

**The Private Rented Sectors in the North and South of Ireland:  
A Case Study in Convergence Analysis**

Paper Presented at:  
European Network for Housing Research (ENHR) 21<sup>st</sup> Conference,  
'Changing Housing Markets: Integration and Segmentation'  
28 June 28 – 1 July, 2009  
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# **The Private Rented Sectors in the North and South of Ireland: A Case Study in Convergence Analysis**

## **Abstract**

The theme of this paper centres on the convergence and divergence of housing policy between two regimes inhabiting the same geographical space on the island of Ireland, as reflected in the development of the private rented sector (PRS) in both jurisdictions. Using an historical comparative analysis of key indicators, this paper aims not just to present an accurate picture of the state of policy towards the sector in both jurisdictions today, but to place this analysis within a framework which looks at the backdrop of overall housing systems. The paper postulates that while Northern Ireland and the South of Ireland are reflective of the Anglo Saxon tradition in housing, major historical differences in their pathways have brought clearly identifiable policy outcomes indicative of their differing status in comparative welfare analysis. The historical path demonstrates the evidence of a move from convergence to divergence between both housing systems. More recent changes in housing policy in both jurisdictions away from bricks and mortar subsidies and the changing role of the PRS are also examined and a convergence theory is proposed.

## **Introduction**

Ireland is a unique island within an EU context in that it contains two distinct political jurisdictions which have shared identities and historical and administrative roots. Both countries were part of the United Kingdom until the South of Ireland [this term is used throughout and refers to the country known today as the Republic of Ireland] gained its political independence in 1922. Northern Ireland at the time of separation, though smaller in size and population, was a more economically developed country with an advanced industrial base while the South was a distinctly agricultural country with a weak industrial sector. Today both jurisdictions remain separate politically but have more common frameworks which have been established as a result of the Good Friday Agreement (a political settlement negotiated between the South of Ireland and the United Kingdom to end the conflict in Northern Ireland). Housing is not one of the areas covered at intergovernmental level but never the less there are elements of similarity evident in the housing policies North and South. Research undertaken for this paper indicates that there is no concerted attempt to follow a common approach towards housing or even to include discussion of housing in any formal way. Yet although the historical paths have been significantly different in both jurisdictions in more recent times common features are easily identifiable. The aim of this paper is to present a comparative analysis of PRS housing policy in the North and South of Ireland. A brief outline of the principal features of the sector in the North and South will be followed by a discussion on the emerging features of the sector. The intention is not as Kemeny puts it when critiquing comparative analysis (Kemeny, 1992) to present a “simplistic inventory of differences” but to look at the variations set against the backdrop of the overall housing systems in both countries.

Within overall welfare theory as espoused by Esping-Andersen (Esping-Andersen 1990) Northern Ireland, by definition a region of the UK, comes within the overall analysis of the UK as being a liberal regime within the Anglo-Saxon tradition. Esping Anderson in his classic work on welfare theory (Esping-Anderson, 1990) in so far as he gives any attention to the South of Ireland at all places it with the Anglo-Saxon countries although within the conservative family where catholic political parties are strong. Other studies have placed the South of Ireland within the Latin Rim, a category developed by Liebfried (1993). Ireland is so placed because of the prominence the Church, women and agriculture within Irish society and because of Ireland's rudimentary welfare state and its peripheral location. Castels and Mitchell (1993) add a "fourth" world to Esping-Anderson's typography that of "Radical", and include Ireland on the grounds that it has a predominantly rightist government which developed from its revolutionary past and did not develop around right/left class issues. Mel Cousins (1997) moreover suggests that not enough attention is paid to the South of Ireland's neo-colonial status and distinct historical path.

Northern Ireland does not fall for a separate analysis within the classical literature; this is largely due to its position as a region within the UK. It can be argued though that this failure hides some of the complexities of the unique experience of Northern Ireland. Northern Ireland too has failed to develop a political system based on class issues. Its political system has been based in the main around the conflict known as the Troubles and political parties have predominantly reflected either a Unionist or a Nationalist perspective. Northern Ireland has a weaker economic base and is heavily dependant on economic transfers from the overall UK exchequer. This is in no small part due to the political conflict that has hampered the economic development of Northern Ireland. It can be argued also that, Northern Ireland because it remains part of the UK, benefits from a welfare system more reflective of the overall UK mix than one more typical of its stage of development. These considerations must be taken into account when examining the housing policies of both jurisdictions.

### **The Role of the Private Rented Sector**

It is proposed here that if you examine the development of the PRS within the context of overall housing policy in both parts of Ireland, a path can be identified which demonstrates long term convergence towards similar outcomes for the sector. Both countries experienced convergence of policy in housing, as in many other areas, until 1922 while both were part of the United Kingdom. Following the South of Ireland's independence from the UK however both jurisdictions followed clearly different paths. These paths reflected their positions in the overall political, economic and social contexts of the world's stage. The South of Ireland, a small open economy with a strong agricultural base, weak industrial base and a small and often shrinking population in many ways had more in common with the economies of Southern Europe than its nearest neighbour the UK. Northern Ireland on the other hand remained part of the UK and although physically separate was part of a nation with a strongly developed industrial base, powerful on the world's stage. Moreover in the years that followed the UK was to establish a strong welfare state, the benefits of which were to accrue to a country that might otherwise not have been able to

afford it. This divergence of fortunes was to have outcomes for housing policy in both jurisdictions.

In the decades after independence the South of Ireland was to achieve one of the highest rates of home ownership in the world (Power, 1993). Northern Ireland would more closely follow Britain's path and home ownership would only exceeded fifty per cent in the early 1970s (see figure 1). Following the break out of the internal conflict known as the Troubles in 1969, Northern Ireland, previously governed by its own Parliament based in Stormont outside Belfast, came under the direct rule of the UK. Housing policy had been one of the main planks of the grievances of the civil rights marchers. Abuse of the allocations systems of Council housing, which it was claimed favoured Protestants, causing bitter dispute. Direct rule from Westminster which continued with only minor interruption until its reinstatement following the Good Friday agreement in April 1998 confirmed its regional status and meant that Northern Ireland's policies followed even more closely those of Britain. Politically also the Troubles fixed party politics firmly around issues concerning British rule and not around the rights of different social classes as was the case in most of Europe.

This accorded more closely with the political framework of the South, whose political system was also based on what was termed "civil war politics" meaning the two parties who had fought on either side of the bitter civil war which followed independence. Northern Ireland however was part of the larger UK and did not have a significant influence on overall policy outcomes. Beneficiaries of the Welfare State in the post war years, Northern Ireland too experienced the grip of Thatcherism and the neo-liberal agenda in the 1980s though its impact on Northern Ireland was tempered by the particular circumstances of the Troubles. For example, Northern Ireland was the beneficiary of a more generous housing policy than the rest of the UK in the 1980s because of its special circumstances.

The fall and rise of the PRS too followed the broad UK trend, that of decline and marginalisation with recovery in more recent times. The PRS in the North and South followed similar paths in the years after political separation, but within different housing structures. The South developed one of the highest rates of home ownership in the world aided by a robust privatisation policy. The North experienced much slower growth in home ownership and a much stronger role for the social rented sector more in line with the size and commitment to that sector within overall UK policy. We will examine the evolution of the rented sectors both North and South in the next section of this paper.

### **History of Decline of the PRS in the South of Ireland**

The PRS in the South of Ireland in common with the rest of the UK was the majority tenure at the turn of the twentieth century. On the eve of the First World War it is estimated that 88 per cent of the total housing stock in the UK including Ireland (North and South) was private rented. There was nothing unique in this within a European context. In the main in the South of Ireland an urban tenure centred on

the cities of Dublin, Belfast, Cork, Limerick and Waterford the sector had come to epitomise poverty, overcrowding and inconceivable sanitary conditions for the majority of people living in rented housing. The living conditions of the majority of the people of Dublin, in particular, towards the end of the nineteenth century were pitiful, even by the standards of the time. The rich and influential had removed themselves from the experiences of the general population and the nineteenth century had seen the upper and middle classes abandon large parts of the city centre in favour of locations on the periphery. Many of these splendid Georgian residences occupied by the aristocracy were to become some of the worst tenements in Europe. The levels of poverty in Dublin at the beginning of the twentieth were acknowledged to be the worst in the British Isles. Poverty, disease and poor housing blighted Ireland's major cities (see generally, Daly 1981, Daly 1985, Aalen 1985, and Aalen 1987).

