



## **Housing for All**

**Review of the Government's Housing Strategy  
September 2021**



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## Housing for All – A new Housing Plan for Ireland

The Government has published its long-awaited housing strategy – Housing for All – with a budget of €20 billion over the next five years. Housing for All consists of four pathways:

- Supporting homeownership and increasing affordability;
- Eradicating homelessness, increasing social housing delivery and supporting social inclusion;
- Increasing new housing supply; and
- Addressing vacancy and efficient use of existing stock.

A unit will be established in the Department of the Taoiseach to monitor and oversee the Strategy and an Programme Delivery Office will be established in the Department of Housing, Local Government and Heritage to support its implementation.

The Overall Targets set out in the Strategy provide for 90,000 social homes, 36,000 affordable homes, 18,000 cost rental homes and 156,000 private homes. This seems ambitious, however these targets set to 2030 – a ten year term – while the funding is guaranteed for half that time.

The targets are also based on a Housing Need and Demand Assessment (HNDA) of 32,700 new homes, without any reference to the backlog built over a more than a decade of under-provision.

### Supporting homeownership and increasing affordability

We welcome:

- The commitment to deliver 6,000 affordable homes a year, 54,000 over the lifetime of the Strategy, with more than half to be delivered by 2026. Two-thirds of these homes will be delivered as affordable purchase while one third will be through Cost Rental.
- The implementation of the ‘Fresh start’ principle to allow people who are divorced or separated, and who have no financial interest in the former family home, to be eligible to apply for State housing schemes. However, the exact wording of this principle will need to be carefully drafted in order for it to be effective, as a transfer of the legal ownership of a property under an order for separation or divorce has no impact on the responsibility for the mortgage. It is therefore possible that a separated person, who is still a joint borrower on the mortgage, will remain barred from State supported schemes.
- The Local Authority Affordable Purchase Scheme, a form of shared ownership, which subsidises the cost of Local Authority housing for purchase (average price of €250,000) and allows the Local Authority to retain a maximum equity stake of 30 per cent.
- Project Tosaigh, allowing the State to build out lands with dormant planning permission, curtailing land speculation and making use of land suitable for residential development that would otherwise lie idle. We are, however, concerned that the Land Development Agency will potentially be provided with significant additional resources to enter into partnership with private developers as well as supplementing these developments with lands from the State’s land bank. *Social Justice Ireland* believes that State land suitable for residential development should be utilised for social housing.
- The expansion of the Part V requirement to 20 per cent and setting a time limit on its implementation to encourage landowners to develop out their sites. We are concerned, however, that given the expansion from social housing only to social, affordable and cost

rental housing, that delivery of social housing through this mechanism will be adversely affected.

- While we welcome the improvements to the Local Authority Home Loan Scheme, this must be funded to take account of a possible increase in applications.
- The owner-occupier guarantee allowing Local Authorities to stipulate a minimum proportion of new homes developed in the areas for owner occupation, as opposed to buy to let.
- Linking rent increases to the cost of living, rather than an arbitrary amount.
- Tenancies of indefinite duration. We note that this is “subject to legal advice” and would urge Government to address this as a matter of urgency given the proportion of the population living in the private rented sector, and the increasing proportion of those in middle and older age.
- Increased resources for the Rental Tenancies Board (RTB) to enforce landlord and tenant legislation and mediate disputes.
- Increased targets for private rental inspections of 25 per cent of all private residential tenancies. The current rate is 10 per cent.
- The examination of a deposit protection scheme (notwithstanding that this was been provided for in the Residential Tenancies (Amendment) Act, 2015 but not yet commenced).
- Measures to increase energy efficiency in private rented housing, which should include supporting the upfront costs of retrofitting.

