



Society of St. Vincent de Paul

# **Calls for Submissions: Statement of Strategy 2021-2025**

**From the Department of Housing, Local Government  
and Heritage**

**October 2020  
SVP Social Justice and Policy Team**

## SVP Introduction and Background

SVP welcomes the opportunity to contribute to the Department of Housing, Local Government and Heritage new Statement of Strategy 2021-2025. The comments below are based on the experience of our 11,000 members across the country who visit people in their homes as well provide support to families and individuals in emergency homeless accommodation. SVP staff and volunteers also work in resource centres operated by the society which provide vital supports to families experiencing homelessness and housing distress. In addition, the society is a provider of social housing with almost 1,000 units across the country, manages ten homeless hostels, and engages in advocacy on the issue of housing and homelessness, drawing on the experience of members and policy analysis to seek to bring about the necessary policy change.

The Department's objective for housing for the period covered by the current Statement of Strategy<sup>1</sup> are set out in the Rebuilding Ireland plan<sup>2</sup>. This submission will provide additional objectives, actions, and recommendations for consideration for the new Statement of Strategy 2021-2025.

### **Strategic Goal B: To provide for a stable, sustainable supply of good quality housing:**

#### **Objectives**

***'To support local authorities and Approved Housing Bodies (AHBs) to provide 50,000 new social housing homes as set out in Rebuilding Ireland, through a combination of finance and delivery mechanisms'.<sup>3</sup>***

Rebuilding Ireland<sup>4</sup> was designed in 2016 to accelerate housing supply in response to the rising numbers of people experiencing homelessness and insecure housing. However, the majority of housing to be provided under the plan is to come from private sector supply. Approximately, 83,760 social housing homes are to be provided via the Housing Assistance Payment (HAP) between 2016 and 2021 as part of the Rebuilding Ireland targets. In the same time period only 33,617 homes will be built, 6,830 will be bought and 10,036 will be leased by the local authorities or the voluntary housing.<sup>5</sup> Whilst the private rented sector is providing much needed accommodation to low income families who need a home, it should only be used as a short term response. The only viable response to the level of housing need is to ensure Local Authorities and AHBs have the required resources to

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<sup>1</sup> [https://www.housing.gov.ie/sites/default/files/publications/files/20180501\\_-\\_statement\\_of\\_strategy\\_2017-2020\\_english\\_published.pdf](https://www.housing.gov.ie/sites/default/files/publications/files/20180501_-_statement_of_strategy_2017-2020_english_published.pdf)

<sup>2</sup> <https://rebuildingireland.ie/>

<sup>3</sup> [https://www.housing.gov.ie/sites/default/files/publications/files/20180501\\_-\\_statement\\_of\\_strategy\\_2017-2020\\_english\\_published.pdf](https://www.housing.gov.ie/sites/default/files/publications/files/20180501_-_statement_of_strategy_2017-2020_english_published.pdf)

<sup>4</sup> [https://rebuildingireland.ie/wp-content/uploads/2016/07/Rebuilding-Ireland\\_Action-Plan.pdf](https://rebuildingireland.ie/wp-content/uploads/2016/07/Rebuilding-Ireland_Action-Plan.pdf)

<sup>5</sup> "Accelerate Social Housing", Rebuilding Ireland, Department of Housing, Planning and Local Government <http://rebuildingireland.ie/accelerate-social-housing/>

build quality homes for those who need them. SVP recommends that any new strategy has this objective as its main focus.

*“Housing is the basis of stability and security for an individual or family. The centre of our social, emotional, and sometimes economic lives, a home should be a sanctuary; a place to live in peace; security and dignity”.*<sup>6</sup>

**SVP Recommendations:**

1. Provide State Owned Lands for Social and Affordable Housing development. Land in public ownership is a significant resource available to the State. 1,900 hectares of state-owned land has been identified as suited to housing, 1,700 hectares owned by Local Authorities and the Housing Agency and 200 hectares in the ownership of other state and semi-state bodies. This has potential to provide at least 50,000 housing units and is not all the state-owned land available.<sup>7</sup> While, in 2015 the Department of Environment, Community and Local Government published the results of the Residential Land Availability Survey 2014, which indicated that Local Authorities owned enough zoned land to build 414,712 homes.<sup>8</sup>
2. Restore Part V to at least its original 20%. Restoration to at least 20% social or affordable provision on development sites would also have a positive impact on tenure mix.
3. A target of 20 per cent of all housing stock in Ireland should be social housing similar to other European countries and targets should be drafted to achieve this within a five year period.