The problem of the tenements and slum clearance in the major urban areas, particularly Dublin, were to occupy both the British and successive national governments after independence was achieved in 1922. Rent control in common with the rest of the UK was introduced in Ireland during the 1914-1918 periods to control rapid rental inflation during the war years and was successively renewed in the years to come. Government intervention however was slow to bring about substantial change and the plight of those in rented housing and the treatment of the working classes contrasted starkly with its treatment of the rural labourers. While renting and poor quality housing was not just an urban problem what are known as "the land wars," a term given to a period of agitation and unrest during the nineteenth century, had led the British Government to pursue a policy of appeasement which resulted in the nationalisation of land and its redistribution to the peasantry (Curtis, 1963). This redistribution did nothing however for the landless labourer who had not benefited from land redistribution. To further ensure stability in Ireland, rural housing was built by the state to appease agricultural labourers. In fact Irish agricultural labourers were among the best housed in Europe at the end of British rule in Ireland.

The enduring legacy of this period was an embedded policy which saw Government efforts focussed on public housing to tackle slum clearance. While successive governments supported home ownership, public monies in the main were directed towards public housing construction via the local authorities. This policy was to develop as the years went on to encompass an increasing emphasis on homeownership which coincided with the growth of the Irish economy (Blackwell, 1988). From the mid-1960s home ownership began to challenge state build which coincided with a period of economic growth and stability. The 1960s brought about economic prosperity for the first time and the Government recognised the potential for homeownership to make a real contribution to the country's housing needs. Even though private purchase had been subsidised since the first Free State Government in 1922, the Government White Paper published in 1971 set out the logic for subsidising home ownership and vocalised a trend that had already been set in place anyway (DOE, 1977). The strong sales of agricultural social housing units to sitting tenants in the 1940s, 1950s and 1960s ensured that homeownership rates by 1971

were already high. Sales to urban tenants of social housing in the 1970s and 1980s driven by significant incentives were to ensure the shrinkage of that sector. The residualisation of social housing in the South of Ireland was well underway long before “Right to buy policy” became an issue in the UK. In essence therefore homeownership was established as the “normal” tenure in the South of Ireland with social housing occupying an increasingly residual role by the late 1980s. The role of social housing in the South has historically been one of growth in response to crisis such as the slum clearance programmes of the 1930s and 1960s. Its subsequent revival as a tenure in the late 1990s resulted from the crisis of affordability which limited access to homeownership for groups traditionally able to access this tenure. The South of Ireland therefore fits into the framework postulated by Harloe (1995) which says that extensive state involvement in housing provision is largely driven by crisis.

The PRS, termed the “forgotten sector” (O’Brien and Dillon, 1982) on the other hand suffered a dramatic and consistent decline which can be attributed to public attitude coupled with political neglect. The sector since independence in 1922 became increasingly residualised as a home for those who could not access public housing, which was allocated on a needs basis and which favoured families at the expense of the single and the elderly. An entirely different PRS grew up centred on the provision of furnished accommodation to overcome the restrictions of the rent control legislation. Rent control, it has been argued, rendered the sector an unattractive investment as landlords could not compete with local authorities who provided social housing or indeed the generous subsidies for owner occupation (DOE, 2000). Legislatively, little or no change was effected to address the difficulties which existed in the sector around security of tenure and quality of accommodation, particularly in what were mainly run-down units in what are termed “houses in multiple occupancy” (HMO’s). Rent levels and retaliatory eviction were also significant problems (O’Brien and Dillon, 1982). Ultimately the sector had little public sympathy particularly due to its association with a past of slum landlordism and British rule. Furthermore it housed either those passing through as students or saving to buy or more particularly were the marginalised in Irish society and was not viewed as a priority in policy terms.

As the end of the twentieth century approached the PRS had declined to an all time low. In 1996 the PRS comprised only 7 per cent of the housing market. This mirrored a similar decline in the PRS in the UK. The decline of the sector in addition to the factors listed above is also linked to push factors - Government policy in supporting home-ownership, rising real incomes and consequent savings, the development of the building societies and other means of accessing money - all of which influenced a trend towards owner occupation. On the negative side, the impact of rent control has been given as the principal reason for the reduction in supply and stimulating the decline of the sector. In time, furnished rented accommodation emerged more strongly in the market as a means of avoiding the rent control legislation (O’Brien and Dillon, 1982).

## **Development of PRS in the South of Ireland Since 1997- a reversal of fortunes**

The development of the PRS post-1997 must be set against a backdrop of the South of Ireland's dramatic reversal of economic fortune in this period. With growth rates well exceeding the European Union average the country's economic performance earned it the title "Celtic Tiger" after the so called Asian Tiger economies. The rise in real incomes coupled with falling European Central Bank interest rates led to a sharp rise in demand for housing. This was exacerbated by the carryover of suppressed demand from previous decades, overall population growth, inward migration and the rise in single person households (NESC, 2004). Ireland as result experienced unprecedented growth in housing supply, but not without significant cost.

The Government struggled to implement measures to control the rapid rise in house prices by attempting to restrict the growth of the buy-to-let market in favour of first-time buyers. On foot of a report commissioned from Bacon and Associates (Bacon, 1998), this was to be achieved by removing mortgage interest tax relief (MITR) from investors. However shortly after the introduction of the measure the Government was forced to retract in light of the sentiment of investors and severe rent increases in the PRS. The dramatic rise in rents is attributed to the impact of the measure on the supply of available properties to rent (Downey, 1998). Other measures introduced arising from what are termed the "Bacon Reports" included rezoning and fast tracking planning applications for designated development areas and the introduction of measures to limit the life of planning permissions (Bacon, 1998, 1999, 2000).

However while these measures had an impact on increasing production, house prices rose dramatically. Between 1994 and 2004, the average price for a new house nationally increased by 243 per cent, while the average price for a second hand house increased by 322 per cent (Drudy and Punch, 2005). Construction grew dramatically with 633,000 private houses built between 1997 and 2007 for a population of just over four million people. Indeed in 2007 the South of Ireland had the highest per-capita rate of house building in Europe (DEHLG, 2007). Excess demand for housing both from owner occupiers and investors coupled with rising prices led to affordability problems for many groups who traditionally would have accessed home ownership with ease. Media attention focussed on the plight of categories of earners, such as teachers and civil servants, who were now forced to rent because they could not afford to buy. This increase in demand for private rented accommodation from this group placed pressure on the sector and resulted in a "crowding out effect" (Downey, 1998). In essence competition for accommodation from those in the higher income quartiles displaced traditional occupants and put upward pressure on rents.

The widespread sale of social housing to tenants, particularly in the 1980s and 1990s at levels far exceeding that under the UK Right to Buy policy (Hayden, forthcoming), coupled with the abandonment of any significant social housing build in this period had ensured the decline of the social housing sector to 7 per cent of the housing stock by 2006 and its marginalisation as a tenure (Murray and Norris, 2004). In the

face of a significant increase in demand for housing the Irish state was left with little choice but to seek options in the PRS for housing marginal groups. The discourse of Government policy which had focussed on homeownership began to speak of the PRS in the context of its part in ensuring the success of the economy by contribution to mobility (Programme for Prosperity and Fairness, 2000)

Although the numbers in receipt of state assistance (rent supplement) for their housing in the PRS began to rise rapidly [see Fig 6] no overt mention was made in housing policy of the role of the sector in addressing housing need. From 1997 onward the sector expanded both in absolute and in comparative size so that by 2006 it constituted 13 per cent of all households. Moreover the numbers in receipt of state benefit for housing purposes increased proportionately, so much so that by 2005 those on receipt of rent supplement, an income support payment to cover housing costs in the sector, rose to 40 per cent of the market. At the same time there was significant media attention around matters such as standards in the sector together with the lack of security of tenure of tenants.

The increase in size of the sector, its developing role in housing low income groups, in the face of a lack of alternative accommodation and pressures around the adequacy of security of tenure, led to the establishment of a Commission to examine the future of the sector in 1999. In its report, published in 2000, the Commission recommended widespread reform of the sector. This process led to significant legislative change in the form of the Residential Tenancies Act 2004 which significantly improved security of tenure, introduced rent certainty, provided a clear statement of the obligations of landlords and tenants, and a cheap and quick dispute resolution service outside of the courts system.

