additions to social need	Average annual additions to Part V affordable	Part V affordable as % new households	Average annual social supply available to let+
	<i>households</i>	<i>households</i>	<i>%</i>	<i>Units</i>
Carlow		108	17	172
Cavan	27	84	20	170
Clare	37	324	25	219
Cork	1200	1373	36	1250
Donegal	304	444	50	328
Dublin Corporation	1200	1582	36	1583
Dun Laoghaire-Rathdown	350	965	55	420
Fingal	400	1274	51	599
Galway Corp		165	20	197
Galway Council	200	296	23	206
Kerry		234	27	225
Kildare	655	799	30	521
Kilkenny		64	10	165
Laois		88	12	185
Leitrim	68	87	24	78
Limerick City		198	30	275
Limerick Co Co		158	20	260
Longford	89	143	51	217
Louth		334	27	296
Mayo		200	22	201
Meath		881	23	243
Monaghan		203	35	211
Offaly		81	15	145
Roscommon		85	23	106
Sligo		246	31	211
South Dublin	1057	1166	46	577
Tipperary NR	47	180	21	89
Tipperary SR		154	25	216
Waterford Corporation	211	261	65	340
Waterford		232	26	135
Westmeath		346	31	123
Wexford	221	313		288
Wicklow	637	741	54	354
<b>TOTAL 16 LAs</b>	<b>6703</b>	<b>10032</b>	<b>39</b>	<b>7239</b>
<b>TOTAL ALL LAs</b>	<b>9238e</b>	<b>13809</b>	<b>*33</b>	<b>10605</b>

\* Wexford excluded since household formation not available

+ Supply from local authorities and voluntary sector; includes casual vacancies where reported.

E estimate

### *Projected new social need*

Out of 33 local authority strategies only 16 projected the number of additional households expected to qualify for social housing during the course of their strategy. Amongst the 16, urban areas are better represented than are rural ones. Altogether the 16 strategies projected 6,703 more households going on waiting lists each year (Table 6.7).

Over five years the additional social need for housing in the 16 strategies would amount to 33,515, or almost as many again as were already waiting for social housing in these same jurisdictions in 2001 (39,288 households). In total the social housing requirement (existing and projected) amounts to 72,803 units in five years.

Despite the missing information in the housing strategy documents it is important to generate a national projection of social need. Estimation of future social housing need for all areas of the country is calculated by combining the projections for the 14 of the local authorities publishing such projections (i.e., South Dublin and Wexford excluded) with other information from the housing strategies. It is assumed that the 14 authorities' share of social housing need nation-wide is indicated by their share in related trends, namely projected total household formation and projected Part V affordable households. These calculations yield two counts, which are averaged to give an estimate of the national annual average level of new social housing need. While this 'grossed up' projection is open to criticism because, for example, the base 14 local authorities are not representative of the country as a whole, it covers an information gap pending all local authorities providing their own projections.

The calculations, summarised in the box, yield an estimated projection of national social housing need of about 9,238 units per year and 46,190 over five years. Added to the existing waiting lists this yields an estimated 104,979 social housing units required country wide during five years under the housing strategies if social need is to be fully addressed.<sup>26</sup>

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<sup>26</sup> It may be noted that an estimate of future social need based on recent trends reported in the previous two needs assessments plus new local authority lettings, instead of housing strategy information, gives an annual increase of 6,573 more households in need in the sixteen local authority areas and 9,963 for the country as a whole.

### **Estimating a national projection of social housing need**

The social need projections of Wexford and South Dublin are omitted from the estimation because projected household formation is missing for Wexford and because the very high level of need for South Dublin would unbalance the grossing up calculation.

Projected household formation for the 14 local authorities (i.e., excluding South Dublin and Wexford) was 22,389 per year, or 55 per cent of the aggregated household formation projections of 40,754 for all the strategies (except Wexford).

Projected Part V affordable need for the 14 local authorities was 8,553 per year or 63 per cent of the aggregated Part V affordable projections of 13,496 for all the strategies (except Wexford).

Projected social housing need for the 14 local authorities adds to 5,425 per year. If this amounts to 55 per cent of the national level, the national projection would be 9,864 households; if it amounts to 63 per cent, national projected social need would be 8,611.

Averaging the two estimates yields an estimated projection of social housing need of 9,238 households per year.

### **Gap between social need and public supply**

The strategies include information on projected available social housing supply from local authorities and, less consistently, from the voluntary sector.<sup>27</sup> Table 6.6 shows the average annual available housing units (including casual vacancies as reported) projected by each authority and the national total. The rural authorities sampled averaged 28 per cent whereas the urban ones averaged 31 per cent social supply units to number of new households. The total for the 16 local authorities projecting social need was 7,239 units per year and nationally it was 10,605 units.

The additional social supply during the strategy periods typically appears substantial in relation to the additions to social need amongst the housing strategies projecting social need; in 13 out of the 16 cases provision would exceed new need, sometimes by large amounts. South Dublin, Wicklow and Kildare are the only authorities in which projected new social need outpaces supply.

When the existing unmet social need is factored into the equation, however, the situation becomes more complicated. Table 6.8 shows the diversity of the projected futures amongst the areas covered by the 16 strategies. Counties such as Clare, Fingal, Waterford City and Cavan would cut their wait lists by large amounts. For the sixteen strategies together the projected gap between social need and supply at the end of five years adds up to 36,608 units. Such a result would only cut the length of the waiting lists, in aggregate, by 7 per cent. If South Dublin and Wexford are excluded from consideration,

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<sup>27</sup> Social supply includes new build, acquisitions and casual vacancies in the local authority and voluntary housing sectors.



the length of the 14 waiting lists after 5 years amounts to 28,827 households, which is 14 per cent less than the aggregated length of the lists in 2001.

The information in the strategies implies a future where social supply would only exceed emergent need by some 6,835 units nationally over five years, despite the fact that there are already many people waiting for accommodation. Nationally the projected social housing provision is 10,605 units annually. Taking the national projected social need estimate of 9,238, aggregated waiting lists would be cut by about 1,367 households each year. The gap at the end of five years would be in the vicinity of 51,954 households, not much lower than in 2001. (Table 6.8)

According to the strategies some 20,000 units of social housing would be required annually to fully address social need within five years. The National Development Plan commitments amount to 9,313 units of social housing per year.<sup>28</sup> Taking into account vacancies, some 12,113 would become available. Although the Plan represents a substantial expansion in social housing provision compared with the level in the 1990s, it still will not meet the level of need identified by the strategies.<sup>29</sup>

**Table 6.7 Existing and Projected Social Housing Need and Projected Supply, 2001-5**

	<b>Existing social need 2001</b>	<b>Social need 2001-5</b>	<b>Social supply* 2001-5</b>
	<i>housing units</i>	<i>housing units</i>	<i>housing units</i>
Carlow	1216		860
Cavan	974	135	850
Clare	1005	185	1095
Cork	7500	6000	6250
Donegal	2295	1520	1640
Dublin Corporation	7530	6000	7915
Dun Laoghaire-Rathdown	2154	1750	2100
Fingal	1545	2000	2995
Galway Corp	1303		985
Galway Council	1257	1000	1030
Kerry	1797		1125
Kildare	3090	3275	2605
Kilkenny	1163		825
Laois	1618		925
Leitrim	668	340	390
Limerick City	600		1375
Limerick Co Co	982		1300

<sup>28</sup> To realise the commitments in the (revised) National Development Plan, given experience in 2000 and 2001, an output of 6,654 local authority units and 2,660 voluntary units per year is required during 2002-2006.

<sup>29</sup> A conservative projection that does not rely on the housing strategies also indicates a substantial gap. An alternative projection of supply using the 1999 national vacancy level of 2,800 and the residual NDP average annual output commitment of 9,313 implies 60,565 units over 5 years. Estimates of the 2001 waiting list and future social need based on recent reported experience gives 47,009 existing need plus 49,815 new need during 5 years for a total need of 96,824 households. The implied cut in waiting lists would total 2,150 annually, and the resulting housing shortage after 5 years would be 36,259 units.

	Existing social need 2001	Social need 2001-5	Social supply* 2001-5
Longford	811	445	1085
Louth	1923		1480
Mayo	1938		1004
Meath	1469		1215
Monaghan	716		1055
Offaly	770		725
Roscommon	586		530
Sligo	1252		1055
South Dublin	3515	5285	2885
Tipperary NR	626	235	445
Tipperary SR	901		1080
Waterford City	1106	1055	1700
Waterford	513		675
Westmeath	754		615
Wexford	2201	1105	1440
Wicklow	3011	3185	1770
<b>Total 16 LAs</b>	<b>39288</b>	<b>33515</b>	<b>36195</b>

**Table 6.8 Impact of Social Housing Strategies: Public Sector\***

	Waiting list after 5 years (households)	End waiting list as % starting list
Carlow		
Cavan	259	27
Clare	95	9
Cork	7250	97
Donegal	1550	68
Dublin Corporation	5615	75
Dun Laoghaire-Rathdown	1804	84
Fingal	550	36
Galway Corp		
Galway Council	1227	102
Kerry		
Kildare	3760	122
Kilkenny		
Laois		
Leitrim	718	107
Limerick City		
Limerick Co Co		
Longford	481	59
Louth		
Mayo		
Meath		
Monaghan		
Offaly		
Roscommon		
Sligo		
South Dublin	5915	168
Tipperary NR	336	54
Tipperary SR		

	<b>Waiting list after 5 years (households)</b>	<b>End waiting list as % starting list</b>
Waterford Corporation	461	42
Waterford		
Westmeath		
Wexford	1866	85
Wicklow	4426	154
<b>Total 16 LAs</b>	<b>36608</b>	<b>93</b>
<b>Est'd Total all LAs</b>	<b>51954</b>	<b>88</b>

\*Public sector includes supply from local authorities and voluntary bodies.  
The impact of Part V in meeting social need also has to be taken into account.

The main findings of this review of need and provision projections from the local authority housing strategies are as follows:

- The housing strategies indicate that there will be a persistent social housing shortage nationally despite the increased rate of provision that began at the turn of the century. Questions about the accuracy of the existing waiting list counts as a measure of need and about the projections of additional social need and supply might argue for smaller gaps between need and supply than a simple reading of the strategies would indicate. However the inaccuracies would have to be very large indeed to alleviate concern.
- The projections of households unable to afford to buy a home are vulnerable to criticism because they have been based on dated (1996) census information and sketchy house price information. That said the strategies typically indicate that households in social need are more numerous than those who cannot afford to purchase without some financial help.
- The strategies suggest that the social housing shortage will be worse in some areas than in others.<sup>30</sup> The focus on addressing social housing need is more apparent in some strategies than it is in others.

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<sup>30</sup> These findings are tentative, given concerns about the data underlying them.

## 7. Housing Strategies: Strategic Objectives and Policies

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### Introduction

The last chapter identified a range of critical concerns, both already apparent and projected, in the local housing situation. These include a considerable crisis of affordability and unmet social need, increasingly unsustainable development patterns, and limits in the ability of market and non-market systems to achieve adequate levels of provision of private, affordable and social housing. In view of such issues, what strategic objectives and actions are proposed in the strategies? This chapter offers an exploration of policies emerging from the strategies, while a later section explores some implementation issues and perspectives on the nature and value of the whole exercise, drawing from interview data.

### Objectives

In most cases, there are few clear strategic objectives identified, beyond a restatement of existing central policies such as encouraging home ownership, higher densities and avoiding “undue” segregation. In this regard, it could be argued that these documents reflect the circumscribed role (and limited power) afforded local government in Ireland, the role of which effectively involves the local management of policies determined nationally (MacLaran and McGuirk, 2001). The main comments on specific local policies are generally provided by reference to development plans. In a number of cases, the links between inequality, exclusion and housing access are tacitly accepted, noting that a key part of the brief of the County Development Boards is to advance the social inclusion agenda. There is little by way of targets or vision, however.

Nevertheless, some strategies do contain some more striking strategic objectives. A number adopt a broad conception of the function of the housing strategy, such as the observation in the Cavan strategy that “good housing delivers better health, improves educational attainment, creates better employment opportunities and improves the social and economic fabric of the country”. The Clare strategy also sets itself within a broad vision of a housing strategy that is sustainable in its impacts on local communities, ensuring equality of opportunity and promoting social inclusion by extending access to housing and related services. This will be delivered through partnerships, efficient use of resources and excellence in housing services.<sup>31</sup> The Cork Strategy states that it is based on a shared vision, which sees having a suitable place to live at an affordable price as a basic right. Some clear principles follow from this, namely to provide for a diverse range of housing needs and to promote balanced communities, sustainable development of the urban and rural environment and a high quality living environment. The Leitrim Strategy is also broad ranging and progressive in its stated aims:

- Stabilisation of the population at a level consistent with County’s resources and people’s economic aspirations

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<sup>31</sup> Though it is hard not to suspect that the desire to adopt an acronym, SCOPE (Sustainability, Community, Opportunity, Partnership, Excellence), accounts for at least some of this level of strategic detail.

- Removal of the economic necessity for people to migrate
- Equality: spread of benefits of development through all sections of the community
- Ensure no household is inadequately housed due to lack of resources or services
- Provide, landscape and maintain serviced halting sites
- Sustainable development patterns

A number of other authorities situate housing policy within the nexus of urban or rural renewal and sustainable local development (e.g. Kerry, Limerick County Council, Limerick City Council, Mayo, Meath), while others emphasise the connection with social inclusion and community development processes (e.g. Waterford County).

