



Ending Homelessness: What the EU's Affordable Housing Plan Must Deliver

by Ruth Owen and Catherine McGillicuddy

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Abbreviations

AHB - Approved Housing Body

CALF - Capital Advance Leasing Facility

DHLGH - Department of Housing, Local Government and Heritage

EPOCH - European Platform on Combatting Homelessness

EU – European Union

ICSH - Irish Council for Social Housing

MTFF - Multiannual Financial Framework

Homelessness & Housing Affordability: Twin Challenges For Europe

At least **1.2 million people** sleep rough or in temporary accommodation in Europe each night, with 400,000 children exposed to these conditions. In most Member States, homelessness is on the rise. 4% of the EU population has experienced some form of homelessness and one third of EU citizens view it as an urgent issue.¹

The EU has gradually stepped up its involvement in addressing homelessness, as part of efforts to promote social rights and to tackle poverty. In 2021, the European Union (EU) set a common goal of working to end homelessness, establishing a **European Platform on Combatting Homelessness** (EPOCH) for cooperation on learning, data, and funding.² Homelessness is part of the portfolio of the Executive Vice-President for Social Rights and Skills, Quality Jobs and Preparedness, Roxana Mînzatu. There are two social policy initiatives in the pipeline – the EU’s first ever **Anti-Poverty Strategy** and a second **Action Plan on the European Pillar of Social Rights**. These initiatives will provide opportunities to build on, and consolidate, the EU’s work on homelessness.

The second Von der Leyen Commission has also made **affordable housing** a key political priority. In her 2025 State of the Union speech, the President underlined that housing is a “social crisis” and a “matter of dignity”.³ Despite limited direct competence, the Commission is preparing a first-ever **Affordable Housing Plan** to address the housing crisis, under the responsibility of Commissioner for Energy and Housing, Dan Jørgensen. A Task Force has been established to develop the Plan, which is expected in December 2025. Its work is supported by an **Advisory Board**, chaired by Eamon Ryan, Former Irish Minister for the Environment, Climate and Communications and for Transport, and the European Parliament’s **Special Committee on the Housing Crisis**, set up “to thoroughly examine the root causes of the current housing crisis and propose concrete, actionable solutions at the European level.”⁴ In November, the Advisory Board presented policy recommendations to address the housing crisis to Commissioner Jørgensen. The recommendations focused on social housing and protecting the most vulnerable; land management, urban planning and permitting; sustainability and affordability; modern methods of construction; finance and investment; and coordinating European, national and local efforts.⁵ So far, the Commission has announced that the Plan will include a strategy for construction and renovation; a pan-European investment platform, a partnership with the European Investment Bank; efforts to mobilise more cohesion policy investment; the revision of the state aid rules on affordable and sustainable housing; a European Housing Summit; and strengthening the New European Bauhaus.

Executive Vice President Mînzatu and Commissioner Jørgensen have committed to making homelessness a priority in the Affordable Housing Plan and the Anti-Poverty Strategy. Over the past few months, the Commission has been working to translate this commitment into concrete actions. Whilst the EU has no direct responsibility for addressing homelessness, the Commission has an unprecedented opportunity to support and add value to Member States’ efforts, building on the existing EPOCH initiative. Most Member States are struggling to curb growing homelessness. Recent developments in the US illustrate the potential consequences of high levels of homelessness. With 771,480 people facing homelessness in the US, the Trump administration has abandoned evidence-based policy and opted to penalise and criminalise them.^{6,7} As a social market economy, Europe can take a different path. This requires strategic investment now in re-housing and prevention. The EU’s Affordable Housing Plan is an opportunity to catalyse this. Seizing this opportunity requires going beyond the imprecise concept of “affordable housing” and taking specific measures to meet the housing needs of people experiencing or at risk of homelessness.