In more recent times this has been followed by Regulations to improve minimum standards of accommodation ( DEHLG,2008; DEHLG, 2009), the introduction of innovative tenures which have incorporated elements of the security more often attached to social housing (Rental Accommodation Scheme) and standards to improve the quality of apartment building perceived as the form of building most impacting on the PRS. These developments are discussed further below.

In conclusion in the period after 1997 the PRS in the South emerged from the shadows of neglect in housing policy terms. A new role for the sector emerged which coincided with the abandonment of an ideology which sought to provide adequate social housing solely through bricks and mortar subsidies – in other words, state-built housing (Blackwell, 1988). In policy terms movement has been to extend the provision of social housing and housing support via the market generally and the PRS in particular. The renewed role of indirect subsidies for housing provision may be traced back to a seminal report on housing (Blackwell, 1988). However the outcome of this policy change is the most significant development to occur in the PRS since that time and coincided with a reversal of its fortunes in the late twentieth century.



## History of Decline of the PRS in Northern Ireland

When Northern Ireland was established as a separate political entity under the Government of Ireland Act 1920, the majority of people rented their accommodation as indeed they did in the South. The devolved Northern Ireland government established at Stormont in Belfast, which existed for over 50 years until 1972, had considerable autonomy regarding policy and expenditure housing (Connolly, 1990). This resulted in divergent public policies and housing market relations between Northern Ireland and other parts of the UK (Paris, 2001) and with the South of Ireland.

Much of the PRS in Northern Ireland was covered by Rent Restriction legislation introduced during the First World War to mitigate hardship resulting from scarcity of housing. Following the war Northern Ireland, like the rest of the United Kingdom and Ireland experienced a decline in private landlordism. A complex system of rent control developed, based on amendments and additions to existing legislation, which required a detailed knowledge of the history of the dwelling and its rateable value at key dates. In 1956 the Northern Ireland government attempted to introduce new legislation to decontrol wide sections of the market but faced considerable opposition and this issue was not addressed again until the 1970s.

In the period 1919-1939, when 4 million houses were being built by private enterprise and local authorities during a housing boom in England and Wales, many fewer houses proportionately were built in Northern Ireland. Only 50,000 houses, or an average of 2,500 per annum, were built between in Northern Ireland between the wars. This was largely due to reluctance on the part of local councils to engage in house-building (Birrell, Hillyard et al. 1971; O'Brien, 1953). The enormity of the deficit created may be judged by the fact that the first report on housing in Northern Ireland, published in 1944 by the Housing Committee of the Planning Advisory Board, estimated that 100,000 houses were needed immediately to provide reasonable housing conditions.

A contributing factor was that grants made available in Great Britain since 1933 for slum clearance were not available in Northern Ireland; consequently, while 250,000 slum houses were cleared in Great Britain before the war the problem was virtually untouched in Northern Ireland. The extensive provision of social housing by local councils was a prominent feature of housing provision in the UK after the end of the Second World War (Balchin, 1996) but not in Northern Ireland largely due to a reluctance to engage in slum clearance (Murie, 2001). In essence this failure to address housing need was to add significantly to the part housing had to play as one of the root causes of the Northern Irish conflict which commenced in 1969.

Social housing administration and allocation was different in Northern Ireland than in any other part of the UK. Conflicts over allocations based on religious and ethnic background were a prominent feature of the civil rights campaigns of the late 1960s. The 1969 Cameron Report which examined the causes of the civil disturbances concluded that council housing policy had been distorted for political ends (Murtagh,

2001). This led to the removal of housing and planning powers from local councils and the creation in 1971 of a new body, the Northern Ireland Housing Executive, which took on the role of public sector landlord and began major programmes of public housing construction, slum clearance and redevelopment (McPeake, 2001).

Housing supply and conditions were transformed during the 1970s. Major slum clearance programmes removed the worst private rented housing. Over 120,000 new public sector dwellings were built between 1970 and 1978, compared with just 35,000 private sector completions during the same period (Paris, 2008). The Housing Executive established a reputation for absolute fairness in allocation and treatment of all applicants regardless of religious identity or ethnic background (Gray & Campbell, 2001). The combined effects of slum clearance, new public sector construction and a low level of private house building transformed the tenure system (Murie, 2001).

A new system of rent control introduced in the 1970s was credited with the demise of the PRS. Rejecting the English model of fair rents, the Northern Ireland government amended the existing system by raising the rateable value at which a dwelling was subject to rent regulation. The Rent Order (Northern Ireland) 1978 introduced two types of tenancies: restricted and regulated. Restricted tenancies applied to certain dwellings with a specified value which had not been inspected or registered and to dwellings above that annual value which had been issued with a Restricted Rent Certificate. This change in essence created two forms of tenancies. Rent increases were not permitted for restricted tenancies (similar to controlled tenancies in the South of Ireland) while rent increases of a specified amount were permitted for regulated tenancies which fulfilled certain registration requirements.

During the 1980s, housing policies in Northern Ireland followed housing initiatives driven by the Westminster government which promoted private sector housing construction. Between 1986 and 1990, the private sector completed over twice as many new dwellings (91,000) as the public housing sector (36,000), representing a reversal of the public housing action that dominated the 1970s (Paris, 2008). The introduction of the right-to-buy House Sales Scheme led to significant sales of Housing Executive homes to sitting tenants. Public sector housing construction declined further in the 1990s and a housing policy review in the mid-90s brought an end to Housing Executive house-building programmes and a shift towards construction by housing associations.

### **Development of PRS in Northern Ireland Since 1997 – a reversal of fortunes**

The PRS in Northern Ireland experienced a renaissance in the late 1990s and by 2006 the sector comprised over 80,000 occupied dwellings compared with less than 30,000 in 1991. Factors contributing to the increase were the emergence of buy-to-let investors, affordability problems for groups that would have traditionally been able to access home ownership, inward migration and the importance of housing benefit. Policy initiatives that have sought to regulate and promote the PRS as a

housing solution for low income households who would have previously accessed social housing have also played a part in its reversal of fortunes.

Rapid house price growth in the decade to mid-2007 can be attributed to a number of factors, including increased political stability in the region, proximity to the booming South of Ireland, low interest rates and strong wage increases. This led to affordability problems for many groups who would have previously been able to access home ownership such as young professionals. First-time buyer mortgage costs rose to 37 per cent of average individual earnings in 2007 which was far higher than the peak level of 32 per cent recorded in 1989 (NIHE, 2008). Many first-time buyers had therefore no choice but to rent for longer periods until they could afford to purchase a home, or defer entering the owner occupied sector until market conditions changed.

Housing Benefit has also played vital role in supporting the PRS and enabling its expansion. Approximately 40,000 tenants in the PRS are on Housing Benefit and the annual budget is approximately £150 million (NIHE, 2008). A Housing Executive survey of private rented tenants in 2006 revealed that one third (35 per cent) of respondents stated that an inability to access other tenures was the main reason for living in the PRS. The growth in social housing waiting lists means that access to social housing has been blocked for many low income households who rely on the PRS to meet their housing needs. Housing waiting lists grew by almost 60 per cent from 23,000 in 1997 to 36,000 in 2007, while social housing completions fell from an average of 1,500 in 1997-1998 to 1,300 in 2006-2007. The growing number of migrant workers in Northern Ireland also increased demand significantly, for example, migration added almost 10,000 residents to the Northern Ireland population in the year to June 2007 (NISRA, 2008).