Some authorities are more explicit in setting priorities, in some cases emphasising the needs of socially disadvantaged households. Dublin City Council notes, for instance, that the needs of low-income households "who cannot house themselves and their families from their own resources, must take precedence over other housing needs within the City" (p. 55). Kilkenny claims that "...as confirmed by members, the priority for the Council is thus social not affordable housing" (p. 37).<sup>32</sup>

One of the important analytical values of the strategies is that they provide an indication of the priority authorities give to planning for social housing need:

- As shown earlier, sixteen authorities projected the additional social need expected, thereby quantifying the priority for investment in such housing in relation to opportunities created by Part V or other initiatives;
- Another six authorities gave targets for cutting the length of the waiting list for social housing;
- Eleven authorities, however, did not use the development of their housing strategy to map the housing prospects for families and individuals in greatest need.

### **Policies**

In some ways, the dominant policy concern of the whole exercise, as is clear from the emphasis in the strategies, relates to the social and affordable provisions within Part V of the Planning Act. The only consistent and thorough element within the 33 strategies is the more or less formulaic "justification" for reserving up to 20 per cent (or somewhat less in the case of Cavan, Donegal, Fingal, Laois and Offaly) of housing, land or sites in new residential development for social and affordable needs. There are variations in how the different strategies intend to use this provision, reflecting different policy orientations and priorities, and this is examined below. However, there were necessarily very many more provisions contained in Part V and expanded on in the guides. It will therefore be necessary to analyse a number of policy issues relating to access and provision beyond the 20 per cent element alone.

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<sup>32</sup> Though this is contradicted somewhat by not making a commitment to more social than affordable housing under the 20 per cent clause, discussed below

## **Policies for Access/Provision**

### *Facilitating development*

One of the main policy actions involves ensuring sufficient land is serviced (in far larger quantities than are required to allow for the problem of land holding). A related step involves undertaking a considerable rezoning exercise, and this is essentially a response to the fact that the provisions under Part V for social and affordable housing only relate to zoned land. This creates a pressure to undertake rezoning exercises of this kind as a key strategic action (e.g. through local area plans, village development, etc.). In many cases, this is the most direct step towards a spatial settlement strategy for the county, other provisions being facilitative or aspirational (e.g. stating that ribbon development should be discouraged). Across strategies, the policy is couched in different language and is to be advanced in various ways, but it amounts to the same set of actions: producing draft schedules of towns and villages for which local area plans will be prepared (Carlow); prioritised residential zoning plans to cover unzoned areas (Mayo); wider geographic spread of zoned serviced land needed beyond Ennis and Kiltrush (Clare); a programme of land zoning is being progressed, which will enable the council to take advantage of Part V (Sligo). As with the serviced land, it is also recognised that up to three times the amount of land actually required to meet housing need will have to be zoned to allow for “distortions in the supply of land to the building market” (Tipperary North).

While there is a certain logic in all this, it is not yet clear what the broader effects will be in terms of betterment and land prices. Presumably, the intention is that the “existing use value” clause will prevent price escalation where agricultural land is rezoned as development land, though how this will be interpreted legally remains to be seen. It is also uncertain what the economic effect will be in the other 80 per cent of the development.

### *Non-market systems*

The main policy statements for social housing generally involve detail on the continuing multi-annual programme. The most interesting general policy shift is that noted in the Donegal strategy, the gradual changing nature of non-market systems in operation: “the pattern of procurement is now beginning to change radically”, there being less direct public provision and more emphasis on private sources (acquisitions in the market, voluntary provision, turnkey developments). However, in many cases it is noted that acquisitions in the market will be limited, as excessive local authority demand would have an adverse effect on house prices in the first-time buyers’ segment of the market (e.g. Clare, Dublin City Council, South Dublin, DLRD, Fingal, Meath). Generally, tenant purchase schemes are not reviewed, and only Clare notes that it is expected that the local authorities will seek to reduce sales in order to maintain stock levels and to meet needs.

### *Role of the voluntary sector*

All the strategies contain statements regarding the involvement of the voluntary sector, reflecting central imperatives towards an expanded role for third-sector providers, but again detail is very patchy, usually amounting to an acceptance of the need to work with the sector. Many of the rural authorities mention the important role such organisations have played historically in meeting special needs. Notably, Limerick County Council point out that a Voluntary Housing Forum has been set up to help this sector develop, and a number of the rural authorities endorse the important role of community-voluntary housing in sustaining rural communities and arresting rural depopulation. It is in this role that the most positive and clear statements about voluntary housing are made. Against this, recent conflict in Clare regarding rural resettlement schemes and policies against housing for “non-locals” should be noted, as it highlights a degree of contradiction and a complex policy challenge.

### *Special Needs*

Specific policies for special needs generally receive brief mention, in many cases restating existing policies (e.g. Part M of the building regulations, which relates to accessible house design), or making allusion (in varying detail) to provisions under the Traveller Accommodation Programme and the Homeless Action Plan (where available). There are notable variations in how these are dealt with, particularly details such as house type and the geographic location of social housing, Traveller developments or hostels and emergency accommodation. On balance, it seems that the process of producing the strategies and these other special needs plans have remained more or less discrete. The Waterford City strategy does note that the Homeless Action Plan will be incorporated in the Housing Strategy, as soon as completed, and it will be interesting to see how successfully these documents (and more importantly the planning process lying behind them and their practical implementation) are welded together. Elsewhere, the main detail provided involves a summary of the issues raised in *Homelessness: An Integrated Strategy*. Some strategies contain concrete commitments to homeless provisions (e.g. Fingal sets out three types of homeless accommodation to be provided; Kilkenny plans to provide 75 homeless units, including a “wet room” to eliminate rough sleeping). In a number of cases, the strategy essentially name checks this issue, stating that the Homeless Forum is dealing it with in its action plan.

This specific special need/provision issue is explored in detail in the next chapter, which analyses the policies and provisions set out in the Homeless Action Plans.

Elderly housing is routinely dealt with by proposing an empty-nester policy (or Financial Contribution Scheme), generally following the Dublin City model, which has been in place since the 1980s. The importance of semi-supported or assisted living is mentioned, usually without any specific proposals. Wicklow’s Avoca scheme is notable in this regard, being – at least on the surface – an interesting and innovative system for meeting elderly needs and one which deserves monitoring and possible replication elsewhere, if it proves to work well. With regard to disabilities, there are many comments about the need for suitable designs. Also popular is a policy of making 1 per cent of all new schemes fully wheelchair accessible. Finally, most of the strategies are sketchy, or say nothing at

all, about accommodation for asylum seekers and refugees. A number do mention the issue, but there are no policies. At best, there is a commitment to co-operating with voluntary groups to deal with the issue and some mention of the need for a staged approach (moving people through different housing supports, presumably eventually accessing the formal housing system).

### *Public land banking*

The strategies provide little detail on policies or proposed actions for public land banking. Where some policy statement is offered, these tend to involve broad aspirations about actively pursuing land banking. Some of the stronger statements relate to using compulsory acquisition powers to acquire land for social housing (e.g. Leitrim, South Dublin) and a commitment to formulate a land-bank acquisition programme by 2002 (Donegal).

Importantly, some of the city authorities note that there is little or no capacity for acquiring additional lands for social housing (e.g. Dublin, Cork). This raises critical questions regarding recent policies of privatising public lands. For example, in the late 1980s in Dublin's inner city, the local authority's Inner City Development Team was one of the more prominent public agencies involved in urban development, acting as a catalyst for a property-led renewal programmes by selling off inner-city public sites, many of which had been earmarked for social housing (MacLaran and McGuirk, 2001). The clearance of older social housing complexes on Sheriff Street in the docklands as part of a general renewal programme and the sale of the land for (high-grade) private development is a further example, and one which generated much local conflict and protest (Punch, 2001).

The scarcity of land for social housing in the urban areas, where need is greatest (in absolute terms), also now demands an ability, not evident in the past, to liaise with neighbouring authorities to relieve social housing pressures.

### *Alternative models of provision*

Traditionally social (geared to income rental) housing has been provided by local authorities and, particularly in the last decade, by the voluntary sector. However there are other potential sources of supply of housing for families in social need. The private rental market accommodates people on SWA rent supplement for example.<sup>33</sup> Part V of the 2000 Act creates a new social housing supply possibility. The analysis of these 'private' sources of supply in the housing strategies therefore merits review.

The strategies typically made no projection of accommodation, or of low cost accommodation, coming from expansion of the private rented sector. Several however noted a link between a tightening private rented sector market and escalating rents and a lengthening of the waiting list. A number of authorities also acknowledge that it is uncertain as to how many recipients of SWA are on/not on housing lists. Indeed, policies for the private-rental sector generally were weak or absent, rarely involving more than

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<sup>33</sup> During 2001 recipients of the rent supplement totalled 45,028, of who 24,110 (53.5 per cent) had been recipients for 12 months or more (Department of Social, Community and Family Affairs, 2001).



broad endorsement of the proposals of the Commission on the Private Rented Residential Sector.

Part V of the 2000 Act adds another potential source of low cost housing supply through private/local authority/voluntary agreements. The use of the 20 per cent clause under Part V is one of the central policies detailed in the strategies, and the views of the various authorities as to the use of this clause as a social-housing mechanism are of some importance.<sup>34</sup> The actual implementation of this clause is market-dependent, being reliant on planning applications coming in from the private sector, whereupon social and affordable housing will be made a condition of planning permission. As such it is in some respects a curiously indirect method of achieving social housing. The key analytical question, however, is the commitment to social versus affordable options under this scheme, which will presumably reflect broader policy orientations.

Part V of the Planning and Development Act establishes the allocation of up to 20 per cent of eligible private residential for social/affordable housing but it does not specify how this is to be divided between social housing for rent and housing for sale at a discount. While most strategies state that the local authority will take advantage of the maximum of 20 per cent, few commit to taking a particular proportion or number for social housing as opposed to subsidised housing purchase. Indeed many are unspecific about how much affordable housing they anticipate resulting from the application of Part V. Also unclear from the strategies is the extent to which Part V facilitates the meeting of existing targets for local authority or voluntary provision as opposed to adding to that outlined in the previous section.

Table 7. 1 shows the amount of housing expected under Part V, where strategies provided specific information. Details about how Part V housing would be apportioned between social need and discounted purchase is also shown, along with the expected impact on social need. Generally, its main potential is seen as a means of counteracting segregation. This translates in almost all cases into an element of uncertainty, in that most authorities, even where a general social-affordable ratio has been specified, include room for flexibility in order to ensure “integration” (i.e. having less social housing in areas where there is currently a concentration). In short, the strategies end with a degree of vagueness in their statements about the 20 per cent, which leaves them open to interpretation and contestation.

The other constant is that the favoured option will be units of housing rather than land on the grounds that the latter will result in unfinished estates and a kind of second level segregation. However, some do see it as a tool for public land banking.

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<sup>34</sup> There has been opposition to these measures from private sector interests. Some of this opposition adopted constitutional grounds, implying that in some sense the presence of social housing and disadvantaged households (low-income, elderly, disabled, homeless, Travellers, etc.) amounted to an illegitimate attack on private property, thus contradicting Articles 40.3.2 and 43 of the Bunreacht. Nevertheless, the Supreme Court ruled that none of the original provisions of Part V of the 1999 Bill contravened the constitution.

Interestingly, a number comment that they could justify using most, if not all, of the 20 per cent for social housing, but fail to commit to a policy of this kind, opting instead for a 50/50 split or a weaker commitment to social. For example, the Cork strategy notes that “...there is a need to increase the level of housing output to address social housing needs and to avail, as much as is practicable, of the mechanisms provided under PV of the Planning Act for the purposes of social housing need”, pointing out that even if all PV houses were social, outstanding need would still be over 3,000. However, its actual commitment is to a 15-5 affordable/social split, with variations. Waterford City comments even more clearly that “an analysis of the social housing need indicated that there was justification for reserving the maximum of 20 per cent of all housing lands within the City under Part V of the Act for social housing, i.e. to meet the needs of those on the housing list” (Waterford City Council, p.177); however, it opted for a variable ratio (unspecified). Many other councils note a reliance on the mechanism to take up shortfalls in meeting need, clearly seeing it as additional to the multi-annual programme.

Some concerns regarding this approach to social housing are raised, however. Wexford notes the important problem with market approaches, namely a lack of control over the phasing and, beyond some detail of the planning permission, the location of social housing delivered in this manner: “If this authority were to rely on the opportunity provided by Part Five of the Planning and Development Act 2000 for the delivery of its Social Housing Programme, it would also have to rely on the general assumption that private sector development would happen at locations consistent with locations of need in terms of social housing” (Wexford, p. 15). There seems little likelihood of the patterns and rhythms of the private residential market, uneven at the best of times, matching the nature of social need, for example at “unattractive” areas of rural decline and social exclusion (Wexford).