We regret:

- The First Home Scheme. This was introduced by the Affordable Housing Act, 2021 and is the private market version of the Local Authority Affordable Purchase Scheme. In this scheme, the State will make up the difference between the purchase price of a property on the private market and what the purchaser can raise themselves for a deposit and a mortgage. By artificially inflating the amount available to the purchaser to buy the property, the State is maintaining high house prices, rather than tackling the real issue of supply-side inflation.
- While we welcome the scaling up of Cost Rental homes in principal, the provisions of the Affordable Housing Act 2021 allow investors to add a profit element, which is not part of the cost. There is also the issue of who is excluded. Under the legislation, tenants reliant on the Housing Assistance Payment (HAP) cannot access Cost Rental. Acknowledging that this is intended to provide affordable housing for households above the social housing income thresholds, without adequate social housing construction, the potential exists to create both another tier of housing provision, stigmatising social housing and social housing tenants even further, while continuing the reliance on the market to provide social housing at private rent rates.

## Eradicating homelessness, increasing social housing delivery and supporting social inclusion

We welcome:

- The expansion of Housing First and the commitment to publishing an updated National Implementation Plan. It is regrettable, however, that this expansion did not extend to homeless families.
- Increased healthcare supports for people experiencing homelessness.
- Re-commitment to *the National Traveller and Roma Inclusion Strategy 2017-2021*. Action has been lacking in this area for decades, with Local Authorities not drawing down their allocation to provide safe, sustainable housing for Traveller and Roma families. We also welcome the improved Caravan Loan Scheme. It is regrettable, however, that no provision was made for enforcement where Local Authorities refused to drawdown allocations to provide Traveller accommodation in their areas.
- Enhanced tenancy sustainment supports for families in long-term homelessness continuing to access emergency accommodation. It is regrettable, however, that the main intervention for securing accommodation for these families remains the homeless HAP payment rather than Housing First model.
- The development of a Youth Homelessness strategy to support the 3,000 young people experiencing homelessness in Ireland.
- The phasing-out of social housing leases from private developers. However we note that Local Authorities will have discretion to use short term rental availability agreements, based on the RAS model. These must be time-limited and not permitted to become de facto RAS tenancies.
- Amendments to the Mortgage to Rent Scheme to make it more effective, while we regret the missed opportunity to provide real support to borrowers in mortgage distress by way of equity supports.
- The development of new Local Authority Housing Delivery Action Plans with multi-annual targets and targets for vacant properties.
- Reform of the differential rent system to provide parity nationally.
- Reform of the tenant purchase scheme to allow tenants with a minimum 10-year tenure to buy their home from the Local Authority at a reduced discount of 25 per cent.
- The roll-out of choice-based letting to support applicants for social housing to move between counties. This is particularly important for people who wish to move near family and support networks and victims of Domestic, Sexual and Gender-based Violence who may need extra distance from an abusive relationship.
- The expansion of housing options for older people informed by the *Housing Options for our Ageing Population* joint policy statement between the Department of Health and the former

Department of Housing, Planning and Local Government. This advocates for a spectrum of housing for older people, from owner-occupied housing within communities, to housing with supports and supported housing following principles of Universal Design. This policy statement was published in February 2019 and is supported by NGOs and others working with older people who recognise the importance of housing and its impact on health, frailty and well-being among the older population.

- Increased supports for people with a disability and the development of a new National Housing Strategy for People with a Disability. We particularly welcome the review of housing adaptation grants, which have not recovered from the cuts of 2011 onwards.
- The inclusion of the housing needs of refugees and the implementation of the recommendations of the *White Paper to End Direct Provision and to Establish a New International Protection Support Service*.
- Increases to the Capital Assistance Scheme (CAS) to support housing for vulnerable groups.