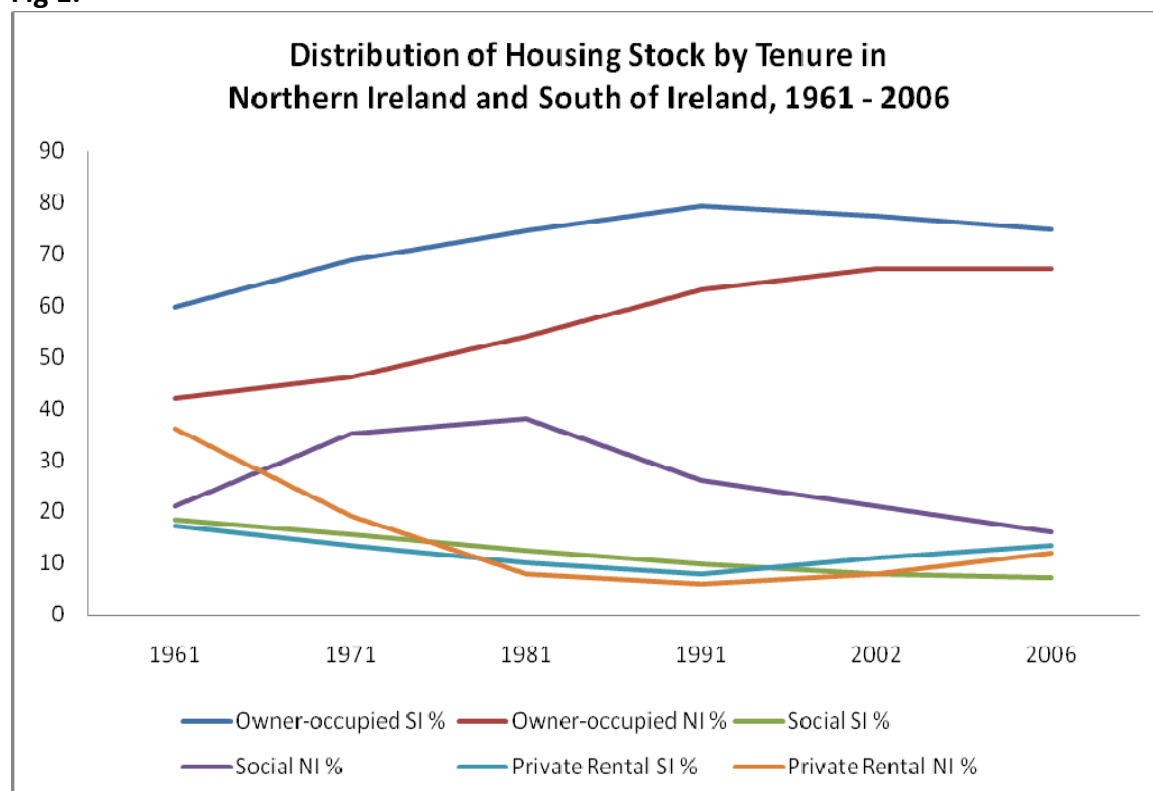
The pace of developments in the housing and economic market prompted a review of existing policies and the development of a new strategy for the PRS. The 2004 joint DSD/NIHE Strategy for the PRS in Northern Ireland stated the role of the sector as promoting 'choice' and 'flexibility', in a similar vein to policy statements in the South. But the 2009 consultation from the DSD went further than statements in the South in seeking to pave the way for the sector's envisaged role in 'meeting housing need' for 'those people who traditionally look to the social sector for housing'. It makes a number of proposals including voluntary landlord registration, linking the payment of Housing Benefit to registration, introducing Government deposit guarantee scheme, an independent dispute resolution body, new fitness standards and longer periods of notice to quit for long term tenants. These proposals followed the Private Tenancies (Northern Ireland) Order 2006 which introduced requirements for landlords to provide rent books and a written statement of tenancy terms, as well as seeking to target unfitness and encourage landlords to improve unfit properties, in a similar way that Minimum Standards Regulations have been strengthened in the South.

## Comparison of Key Indicators North and South

This section of the paper picks out key indicators within the PRS and carries out a comparative analysis using these indicators. These include: the structure of the sector; size and overall share of housing market; composition of households; role in catering for low income groups; and regulatory framework including minimum standards legislation.

### Size and Overall Share of the Market

Fig 1:



Source: CSO, Census 1961 – 2006 and CONI, Census 1961 – 2006

The South of Ireland at 75 per cent has one of the highest home ownership rates in Europe, along with Portugal at 76 per cent and Italy, Spain and Greece with rates of more than 80 per cent. As far back as 1946, the majority (53 per cent) of all households in the South of Ireland owned their own home. By contrast, home ownership rates in Northern Ireland were only 42 per cent in 1961 and did not pass the 50 per cent mark until the mid-1970s. By 2006, three quarters (75 per cent) of all households in the South were home owners and over two-thirds of all households in the North owned their own home.

The most notable aspect of the chart above is the different paths taken by the social housing sectors in Northern Ireland and the South of Ireland. While the proportion of social housing in the South fell by a third, from 18 per cent in 1961 to 12 per cent in 1981, the proportion of social housing in the North increased from 21 per cent to 38 per cent over the same period. This was largely due to the social housing construction programmes undertaken by the Housing Executive in the 1970s.

The social housing sector in the South has been in decline since the 1960s and today constitutes just 7 per cent of the overall housing stock. The number of dwellings rented from local authorities steadily increased until 1961, then fell consistently from 1961 until 2002 (from 125,000 to 88,000 units). Between 2002 and 2006, the number of local authority rented dwellings increased to 106,000 units. While this stopped the decline in overall terms, this increase represented just 6 per cent of the 320,000 units built in the South of Ireland during this four-year period. As a consequence the social housing sector has failed to keep pace with housing need; the most recent figures show that the number of households in need of social housing increased from 43,000 in 2005 to 56,000 in 2008.

This pattern was not matched in Northern Ireland which benefited from the UK boom in social house building in the 1960s and 1970s. However in more recent times, the social housing sector in the North has declined in the same way as the South, the number and proportion of tenanted Housing Executive dwellings has dwindled, largely as a result of the sale of properties to sitting tenants (in 2001 there were 116,000 NIHE properties compared to 93,400 in 2006).

The PRS in both North and South have followed similar paths with both experiencing a comeback in the last decade after periods of continuous decline. The PRS constituted 36 per cent of Northern housing stock in 1961, compared with 17 per cent in the South. By 1991, the PRS constituted 6 per cent in the North and just 8 per cent of housing in the South.

From 1991 onwards, the PRS in both the North and South began to grow again and both currently comprise around 12-13 per cent of the housing market (approx. 250,000 units in the ROI and 81,000 units in NI). The PRS has become an important source of accommodation for particular social groups who cannot access social housing, in particular single people and one parent families on low incomes in receipt of income supports in the South and housing supports in the North. The PRS has also been utilised by both Governments as a means of housing low income households. Nevertheless the PRS in both jurisdictions remain small compared with Portugal and France with rates of 20 per cent or more and Germany with over 50 per cent.

### **Structure of the Private Rented Sector**

A major study on the PRS in Northern Ireland conducted at the end of the last century (NIHE, 2002) highlighted significant changes in the household profile of private tenants with increasing proportions of single person households and lone parent households, decreasing proportions of lone pensioner households, a decrease in the age of the head of household, higher turnover of tenants, and increasing proportions of tenants in receipt of Housing Benefit. It also highlighted a flow of new landlords into the sector, with four out of ten landlords having entered the sector in the last five years. It is also interesting to note that a significant proportion of new

rented properties were former Housing Executive dwellings (i.e. former public housing) bought out under the Right to Buy (NIHE, 2002).

The PRS in Northern Ireland is housing an increasing number of younger tenants, with a growing proportion of tenants under the age of 40 (54 per cent in 2006 compared to 37 per cent in 2001). This significant increase is attributed to the growing difficulty experienced by this group in accessing other tenures, due to ongoing affordability issues for first-time buyers. Between 1983 and 2006, house prices in Northern Ireland were on average 71% of those for the UK as a whole. But in February 2007 the NI average house price overtook the comparable UK figure for the first time ever and it became the third most expensive region in the UK (Ulster Bank NI, 2007). Tighter controls on lending more recently may mean first-time buyers could remain in the PRS for much longer periods. The growth in the number of younger tenants is also due to the difficulties experienced by younger households in accessing social housing in their preferred geographical location.