**Table 7.1 Local Authority Plans Under Part V of the Planning and Development Act, 2000**

LA group reference page	Part V take-up & division between social and affordable purchase	Social housing target
Carlow 5.2.1-3; 4.2.1	Pt V take-up 20%; ratio of 1:1 for interim; deviations to ensure integration and affordable access	‘fair to assume that the Authorities could house 50% of households from the waiting list during the strategy period’
Cavan p 43	Pt V take-up mostly 15% ; approx 111 units per year with no division specified	reports that 611 units under Pt V would eliminate social+affordable need but this amounts to 40% of private build; LA only plans to take 5%-15% under Part V. Given 15% take-up, 458 households would still suffer affordability need
Clare 6.3	20% take-up; no division specified	notes that 24% or 324 units per year required for affordable need, i.e., well beyond realistic take-up
Cork p 33,29,34	20% take-up; approx 550/year; one quarter social within metro area with exceptions; less elsewhere	should deliver 500-600 units per year, ie., less than projected social housing gap of 6400, before taking into account affordability
Donegal p12, 15	15% take-up; Pt V for use as social and affordable	Council proposes to meet 80% of new demand for social and affordable by 2006

LA group reference page	Part V take-up & division between social and affordable purchase	Social housing target
Dublin Corporation 8.1, 8.2	20% take-up yielding about 475 units per year; using a 1:1 ratio; “a substantial amount of any additional lands or housing units made available to it under PV should be reserved for social housing”	projects with full yield under PtV would still have 6500 on wait list by end of strategy; at 10% or 950 units, the wait list would be 7450
Dun Laoghaire-Rathdown p 43-5	20% take-up; approx 78 units/year; at least 50% should be social	the length of the wait list should be reduced over a number of strategies
Fingal p2	7%-15% take-up; approx 282 units /year	yielding 1409 social/affordable units of which 650 will be social
Galway Corp p23-27, App H	20% take-up; approx 101 units/year; using 1:1 ratio with exceptions	anticipates being able to offer housing to social applicants within 1-2 years of their inclusion on the waiting list; calculates an unrealistic 101 Pt V units required annually to meet all soc/affordable need
Galway Council Exec Sum, App H, p23	20% take-up; approx 337 units/year; ratio 3:1 in favour of social, with variations	60% of existing housing list is to be housed
Kerry p32, 59-60	mostly 20% take-up yielding about 103 units per year; no division specified	identifies shortfall in meeting identified soc/affordable need of about 2000 units to 2006
Kildare p 29	20% take-up; 8% social and 12% affordable	
Kilkenny p 50	reserve 20% as a general policy to deliver at least 46 units per year	will consult on mix and seek to reduce waiting lists Replace all demountables with permanent one-bed units over strategy (by 2006)
Laois p 5	17.5% take-up; but “baseline ratio” will be established when data is available; deviations at concentrations of social and to facilitate affordable in areas of considerable price inflation	clear 40% of existing waiting list (ie house 647 households) by end
Leitrim p 51	20% at ratio 1:1	
Limerick City p 11, 13	reserve up to 20%; approx 43 units per year	requires 43 Pt V units per year to meet social/affordable need, ie. 215 units in total
Limerick County Council p54, 75	20% take-up at ratio 1:1 in Limerick environs and 1:3 in favour of affordable elsewhere; Pt V appears to yield 98 units over 6 years	clear 75% of accumulated need during strategy
Longford p18	20% with reservations on a site by site basis	
Louth	to reserve 20%; no requirement for social in some areas to counteract undue segregation	
Mayo p34, 39	20% take-up; potential yield of 41 units per year given zoning; ratio	

LA group reference page	Part V take-up & division between social and affordable purchase	Social housing target
	of 1:1 but flexible	
Meath p56	20% take-up with up to 5% social and remainder affordable	
Monaghan p28,48-9	20%; about 80 units per year; no division mentioned	expects 900 unit social/affordable shortfall to 2006
Offaly p 27-8	15% take-up at ratio 1:1 with variations	
Roscommon Exec Summary, p 35	20% take-up, but strategy of 152 Pt V houses to 2007 is 11% of total private build	reduce the social and affordable wait lists by nearly 50% over the six years
Sligo p5-1,5-2	20% yielding 355 houses over six years	aim to almost halve waiting list
South Dublin p3, 61, Exec Summary	up to 20%; generating 'up to 2819 units' although this relates to total build, not to that which is private and covered by Part V	
Tipperary NR p 7	20% take-up; division on site by site basis, to encourage social integration and sustainable development	
Tipperary SR pi,ii	20% take-up, estimated to generate 350 units between 2001 and 2006	reduce the combined housing lists of the 5 authorities from 901 to 180 by end of 2006
Waterford Corporation p 200-2, 196	20% with varying ratios depending on area; it is likely that between 30 and 40 units per annum will be provided for affordable supply	essential to use Pt V to meet projected social need gap of 329 units It is anticipated that the LA's influential role in city housing will continue through the HS due to a much expanded SH programme
Waterford p i, 31-4	20% take up yielding 723 units over 6 years; division likely to favour affordable outside main settlements	
Westmeath pi, 5-2,5-3	20% yielding 515 units between 2001 and 2006; variable split, but weighted towards affordable outside main urban settlements	
Wexford p18	uniform 20% take-up	to help offset the 26% of houses needed but not supplied under other programmes
Wicklow p 69	aim to reserve 20%; "A significant amount of residentially zoned land must be reserved for social housing"	due to affordable/social shortfall over 2001-05 of 54%

### Socio-environmental/sustainability policies

The "integration" philosophy, which to a degree underpins the concept of the 20 per cent approach<sup>35</sup>, leads into a whole other field of policy aims and actions orientated towards

<sup>35</sup> Although the aim in the act is to avoid "undue segregation", it is uncertain how this will be achieved in practice; for instance it would seem that early Part V agreements are tending to have social housing units grouped together but the affordable sale units scattered across the development.

socio-environmental issues, including the as yet ill-defined sustainable development idea.<sup>36</sup> This raises important issues, moving beyond the aim of general access and making the link between housing policies and broader questions of uneven social and spatial development (connecting with debates about regional inequality, social inclusion, etc.) and environmental systems. However, principally, the practical interpretation of the sustainable development language lies in issues like spatial patterns of residential development, densities and social integration. Some of the key positions emerging from the strategies can be summarised.

### *Social integration*

All the strategies use the language of integration (broadly as a counterbalance to “undue segregation”). In practice, this translates into a policy of greater dispersal of smaller social housing developments. In line with the integrationist philosophy, some also adopt a policy of public land banking in smaller pockets, while using existing large sites for uses other than social housing or partially privatising such sites (through there would seem to be a contradiction between such aims and the problem of public land scarcity). However, the policy commitment to integration is weak in one sense in that while the authorities have no problem in stating that levels of public construction will be reduced in areas of high social housing, the necessary opposite side of that coin, increasing construction under the multi-annual programme in areas of low/no social housing is not so clearly stated.

Although the broad principles of social integration (and ways of achieving it) seem to be accepted as axiomatic, there are ideological and social concerns, as well as community development issues in spatial responses of this kind to poverty and inequality. In particular, spatial fixes to broader problems of social inequality are rarely adequate in themselves and have been long criticized. The difficulty lies in looking at urban segregation as a problem of the “poor”, which can be solved geographically through a *limited* integration policy, which amounts to scattering poor households across the city, presumably ultimately achieving a spatially random pattern of deprivation, thereby eliminating the *geography* of poverty (MacLaran, 1999). It is important to keep in sight the broader structural bases of inequality and the links to the housing system.

The organic emergence of community structures and local culture within the “locale” (however such a geographic unit is defined or perceived) is also complex and important, which is why the problem of displacement is of critical interest. Moreover, in many instances different social or ethnic groups exhibit a preference for a degree of concentration (or “self-segregation”) rather than dispersal, enjoying the community-cultural benefits of spatial proximity (including the possibility of developing and supporting distinctive social, commercial or religious services and facilities and strengthening identity and kinship networks). A final twist is added when it is considered that the potential political power of minority or marginalized groups may be further frustrated or diluted if that group is effectively scattered across middle-class areas, given the geographic basis of the electoral system, both central and local.

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<sup>36</sup> A concept subscribed to and liberally applied in strategic planning documents at central and local levels, arguably without ever pinning down satisfactorily what is actually meant by the term

In short, social geography is complex, and some strategies do exhibit some realisation that social patterns result from a range of forces, while the outcomes of social concentration are not necessarily all socially regressive.<sup>37</sup> Social networks, patterns of kinship and family ties are important (and positive) community forces, which should be factored into the analysis when generating housing policies. The complexity and the human implications of these issues are crucial and should be borne in mind when planning for “integrated” development: “...single parents with children who make up the majority of applicants have a fundamental desire to reside in areas where they will receive peer support from family and friends and easy access to health and social services provided by the Local Authority. This virtually forces a perpetuation of the existing local-authority housing pattern. Insofar as the pattern of social background follows closely the pattern of housing tenure, then the Borough may be said to have a highly segregated pattern” (Limerick City Council). Elsewhere, while noting a consensus that mixed communities are preferable to segregated, there is recognition of individual preferences to live near others of similar background (Monaghan Strategy).

In a related point, other strategies also emphasise a range of interconnected issues beyond a focus on social geography/design:

*“...a small number of estates suffer from adverse social perceptions due to various factors such as inadequate estate management practices, poor environmental conditions, poor social and recreational amenities and an excessive concentration of housing in one area. While current housing design practices are conscious of historical mistakes, it is equally important to ensure that progressive estate management procedures and practices are put in place to counteract existing deficiencies”* (Meath).

Aspects of the different positions on social engineering through integration policies are captured in Table 7.2.

**Table 7.2 Social Integration/Social Engineering**

<b>Local Authority</b>	<b>Indicative comments on social integration</b>
Carlow	Deviations in the PV ratio will be allowed to ensure social integration (e.g. social housing component reduced to half where existing concentrations merit this)
Clare	Acquisitions will be spread throughout the county in order to avoid undue concentrations/promote social integration
Cork	Multi-tenure development, planning applications will have to demonstrate how the overall development will be perceived as a cohesive unit; good estate management
Donegal	Ensure mix of social, affordable and private housing and neighbourhood centres PV taken as guidance on avoiding undue segregation – all procurement proofed against this
Dublin City	The Corporation “...will provide for the dispersal of social housing and its

<sup>37</sup> What is undeniably regressive is spatial inequality in positive externalities (e.g. good schools, services, job opportunities, amenities, environmental quality) and negative externalities (e.g. proximity to a landfill site), which can tend to reinforce advantage and further compromise the social opportunities and health of poorer social classes

Local Authority	Indicative comments on social integration
	integration with other forms of housing” Consolidate the metropolitan area in line with the principles of sustainable development Will provide for dispersal using land swaps
DL/RD	“...a greater mix of house prices and sizes is required in Dun Laoghaire Rathdown in order to achieve an equitable geographical distribution of social classes throughout the Dublin Region” (16) “It will be the Council’s policy to encourage the development of mixed and balanced communities so as to avoid areas of social exclusion” (36)
Kildare	Encourage mixed-use developments
Limerick City	Will purchase houses in private estates for letting in order to counteract the effects of social segregation Tenant Purchase scheme seen as way of counteracting segregation
Limerick County Council	Integration of all social and affordable units in any development
Louth	“To disperse social and affordable housing as far as practicable throughout each proposed housing scheme” (p. 45). To ensure “that there is little or no visual recognition as to the precise location of the social dwellings within the overall housing area” p45
Mayo	Policy of integrating social and affordable to achieve mixture of tenures to counteract social segregation
Meath	Public plots in larger parcels (e.g. over 5 acres) will be developed using as many housing options as possible in the interests of social integration – voluntary, affordable, shared ownership, private “in conjunction with and adjacent to social housing”
Monaghan	Will make sites available to encourage private and public development “to create a balanced community structure” (p. 36)
Offaly	“There are certain areas in the County which already provide a high proportion of social housing. It will be necessary to encourage private, voluntary and shared ownership housing in these areas to counteract undue social segregation and to increase the level of owner occupation. In these areas the Housing Strategy can further encourage home ownership and owner occupation by emphasising affordable, rather than social, housing”
South Dublin	Housing must avoid large schemes of single social types; schemes over 50 units will be required to provide for a mix of dwelling types In the IAP for Tallaght, the provision of S/A housing up to a level of 15% integrated with private is a requirement for designation
Waterford City	“...encourage the development of balanced communities comprising a mixture of differing age, social and tenure types” p. 189
Wicklow	Segregation: growing consensus that ‘mixed’ communities are preferable. However, many peoples may have preference to reside near ‘like’ others

### *Spatial planning*

The final socio-environmental policy area touched on in some detail in most of the strategies relates to spatial planning, principally regarding residential patterns and the problem of unsustainable spatial forms (such as urban sprawl, ribbon development and one-off housing in remote areas). In this case, the aim of concentration is the constant keynote, allied to higher densities. A number of strategies also consider possible “options” in terms of residential spatial structure. They generally reject the extreme models of commuter development in a dispersed manner and of promoting the development of one or two major growth centres, adopting instead a “balanced approach”

based on promoting the development of a large number of towns and villages in a hierarchical plan, based around major urban centres, towns, villages, local clusters of housing (Cavan, Clare, Sligo, Tipperary South, Westmeath and Wicklow provide typical examples). One interesting observation relates to the objective of “strengthening the urban structure” in order that built-up areas can “compete” with the perceived benefits of locating in the countryside (Cavan).

Although the aims and the theory are fine, it remains to be seen if strong and proactive spatial planning can be put in place against the tendencies of the market to throw up unsustainable patterns of one-off housing, peripheral sprawl and ever-expanding commuter belts. The policy objectives are broadly stated and could be interpreted in a variety of ways. What is clear is that the creation of a national spatial strategy is of fundamental importance; without this it seems unlikely that any of these issues will be progressed.

In this respect, one detail in the Sligo strategy is telling. The plan indicates as a planning policy a distribution of housing between urban, rural and village-type locations, which exactly mirrors the pattern of private sector planning permissions that emerged between 1997 and 1999 (45 per cent rural, 18 per cent Sligo town, 37 per cent other main settlements). The commitment to any kind of spatial strategy, beyond what “market forces” happen to throw up, is not evident, despite the rhetoric of consolidation.