We regret:

- The commitment to “working towards” ending homelessness by 2030. This commitment lacks the ambition required to actually end homelessness within this timeframe (a timeframe which is far too long). Government must commit to the eradication of homelessness and the implementation of Housing First principles for all, especially families experiencing homelessness.
- A lack of a coherent strategy for the prevention of homelessness and an over-reliance on private providers of emergency accommodation. In 2019, emergency accommodation alone cost the State €185 million, an increase of 26 per cent on 2018, while expenditure on homelessness prevention and tenancy sustainment was €10 million (no increase on 2018).
- While we welcome the commitment to increasing social housing provision, particularly in the area of social housing construction, the targets contained in the Strategy are grossly inadequate. 121,701 households need social housing (61,880 on the social housing lists and a further 59,821 in HAP tenancies). The Strategy’s target of 90,000 social homes is less than three-quarters of existing need, without factoring in any new applicants for social housing.

Between 2016 and 2020, an average of more than 13,000 households joined the social housing waiting lists. Between 2017 and 2020, an average of more than 14,500 new HAP tenancies were created each year (not including transfers from Rent Supplement). This is an average of more than 27,500 new applicant households for social housing supports each year.

In addition, the target extends over 10 years, while the funding is guaranteed for five.

- The continued reliance on HAP and RAS, subsidies to the private rented sector, to provide social housing solutions as a result of under-investment in the construction of social housing by the State.

- The use of the PPP model for the development of social housing. This has proven to be more expensive and inefficient for the State in previous large-scale projects.

### Increasing new housing supply

We welcome:

- While we welcome the increased construction to an average of 33,000 homes annually, this only takes account of new household formations and demographic change. It does not address the backlog of households in need of affordable, sustainable housing caused by over a decade of under-provision.
- The reintroduction of the Windfall Gains Tax or 'Land Value Sharing'. *Social Justice Ireland* has previously called for this to be reinstated at a rate of 80 per cent of the value of the uplift.
- While we welcome improvements to the planning processes (particularly in respect of commitments to comply with Aarhus Convention obligations) and the replacement of Strategic Housing Development arrangements, we regret that Local Authorities continue to be removed from this process, hindering their ability to fully implement their county development plans.
- The introduction of a Vacant Land Tax. *Social Justice Ireland* has been advocating for a Vacant Site Levy for some time now to combat land-hoarding and speculation. The rate of the tax, the clarity of the legislation implementing it and resourcing capacity to enforce it will be key to its successful implementation.
- The increase in apprenticeships and labour activation measures for the construction sector. However, construction to meet these (albeit low) targets must commence as soon as possible. The measures set out in the Strategy require time to train and support new entrants to the sector. There is insufficient detail within the Strategy of what Government intends to do to stimulate employment of skilled workers who can begin the necessary work now, other than recruitment at employment fairs internationally and modifications to the work permits processes (which, again, will require time).
- The increase in capital funding for housing. This is a significant step-change compared to previous Governments. Ensuring that this funding is used appropriately and effectively to deliver the necessary social and affordable housing will be critical.

We regret:

- As many of the remaining actions within this Pathway of the Strategy are based on reaching the 33,000 construction target, such as Local Authorities identifying suitable lands for development of their target number of houses; having sufficient numbers of planning permissions within the system to expedite the development of lands through with the assistance of a new fund (Croí Cónaithe (Cities)); and estimates of labour requirements; these ancillary targets are likewise insufficient to meet the scale required.

In addition, there are likely to be legal and Constitutional barriers to the proposal to activate planning permissions which will undoubtedly delay the process.

## Addressing vacancy and efficient use of existing stock

We welcome:

- The development of a Town Centres First policy which provides funding to regenerate rural and regional towns and villages. *Social Justice Ireland* has previously called for small-scale construction within towns and villages, such as change of use to permit over-the-shop spaces be used for residential dwellings<sup>1</sup>. This will not only provide additional housing, but support local and regional economies.
- Launching a Compulsory Purchase Order programme for vacant properties. This is also something we have advocated for to bring vacant properties into the housing system.
- The activation of State-owned vacant properties which could be brought back into use and completion of unfinished estates. This not only brings more residential properties into use, but improves the quality and standard of living for households living in unfinished housing estates.
- Data collection on Vacancy for the purpose of collecting the Vacant Property Tax. This is just one of many areas in which data collection methods require significant improvement.
- The introduction of short-term and holiday lettings regulations. While this is welcome, its implementation must be resourced. The previous register underrepresented the number of short-term lettings across the State and Local Authorities were not sufficiently resourced to enforce its requirements.