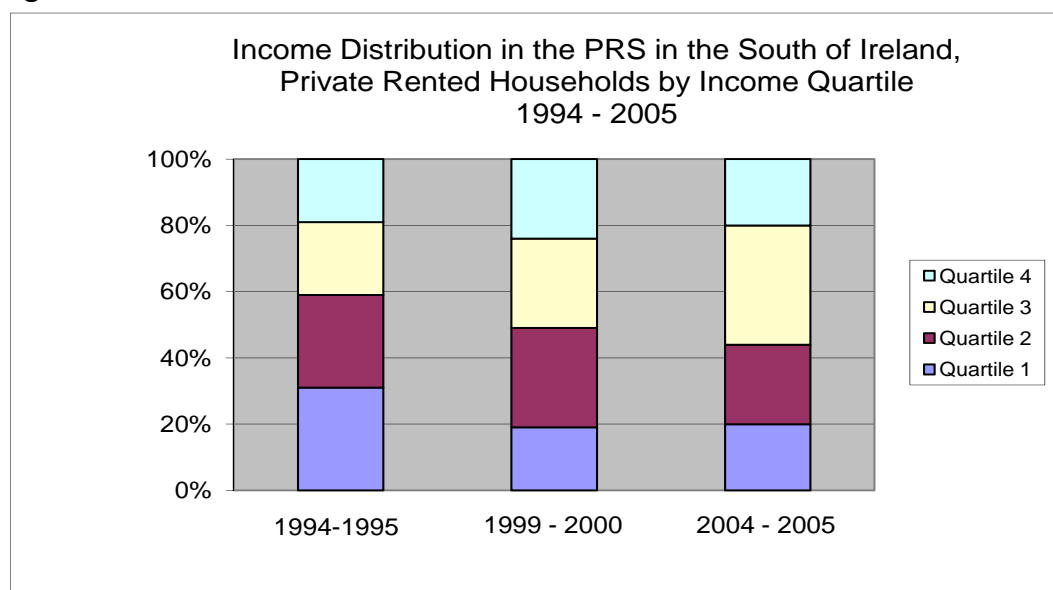
It is also clear that tenants in the South also have significant difficulties in accessing other tenures. A higher proportion of employed people live in the PRS in the South than in the North. Table 1 below shows that over two-thirds of people living in the PRS in the South are employed, whereas the majority (57 per cent) in Northern Ireland are not economically active (i.e. unemployed, working in the home or retired). The barriers to affordable home ownership in the South caused by exceptional house price inflation, which averaged 14.9 per cent per year between 1997 and 2005 means that a high proportion of people in employment have been forced to spend longer periods living in the PRS (Permanent TSB House Price Indices, various).

**Table 1: Employment Status of Private Rented Households, North and South**

	Northern Ireland		South of Ireland	
	2001	2006	2002	2005
<b>Employed</b>	47%	43%	70%	67%
<b>Economically Inactive</b>	53%	57%	30%	33%
<b>Total</b>	100%	100%	100%	100%

Source: CSO Household Budget Survey 2002 and 2005 (requested calculations) ROI and House Condition Survey, 2001 and 2006

**Fig 2:**



Source: CSO Household Budget Surveys (various)

Further evidence of the social structure of the PRS in the South of Ireland can be derived from figures showing the proportion of households in each income quartile (see Fig 2 above) The latest available figures (2005) show that 20 per cent of private rented households in the South were in the lowest income quartile and that just over half of them (53 per cent) were in employment. By contrast, the overwhelming majority (94 per cent) of the 20 per cent of private rented households falling into the upper income quartile were in employment. This shows two distinct cohorts of people relying on the PRS, one cohort includes low paid workers, unemployed, elderly or otherwise marginalised people and the other consists of people on high incomes and in many case possessing dual sources of income.

However the shrinkage of the overall proportion of people on low incomes living in the PRS indicated by the chart above does appear to conflict with other data, which shows that at least 40 per cent (Department of Social and Family Affairs, Minister's Statements) of the PRS is comprised of people in receipt of rent supplement, which is only available to people in receipt of a social welfare payment. It could be surmised that this sizeable proportion of rent supplement recipients, taken together with a further cohort of people in low paid employment ('working poor') should add up to a greater proportion of the rented sector than the figures above indicate. The working poor in the South, unlike in Northern Ireland and UK, are not entitled to government assistance with their housing costs, and comprised 6.5 per cent (116,000 people) of the working population in 2006 (Central Statistics Office, 2007).

Either way the trend in the above figures shows that demand has increased for private rented accommodation amongst households in the middle and upper income categories. This is because escalating house prices have meant that many middle-class households have postponed home purchase in favour of renting. This extra pressure on the rental market means that access to rented accommodation has

become more restricted for households at the lower end of the market “the crowding out” effect noted above.

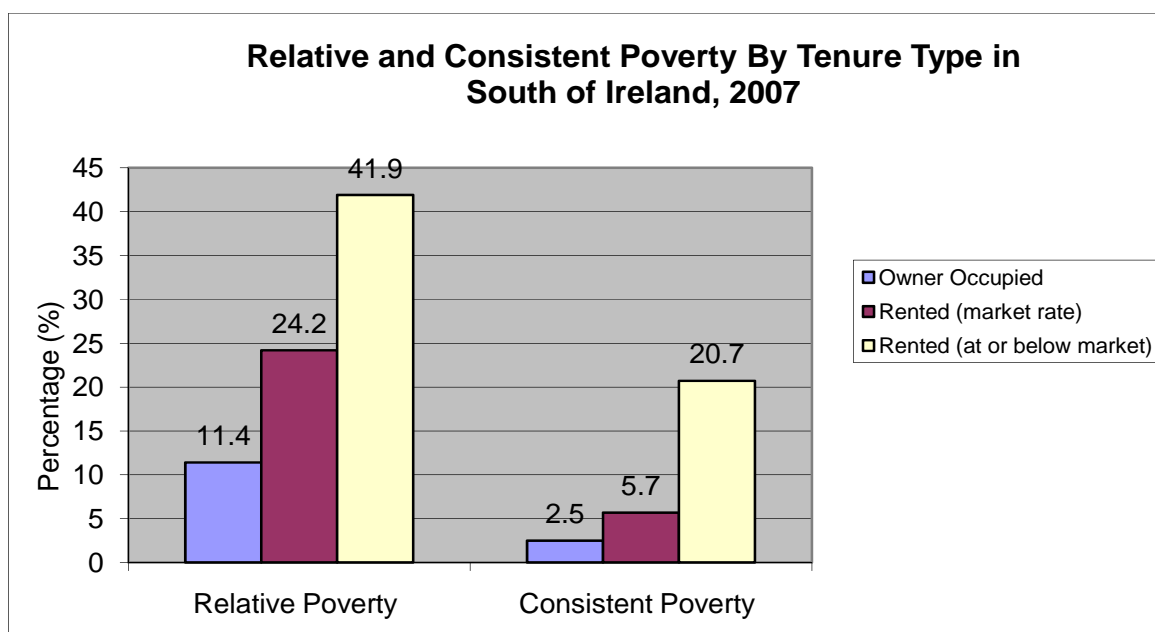
**Table 2: Gross Household Income (%) in the PRS in N Ireland , 2001 and 2006**

	2001	2006
Under £9,999	45.6	43
£10,000-£19,999	35.3	38.7
£20,000 or more	19	18.3
<b>Total</b>	<b>100</b>	<b>100</b>

Source: Northern Ireland House Condition Survey, 2001 and 2006

Income figures for Northern Ireland show a high representation of households from lower income categories in the PRS, with over 40 per cent of households having an annual income of less than £10,000. Restricted access to social housing means the PRS is the only option for many of this group. Demand from middle and higher income categories is also a feature and comes mainly from young professional households.

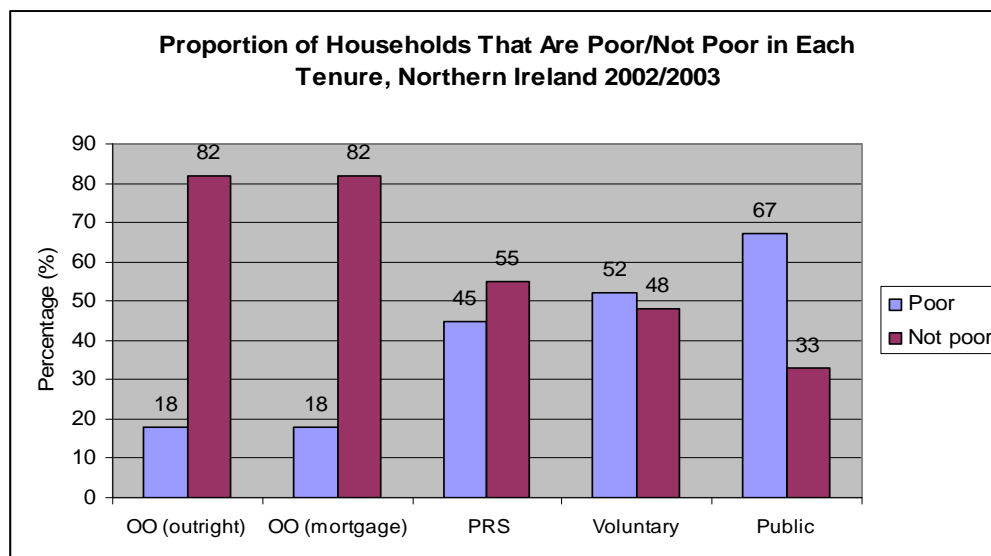
**Fig 3:**



Source: CSO EU-SILC, 2007



Fig 4:



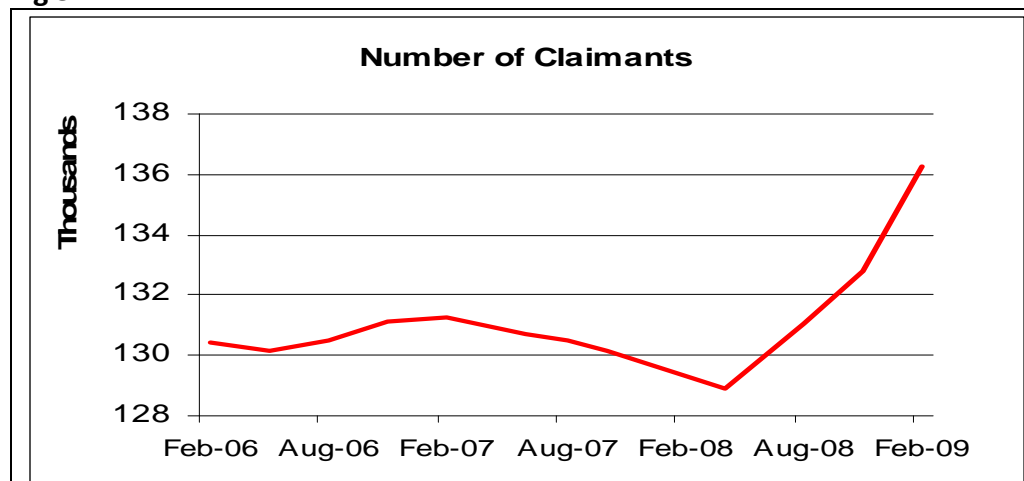
Source: PSE NI Poverty Index, 2002/2003

### Government Support for Tenants on Low Incomes Living in the PRS

#### Housing Benefit (NI) and Rent Supplement

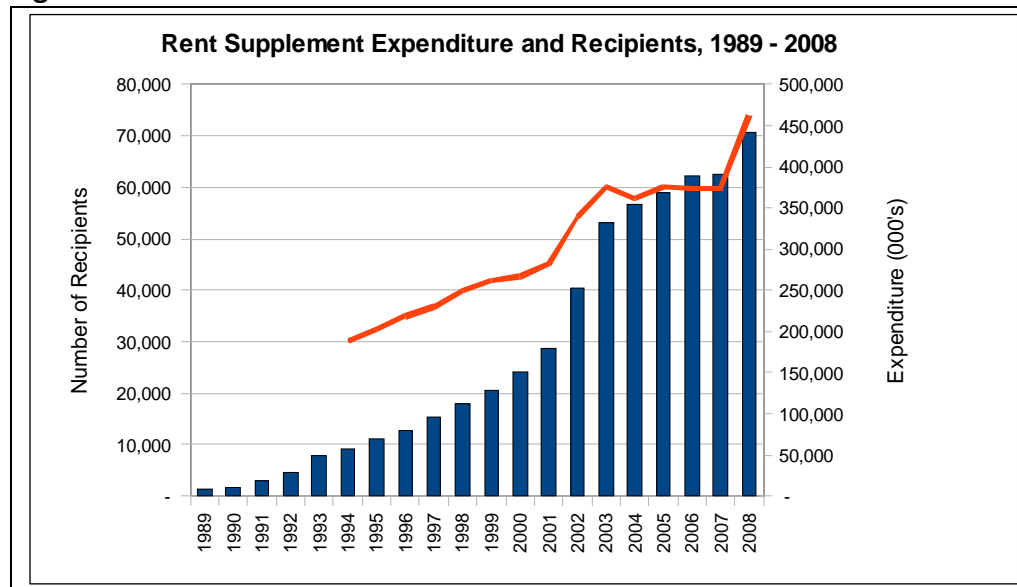
The growth in the number of Housing Benefit recipients in the North and rent supplement recipients in the South has contributed to the overall expansion of the PRS in both jurisdictions. Housing Benefit, which was introduced in Northern Ireland in 1983, is a social security benefit to assist individuals or families on low income with their housing costs in Northern Ireland. Anyone who has to pay rent or rates for their home can claim Housing Benefit, including public and voluntary social housing tenants as well as tenants in the PRS. The payment is available to both people in receipt of a social welfare payment and people in full-time employment on low incomes. The number of households in receipt of Housing Benefit in Northern Ireland has dramatically increased in recent years doubling from 18,000 (2001) to approximately 40,000 at the end of 2008. The annual budget for Housing Benefit is approximately £150 million.

Fig 5:



Source: Northern Ireland Social Security Statistics Bulletin, May 2009

**Fig 6:**



Source: Department of Social and Family Affairs, 2009

By contrast, rent supplement, which was introduced in the South of Ireland in 1989, is not a housing benefit but an income support to overcome a short-term difficulty with paying rental costs. The payment applies only to private rented accommodation and not to local authority or voluntary housing; it is only available to people in receipt of social welfare and not people in full-time employment, even those on low incomes; the level of support provided is capped depending on household type, size of property and the geographical location; and every tenant must pay a contribution to the rental costs.

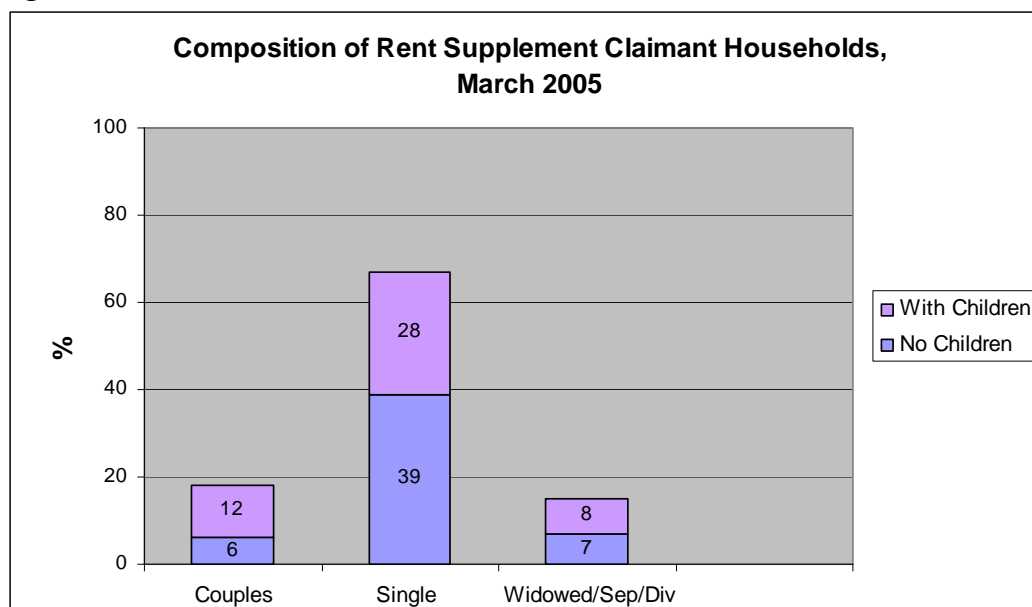
While the number in receipt of rent supplement was comparatively insignificant when the measure was introduced, it increased dramatically in the mid 1990s during Ireland's economic boom. The number recipients increased from 30,100 in 1994 to 74,038 at the end of 2008 and the cost to the Exchequer increased from €8 million in 1989 to €441 million in 2008. Numbers had stabilised at around 60,000 households by 2007, but increased dramatically with the economic recession to 84,000 by March 2009 with a projected cost of €530 million by end 2009.

Rent supplement, while not a housing benefit, has become the main means by which housing support is delivered in the South. The rapid growth in the number of recipients in the early part of this decade had brought about calls for rent supplement reform and the recognition of the long term housing needs of those in receipt for longer than 18 months. This led to the introduction of the Rental Accommodation Scheme in 2004, which involved a transfer of responsibility for long-term rent supplement recipients from the Department of Social and Family Affairs to the Department of the Environment, Heritage and Local Government. A new form of 'social housing' would be delivered in the PRS by means of long-term leases agreed between local authorities and private landlords. Most existing voluntary housing tenants were also transferred to the scheme.