#### **Implementation: Practitioners’ views**

This final section is based on interview data, providing some insight into the views of key practitioners (local housing and planning officers involved with the production and/or the implementation of the local strategy). This offers some important grassroots experiences, as well as some perspectives on the meaning and value of the whole exercise.

##### *Access/provision*

The first critical point regarding implementation relates to the role of private developers and the building industry. This is of obvious interest since the delivery of housing (social, affordable or private) under Part V (outside of the multi-annual programme) remains dependent on market trends and will be driven by private applications for planning permission. For some practitioners, this raises some uncertainty about the operation of Part V, as it actually makes all tenures (social, affordable, private) more rather than less dependent on market activity, while leaving the public role one step removed from the real action. This contrasts with an earlier tradition of large-scale public development, which was not unsuccessful in meeting needs. Instead, planning for social housing must increasingly contend with unpredictable and uneven market forces.

There is a strong perception that a general reticence and cautiousness exists, based on a wait-and-see attitude in the private sector. Few large-scale housing schemes are emerging, while many applications, which come under Part V, have been returned invalid. Officials feel there will be significant problems in drawing up agreements, particularly for the social element. There are fears that legal challenges are almost inevitable, and it will take some time before the system is working smoothly. There was



also some disillusionment among housing and planning officers in that one year on literally nothing has happened on the ground. Nevertheless, there are at least some more positive signs in that developers are engaging in various ways (“facing reality, they know they have to do this to get permissions”).

The main variation in implementation of the 20 per cent clause under Part V lies in the relative emphasis placed on social over affordable provision and the degree of flexibility allowed (Table 7.3). In some cases a blanket application of a 10:10 social/affordable ratio will be provided, but with some stated variation (e.g. clear maps showing areas where lower social will be allowed due to existing concentrations). This clarity and certainty is seen as necessary in the interests of transparency and to avoid any possibility of contentious decisions or legal battles regarding the balance. Others are also adopting a 10:10 guideline, but with provision for variations where the existing concentration of social housing justifies a greater emphasis on affordable. This leaves room for some flexibility (and potential inconsistency) at agreement stage. In others, a fully flexible approach will be taken, more or less adopting a site-by-site approach. These variable interpretations result from the lack of strong central-level guidelines on implementation, and this is some cause for concern given the general uncertainty and the possibility of legal challenges and controversial decisions.

Although there is some uncertainty and concern on the issue of whether the Part V social will be additional housing (and funded as such) or just another method of delivering other programmes (multi annual, Traveller accommodation), all local authorities interviewed were proceeding on the assumption that this will provide an extra means of acquiring units. Anything less would seriously undermine the whole point of the exercise (in one view, if Part V does not deliver additional social units, the whole exercise would have been a “sleight of hand”). Moreover, the crisis of social need is such that “even with the 20 per cent we were projecting to standstill”.

There is a further concern in this, however, namely that the cost of Part V units, even in rural areas, is likely to be quite high, if not exorbitant in some cases. The underlying issue here is that planning and housing officials are not convinced that the “existing use value” clause in many areas will result in significantly cheaper land costs. Part V only refers to land zoned for residential development, much of which has been acquired privately, often at quite high cost. It remains to be seen how central government will react if Part V housing units come in at costs in excess of €200,000, which some local officials are predicting. In one example, some sites are costing €130,000 before construction or development. The question arises as to how affordable housing can be delivered in such a situation. Furthermore, the unit cost of the social will also be very expensive – perhaps c. €230,000 per unit in some areas of high demand. It would be possible to acquire or build units more cheaply elsewhere. However, by law, the authority has to take 20 per cent regardless of final cost.

It is widely anticipated that developers will favor the voluntary sector, which (thus far) tends to have a more positive public image, and this may extend to presenting completed “deals” with favoured housing associations (e.g. those dealing with the elderly or other relatively “unthreatening”, “deserving poor” categories). However, this raises immediate

concerns as the allocation of social housing must follow the order of priorities, while if developer-voluntary Part V agreements (or ‘packages’) involved “cherry picking” certain categories of need, the implication is the further segregation and residualisation of local authority estates. A related issue is developer/home owners’ fears about anti-social behaviour and estate management, which appear to have been key issues in private sector lobbying and submissions.

In one case, the fears and oppositions expressed by developers were being taken seriously, to the extent that it became clear that planning officials were anxious to find ways to be more accommodating. This included comments on the problem of “undesirables” and the need to find “suitable” tenants for Part V social housing (though without violating the scheme of priorities). Although the problem of ghettoisation of local authority housing was recognised, it was clear that officials were willing to be flexible insofar as is possible. Such pressures (market forces for segregation) and blockages to some early agreements have also apparently resulted in a reduction in practice in the social housing requirement from the stated position in the strategy.

Turnkey projects were also considered a potentially effective approach. Under such projects, a private builder develops a set number of houses for purchase by the local authority in bulk. These have worked elsewhere and are popular with developers, as there is a guaranteed price and sale. It is arguable as to whether such approaches are “unduly segregated” in the sense employed in the act.

The other side of implementation of Part V is the affordable allocations. There is also uncertainty in how this will proceed. Units will be advertised as they become available, but there is concern as to whether a demand will emerge. One problem is that the cost of final units, even with a substantial subsidy, will remain unaffordable for many households in need. The other problem is lack of public awareness, the central problem being that the scheme is targeted at middle-income families, who would not traditionally have any dealings with the local authority in their efforts to secure a home.

In short, much uncertainty was expressed as to how Part V would be used, but it was critical that it becomes a mechanism for delivery of low-cost housing, including traditional social-rental models. At the same time, private sector opposition remains strong, and ability of planning authorities to realise the full social and environmental aspirations of the plans remains to be seen.

**Table 7.3 Part V and Social/Affordable Provision**

Interview	Perspectives on the use of Part V
1	Vital that PV is additional, otherwise is no more than a sleight of hand Reject flexible approach - 10:10 split except where existing concentrations of social housing (map of areas drawn up – not negotiable) Preference for completed units Existing use value likely to be very high where most zoned residential land has been acquired privately at high cost
2.	Uncertain about situation regarding extra funding for PV social – just another means of delivering the multi-annual programme? 10:10 split in floor space Use-value clause will not make land cheap

Interview	Perspectives on the use of Part V
3.	<p>Relying on PV to make up some social housing deficit – assuming it is extra  10:10 split (this is a considerable roll back – towards affordable and away from social – from the commitment in the strategy)...easier to sell affordable to developers; also where odd number of PV units, balance will be tipped towards affordable (e.g.: 3 affordable/2 social)</p> <p>Preference for units  Some units will be hugely expensive  Some social tenants are more desirable than others, but it is difficult to ‘arrange’ deals as Council has to keep with order of priorities  Possibility of cherry picking of tenants/LA estates becoming even more ghettoised</p>
4.	<p>Assuming PV is extra  Selective application based on geography of social class  Social housing now moved more into the hands of the private sector/uncertain market cycles  This will result in a multiplicity of small sites leading to greatly increased unit costs  Fear of cherry picking/further ghettoisation</p>
5.	<p>Assuming PV will be additional social, but the it is not clear (from central level) whether these will be funded as extra  10:10 in areas of low social housing, 15:5 elsewhere  Very slow take-up of affordable – demand is not there  Problem in that large areas are not zoned and do not come under PV</p>
6.	<p>Assuming PV will be additional social, but uncertainty as to central position on this  17:3 affordable/social split (compare Strategy: up to 5 per cent social)</p>
7.	<p>A weaker approach to social provision than the traditional direct provision – it will be hard to make output meet need through this mechanism  The cost of some affordable schemes will be “sky high” due to high land prices  Land prices are extremely high in some areas, raising concerns as to how “affordable” houses can be delivered and the final cost to the state of social housing</p>

The land question was the one constant concern raised in interviews (Table 7.4). This is a complex and important issue, and a number of aspects were raised. Local authorities are faced with the problem of dwindling public land banks and the high cost of acquiring further development land in the market. There were also related concerns with the effects of speculative acquisition of parcels of land in the hope of future gains under increasing development pressures. In one case, it was argued that a small proportion of individuals have accumulated a sizable proportion of development land and have been able to exert undue influence over land markets and residential development – people holding parcels of land, “waiting for the optimum time to jump”.

The location of available land also raised concerns, particularly where development land was available in peripheral locations, which would not prove sustainable for social housing. Residential development “on the edge” for poorer households is unfeasible, as it implies the displacement of people from family supports and networks, community facilities and social services.

These problems also create difficulties in facilitating voluntary sector housing activity, as any further reduction in the council’s land bank will reduce its own capacity to provide housing.

One apparent contradiction emerged at this point between the aim to “avoid undue social segregation” and land scarcity. In the interests of “integration” there are strong pressures towards developing a mix of tenures, social, affordable and private in any new scheme (and in many regeneration schemes), which effectively implies a policy of privatising at least some public land – already a scarce commodity.

**Table 7.4 The Land Question**

<b>Interview</b>	<b>Perspectives on the land question</b>
1.	Dwindling public land bank and cost of land are huge blocks – general problem of land scarcity Happy to work with voluntary sector, but if Council gives out sites, that reduces its own capacity to provide social housing; therefore, no net gain and problems in achieving the multi-annual targets
2.	All the land in the area has been speculatively acquired; small public land bank
3.	Some indications that people are holding on – sitting on parcels of land even after receiving planning permission – delaying tactics
4.	All available land is peripheral and not suitable for social housing Impossible to deliver low-income housing given the exorbitant land prices Speculative acquisition and profit taking off land is a problem No certainty regarding the supply of land in the market – piecemeal and unpredictable
5.	Enough land physically, but it is in the wrong locations Council can’t afford the cost of zoned residential land
6.	Scarcity of land is a block for voluntary and local authority providers
7.	Land prices spiraled over recent years; arguably, financial institutions have a responsibility here in that they are bankrolling developers to pay the exorbitant land costs, while also supporting demand by providing easy access to mortgages Development opportunities are controlled by a few major land owners; there is little land available for the rest (smaller developers, LAs, voluntary), so there is high pressure

*Social integration and sustainability*

Sustainable development and the avoidance of undue segregation were two of the more nebulous specifications included in the legislation and the guides. Although the use of language in this kind is obviously intended to bring broader socio-environmental concerns into the equation, the lack of detail or clarity as to what is intended left plenty of room for interpretation and local variation.

However, there is a general tendency to equate sustainable development with the issues of density and spatial strategies (Table 7.5). This leads to a concern with encouraging higher densities, urban concentration and containing sprawl and ribbon development. The implication is that “traditional” suburban forms and one-off rural housing should be discouraged, while strong spatial planning will be required to encourage rational and sustainable patterns of residential development instead. While the theory makes a certain amount of intuitive sense, achieving this in practice might prove difficult, as is already clear from emerging patterns in the housing market (ribbon development, the ever-expanding commuter zone of Dublin and other urban centres, etc.). Furthermore, it became clear from one interview that, while the planning section initially attempted to build such concerns into the forthcoming draft plan, this has already proved politically impossible, and under pressure at council level, the draft on display is, if anything, more permissive than before on the issue of one-off housing.

The “undue segregation” is being translated into various actions to insure a dispersal of social housing units through new estates and a general commitment to refraining from constructing social housing where there are existing concentrations. However, in one case it was pointed out that in fact the opposite is happening because the public land bank is very limited, and what is available is located on the edge of existing local authority estates. Furthermore, pressures against integrated development (development lobby, NIMBY factor, problems of social division) raise concerns as to what can be achieved.

Finally, the possible expanded role for voluntary providers was generally accepted as a strategic aim. There was a sense that greater professionalism is needed generally in the social housing sector, however (both voluntary and local authority).

**Table 7.5 Social Provision/Sustainability Issues**

<b>Interview</b>	<b>Perspectives on social provision and sustainability</b>
1.	Committed to facilitating increased voluntary sector involvement Sustainable development equated with increased densities
2.	Will work with voluntary sector but anxious that most needy categories are emphasized Social housing acquisition programme could have negative spin-offs for first-time buyers as extra competition in the market will drive up prices
3.	Planning and housing officials held a negative view of social housing/social tenants Developers and private buyers also hold strong antipathy towards social Voluntary housing has a more positive image; anything with the council label is seen as problematic Holiday homes and one-off housing a real problem and likely to worsen in future
4.	Much enhanced potential role for voluntary sector to deal with the ‘soft’ side of housing and to enter into deals with developers; however, they hold divergent interests – profit-driven/community-driven May need new professional housing agencies to implement Concerned about unsustainable patterns of development in all sectors Impossible to find locations for homeless hostels – have to proceed by stealth
5.	Present voluntary housing on a small scale and community based – will need professional housing associations to expand Council has tended to acquire cheaper land for development, but this contradicts sustainable development directives, since the cheaper land is the more isolated land Huge NIMBY problem in planning for homeless services and accommodation Equally strong local pressure against social housing or Traveller accommodation Local Authority housing sections not professional enough – people move through and it is seen as the ‘short straw’ internally
6.	Homelessness a real problem – one of the largest B&B outlays in the country, yet no facilities as yet – homeless sometimes sent to neighbouring county for emergency accommodation
7.	Problem of sprawl in the countryside/abandonment of older urban centres Meeting social needs is the most important issue The 20 per cent is an “artificial implement” to redress social imbalances in some areas; however, some concern that it amounts to diluting some areas by dispersing poorer households – is that sustainable development?