We regret:

- We are concerned that the proposed reforms to the Nursing Home Support (Fair Deal) Scheme, exempting rental income from a principal private residence when calculating the income of an applicant under the Scheme, could have adverse consequences for the homeowner. Questions must be raised about capacity of the homeowner to enter into tenancy agreements in respect of their property; the scope of any existing Powers of Attorney to permit the execution of tenancy agreements on behalf of the homeowner; and the holding of rental income on trust.

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<sup>1</sup> <https://www.socialjustice.ie/content/publications/building-new-social-contract-policy-recommendations>



## What's missing?

In May 2021, *Social Justice Ireland* published our 10 Point Plan to Deliver Housing for All<sup>2</sup>, calling on Government to implement ten policies to help tackle the housing crisis. In reviewing the Housing for All Strategy, we are disappointed that many of these policy proposals were only partially implemented or not implemented at all.

	<b>Social Justice Ireland Proposal</b>	<b>Included in Housing for All?</b>
1	Expand Housing First to families, providing wraparound services and supports for children and parents.	<b>Partially.</b> Housing First was expanded for single adults with additional needs and enhanced tenancy sustainment supports for families in long-term emergency accommodation were included.
2	Acquire an equity stake in properties in mortgage distress, leaving families in situ and increasing the State's housing stock.	<b>No.</b> The Government has committed to taking an equity stake in properties sold to first time buyers and amending the Mortgage to Rent scheme for borrowers in mortgage distress.
3	Build 14,341 social homes each year for the next 10 years at an annual investment of €3.3 billion.	<b>Partially.</b> The Government has committed to building an average of 9,500 social housing units per annum and has increased capital investment in social housing.
4	Prohibit the sale of State lands suitable for residential development and use this land to build social housing.	<b>Partially.</b> The Government has committed to making greater use of State lands for social, affordable and Cost Rental housing.
5	Ensure that AHBs (Approved Housing Bodies) retain their housing stock as social housing and prohibit their sale on the private market by AHBs.	<b>No.</b> AHBs will be provided with additional funding and are set to play a greater role in social housing provision.
6	Address housing affordability on the supply-side rather than investing in demand-side schemes that artificially maintain high house prices.	<b>No.</b> Government continues its commitment to demand-side subsidies, artificially maintaining high purchase prices.
7	Close all tax loopholes for large-scale investment vehicles purchasing residential properties.	<b>Partially.</b> Government has committed to introducing a Vacant Property Tax and Land Value Sharing.
8	Invest in Property Inspections and enforcements.	<b>Yes.</b> The proportion of property inspections is set to increase from 10 per cent to 25 per cent. The

<sup>2</sup> [10 Point Plan to Deliver Housing for All | Social Justice Ireland](#)

		Residential Tenancies Board will receive increased resources for enforcements.
9	Legislate to increase tenant protections and introduce long-term leases.	<b>Yes.</b> Specific commitments have been made in the Strategy to increase protections for tenants, investigate deposit protection schemes, and introduce long-term leases.
10	Invest in the services and infrastructure to support housing developments, with particular focus on social housing developments.	<b>Partially.</b> Through urban and regional regeneration programmes and investment in infrastructure. No specific reference to supporting existing social housing developments.

In addition, *Social Justice Ireland* had called on Government to improve data collection across all areas of housing and homelessness. We regret that this was not a specific commitment within the Housing for All Strategy.

There is much to welcome in the new Strategy, while the real test will of course be its implementation. There is, however, much to regret. Particularly for those who are most in need.



**Social Justice Ireland** is an independent think-tank and justice advocacy organisation of that advances the lives of people and communities through providing independent social analysis and effective policy development to create a sustainable future for every member of society and for societies as a whole.



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