1 EU plus UK. See FEANTSA (2024) *9th Overview of Housing Exclusion in Europe 2024*, available at <https://www.feantsa.org/en/report/2024/09/19/report-9th-overview-of-housing-exclusion-in-europe-2024>

2 European Commission, “Homelessness,” Employment, Social Affairs and Inclusion — Addressing poverty and supporting social inclusion, available at https://employment-social-affairs.ec.europa.eu/policies-and-activities/social-protection-social-inclusion/addressing-poverty-and-supporting-social-inclusion/homelessness_en

3 2025 State of the Union Address by President von der Leyen, available at https://ec.europa.eu/commission/presscorner/detail/ov/SPEECH_25_2053

4 About HOUS — Special Committee on the Housing Crisis in the European Union,” Committee page, available at <https://www.europarl.europa.eu/committees/en/hous/about>

5 European Commission, *Commissioner Jørgensen Welcomes Recommendations from Housing Advisory Board on How to Tackle Housing Crisis*, 20 November 2025, available at https://housing.ec.europa.eu/news/commissioner-jorgensen-welcomes-recommendations-housing-advisory-board-how-tackle-housing-crisis-2025-11-20_en

6 Marcy Thompson, National Alliance to End Homelessness, “Understanding Trump’s Executive Order on Homelessness: A Return to Forced Institutionalization,” *Blog*, 6 August 2025, available at <https://endhomelessness.org/understanding-trumps-executive-order-on-homelessness-a-return-to-forced-institutionalization/>

7 National Alliance to End Homelessness, *State of Homelessness: 2024 Edition*

Homeless People Need Homes

Temporary accommodation is the most prevalent measure to address homelessness in Europe. Whilst necessary, it is a reactive, short-term measure that manages rather than solves the problem. Turning the tide on rising homelessness necessitates a significant boost to re-housing and prevention efforts.

Housing-led responses to homelessness (i.e. those that prioritise re-housing) are proven to be effective and sustainable. Housing First, which supports homeless people with complex needs to quickly access regular tenancies, whilst simultaneously offering social and health support, is the best-known example. It has helped to reduce homelessness in countries like Denmark and Finland.^{8 9} Whilst Housing First exists in most European countries, it is not happening at the scale needed to make a decisive impact on homelessness. A minority of the homeless population require the intensity of support involved in Housing First. Most homelessness can be solved by rapid access to housing with less support.

When it comes to prevention, it is important to note that the effects of worsening housing affordability are not evenly distributed. Low-income households are often hit the hardest. Effectively preventing homelessness means ensuring that low-income and vulnerable households can access and keep decent housing. The Affordable Housing Plan will need to boost housing provision that aligns with their needs. Ensuring that people going through risky transitions, e.g. leaving care, prison, reception conditions, or hospital, can access housing is another key intervention for homelessness prevention.

Homelessness and Housing Affordability: The Irish Context

Housing affordability and homelessness are issues that every European country is grappling with, and which EU structures are addressing through a range of policy responses already outlined.

In her most recent State of the Union address, Ursula von der Leyen stated that the forthcoming European Commission Affordable Housing Plan would be “*a European effort anchored in local realities.*”¹⁰ Any agency working in homelessness in Ireland is all too aware of the local realities when it comes to homelessness. The monthly reported figures of those accessing state-funded emergency accommodation recently reached yet another high of 16,766 in October, with 5,274 of these individuals being children.¹¹

These figures, as high as they are, are just the numbers of people accessing state-funded emergency accommodation. They tell us nothing of the thousands of individuals and families couch-surfing, staying temporarily with family or friends, sleeping in tents, sleeping in their cars or in domestic violence refuges. In 2024, the Simon Communities of Ireland published *Under the Radar* which attempted to measure the extent of hidden homelessness on the island of Ireland and found that tens of thousands of additional people in Ireland are experiencing hidden homelessness.¹²

Ireland’s Policy Response

Following a successful demonstration project in 2011, Housing First was established more formally with a dedicated Dublin based Housing First service, followed by the first *Housing First Implementation Plan* which ran from 2018-2021.¹³ The establishment of the Housing First National Office within the Housing Agency in 2022 and the publication of the second *Housing First National Implementation Plan 2022-2026*¹⁴ have been key milestones in firmly establishing

8 European Policy Centre, *Europe’s Housing Crisis: Denmark Leading the Way*, 18 November 2024, available at <https://www.epc.eu/publication/europes-housing-crisis-denmark-leading-the-way/>