### *Central-local relations*

There were a number of clear points regarding central-local relations in planning and implementing housing strategies, which were raised by almost all interviewees (Table 7.6). There is a general sense that some of the guidelines provided at central level were

inadequate and unclear, apart from the methodology for calculating and projecting levels of affordable need. Many data gaps need to be addressed, while firm national policies on implementation are seen as crucial to avoid inconsistencies, challenges and conflicts. In this respect, a number of interviewees suggested there was a strong case for a general housing strategy at central level or, more radically, a general housing authority, which could develop rational residential and spatial strategies.

The issues of management and maintenance (and related resourcing concerns) of social housing, including future Part V estates, need to be addressed. This has always been a concern with traditional local authority estates, but the whole exercise will become more costly and complex with “integrated” schemes, which essentially mean that social housing units will be dispersed geographically, raising particular management challenges.

**Table 7.6 Central-Local Relations**

<b>Interview</b>	<b>Perspectives on central-local relations</b>
1.	Case can be made for a general housing authority to bypass local political blocks and implement a rational strategy
2.	Need DoE&LG support and guidance on implementation – they have been very vague re. agreement phase – likely to lead to future problems Management and maintenance costs not covered Vital that the DoE&LG provide strong support for the next round of strategies, including data and implementation
3.	More support and guidance needed Management and maintenance costs
4.	Need national level housing strategy to arrive at realistic global figures and to plan for social housing across local boundaries
5.	Need firmer national guidelines Consideration could be given to a housing-specific authority
6.	Clear-cut guidelines needed for implementation
7.	Concerns regarding guidelines, consistency and support in dealing with any problems or unworkable elements, which emerge

*Perspectives on the overall experience*

Finally, interviewees were asked for some general perspectives on recent departures in planning for housing (Table 7.7). Four cases were broadly positive, noting that the challenges and problems were considerable in producing the first strategy, but in the long term, it represented a step forward in planning for all aspects of housing need and provision. There was also a sense that the exercise needed to maintain a wide (or expanded) focus, beyond the issues of affordability and the 20 per cent mechanism, given the complexity of local housing systems, the importance of all tenures, including private and social rental, and the difficulties with regard to land acquisition and spatial planning. In short, it was critical that the DoE&LG would be proactive in supporting and developing the departures, as well as making sure it did not collapse or unravel for lack of funding for all the necessary stages.

One case was positive about Part V in general, but held strong reservations about the appropriateness or likely efficacy of the 20 per cent mechanism for delivering social housing. A second case was largely negative about the whole exercise, for similar reasons. One criticism of the new system was that it moved some elements of social

housing provision further away from the local authority, leaving it subject to the vagaries of the market. Levering social housing depends on whatever applications come into the authority, something over which there is absolutely no control and which is subject to considerable fluctuations. The approach also added further momentum to the political emphasis on ownership, to the extent that social or private rental options are construed as less valid, beyond offering residual or temporary housing solutions.

This contrasts with an earlier tradition of long-term planning, vigorous public land banking – something critical to the delivery of social housing – and a sizable social housing programme. This proactive public approach was largely dismantled in the late 1980s/early 1990s with a whole-scale reduction of public housing programmes and a subsequent loss of expertise and capacity. The recent changes, therefore, were seen as negative, in that they seem to continue this movement away from public intervention towards a more marketised system. Furthermore, it was doubted that such an indirect approach could achieve the necessary output to meet social need.

Finally, another case was also strongly critical, though for almost entirely opposite reasons. Taking a different emphasis, the difficulties encountered by developers and the perceived unfairness to private owners and people buying at full market cost were seen as major concerns. The whole exercise was seen as more trouble than it was worth, and it was generally expected that the system would not survive in the long term.

**Table 7.7 What’s It All About?**

<b>Perspectives on the objective and value of the exercise</b>	
+ve	Much more than PV Overall, a great idea, which focuses attention on all housing difficulties
+ve	Mechanical exercise/mathematical exercise Frustrating and difficult in the short term, but positive future contribution Possible contribution in breaking down segregation and discrimination Government emphasis remains focused on ownership
-ve	A fair bit of hassle; unfair to buyers and developers; unsteadiness among developers – no one wants to be first in Social housing is more manageable on our own estates; Disagreement among officials as to whether it will be a short-term programme or will become just a normal part of planning
-ve	Immediate but questionable presumption in the model: home ownership is the only valid option Sustainable development language is aspirational only What we have now is less good than what we had before; programme of public land banking/social housing development was strangled in the 1980s/1990s PV is ‘opportunistic’ – can’t abandon local authority programme No sea change in how local authority views its role: how many units, keeping the list under control, but no departure
+ve	Fear that the whole thing will be rolled back Last summer there was pressure to push affordable initially, but worked to build in definite social commitment Very urban-based guide – e.g. only relates to zoned land. What about village development? Rural development. It is not holistic, it is very mechanistic Overall: positive – greater awareness of issues and links between planning and housing; brought housing to attention politically (at local level)

<b>Perspectives on the objective and value of the exercise</b>	
	Disappointing that there are no outputs almost one year on Laudable objective: put in place a radical piece of legislation to counteract segregation Short term difficulties, but it will be a good thing once it settles down
+ve	PV properly applied would give considerable number of social houses (additional to multi-annual programme)
Mostly +ve, but -ve re. 20% clause	Aspirational in some ways, but the broad aims are good – using the planning system as a means of providing for and shaping society Real concerns regarding the 20 per cent mechanism in social-housing provision. “Scatter-gun” approach – very hard to make output meet need in this way The 20 per cent was not introduced as some exercise in social engineering but to cool the market – it was introduced to do one thing, but dressed up as another

### **Conclusions**

This part of the report has provided a detailed analysis of the 33 housing strategies, exploring problematic aspects of the local housing situation and strategic planning objectives and policies being proposed. The issues of social need and general access were given emphasis, along with related points regarding the land question, the use of the social-affordable provisions under Part V, and socio-environmental/sustainability issues. Some perspectives on the implementation of the plans were derived from interview data.

Clearly, the exercise in producing these strategies was ambitious, involving an attempt to construct a comprehensive policy response to the development of the housing system at local level. Concerns and weaknesses remain, and these are addressed in the concluding overview and recommendations chapter. However, the next chapter first examines one specific aspect of unmet social need, homelessness, examining the more focused policy documents, Homeless Action Plans, which were generated to provide detailed and specific responses to this issue.



## **PART C**

### **Homeless Action Plans**

## **8. Homeless Action Plans – An Analysis**

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### **Homelessness – An Integrated Strategy**

In recognition of the growing housing and homelessness crisis, a cross-departmental team on homelessness was set up through the Department of the Environment. The purpose of the cross-departmental team was to formulate strategy and to develop a comprehensive Government response to homelessness, incorporating all matters relating to homelessness including accommodation, health and welfare, education and preventative measures. The cross-departmental team received submissions from a number of groups including voluntary bodies working with the homeless or those vulnerable to homelessness, local authorities, health boards, education bodies and other official bodies e.g. Combat Poverty Agency, Homeless Initiative. In May 2000 Homelessness – An Integrated Strategy was launched. The key recommendations were:

- Local authorities and health boards, in full partnership with voluntary bodies, to draw up action plans on a county by county basis to provide an integrated delivery of services to homeless people by all agencies dealing with homelessness.
- Develop homelessness fora, comprising of representatives of the local authority, health board and the voluntary sector to be established in every county.
- Local authorities will be responsible for the provision of accommodation, including emergency hostel accommodation for homeless persons and health boards to be responsible for the provision of their in-house care and health needs.
- A Director for homeless services in the Dublin area will be appointed by Dublin City Council and a centre to be established for the delivery of these services in Dublin.
- Additional accommodation will be made available to enable persons accommodated in hostels to move on to sheltered or independent housing, as appropriate, thereby freeing up spaces in emergency hostel accommodation.
- A variety accommodation is required for a range of homeless households, which includes couples and individuals with children.
- Settlement and outreach worker positions will be established to facilitate and encourage persons to move out of emergency hostel accommodation.
- Preventative strategies, targeting at-risk groups including procedures to be developed and implemented to prevent homelessness amongst those leaving custodial care or health related care.

### **Producing the homeless action plans (HAPs)**

The process by which the homeless action plans (HAPs) were developed and adopted was similar to the process used for the housing strategies. The process included 5 broad steps:

- a. Convening of Homeless Forum;
- b. Development of a draft plan by the Homeless Forum members;
- c. Presentation of draft plan to the Housing Committee of the Strategic Policy Committee for approval;
- d. Presentation of draft plan to health board for approval; and
- e. Presentation of draft plan to County Councillors for approval.

A Homeless Forum was convened in all local authority areas made up of representatives from the local authorities, the health board, voluntary organisations and other interested parties e.g. Gardai, religious etc. The composition of the Homeless Fora in each Local Authority area depended on the level of community and voluntary activity in the area. For example, members of the Cork Homeless Forum included the 3 statutory bodies (City Council, County Council and Health Board) and 5 voluntary organisations. However, the diversity of the Fora was not simply a matter of urban versus rural. A number of rural local authority Fora had a diverse membership. The Homeless Forum in Carlow comprised the Urban and County Councils, the Health Board, the Gardai, Carlow VEC, Carlow Probation Service and 2 voluntary organisations; the Society of St Vincent de Paul and Carlow Women's Aid.

Following the development of a draft HAP by the Homeless Forum members, the Strategic Policy Committee examined the plans. This Committee is made up of local councillors and other interested parties e.g. voluntary or community groups, local business representatives etc. As mentioned in Chapter 5, it was at this point that overt local political concerns and/or opposition became clear (see pps 45-48).

The HAPs faced a further two stages, acceptance by the health board and finally acceptance and adoption by the County Council itself.

All local authorities were to have completed and adopted their homeless action plans (HAPs) by November 2001. As of the beginning of June 2002 19 HAPs have been completed and adopted, 2 HAPs, for Roscommon and Galway City, have been adopted by their respective Councils but not by the Health Board. Five (5) have been prepared but are awaiting formal adoption by either the county council and the relevant health board and 4 are incomplete.

The delays may be attributed to a number of factors including:

- i) The timing of the homeless action plans;
- ii) The lack of legislative responsibility to provide plans within a specified timeframe; and
- iii) The resource constraints on local authority housing departments.

*i) Timing of the Action Plans*

The launch of the Government strategy on homelessness coincided with the passing of the Planning and Development Act, 2000 which required that local authorities develop 6-year Housing Strategies, to analyse and plan for housing need and provision, including social and affordable needs, residential land, integration and sustainable development. In addition, Local Authority housing departments also had to assess and plan for the accommodation needs of travellers under the Housing (Traveller Accommodation) Act, 1998. In short, while not wishing to ignore or understate the delays in formulating and adopting their homeless action plans, local authority housing and planning departments were required to produce a variety of different plans and strategies in a short space of time.

*ii) Lack of Legislative Responsibility*

The Integrated Strategy and its requirement for local area homeless action plans, while extremely welcome, remains government strategy rather than a legislative responsibility. All local authority housing and planning departments were statutorily required to draw up their Housing Strategies but this was not extended to the homeless action plans. Therefore, the imperative for housing and planning departments was to complete the Housing Strategies rather than homeless action plans.

*iii) Resource Constraints*

Associated with the lack of a legislative imperative and the competing priorities of producing Traveller Accommodation Plans and Housing Strategies as well as homeless action plans, there were two further impediments:

- a. Lack of funding to contract out/consult re the development of the plans where the expertise/knowledge of the complexities of homelessness were not widely understood (funding was made available to local authorities to hire expert staff to help in the preparation of the Housing Strategies); and
- b. Lack of up-to-date and reliable local data on which to base the development of the plans.

a. Lack of funding

Although the Homeless Fora were made up of representatives from local authority housing departments, health boards and voluntary organisations working with the homeless and socially disadvantaged, there was no provision within the Integrated Strategy with which they could contract or consult on a professional basis experts on the complex issues and needs of homeless households.

b. Data deficiencies<sup>38</sup>

Local authorities and their Homeless Fora were faced with two main data difficulties. Firstly, the most recent national data on homelessness available to local authorities when drawing up their plans dated from the 1999 assessment of homelessness. Secondly, the national data provides little information on the age/gender characteristics of homeless households, household formation and size, income source, special needs, nationality or health status. Characteristics that are necessary to know if appropriate services and accommodation are to be provided for homeless households. Very few of the plans analysed relied on national assessment data only, rather ad hoc surveys among health boards, local authority housing departments and voluntary organisations yielded much of the data upon which the plans were formulated.

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<sup>38</sup> The issue of data deficiencies is discussed more fully in the next section

**Table 8.1 Status of Homeless Action Plans**

<b>LA's with completed and adopted homeless action plans</b>
Carlow CC
Cavan CC
Clare CC
Cork City & County
Dublin Area
Kilkenny CC
Leitrim CC
Limerick City Council
Limerick CC
Louth CC
Meath CC
Offaly CC
Sligo CC
Tipperary (N) CC
Waterford City Council
Waterford CC
Westmeath CC
Wexford CC
Wicklow CC

<b>LA's with draft plans awaiting adoption</b>
Galway City Council
Galway CC
Kerry CC
Kildare CC
Laois CC
Longford CC
Roscommon CC

<b>LA's with incomplete plans</b>
Donegal CC
Mayo CC
Monaghan CC
Tipperary SR CC

**Scale of Homelessness**

Before discussing the content of the various homeless action plans, it is important to set the scale of the homeless population in each Local Authority area into context. As already stated, the Housing Act, 1988 conferred on Local Authorities the responsibility of conducting an assessment of their homeless populations at least once every three years. The last national assessment was carried out in 1999. It is evident from a number of plans that the 1999 assessment data was not used for the development of the HAP or was found to underestimate the real number of homeless individuals in an area. For example, Clare County Council reported no homeless people in the county and Kiltrush UDC reported only 1 person out-of-home in the 1999 assessment and yet a survey held prior to the development of the action plan found 175 people homeless (including 47 Travellers) in the county. Similarly, Cavan County Council and Cavan UDC found 8 and 3 people respectively homeless in 1999 and yet 28 people presented to the health board in 2000 as homeless.

