

## Ireland 2040 Submission

### Introduction

Focus Ireland welcomes the opportunity to comment on the draft National Planning Framework, Ireland 2040. As one of the leading housing and homelessness organisations in the State, Focus Ireland works with individuals and families every day who are bearing the brunt of our unstable and unsustainable housing system. The overreliance on a stretched rental market to provide 'social housing solutions' has resulted in the highest homelessness figures since official records began.

While Rebuilding Ireland provides a crucial contribution to tackling the housing and homelessness crisis, Focus Ireland believes that long term solutions must be founded on a broader range of sustainable strategies for housing, spatial planning and economic development. While the causes of homelessness can be complex, it cannot be solved without an adequate supply of affordable, quality housing in sustainable communities – with such a supply Ireland can move onto fulfil its long stated objective of ending long-term homelessness. It is perhaps not in the nature of Rebuilding Ireland to set out a clear long-term vision and objectives for a functioning housing market that protects people from homelessness, and the development of the National Planning Framework presents a critical opportunity to develop such a vision.

And homelessness is costly. For individuals and families experiencing homelessness, the human cost is enormous. For society as a whole, our inability to protect those at risk should weigh on our collective conscience. But at a more fundamental level, the current homelessness crisis is a considerable financial burden on the State. In 2017, it is estimated that the State will spend €134 million on homeless services. While this level of spending is vital to provide those experiencing homelessness with safe emergency accommodation and the necessary support, we must work to develop a housing market that does not propel individuals into social care services.

Focus Ireland believes that the Ireland 2040 framework provides the opportunity to develop a roadmap for developing national housing market that creates sustainable communities and serves our entire society. We believe that the draft document goes some way towards achieving this, but would ask that the following recommendations be considered to strengthen the framework.

### Vision

Chapter 5 of the draft framework states that *'the long term vision for Ireland's housing future aims to balance the provision of good quality housing that meets the needs of a diverse population, in a way that makes our cities, towns, villages and rural areas good*

*places to live now and in the future*. While we believe this broad statement provides a positive vision for the future of the housing market, we are concerned the draft framework does not contain sufficient specific objectives. While there are a series of 'National Objectives' stated many of these are not in fact 'objectives' but proposals to create policy instruments, measurements or processes.

As recognised in Ireland 2040, the framework must operate in the context of other strategies and planning documents. While it is all well and good for the vision expressed in Ireland 2040 to be a positive one, its execution rests on myriad other systems. The Rebuilding Ireland action plan, for example, is a continuation of plans which have been in place since 2014. These documents placed an over-reliance on financial measures to incentivise the private development of housing. This has not worked and the Government's increased recognition that the State must now take an active role in the building of social housing on a large scale is not reflected in the draft framework. The vision outlined in Ireland 2040 should crystallise the Government recognition that the provision of housing is a State responsibility, and cannot be left to the outcome of market forces. Housing can no longer be seen as a financial commodity.

Failing to address the current housing crisis will likely impact many of the other growth aims outlined in the framework.<sup>1</sup>

The Plan should include clearer statements of principle and objectives in relation to housing. These should include:

- The objective of eliminating long term homelessness – achieving and maintaining 'functional zero' levels of homelessness
- A clear statement that adequate housing is a human right and that recognition of this right is a central to the framing of the approach taken by the document<sup>2</sup>

## Housing Type and Tenure

In acknowledging our future housing requirements, Ireland 2040 correctly notes the increased demand for housing for households of 1 or 2 individuals. However, there is only a cursory reference to the housing and tenure types which may be required in the future. This includes social housing, as outlined below.

The plan refers to the importance of 'tenure mix' but does not reaffirm the Government commitment to 'tenure neutrality' in relation to public support for housing finance. The document also follows the pattern of using 'tenure mix' where the actual policy objective is 'social mix.' Tenure mix is only one factor in achieving a good social mix, and can

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<sup>1</sup> Housing Crisis Could Hold Back Economic Growth, Deloitte Pre-Budget Submission, see: <https://www.irishtimes.com/business/economy/housing-crisis-could-hold-back-economic-growth-warns-deloitte-1.3221508>

<sup>2</sup> Office of the United Nations High Commissioner for Human Rights, available at: [http://www.ohchr.org/Documents/Publications/FS21\\_rev\\_1\\_Housing\\_en.pdf](http://www.ohchr.org/Documents/Publications/FS21_rev_1_Housing_en.pdf)

frequently have a distorting effect on policy when 'tenure' is used as a proxy for 'social' mix.

The plan is strong on seeking different outcomes than occurred in the past, but frequently appears to rely on the same basic development models that shaped the past. As a 'framework' the document cannot cover every aspect of potentially relevant policy, but the absence of any reference to the important role that can be played by 'cost rental' models of housing supply is regrettable, and should be rectified in the final plan.

## Social Housing

As noted above, the shift away from State-built social housing has been one of the most detrimental policy decisions taken in recent decades. We welcome the recognition in Ireland 2040 that social housing will be an aspect of the need and demand profile in the coming decades. However, we also note that the framework document references 'housing supports'. This terminology is one which seeks to include state subsidies to private landlords in the same category as 'social housing'. Socialised private sector housing (such as HAP) will always be needed to in short-term circumstances, but is very poor value for money for the taxpayer and provides less insecure housing for vulnerable people. It will take some time to reduce our dependency on this form of housing supply, but State policy should be to reduce overtime the dependence on this form of subsidy to private rents. Language which deliberately blurs the distinction between two different policy instruments (i.e. publicly owned housing and public subsidies to private landlords) is not a good building block for effective long-term strategy and should be avoided.

Ostensibly providing social housing through the rental market does nothing to improve the supply of housing in the State. Nor does it provide those with a social housing need with any real security of tenure. Rent caps are not adequately responsive and rental standards are poorly enforced. The State spends considerable amounts of money funding private landlords who may exit the market at any time, rather than investing resources in housing that will provide security for generations. Rental sector housing supports will continue to be necessary, but we should not confuse these with true public housing. The need and demand profile should be amended to reflect the difference between the two.

The document is also lacking in any discussion of the challenges that will arise in building social housing at a large scale which is required, for instance the question of vibrant communities and the resistance by existing residents to social housing developments. While it refers to the need for Traveller Accommodation, it does not address the spatial and planning issues that actually shape practice on these issues. Unless difficult issues such as this are addressed, the document will fail to have the intended impact.

## Vacancy Rates

Ireland 2040 recognises the importance of 'building resilience in housing' through the development of adaptable homes, increased residential density and reduced vacancy rates. With regards the latter, we note that national policy objective 35 commits to

“implement measures to reduce vacancy and to progressively target the reduction of the national housing vacancy rate to 5% by 2040 (currently 9.15%)”. While Focus Ireland supports the introduction of policies to bring vacant housing back on stream, we note that these figures have been called into question by local authorities.<sup>3</sup> Drafters might consider reframing the objective in order to account for this uncertainty.

## Housing Data

Focus Ireland strongly welcomes the statement in Ireland 2040 that ‘more and better housing data at national, regional, country and settlement level is needed to understand housing conditions...’.<sup>4</sup>

There is a strong case that such data should be placed under the authority of the Central Statistics Office.

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<sup>3</sup> Number of Vacant Homes ‘May be Grossly Overstated’, see:

<https://www.irishtimes.com/news/politics/number-of-vacant-homes-may-be-grossly-overstated-1.3220063>

<sup>4</sup> Ireland 2040 draft, page 89