### Profile of Claimants

The latest available demographic profile of rent supplement claimants is from 2005, which shows that three quarters (75 per cent) of all claimants were either single person households (39 per cent) or one-parent families (36 per cent). The number of claimants was 57,960 in June 2005. Rent supplement claimants were more likely to be single than the general Irish population. 67 per cent of rent supplement claimants were single, compared with 55 per cent of the general population; a further 15 per cent were widowed, separated or divorced compared with 8 per cent of the general population.<sup>1</sup>

Fig 7:

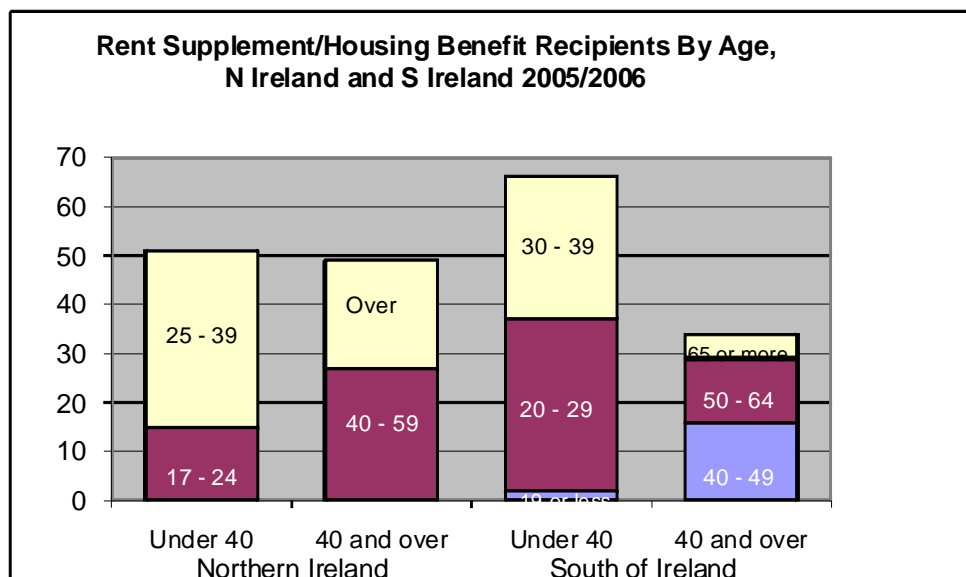


Source: Department of Social and Family Affairs, 2005

Rent supplement recipients were also substantially younger than the general population: in 2006, 46 per cent of the population of the country was aged between 20 and 49 years; however, 64 per cent of all rent supplement claimants in 2005 were aged between 20 and 49 years. Females were more represented amongst rent supplement recipients than in the general population; 58 per cent were female and 42 per cent male, compared with a general population in Census 2006 of 50 per cent male and 50 per cent female. Female rent supplement recipients were generally younger than male recipients, again differing from the general population where ages are broadly similar. 45 per cent of female claimants were aged between 20 and 29 years, compared with 21 per cent of men, while 12 per cent of women were aged over 50 compared to 26 per cent of men.

<sup>1</sup> Comparison of rent supplement claimants in March 2005 in with Census of General Population, 2002

**Fig 8:**



Source: Department of Social and Family Affairs, 2005 and House Condition Survey (NI), 2006

### **Rental Accommodation Scheme in South of Ireland**

Rent supplement, while not a housing benefit, had become the main means by which housing support was delivered in the South. But the rapid growth in the number of recipients had brought about calls for rent supplement reform and the recognition of the housing needs of long-term rent supplement recipients (i.e. 18 months or longer). This led to the introduction of the Rental Accommodation Scheme (RAS) in 2004, a new hybrid form of housing delivered through the PRS by means of long-term leases agreed between local authorities and private landlords and with additional benefits for tenants traditionally associated with social housing. Most existing voluntary housing tenants were also transferred to the scheme.

The RAS scheme was designed to make financial savings for the state. Lower rental payments were offered to landlords in return for longer-term agreements. Landlords would benefit by having guaranteed income from the state. Tenants would benefit from greater security of tenure than that guaranteed by private rented legislation. Most importantly they would pay differential rent (i.e. rent based on income) - a positive feature of social housing not available to rent supplement tenants - which meant that the tenant could take up employment without losing all financial support from the state. RAS tenants would remain in the PRS and be subject to PRS regulatory control. They would not be tenants of the Local Authority, thereby reducing the management burden. It was also considered that RAS would facilitate greater social integration than traditional social housing by providing a greater geographical spread. This trend towards market provision of "social" housing in the South has continued with the introduction of the Social Housing Investment Programme which will source housing for those in need through the long term leasing of units from the private sector rather than through traditional buy and build.

## **Regulatory framework**

The root of legislation governing the rented sector in Ireland followed closely that of the UK (given Ireland's status within the Union of Great Britain and Ireland) until independence in 1922. Measures around rent control introduced during the 1914-1918 period were common to both jurisdictions. Prior to the introduction of the Residential Tenancies Act 2004 however only minor changes were introduced to the legislative code in the South mostly with the intention of protecting vulnerable tenants. It is interesting that at the time of the introduction of Residential 2004 the trend across Europe was to remove stringent protections and to move further on the path of deregulation.

### **Principal features of legislative framework in the South of Ireland**

The sector is now governed by Residential Tenancies Act 2004. This legislation was charged with improving security of tenure for tenants and providing a cheap and speedy means of resolving disputes for both landlords and tenants. The Act applies to every tenancy with some exclusions, for example, business lettings, holiday lettings, dwellings where the landlord is also resident and voluntary housing. The Act provides for:-

- Security of tenure for up to four years (following a six month probationary period). Commonly referred to as a Part 4 tenancy
- A measure of rent certainty, as rents can only be reviewed annually and cannot exceed market rates
- Clearly defined rights and obligations of both landlords and tenants including specified notice periods for both landlord and tenant based on duration of the tenancy
- Established the Private Residential Tenancies Board (PRTB) which is tasked with regulating the sector and providing a dispute resolution service for both landlords and tenants.
- Mandatory registration of all tenancies with the PRTB
- Protection against illegal eviction for tenants
- Specifies grounds under which a landlord can regain possession of the property, for example, non-payment of rent or landlord is seeking to sell the property.

In addition to the overall regulations set out in the RTA 2004, the regulation of multi-unit developments is currently under review. The growth in apartment living in the last decade has highlighted a number of areas in need of regulation, including the legal structure, responsibility for common areas and day-to-day management. This is important because multi-unit developments form an increasing proportion of the overall private rented stock.

## **Regulatory Framework in Northern Ireland**

### **Principal features of the legislative Framework**

The regulatory framework in Northern Ireland is governed by the Private Tenancies (Northern Ireland) Order 2006 (introduced in April 2007) sets out the conditions which apply to all private rented tenancies, and provides a new structure for the PRS. The rationale for this legislation was to: target unfitness and disrepair through rent control; reduce inequities between tenure types; and simplify, clarify and raise awareness of landlord and tenant obligations.

Some of the main features are:

- As well as having rent books, new tenants have to be supplied with a written statement of the terms of their tenancy. Where a tenancy agreement fails to clarify repairing obligations, the law provides default terms.
- New tenancies are defined on the basis of their fitness for human habitation – an unfit tenancy will be subject to rent control until it is made fit.
- District Councils are responsible for inspecting tenancies for fitness and have been given new powers to ensure unfitness and serious disrepair are addressed.
- Controlled rents are now based on a number of factors including the state of repair, the equivalent Housing Executive rent for a similar dwelling and the general level of rents in the area.
- Restricted and regulated tenancies will retain their protection. Existing tenants will have a tenancy for life but there will only be one further succession possible, rather than two as at present.
- There are to be no more protected tenancies. On vacancy, all currently protected tenancies will be decontrolled. If the property is rented out subsequently, the rent is not subject to control, as long as the property is fit.

The Department for Social Development issued a consultation document: “Building Sound Foundations: A Strategy for the Private Rented Sector” on 12th June 2009. The Strategy aims to encourage the development of a healthy PRS capable of responding more effectively to meeting housing need in Northern Ireland. Indeed the Strategy further states that over time the aim is that the sector will offer greater choice in meeting housing need, particularly for those people who traditionally look to the social sector for housing.