As a result a number of Local Authority areas conducted assessments through ad hoc surveys, commissioned research or by consulting local voluntary and community groups and by utilising health board information concerning the allocation of special payments

which yields information on the homeless status of individuals in the relevant health board area.

**Table 8.2 Data Sources Used by Local Authorities in Drawing up HAPs**

Local Authority	Data Source	Number Homeless
Carlow CC	Rough Sleepers Count	12
Cavan CC	Health Board & others (2000)	28
Clare CC	Homeless Survey	128 (+47 Travellers)
Cork	UCC study	Not specified in Plan
Dublin	Counted In	2,900
Kilkenny CC	Rough Sleepers Count by Gardai	10
Leitrim CC	Variety of sources (2000 & 2001)	48
Limerick City Council	HPU, Childcare & Domestic Violence Sources	394
Limerick CC	Housing Need & Homeless Assessment 1999	982 housing need & 67 homeless
Louth	Based on services	Not specified in Plan
Meath CC	Health Board data	>55
Offaly CC	Homeless Assessment 1999 & local information	42+
Tipperary NR	Health Board & voluntary orgs	145 (estimated including those in institutional care)
Waterford City Council	Waterford City Council, Health Board & Voluntary orgs	98 adults with 35 children
Waterford CC	Survey in 2000	Not specified in Plan
Westmeath CC	Health Board & Voluntary orgs	88 adults and 81 children in B&B (1998-2000)
Wexford CC	Voluntary organisations	100
Wicklow CC	B&B use	Not specified in Plan

The table above illustrates quite clearly the data deficiencies that Local Authorities faced in developing their plans. The 1999 assessment data was out-of-date or underestimated the true extent of homelessness in local authority areas, no meaningful socio-demographic data could be obtained from the assessment data to help inform the type and scale of both the accommodation and services required and single people were often under-represented in assessment data as they did not register or link in with the local authority housing departments because of the length of time spent on the housing waiting list.

A number of HAPs recognise the data deficiencies and at least one action plan states this explicitly, for example, the Louth HAP states:

*“It is accepted that the official figures quoted in the Government report [Housing Statistics Bulletin September Quarter 1999] do not reflect the full extent of the problem” (2001:3)*

Others note the difficulties involved in estimating their homeless populations and make recommendations regarding improved systems for data recording and information gathering. For example, the Westmeath HAP states:

*“The local authorities, the Midland Health Board and the voluntary bodies will develop a template that will assist in the gathering of information on homeless people and families..... This information will be used to inform the agencies and bodies involved in service delivery of emerging needs and will facilitate the planning and provision of services for the homeless” (Westmeath HAP, 2001:19)*

The Tipperary NR HAP states that its strategy will:

*“Put in place an information and research unit for homeless services” (2001:21)*

Waterford County Council’s HAP states:

*“Waterford County Council, in conjunction with the S.E.H.B., will develop a template for the collection of information and data on homeless people. Such information will be used on an ongoing basis to facilitate the planning and provision of services for the homeless” (2002:6)*

### **The Homeless Action Plans: Content & Context**

The action plans have been developed in the context of the local situation and the recorded incidence of homelessness in each particular area. It is, therefore, not surprising to find that the level of commitment and specificity varies greatly between urban and rural local authorities.

The response of the non-urban local authorities and urban district councils varies significantly. Counties such as Clare and Meath demonstrate a good understanding of the pathways into and the consequences of homelessness **and** make general and specific commitments for the provision of housing and services to people out-of-home. The differences between the national assessments of 1999 and the data used in the HAPs for both of these counties, in particular, illustrate the striking differences between the two sets of data. The data from the survey carried out in Co. Clare and the assessment in Meath based on health board and voluntary organisation information shows how significant the problem is in each county. Both of these counties have only a limited range of existing services hence the need for more detailed and specific plans for homeless provision in the respective counties.

Other rural local authorities such as Offaly, Tipperary North Riding and Westmeath demonstrate a clear understanding of the pathways into and consequences of homelessness but fail to make specific commitments or identify clear mechanisms for establishing or improving access to housing and/or support services.

Counties such as Louth have developed their plan in light of significant existing provision via organisations such as the Dundalk Simon Community, Drogheda Homeless Aid Association Ltd, Drogheda Women’s Refuge, Children’s Centre Ltd and the St Vincent de Paul. The plan, therefore, identifies areas of need that are currently not being met.

There exists a similar level of variation between urban/metropolitan plans as found in rural plans. The action plan for Dublin is comprehensive and identifies those groups most in need, it provides for a mechanism to deliver and monitor the delivery of the plan and it makes specific commitment to the provision of an additional 1,640 units of accommodation. The response from Limerick City Council incorporates most of the recommendations from the Integrated Strategy including a commitment to the mechanism of delivery and monitoring of services, it addresses issues of provision of and access to health services and it states explicitly the type and number of units of accommodation to be provided. However, the intended number of units of accommodation (51 units of a variety of accommodation types and one extra unit in each hostel for those with mental health needs) would appear to be inadequate given the 394 people who accessed the Homeless Persons Unit in the city in 1999.

The mission statement contained within the Cork City and County Council plan is “to eliminate homelessness” and the elimination of homelessness is an aspiration in the Galway City Plan. While there are a number of homeless service providers in the Cork city and county area, much of the plan refers to carrying out assessments of need. The issue of delivery of services and providing the mechanism for this delivery is adequately dealt with as is the recognition and commitment to the provision of and access to adequate health care services. However, there is little **specific** commitment to the provision of additional accommodation with the exception of “move-on” accommodation for which 40 units are planned.

While the incidence of homelessness does indeed vary between urban and rural areas, there is little sense from the non-metropolitan plans on the process for diminishing the incidence of homelessness in source areas outside of major urban areas. Without appropriate strategies non-metropolitan local authorities will continue to “export” their homeless constituents to large cities.

### **Strategic Objectives and Policies**

A total of 20 plans (out of 30 possible plans) were analysed for the purposes of this research. At the time of this analysis (November 2001 to the end of May 2002) 19 had been adopted or were adopted during the period of the research and one (Galway City) has yet to be adopted by the health board. The action plans analysed in this section of the report include the following:



**Table 8.3 Action Plans Analysed in Course of Research**

Carlow CC	Cavan CC
Clare CC	Cork
Dublin	Galway City Council (draft form)
Kilkenny	Leitrim
Limerick City Council	Limerick CC
Louth	Meath
Offaly	Sligo
Tipperary North	Waterford City Council (draft form)
Waterford CC	Westmeath
Wexford	Wicklow

This section of the report analyses each local authority homeless action plan in regard of the following broad themes that emerged from *Homelessness – An Integrated Strategy*<sup>39</sup>:

- Implementation structures
- Health provision
- Accommodation
- Prevention strategies

#### *Implementation Structures*

All of the local authorities have appointed Homeless Fora, as directed in the Integrated Strategy. In all cases these Homeless Fora are made up of local authority and health board staff and representatives from voluntary organisations. The development of the HAPs has implications<sup>40</sup> for the Homeless Fora and local authorities in a number of areas including:

- Governance and administrative capacity;
- Quality of service provision; and
- Monitoring and evaluation.

In many cases the HAPs anticipate a monitoring and/or evaluation role for the Homeless Forum, however, the regularity of these meetings is determined by individual local authorities, the administrative capacity of these Fora is as yet largely unknown, the capacity of these Fora to respond to public and political resistance and or funding crises is also, as yet, unclear.

All available plans were scrutinised for the way in which they planned to provide homeless services and accommodation. The HAPs were examined in terms of the proposed structures for implementation and co-ordination. Three broad questions were asked:

- Did the action plan provide for a co-ordinating body to oversee the delivery of the homeless action plan?

<sup>39</sup> Please note this analysis has been carried out on the content of the action plans only and as they relate to the Integrated Strategy.

<sup>40</sup> These implications will be discussed in more detail later in this chapter

- Did the action plan provide for one nominated person to co-ordinate all services in the local authority area?
- What methods of service delivery directly to homeless adults, do the action plans intend to put in place?

***Did the action plan provide for a co-ordinating body to oversee the delivery of the homeless action plan?***

A key concern for voluntary service and accommodation providers in the past has been the un-coordinated and disparate nature of homeless services. Traditionally, the housing policies of local authorities were not concerned with sourcing and providing accommodation for those out-of-home, in fact some local authorities refused to deal with homeless people. Instead under the Health Act (1954) the health boards were responsible for the provision of emergency accommodation for those without shelter. A key difficulty in measuring homelessness and planning for future provision has been the lack of a development body to pull together all the relevant service providers and policy makers in a local area. A key recommendation of the Integrated Strategy was the development of Homeless Fora in each local authority area to co-ordinate activities and plan for future developments for statutory and voluntary service providers. All local authority areas have set up a Homeless Forum.

A key recommendation of the Integrated Strategy was the establishment of a centre/coordinating body to oversee the delivery of homeless services in Dublin. The principle of a centre or coordinating body taking responsibility for ensuring the delivery of services is an important one. The development of such a co-ordinating body or centre for delivery becomes a focus for service providers. Some of the difficulties encountered by service providers in the past have included:

- Inadequate mechanisms for information sharing;
- Lack of knowledge of service availability for clients or customers; and
- Disparate funding mechanisms.

Part of the remit of this analysis of the action plans was to determine whether other local authorities adopted this recommendation for their own areas. Of the 20 analysed action plans 10 Local Authorities explicitly state that their Homeless Forum will be the body responsible for overseeing the implementation and co-ordination of the homeless action plan, these include Cavan, Galway City Council, Leitrim, Limerick City Council, Limerick County Council, Offaly, Tipperary NR and Waterford County Council, Westmeath and Wexford. A key question will be whether an individual Homeless Forum will have the capacity to co-ordinate and manage the delivery of homeless services. The effectiveness of this delivery will depend in part on the following:

- The regularity of Homeless Forum meetings;
- The level of attendance at these meetings; and
- Their practical ability to manage the delivery of services.

Four (4) local authority areas nominate a specifically-dedicated centre for co-ordination of the delivery of services, for example in Dublin the Homeless Agency is charged with co-ordinating the delivery of services, in Co Clare the proposed inter-disciplinary

Homeless Unit would appear to have a dual mandate, that is the co-ordination and actual delivery of services. The Clare plan states that its inter-disciplinary homeless unit will include:

1. Co-ordinator of services who will oversee the implementation and co-ordination of the plan.
2. A Resettlement Officer
3. A Community Welfare Officer
4. Administrative and Secretarial support
5. Designated Psychiatric Social Worker
6. Designated Public Health Nurse.

The Homeless Person's Unit in Cork and a Management Committee in Meath are charged with overseeing the co-ordination of their respective action plans.

***Did the action plan provide for one nominated person to co-ordinate all services in the local authority area?***

In the absence of a co-ordinating body or centre, the research was interested to find out if any of the Homeless Fora made recommendations on the appointment of at least one nominated person who might co-ordinate the HAP and/or act as a point of contact for all the stakeholders in the delivery process e.g., Homeless Forum members, health board staff, local authority staff and voluntary organisations. Of the available plans analysed, a total of 8 local authorities intend to fund a nominated person to oversee and co-ordinate the delivery of homeless services, while one plan (Offaly) identifies the potential for a co-ordinator of services.

***What methods of service delivery, directly to homeless adults, do the action plans intend to put in place?***

*“Local homeless persons centres will be established jointly by local authorities and health boards, in consultation with the voluntary bodies, throughout the country. The service provided will be enlarged to involve a full assessment of homeless persons’ needs and to refer persons to other health and welfare services” (Homelessness – An Integrated Strategy, 2000:56).*

Nine (9) local authority areas intend to provide some form of a dedicated service delivery system to people out-of-home staffed by a combination of local authority and health board staff. Some counties envisage a “one-stop shop” situation where accommodation, social, health, welfare and settlement services and advice will be available to people out-of-home. For example, the Meath action plan states:

*“The overall aim is that the centre will meet the accommodation, health and welfare needs of all persons who are homeless and presenting themselves as homeless” (2001:6)*

Others see a mixed type of service delivery with the development of a dedicated centre or unit for advice and some direct service provision but with other services delivered

through a number of different sources e.g. other statutory service providers, voluntary organisations and community groups. For example, the Waterford County Council plan in its Executive Summary states:

*“A One-Stop Shop of Social Services will be provided in the central Dungarvan complex which will include care support and training services for the homeless in addition to facilities for childcare and other social and voluntary organisations.”*

The action plan continues:

*“A Social Worker will be appointed by Waterford County Council to liaise with the South Eastern Health Board and other relevant agencies as well as homeless persons in the provision of support and aftercare services”* (2002:6)

At least two of the plans commit to the development of a dedicated service delivery system once research has been conducted regarding the need for and scope of such a service. For example, the Cork plan states:

*“The purpose, operation, funding and staffing of such a centre will be decided on through a research and consultation process involving all agencies and with the input of homeless persons as supported in the National Strategy”* (2000: 9).