9 Housing First Europe Hub, *Finland*, available at <https://housingfirsteurope.eu/country/finland/>

10 European Commission, “2025 State of the Union Address – Speech by President Ursula von der Leyen” (SOTEU 2025), 10 September 2025, available at https://ec.europa.eu/commission/presscorner/detail/ov/SPEECH_25_2053

11 Government of Ireland, *Homeless Report October 2025*, Department of Housing, Local Government and Heritage, available at <https://www.gov.ie/en/department-of-housing-local-government-and-heritage/publications/homeless-report-october-2025/>

12 Simon Communities of Ireland, *Under the Radar: Unveiling Hidden Homelessness Across the Island of Ireland* (May 2024), available at <https://www.simon.ie/wp-content/uploads/2024/05/Under-the-Radar-Unveiling-Hidden-Homelessness-Across-the-Island-of-Ireland-FINAL-1.pdf>

13 Government of Ireland, *Housing First National Implementation Plan 2018-2021*, Department of Housing, Local Government and Heritage (26 September 2018), available at <https://assets.gov.ie/static/documents/housing-first-national-implementation-plan-2018-2021.pdf>

14 Department of Housing, Local Government and Heritage, *Housing First National Implementation Plan 2022-2026*, published 20 December 2021, available at <https://assets.gov.ie/static/documents/housing-first-national-implementation-plan-2022-2026.pdf>

Housing First as an official and well-supported response to homelessness. Despite the wealth of evidence available from across the world on the success, mentioned previously, of Housing First as an approach, it has not been supported or rolled out to the same extent in many European countries.

Housing for All, the government's comprehensive plan that aimed to address issues across all tenures of housing ran from 2021-2025 and featured the eradication of homelessness and increased output of social housing in one of its four pathways. While progress has been made in social housing output in recent years, levels of housing need are rising and the increased output we've seen hasn't dented the homelessness figures; they continue to rise month on month.¹⁵

In November 2025, the Department of Housing, Local Government and Heritage (DHLGH) published the successor to *Housing for All. Delivering Homes, Building Communities* outlines the government's plans to deliver 300,000 homes over the course of the plan which will run from 2025-2030.¹⁶ It further details the provision of 72,000 social homes and includes renewed commitments to prioritising ending homelessness including working with the European Platform on Combatting Homelessness (EPOCH) to achieve the aims of the Lisbon Declaration of working towards ending homelessness by 2030. The inclusion of this aim and the commitment to continue working with EPOCH is very welcome, however the success or otherwise of this plan will depend on actions and outputs, and how successful it is at truly working towards ending homelessness. The urgency evident in the plan and the whole-of-government approach is much-needed

Published the same day as *Delivering Homes, Building Communities*, the *Report of the Approved Housing Body Strategic Forum* detailed the DHLGH's findings following an extensive collaboration process with the approved housing body sector.¹⁷ Implementation of the reforms outlined will be a long-term project with a timeline of ten years. Despite the long-term pace of change, there are realistic timelines and periodic milestones outlined in the Report which aims to create a well-governed and sustainably funded Approved Housing Body (AHB) sector.

The recognition of the AHB sector's expertise in delivering supported housing and solutions for people exiting homelessness in these policies is very welcome, as are the reforms outlined in the *Report of the AHB Strategic Forum* and the funding and frameworks for increasing delivery in *Delivering Homes, Building Communities*. However, while we wait for these policies to roll out and be fully implemented, it's vital that approved housing bodies and homeless service providers are still funded and supported to deliver housing solutions. A change in policy should not result in even the shortest pause in delivery and funding has to steadily flow to support the policies we have, or any targets set in policy will be meaningless.

The eight recommendations presented in the *Report of the AHB Strategic Forum* have the potential to provide significant reforms and ensure greater resilience and capacity within approved housing bodies. In particular, recommendations 2 and 3 which aim to review the rental income models for AHBs and to establish a revolving funding model for future development are very relevant here. If developed and implemented, these recommendations have the potential to provide the sector with the consistent, yet flexible and responsive funding needed to deliver supported housing in greater numbers.