It contained proposals to:

- better inform landlords and tenants of their rights and responsibilities
- introduce voluntary landlord accreditation (possibly tied to the payment of housing benefit)
- encourage housing associations to buy and let private rented accommodation
- extend the notice to quit period after 5 and 10 years of occupancy

- require private rented properties to comply with Decent Homes Standards by 2015
- establish a tenancy deposit scheme and associated disputes resolution service.

These proposed changes show remarkable similarity with measures adopted by the Government in the South to improve conditions in the sector.

### **Divergence and Convergence of Housing Systems North and South**

The housing systems in Northern Ireland and the South of Ireland diverged from 1922 until the 1990s. Early and strong support for home ownership was the main feature of the housing system in the South. Owner occupiers were given a number of fiscal advantages in the North in the post-war period but preference for home ownership can be attributed to the 'right to buy' policies of the 1980s.

Social housing has played a more prominent role in the North than in the South. Discrimination in housing allocations was a factor leading to the Troubles in the late 1960s, but the sector expanded considerably once responsibility was transferred to the Housing Executive in the 1970s. Social housing did play an important role in tackling slum clearance in the South but was superseded by home ownership from the 1960s onwards. The widespread sales of social housing stock in the 1980s and early 1990s considerably reduced the overall size of the sector.

The PRS in both jurisdictions were in decline until the late 1990s. Slum clearance programmes took place in the South in the 1930s and 1940s but the PRS contracted due to the impact of rent control and a climate favouring home ownership. Slum clearance of the worst rented dwellings took place far later in the North and poor quality housing, low financial returns and a complex system of rent control aided the demise of the PRS.

Private sector housing booms in both economies transformed the housing systems in the 1990s and 2000s. In the South, private housing completions grew from 23,500 in 1994 to over 88,000 in 2006 driven initially by housing demand and later by a housing bubble (DEHLG, Annual Housing Statistics Bulletins). GNP growth in the South was unprecedented, running at between 6-11 per cent from 1995 through 2001. The South also experienced dramatic population growth and the number of households increased by over a quarter (26 per cent) between 1991 and 2002 (Paris, 2008). Population growth was slower in the North but household numbers increased by 18 per cent during the same period. Private completions grew considerably from around 5,500 in 1994 to over 17,000 by 2006-2007 (DSD (NI), Northern Ireland Housing Statistics).

In the mid to late 1990s, the PRS in the North and South both re-emerged after periods of continuous decline. The growth in buy-to-let apartments, driven by tax incentives in the South from 1995 onwards, meant that the sector grew from 8 per cent of overall housing stock in 1991 to over 13 per cent by 2006. In the North, the PRS grew from 6 per cent to 12 per cent during the same period with some of this

growth also driven by investors and by home owners letting our former homes after moving to another home (Gray et al., 2002; Gray et al., 2005). Demand also increased as access to home ownership and social housing became more restricted in both jurisdictions.

Social housing construction was much less than in the booming private housing sectors in both jurisdictions. Social housing build fell in the North but grew in the South after 1998. In the North, social housing completions fell from an average of 1,500 in 1998-1999 to 1,300 in 2006-2007, while in the South social housing completions grew from around 3,300 in 1998 to 5,200 in 2006. Modest increases in the South took place in the context of policy measures which required up to 20 per cent of new developments to be set aside for social/affordable housing but which yielded far less.

In summary, prolonged housing booms in both Northern Ireland and the South of Ireland during the 1990s and 2000s transformed both housing systems. Until the 1990s, both jurisdictions had experienced slow house price growth arising from low demand, high unemployment and emigration. The scale of private building together with low social housing build and the sale of social housing, particularly in the North, meant that the characteristics of the two housing systems converged to become more identical to each other.

## **Conclusion**

The case study of Northern Ireland and the South of Ireland shows how two housing systems whose paths diverged after the South of Ireland gained independence from the UK have grown more towards convergence in the last decade. This paper has analysed the characteristics of divergence and convergence in both jurisdictions focusing on the development of the PRS in relation to other housing tenures (other indicators of convergence have been examined but not described in this paper including the fiscal treatment of the PRS and the changing nature of private landlordism). Moreover there are indications that the North and South of Ireland are moving towards policy convergence in terms of adopting similar approaches to housing policy.

The path towards convergence in the South of Ireland is set against the backdrop of a clear policy preference for homeownership established early in the history of the state. This preference can be attributed in part to an association of homeownership with the national struggle for independence and the place of landownership historically. This preference was no doubt assisted by Government support for the tenure, a broader discussion of which is outside the scope of this paper. The decline of the social rented sector, set against the backdrop of significant support for homeownership and its residual role have contributed to the growth in demand for private rented housing in the South.

In Northern Ireland the emergence of the British welfare state, as reflected in the development of a significant social housing sector, is the backdrop against which the



earlier decline of the PRS must be viewed. More recently the decline in the importance of the social housing sector, though still larger than in the South, and significant growth in homeownership have increased demand for private rented housing contributing towards its revival. In both jurisdictions the emerging role of the sector in fulfilling the housing needs of those on low incomes and welfare dependant has been a key development.

What is most noticeable in both jurisdictions has been the manner in which Government has responded to changing housing needs. Government policy has moved quickly in the South to improve the framework by which the PRS can meet housing need. This process has led to the introduction a framework to enable the PRS meet the housing needs of both low income and higher income groups. In this context although the official discourse of policy has been to highlight the role of the sector in broadening housing “choice” (DEHLG, 2008) the *impact* of policy more accords with the states fulfilment of its role in housing provision for low income groups. It is also clear from the introduction of innovative hybrid tenures such as RAS (discussed above) grounded in the PRS, though incorporating aspects usually associated with social housing, within the dualist tradition that market provision is the policy preference. The *ad hoc* development of such hybrid schemes has led to inconsistencies in the rights and obligations attaching to different tenures which have yet to be addressed.

In the North of Ireland the discourse around the role of the sector it is suggested is more transparent. While “choice” and “flexibility” are strategic objectives (DSD/NIHE, 2004) the importance of the sector in meeting housing need was confirmed when the Department of Social Development issued a consultation document on the sector (DSD, 2009). This document set the key aim of developing a strategy to ensure the future role of the sector in meeting “housing need”. The strategy sought to secure this by improving security of tenure, housing quality, management standards, the resolution of disputes and using Housing Benefit to influence landlord behaviour. It is clear that the measures stated are seen as necessary to enable the sector to meets this need effectively. While the process is less well developed than the South in the context of measures to improve security of tenure it is clear that the policies of both jurisdictions towards the sector are converging around its role in meeting housing need.

An analysis of the discourse of Government policy documents would indicate that a sizeable role is envisaged for the sector in future housing provision both North and South. This discourse is phrased in the context of the provision of housing “choice” as stated. There are clear similarities in the role the sector plays in meeting housing need and in the manner in which this has emerged. In particular the decline of the role of the social rented sector in housing certain groups has led to the marginalisation of these groups in the PRS. Both jurisdictions have acted to improve conditions in the sector in recent times though the process is more developed in the South of Ireland. While the discourse for the future of the sector is one of the provision of choice and flexibility the lack of an alternative for low income, welfare dependant groups brings this into question. The emergence of “improved private

rented” in the South via schemes which provide some of the advantages of social housing confirms the future long term role of the sector in housing this group. While this can be defended in the context of value for money and the improvement of living standards, generally such a development cannot be termed a contribution to choice when an alternative tenure is not available to this housing cohort.

It is debatable no doubt whether the developments in the South and North of Ireland can be placed in a wider convergence framework (Harloe, 1995, Clapham, 2002). The dominant approach in international literature remains one focussed on convergence but is according to Kemeny and Lowe heavily weighted around the Anglo Saxon paradigm (Kemeny and Lowe, 1996). It is accepted that both the South and North of Ireland fall clearly within the Anglo Saxon paradigm. However both jurisdictions have experienced significantly different pathways to similar housing policy outcomes in the course of the twentieth century. It is proposed here that both jurisdictions increasingly look to the PRS as a means to privatise the provision of “social” housing through the market.

Both jurisdictions to a greater or lesser extent have constructed policy frameworks to support a privatised structure of social provision and there is convergence in the approaches adopted. There is no evidence that this outcome has resulted from any formal cooperation between the two jurisdictions. Indeed interviews conducted for this paper indicate that no formal cooperation between the policy makers in the North and South of Ireland takes place around housing. Though wider discussions take place regularly between both governments as part of the North South political settlement. It is therefore suggested that such developments should be seen in the wider international context of housing and not the particular political circumstances of the North and South of Ireland.

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