In the case of Galway City Council’s HAP, COPE (Crisis Housing, Caring Support)

*“is committed to ensuring the establishment of a day centre/one stop shop for the homeless in Galway City, and has secured funding from the Western Health Board to undertake research for the provision of such a facility”* (Galway City Council HAP, 2002:22).

The local authorities committed to providing any or all of these structures as stated in their action plans include:

**Table 8.4 Nominated Centres, Nominated Persons Responsible for HAPs & Delivery Method for Services**

Local Authority	Co-ordinating body to oversee delivery of services	Nominated person to co-ordinate delivery of services	Delivery methods for services
Clare CC	Inter-disciplinary homeless unit	Co-ordinator of services	Inter-disciplinary homeless unit
Cork City & County	Homeless Persons Unit	Co-ordinator	Development of current homeless persons unit
Dublin	Homeless Agency	Director of Homeless Services	HPU & variety of service providers
Galway City Council	Homeless Forum	Homeless Services Co-ordinator from Galway City Council	One-stop Shop to be developed
Limerick City Council	Homeless Forum	Co-ordinator of Services	Homeless Persons Centre
Limerick CC	Homeless Forum	Co-ordinator of Services	Homeless Persons Unit
Meath CC	Management Committee	Not identified	Local Homeless Persons Centre
Offaly	Homeless Forum	Potential MHM Regional Co-ordinator	Not identified
Tipperary NR	Homeless Forum	Co-ordinator of Services	Not identified
Waterford City Council	Not identified	Homeless Officer	Homeless Persons Centre
Waterford County Council	Homeless Forum	Not identified	One-stop Shop of Social Services

A number of the plans that do not make explicit nor definite statements to provide such service co-ordination or service delivery mechanisms indicate a willingness to explore such an idea. For example, the action plan for Louth received a submission from the North Eastern Health Board that stated:

*“In the year 2002, the Health Board would like to participate with the Local Authority and voluntary organisations in the provision at Dundalk and Drogheda of a Homeless Persons Centre” (2001:11).*

The Louth action plan continues:

*“There would appear to be a need to develop Drop-in Centres cum Work-Shops in both Dundalk and Drogheda. The Centres would cater for persons who are homeless or at risk....It would be our intention to explore the possibility of providing one such centre in both Dundalk and Drogheda and seek to find a partner to facilitate the operation of same” (2001:14).*

Of those completed action plans where a centre for delivery of services with a nominated individual to co-ordinate service delivery has not been indicated, the majority of these counties believe that they do not have a significant nor obvious homeless problem. For example, the Co. Westmeath action plan states:

*“Historically there has not been a significant problem of homelessness in County Westmeath” (2001:12).*

The Co. Leitrim Plan also states:

*“Historically there has not been a significant problem of homelessness in the County” (2002:7).*

#### *Plans for Health Care Related Provision?*

*“Each health board will consider its range of responses to the health and social well being of homeless persons in its area” (Homelessness – An Integrated Strategy, 2000:58).*

Poor physical and mental health and barriers to accessing health care services have been identified as key concerns for homeless service providers and homeless service users. These barriers include:

- Issues around the time spent on and the cost of travelling to different service providers;
- Affordability of visits to a medical professional and purchase of prescription medication;
- Fear of unknown services or personnel;
- Stereotyping and alienation; and
- Lack of awareness as to services available.

In addition, a number of Irish studies have shown the high levels of mental and physical ill health experienced by the homeless population. Research into the mental and physical health of hostel dwelling men found that 91 per cent of respondents were suffering from at least one complaint, 64 per cent were suffering from some form of mental health condition and 50 per cent of respondents had a dental problem (Feeney et al, 2000). Recent research into homeless women’s health found that 73 per cent of women were suffering from some form of a mental health condition, 25 per cent were suffering from hepatitis C, 50 per cent of women had a dental problem and 11 per cent were pregnant at the time of the study (Mc Gee et al, 2001). Given the significant health issues that the homeless population present with, and the barriers to accessing services that have been noted in the research, a number of key health issues have been examined in relation to the action plans:

- Have after care plans for children leaving state care been included in the action plans?
- Have health services/issues been included in the action plans for development and/or implementation?

#### ***Have after care plans for children leaving state care been included in the action plans?***

Research has shown that young people leaving state institutional care are more vulnerable to homelessness<sup>41</sup> than other young people. There are a number of reasons for this including:

- Lack of family and social support networks;

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<sup>41</sup> See Kelleher et al, (2000) *Left Out on Their Own: Young People Leaving Care in Ireland*, Oaktree Press and Focus Ireland.

- Institutionalisation or dependency; and
- Inability to find or maintain a home due lack of experience or lack of home-making skills.

Four councils; Cork, Dublin, Limerick City Council and Limerick County Council have explicitly identified young people leaving care as a vulnerable group and in need of specific after care plans. A further five (5) county councils (Co. Clare, Co. Offaly, Co. Westmeath, Co. Wexford and Tipperary North Riding) have identified their vulnerability and need for after care plans without stating a specific commitment in their action plan. The table below indicates the level of recognition for this need:

<b>Local Authority</b>	<b>After Care Plans for Young People Leaving Care</b>
Clare CC	Yes, identified
Cork City Council	Yes
Dublin	Yes
Galway City Council	To prepare as per preventative strategy
Limerick City Council	Yes
Offaly CC	Identified
Sligo	After-care plans in general identified
Tipperary NR	Proposed action
Waterford City Council	After-care not explicitly identified but issue of Foyer is committed to
Westmeath CC	Identified
Wexford CC	Identified

The recent strategy document from Government, Homeless Preventative Strategies (2002) makes specific recommendations regarding the provision of services and accommodation to young people leaving institutional care including young offenders. Local authorities and health boards will have to produce strategies to prevent and tackle homelessness among adult prisoners, patients leaving acute and mental health hospitals and young people leaving care. It should be noted that the Health Boards have been charged with developing strategies to prevent and alleviate youth homelessness. The action plan from Galway City Council notes that the strategies particular to the above mentioned groups will be developed throughout 2002 and 2003.

*Provision for the development of health services?*

As can be seen from the discussion above, homeless families and individuals often have specific health care needs related to the nature of their lifestyles, for example, transient with numerous accommodation moves; insecure or inadequate shelter; problem drug and/or alcohol use, inappropriate accommodation types etc. Of the completed plans available at the time of writing fourteen of the twenty have made some commitment to provision/development in terms of health service access and use. The level of commitment and specificity varies with strong commitment from the urban local authorities such as Cork, Limerick, Waterford and Dublin. Clare County Council, Limerick County Council and Meath County Council for example, have all laid down

specific objectives in relation to health care provision and/or access. The provision for health care within the action plans were interrogated under the following:

***Have access points to health services been identified?***

Clare, Cork, Dublin, Limerick City, Limerick County, Louth, Meath, and Waterford City all make a commitment to the provision of access points to medical services.

***Have the issues of access to and use of medical cards been addressed?***

Clare, Cork, Dublin, Limerick City, and Meath all make a commitment to improve access to medical cards for homeless adults and families.

***Have public health nurses/psychiatric or community health nurses been identified within the plan and/or multi-disciplinary teams?***

Clare, Cork, Dublin, Limerick City, Meath, and Tipperary NR all make a commitment to the provision of medical staff or multi-disciplinary teams to address the health needs of homeless adults and families.

***Will outreach services be developed to target rough sleepers and/or users of homeless services?***

Carlow, Clare, Cork, Dublin, Galway City, Kilkenny, Limerick City, Limerick County, Tipperary NR, and Waterford City Council all plan to provide outreach teams to target rough sleepers or those not in touch with homeless services. Louth are to continue with their existing provision.

***Will health promotion schemes be developed targeting the client group?***

Clare, Cork, Dublin, Galway, Limerick City, Limerick County, Tipperary NR, Waterford City, Westmeath and Wexford all commit to the development of health promotion schemes specifically for homeless people.

***Have the issues of problem drug and/or alcohol use been identified and have issues of access to treatment, detoxification and harm minimisation programmes been included?***

Clare, Cork, Dublin, Limerick City, Limerick County, Meath and Waterford City specifically address the issue of improving access to addiction treatment programmes. The issue of addiction is identified but not explicitly addressed in the plans of Carlow, Kilkenny, Tipperary NR, and Wexford.

***Have issues around dental health and access to dental services been addressed?***

Dublin, Meath and Waterford City identify dental needs as an issue to be addressed.

***Overview of Provision of Health Services***

There exists a general commitment to the provision of health care services. Facilitating improved access to services is a recognised need in most plans however, specific commitments regarding funding, staffing, locating and operating such services are absent from most of the plans. For example, Offaly County Council recognises the mental health and addiction needs of homeless people without offering concrete interventions:



*“Many homeless persons have problems with alcohol, drugs and mental health.....it is important that immediate links and referrals be made to the appropriate services and without delay after obtaining accommodation for them.” (2001:12).*

Kilkenny Homeless Forum states in its action plan that:

*“The South Eastern Health Board are committed to undertaking a full assessment of health and social care needs of the homeless population following an initial period of evaluation by the outreach worker. This evaluation and assessment will be undertaken in 2001” (2001:22).*

For those who have made some commitment to the provision of health services for the homeless, the plans are short on specific mechanisms to ensure delivery and ease of access. It will be difficult to ensure greater co-ordination and more effective referral processes in the absence of either a co-ordinating body or an individual responsible for the delivery of services. For example, the Limerick County Council plan commits to providing health service access points, an outreach service to target rough sleepers, a health promotion scheme for homeless people and improved access to drug treatment, detoxification and harm minimisation programmes, but does not nominate any individual to monitor or oversee the implementation or integration of such programmes.

The majority of plans recognise the importance of health care and the particular health needs of the homeless population, however, the language of the plans is conditional and non-committal, for example the Louth action plan states:

*“A range of social activities **might** be organised for homeless people or people who have been settled from homeless projects into independent living”.*

The same report goes on:

*“In year 2003, the Health Board **may** establish a small Sector Team dedicated to meeting the social and health needs of homeless people. The team **may** include a psychiatric nurse, general nurse, social worker and an administrative assistant” (2001:11).*

#### *Provision of a range of accommodation options?*

A key recommendation in the Integrated Strategy was the provision of a variety of accommodation types to help people move through the cycle of homelessness more quickly. A major failing in the Irish system of accommodation provision for homeless men, women and families has been the shortage of transitional or move-on accommodation. As a result accommodation designed for emergency purposes is being used to accommodate people in both the medium and long-term. There also remains a need for emergency accommodation for people in crisis situations, suitable to their needs e.g. people with mental health problems or individuals with substance misuse difficulties. The action plans for each available local authority were interrogated under the following headings:

***Is there a commitment to providing emergency accommodation? And if so, is it specific?***

*“The statutory and voluntary agencies will also have to respond to the needs of homeless women, couples, families and persons with substance addictions” (Homelessness – An Integrated Strategy, 2000:57).*

All except Cork and Wicklow make a general commitment to the provision of new emergency accommodation units/beds. Cork has no plans to expand its existing level of provision in this area and Wicklow does plan to alter its use of B&Bs for emergency accommodation. The following table indicates the local authorities that have made a commitment to specific provision of emergency accommodation:

<b>Local Authority</b>	<b>Specific Commitment</b>
Clare	2 projects, Shannon & Ennis
Dublin	240
Kilkenny	12 units
Leitrim	4 Units (potentially)
Limerick City	>20
Louth	10 units
Meath	4 extra units
Offaly	Potentially 5 hostel spaces
Sligo	10 units
Waterford City	10 bed hostel & 4 family units
Waterford County	10 units
Westmeath	10 units

***Is there a commitment to providing transitional accommodation? And if so, is it specific?***

*“Action plans will consider the need for additional sheltered, transitional and move-on accommodation” ((Homelessness – An Integrated Strategy, 2000:57).*

More than half of the twenty HAPs analysed recognise the need for transitional accommodation and make a general commitment to the provision of additional transition units. Of the 14 who do make a general commitment 10 of those make a specific commitment in terms of actual units:

<b>Local Authority</b>	<b>Specific Commitment</b>
Clare	Up to 130 units (transitional & sheltered)
Cork	40 units
Dublin	200 units
Kilkenny	15 units
Limerick City	40 Foyer units, 10 transition units for families
Louth	4 per cent of LA output
Waterford City	10 units
Waterford County	12 units, 6 for families, 6 for singles
Westmeath	5 units needed
Wexford	In 4 locations

***Is there a commitment to providing sheltered or supported housing? And if so, is it specific?***

*“...the need for sheltered housing facilities and the extent to which they may be required will need to be examined by each local authority”*  
(Homelessness – An Integrated Strategy, 2000:57).

Again, just over half of the analysed HAPs make a general commitment to the provision of sheltered accommodation, primarily for the elderly. Of the thirteen who make a general commitment, 7 make a specific commitment.

<b>Local Authority</b>	<b>Specific Commitment</b>
Clare	Up to 130 units (combination of sheltered & transitional units)
Dublin	300
Limerick City	1 extra unit in each hostel, 10 for the elderly, 12 units for people with “mild” learning disabilities & 1 extra unit for victims of domestic violence
Louth	6 units
Sligo	10 for men, 5-6 bedroom house for young single parents
Waterford City	12, for elderly men & 5 bed treatment accommodation
Waterford County	6 units

***Is there a commitment to providing permanent accommodation? And if so, is it specific?***

*“They [local authority] should also provide a certain proportion of their lettings of suitable new or existing housing units to allow hostel residents to move into either a sheltered or independent housing environment”*  
(Homelessness – An Integrated Strategy, 2000:57).