Approved Housing Body (AHB) Output

AHBs are now delivering almost half of all new social housing stock – 5,638 units in 2023 and 4,385 units in 2024, representing 47% and 41% of social housing output respectively.¹⁸¹⁹ These figures are a significant increase on output levels ten years ago when we were first seeing the beginning of our current crisis in Ireland, however output needs to increase further again. Social housing providers, AHBs and homeless service providers are deeply committed to

¹⁵ Focus Ireland, *Latest Figures*, Knowledge Hub, available at <https://www.focusireland.ie/knowledge-hub/latest-figures/>

¹⁶ Department of Housing, Local Government and Heritage, *Delivering Homes, Building Communities 2025-2030: An Action Plan on Housing Supply and Targeting Homelessness* (13 November 2025), available at <https://www.gov.ie/en/department-of-housing-local-government-and-heritage/campaigns/delivering-homes-building-communities-2025-2030-an-action-plan-on-housing-supply-and-targeting-homelessness/>

¹⁷ Department of Housing, Local Government and Heritage, *Report of the Approved Housing Body (AHB) Strategic Forum* (13 November 2025), available at <https://assets.gov.ie/static/documents/c37ee238/20251003 - AHB Strategic Forum Report.pdf>

¹⁸ Irish Council for Social Housing (ICSH), *Activity Report 2023*.

¹⁹ Irish Council for Social Housing (ICSH), *Activity Report 2024*.

trying to solve this crisis so the fall in numbers is not for want of innovation or commitment. In the Irish Council for Social Housing (ICSH), in the last year or so, we are seeing that our members are delivering housing in, at times, constrained circumstances.

There have recently been constraints and delays in AHB capital funding approvals with the complexity of Capital Advance Leasing Facility (CALF) applications for funding resulting in delays in approvals. In addition, there have been limitations put on AHBs in relation to the targeted acquisition of properties. The focus of government policy has been on AHBs and local authorities constructing new properties or bringing vacant or derelict stock back into social housing use. The ICSH support this approach but, in the past, AHBs have used acquisitions in targeted specific ways to meet the needs of particular cohorts of households in need, such as those exiting homelessness. *Delivering Homes, Building Communities* provides clarity and dedicated funding to allow for such acquisitions with a dedicated fund of €100m for acquisitions to deliver exits from homelessness for families and children experiencing homelessness.²⁰ Strengthening the link between local authority housing strategies and social housing project approvals is very welcomed. While housing delivery is needed, we need to ensure we are delivering the correct type and size of housing in the locations where need is greatest. This latest policy highlights this by prioritising the acquisition of one-bed and four-bed homes, aiming to meet the needs of those who have spent the longest in emergency accommodation.

European Policy and What Can Be Done From an Irish Perspective

The EU has a new focus on addressing homelessness and the appointment of Dan Jørgensen as the first EU Commissioner for Housing in 2024 was a recognition of the vital importance of housing to Europe. The European Commission's first Affordable Housing Plan is due to be published on the 16th December. The Commission has promised an ambitious plan that will encompass much more than homelessness, but it would be a massively missed opportunity if the Plan didn't recognise the impact that Europe's affordability crisis is having on those who are most deprived, those individuals and families who are at the sharpest end of the current housing and social crisis.

The EU's first Anti-Poverty Strategy, due in the first half of 2026, and the second Action Plan on the European Pillar of Social Rights, as mentioned previously, are expected to further enhance Europe's focus on homelessness and delivering solutions.

To Deliver on Homelessness, The EU Affordable Housing Plan Should:

- Focus on responding to **housing need**, as opposed to housing demand. Indicators for calculating housing need should include homelessness, insecurity, overcrowding, inadequacy, unsuitability. Particular attention should be given to the housing needs of population cohorts that are typically under-reported in such counts such as care leavers, ethnic minorities (with a specific focus in Ireland on Travellers), people with a disability, those fleeing domestic violence, rough sleepers, and the hidden homeless²¹.
- Prioritise the protection and production of **social housing**, which is Europe's tried and tested solution to meeting housing need.
- Support the scale-up of **Housing First** and other **housing-led solutions** to homelessness through investment, learning, and capacity building programmes.
- Develop a specific **pipeline of housing projects that address homelessness** within the Pan-European Investment Platform for Affordable Housing.
- Adopt a **Council Recommendation** on homelessness to support and guide progress towards ending it.
- Ensure that tackling homelessness is an **investment priority for the next Multi Annual Financial Framework**, and that an adequate level of funding is earmarked for this purpose.
- Ensure that European funds and finance, including European Investment Bank loans, for affordable housing

²⁰ Government of Ireland, *Delivering Homes, Building Communities 2025–2030: An Action Plan on Housing Supply and Targeting Homelessness*, Department of Housing, Local Government and Heritage.