Eight out of twenty analysed HAPs make reference to the need to increase the provision of permanent accommodation, however, only 5 of them make a specific commitment:

<b>Local Authority</b>	<b>Specific Commitment to Permanent</b>
Dublin	1,200 units
Leitrim	235 as part of multi-annual programme
Louth	4% of LA output
Meath	1 in 20 new units for permanent housing
Waterford City	5% of social housing

### *Overview of Accommodation Provision*

Most local authorities make some general commitment to the provision of accommodation, however, the number of units to be provided and the target group for the housing type are not specified. For example, only 12 out of the 20 available plans make specific commitments (in terms of units to be provided) to emergency accommodation. The level of detail regarding provision of emergency accommodation for different household types varies from county to county. For example, Clare County Council clearly states that they will provide emergency accommodation in two projects for adults with substance abuse problems, women with children and couples, while the action plan for Louth (including Drogheda and Dundalk) specifies 10 units of emergency accommodation for women, but no other group – however, it should be noted that hostel accommodation in the Louth area is already provided by Dundalk Simon Community (25 beds) and Drogheda Homeless Aid Association Ltd (24 beds).

The level of commitment regarding supported/sheltered housing is equally varied. Limerick City Council specifies that 10 units of supported/sheltered accommodation will be provided for the elderly, 12 units will be provided for people with “mild” learning disabilities and a further one extra unit of accommodation per hostel will be provided for people with mental health needs. In the main however, specific commitments to both the number of units and the type of households that will be catered for are not made clear in the action plans.

What is clear is that for those authorities that have specified household types to be accommodated, women and children figure highly. For example, 9 out of the 12 plans that make specific reference to emergency accommodation identify women/women and children in their provision of that accommodation type. The level of provision for single people, male and female, in all accommodation types is generally unspecified. Single people are particularly vulnerable to remaining in the homeless cycle for longer given the method of prioritising housing need by most local authorities on the basis of household size and number of children. There is a clear recognition by most authorities that drug and/or alcohol dependency can lead to homelessness and yet few local authorities make firm commitments to providing accommodation for these vulnerable groups. There are particular difficulties in providing accommodation for these groups among which are:

- Local opposition to the siting of such accommodation projects from neighbourhood residents or businesses;
- Public perception that people with substance misuse problems are in some way “less deserving” of state assistance than families, the elderly or the mentally ill;

- High levels of staff to resident ratios needed in these types of accommodation projects; and
- Legal implications for staff of such accommodation projects if illegal substances are found on the premises.

However, some local authorities do make provision for adults with substance misuse problems, for example Limerick City Council plans to make available 10-15 units of emergency accommodation to adults with alcohol misuse problems, Sligo County Council plans to provide a “wet room” with 4-5 beds available, and the plan for Westmeath also recognises the need for a “wet hostel”. Waterford City Council in its plan states:

*“There is a need for transitional accommodation located in close proximity to the medical centre where alcohol is not permitted to allow the clients to optimise the benefit of their treatment in an appropriate setting” (2002:11).*

The specific requirement and commitment given in its plan states:

*“A 5-bed unit to accommodate homeless people where they can avail of treatment programmes on a medium term duration of 6 months” (ibid:11)*

As discussed above a number of authorities within each accommodation type identify particular groups for example, women, couples, singles, drug and alcohol users and women fleeing domestic violence, in need of housing. The way in which local authorities intend to provide such housing illustrates the differences between how they [local authorities] view themselves and their role in the provision of services and housing. At one end of the spectrum there is the view that the local authority will take on the role of direct provider and at the other end of the spectrum is the view that the local authority take on the role of enabling voluntary organisations to become the direct provider. The series of quotes below illustrates just some of the differences in the ways in which local authorities view their roles in the provision of accommodation as set out in their action plans.

The Louth action plan states:

*“It is therefore our intention to make available in the region of 4 per cent of local authority housing output in the county for the purpose of accommodating homeless persons in conjunction with the various voluntary bodies”.*

The Limerick City Council action plan states:

*“The Health Board and Limerick City Council will jointly negotiate service agreements with the providers of hostel accommodation.”*

The Westmeath plan states:

*“It is considered that 10 units of emergency short term accommodation are necessary within the timeframe of this action plan in both Mullingar and Athlone. These should be provided by consortia consisting of housing*

*associations working with the homeless in the Athlone and Mullingar areas.”*

Eight HAPs include specific costings for the implementation of their plans. Carlow, Clare, Dublin, Kilkenny, Tipperary NR and Sligo include detailed capital and recurrent expenditures associated with the implementation of their plans. Waterford City Council includes its predicted capital expenditure for the implementation of its building programme and the Louth plan includes some costings.

While the inclusion of specific targets and costings illustrates a recognition and commitment from local government and local agencies to the provision of accommodation for homeless individuals and families, their absence may in the end make little difference. A political and financial commitment from central government to tackle the problem is essential if the plans are to be implemented. Local government agencies do not have the resources to fund the specific commitments made in the HAPs without the support of central government – as is noted in a number of the HAPs.

The action plan for Cork states:

*“Successful achievement of the targets can only be realised on foot of appropriate funding from the relevant Government department”* (2001:19).

The Limerick County action plan states:

*“The implementation of all actions within the Plan is totally dependent on the necessary funding being provided by the Department of Environment and/or the Department of Health and Children”* (2001:33).

A recurrent statement in the Limerick City homeless action plan is:

*“The necessary resources specific to this strategy will require discussions with the Departments of Health and Environment”* (2001:30) [or similar].

### *Prevention Strategies*

*“Prevention strategies, targeting at-risk groups, is an essential requirement for those leaving custodial or health related care...”* (Homelessness – An Integrated Strategy, 2000:56).

The Integrated Strategy makes a key recommendation on the need for preventative measures. On this basis the action plans were interrogated for the inclusion and scope of preventative measures or strategies. A number of key questions were asked of the action plans including:

- Is there any commitment to the development of education and/or training programmes (including literacy programmes) for homeless people?
- Is there a commitment to the development of an education programme as part of a prevention strategy?

- Has a commitment been made that each homeless person is assessed for accommodation, health and welfare needs?
- Have there been undertakings by prison management and PWS that they will ensure appropriate accommodation, education and training, and medical services are available to prisoners on release?

The commitment to the development and/or implementation of a prevention strategy varies widely from county to county. The urban centres including Dublin, Cork and Limerick make firm commitments in terms of assessment of need, provision of education and/or training programmes, and commitments regarding release from prison and offering appropriate supports. Counties such as Kilkenny, Sligo and Waterford have identified if not fully committed to providing some or all of the above services.

***Is there any commitment to the development of education and/or training programmes (including literacy programmes) for homeless people?***

*“It is likely that for most homeless people initial training schemes will involve bridging to prepare them to access mainstream services and there will probably be need for self-development courses with a focus on moving towards work or training”* (Homelessness – An Integrated Strategy, 2000:58).

Clare, Cork, Dublin, Galway City, Kilkenny, Limerick City, Limerick County, Tipperary NR and Waterford County make a commitment to the development of education and/or training programmes. Waterford City and Sligo note the need for such programmes while there is potential for the development of such training/education programmes in Louth if the Drop-In centres are developed.

***Is there a commitment to the development of an education programme as part of a prevention strategy?***

The Clare, Cork, Dublin, Kilkenny, Limerick City, Limerick County, Sligo and Wexford plans make such a commitment, while such a programme is being prepared by Waterford City and the need for one is being assessed by Waterford County.

***Has a commitment been made that each homeless person is assessed for accommodation, health and welfare needs?***

*“The service [local homeless persons centres] provided will be enlarged to involve a full assessment of homeless persons’ needs and to refer persons to other health and welfare services”* (Homelessness – An Integrated Strategy, 2000:56).

Clare, Cavan, Cork, Dublin, Kilkenny, Limerick City and Limerick County, Sligo and Waterford City all plan for an assessment of need when a person presents as homeless. The Galway plan commits to assessing the health needs of the homeless population, in Meath assessing the needs of the person will be part of the work of the settlement officer

and this element may also emerge as part of the work of the Waterford County social worker working with homeless people but it is not altogether clear from the plan.

***Have there been undertakings by prison management and Probation & Welfare Service that they will ensure appropriate accommodation, education and training, and medical services are available to prisoners on release?***

*“Prison management and the probation and welfare service will, through sentence management and a pre-release review process, ensure that appropriate accommodation is available to prisoners on release”*  
(Homelessness – An Integrated Strategy, 2000:58).

Cork, Dublin, Kilkenny, Leitrim, Sligo and Wexford all plan for services ex-prisoners. Clare, Tipperary NR identify this group as particularly vulnerable but make no firm commitments in terms of provision.

### **Conclusions**

The content, both general and specific, in the analysed action plans varies significantly from county to county. Some of these differences can be explained by varying levels of homelessness in each county/local authority area and differing levels of existing services. However, a number of common problems regarding the delivery and implementation of the plans can be identified and are linked directly to the issues addressed in the sections above. While the process of developing the action plans has been a valuable exercise in terms of consultation and beginning the process of tackling homelessness strategically, the outcomes of the Plans are in general disappointing.

A key concern must be the failure of the local authorities to produce the action plans on time and the lack of statutory responsibility regarding this failure. As of June 2002, 4 plans remain incomplete, 5 are still in draft form awaiting adoption and 2 have been adopted by their Councils but not by their health board. Just 19 have been completed and formally adopted – more than 2 years after the publication of *Homelessness – An Integrated Strategy*.

*Homelessness - An Integrated Strategy* did not set specific targets for the reduction or elimination of homelessness and this omission is reflected in the local plans. The Dublin plan sets the targets of eliminating rough sleeping and long term homelessness by 2010 and the mission statement for the Cork City plan is to “*eliminate homelessness*” (no date given), however, no other plans set similar targets. The National Integrated Strategy does not require that local HAPs set targets regarding the elimination or reduction of homelessness and in the absence of specific targets, long-term objectives are hard to meet and impossible to measure.

Regardless of the level of specific commitments/targets included in the plans, the implementation of the action plans cannot be moved forward without the appropriate financial resources being made available from central government. Local government are relatively powerless in terms of raising revenues for the implementation of local



programmes of development, and in the absence of this ability, are totally dependent on the commitment of central government. The absence of detailed costings raises questions about how local authorities and statutory bodies view their roles in the provision of accommodation and services. The role of local authorities included in this research range from direct providers of accommodation through to the role of enabler. However, the majority of plans make vague reference to “partnerships” or “working together with” the voluntary sector and housing associations, in the role of enabler away from direct provision.

Concern must also be expressed as to how the plans will be measured to see if any/all specific commitments as set out in the plans have been achieved. The general lack of specific detail regarding the provision of accommodation and the streamlining/improving of service provision means that the monitoring and evaluation of any developments is highly subjective. The plans in general, do not indicate how and when the actions/objectives that are set out will be monitored and evaluated.

The action plans that have been completed are not all equally detailed and specified to meet to local need. Certainly the metropolitan urban areas have produced strategies appropriate to the detail of need, but only in key cities is the implementation of the strategy to tackle homelessness already underway. Little or nothing is being done or proposed in the strategies to diminish the incidence of homelessness in source areas outside major urban areas. Without appropriate strategies non-metropolitan local authorities will continue to “export” their homeless to large cities.

The Integrated Strategy was published at a time when a number of relevant and inter-related strategies were being suggested/developed simultaneously, for example, the National Anti-Poverty Strategy Review, the Health Strategy, the Housing Strategies, Traveller Accommodation Plans etc. Yet there is little sense from any of the action plans that these developments have informed the action plans.

For homeless people there remain significant issues regarding access to waiting lists, the accuracy of estimated need and the criteria against which need is assessed, and these issues raise questions about the efficacy of the national assessments. Given the dearth of detailed quantitative and qualitative data available to local authorities it is surprising to find that only a handful of action plans make any commitment to improving the quality of their record keeping. As already discussed, reliable and accurate data outlining socio-demographic details and if possible routes/pathways into homelessness would prove invaluable in the planning and provision of services and the development of targeted preventative measures.

## **PART D**

### **Overview & Recommendations**

## 9. Overview & Recommendations

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### Introduction

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 created<sup>42</sup> 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.

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.

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<sup>42</sup> 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 1 for details about the range of housing policies.

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 wide-ranging 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 model<sup>43</sup> 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, Travellers, etc<sup>44</sup>. For such households, subsidised home ownership has no relevance. The strategies indicate some important trends.

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<sup>43</sup>That 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

<sup>44</sup> 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.

- 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 multi-annual 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.
- 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.

**Table 9.1 Housing Strategies: Aggregated Picture for Social Housing Provision**

	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

\* 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 co-ordinate 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 per cent 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.<sup>45</sup>

**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 suitable accommodation

**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 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

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<sup>45</sup> 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.

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.

***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&LG; 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.

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## Appendix 1

<b>Summary of Housing Issues and Policies*</b>	
<b>Housing Issue</b>	<b>Policies</b>
<b>General market demand (ownership, private rental)</b>	Various policies, such as servicing and rezoning land, and an array of fiscal measures, facilitate and encourage the market sector, but with a bias towards ownership rather than renting
<b>Unaffordability</b>	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)
<b>Social Need/Unmet housing needs</b>	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
<b>Homelessness</b>	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
<b>Socio-Environmental Concerns</b>	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.

## Appendix 2

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