²¹ "Hidden homelessness refers to people who are considered homeless, but who are not visible on the streets or not included in official statistics – essentially people living without a secure place to call home, but who haven't presented to any housing authority or service provider for help. People who are classed as hidden homeless are sofa surfing, staying with friends or family on a temporary or long term basis and people who are living out of their car." - Simon Community NI, "Different Types of Homelessness," Knowledge Hub — Homelessness, available at <https://simoncommunity.org/homelessness/knowledge-hub/different-types-of-homelessness>

come with **strong social conditions** to avoid social-washing and ensure that public money serves the general interest. These might include permanent affordability, security of tenure, and ensuring that a proportion of units in all projects are used to re-house homeless people.

- Be **realistic and cautious about the extent to which private investment and market-based housing solutions** can provide adequate responses to the most acute social needs. Promote **public and non-profit** housing provision.
- Develop **tenant protection standards** at EU level under consumer law and ensure enhanced implementation.
- Use the EU's research capacity to address **key evidence gaps in housing policy**, rather than working on assumptions.

Conclusion: A Crucial Window of Opportunity for the EU

The EU cannot end homelessness from the top down – but it can catalyse progress. The arrival of affordable housing on the EU agenda creates a unique opportunity to do so. Success will depend on ensuring that the Plan is inclusive by design, guided by clear definitions, measurable needs, and adequate attention to the most vulnerable. If people experiencing or at risk of homelessness are not directly addressed, they will be left behind.

The Irish EU Presidency of the Council of the EU in 2026 is set to coincide with the first phase of the Plan's implementation. Through government policy and the work of expert NGOs, Ireland has, for many years, adopted a progressive housing-led approach to tackling homelessness. Delivering Homes, Building Communities, the Irish government's plan for the housing sector has taken a whole-of-government approach to tackling housing access and affordability. Ireland therefore has an opportunity to provide much-needed leadership within the Council on homelessness in the context of the Affordable Housing plan, Antipoverty Strategy, and Action Plan on the EU Pillar of Social Rights. The 2013 Irish Presidency included a first Roundtable Discussion of EU Ministers with Responsibility for Homelessness, hosted in Leuven. In 2026, Ireland will have the opportunity to again take the initiative on EU-level action on homelessness.

The Danish Presidency recently led the adoption of Presidential conclusions on the future Affordable Housing Plan, supported by 26 EU Member States. The conclusions invite the European Commission to: “promote stronger cooperation at EU level on homelessness, building on the work of and further strengthening the European Platform on Combating Homelessness and housing-led policies such as the Housing First Principle; and consider whether a proposal for a new Council Recommendation on ending homelessness in Europe could contribute to this end” (15709/25).²² This echoes similar calls from the European Parliament, European Economic and Social Committee and Committee of the Regions. The Irish Presidency comes at a key moment and could take a decisive step towards the adoption of a Council Recommendation on Homelessness. It could also ensure that resources are mobilised for the fight against homelessness in the context of the next MFF. A ministerial-level meeting of ministers responsible for homelessness could again be convened to agree on next steps.

Homelessness cannot be solved at EU level but leadership from the EU on the issue can influence national policy and set priorities - the potential impact of the current frameworks focused on housing and their outputs is important. Europe prioritising affordable housing and, within that quite vague term, keeping a dedicated policy and funding mechanism for social housing solutions for the homeless will be a much-needed stimulus to ensure the dedication, determination and optimism among everyone working in this sector is matched by the policy and the funding we need to meet our ambition to end homelessness.

²² Council of the European Union, *Proposal for a Council Recommendation on Housing Policy*, ST 15709/25 INIT, Brussels, 2025, available at: <https://data.consilium.europa.eu/doc/document/ST-15709-2025-INIT/en/pdf>.

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