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<sup>6</sup> Farha, L. Special Rapporteur on Housing. Source:

<https://www.ohchr.org/en/issues/housing/pages/housingindex.aspx>

<sup>7</sup> National Economic and Social Council (2018) “Urban Development Land, Housing and Infrastructure: Fixing Ireland’s Broken System”. NESC Reports No. 145. Available online at:

[http://files.nesc.ie/nesc\\_reports/en/145\\_Urban\\_Development\\_Land.pdf](http://files.nesc.ie/nesc_reports/en/145_Urban_Development_Land.pdf)

<sup>8</sup> <https://www.housing.gov.ie/sites/default/files/migrated->

[files/en/Publications/DevelopmentandHousing/Planning/FileDownload%2C40214%2Cen.pdf](https://www.housing.gov.ie/sites/default/files/migrated-files/en/Publications/DevelopmentandHousing/Planning/FileDownload%2C40214%2Cen.pdf)

***'To provide access to the Housing Assistance Payment (HAP) to any household that can benefit from the secure housing support'.<sup>9</sup>***

While the Housing Assistance Payment is aiding people to find accommodation, there remains many issues with it, which prevents people securing and maintaining accommodation in the private rented sector.

A joint report by SVP and Threshold, The Housing Assistance Payment (HAP): making the right impact?<sup>10</sup> found that for a family with three children, HAP rent caps ranged between about 60-75% of actual market rents. Even allowing for the 20% uplift on rent caps that can be applied on a case by case basis, the rent caps means that most tenancies in the private rented sector are simply out of reach of those who need them. While homeless HAP can provide a further uplift, this is again discretionary and not operational across the whole country.

***'Mary is a Lone Parent in receipt of Social Welfare, which is her only source of income. She has two teenage children, one of whom has special needs. She is paying €50 per week out of her limited income and that is on top of her differential rent contribution for an old terraced house that has no heating as the gas boiler does not work and the landlord has refused to fix it'.<sup>11</sup>***

**SVP Recommendation:**

For HAP to remain an effective measure to support households into the private rented sector, it is critical that HAP rent caps bear a realistic relationship to actual market rents. A complete review of HAP and its interaction with the Private Rented Sector is required to determine the next steps for HAP, given the changing landscape of housing and renting in Ireland.

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<sup>9</sup> [https://www.housing.gov.ie/sites/default/files/publications/files/20180501\\_-\\_statement\\_of\\_strategy\\_2017-2020\\_english\\_published.pdf](https://www.housing.gov.ie/sites/default/files/publications/files/20180501_-_statement_of_strategy_2017-2020_english_published.pdf)

<sup>10</sup> [https://issuu.com/svp15/docs/hap\\_survey\\_report\\_2019/1?e=25010855/73017298](https://issuu.com/svp15/docs/hap_survey_report_2019/1?e=25010855/73017298)

<sup>11</sup> [https://issuu.com/svp15/docs/hap\\_survey\\_report\\_2019/1?e=25010855/73017298](https://issuu.com/svp15/docs/hap_survey_report_2019/1?e=25010855/73017298)

## Homeless Prevention

It is vital that the new Statement of Strategy has a strong focus on homeless prevention. We need to understand more *'who'* is becoming homeless and *'why'*. It will enable us to prevent it happening in the first place.

In Ireland, the majority of people experiencing homelessness in the past were lone men. Homelessness now also affects women and families of all ages, creating new needs regarding addressing and preventing homelessness. 66% of homeless Irish families are headed by lone parents, the vast majority are women.<sup>12</sup> While structural disadvantage, poverty and housing market failure are so often the root causes of homelessness for both men and women, there are ways in which these issues disproportionately impact on women.<sup>13</sup> Lone parent women, in particular, face risks of poverty; for example, - unemployment, low paid, precarious employment and childcare difficulties.<sup>14</sup> They are also more likely to experience hidden homelessness and less likely to engage with services.<sup>15</sup> This is not reflected in current homeless policy regarding who we consider to be homeless. Therefore, we are not adequately addressing the problem.

The monthly data reports published by the Department of Housing Planning and Local Government count people in local authority managed emergency accommodation. As such, they do not provide a comprehensive picture of the number of people who are homeless. Most European member states<sup>16</sup> use the ETHOS Light Classification of homelessness which has six operational categories: people living rough, emergency accommodation, homeless accommodation, those in non-conventional dwellings, and those with family and friends due to a lack of housing. Of the six categories used by other member states, Ireland only calculates its homelessness figures based on two categories: those in emergency accommodation and homeless accommodation such as hostels. SVP is therefore concerned that the data relating to homeless individuals in Ireland, including families, is inadequate and inaccurate.

It is also very important that a Strategy has a clearly worded and ambitious statement to end Homelessness. Homelessness is everyone's issue, and it is not inevitable. SVP recommends that all

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<sup>12</sup> [https://www.tcd.ie/news\\_events/articles/homelessness-among-women-in-ireland-highest-in-europe/7995/](https://www.tcd.ie/news_events/articles/homelessness-among-women-in-ireland-highest-in-europe/7995/)

<sup>13</sup> Edgar B. and Doherty J (2001) Women and Homelessness in Europe. Brussels: FEANTSA

<sup>14</sup> [https://issuu.com/svp15/docs/working\\_\\_parenting\\_and\\_struggling\\_-\\_/1?e=25010855/71456122](https://issuu.com/svp15/docs/working__parenting_and_struggling_-_/1?e=25010855/71456122)

<sup>15</sup> [https://www.tcd.ie/news\\_events/articles/homelessness-among-women-in-ireland-highest-in-europe/7995/](https://www.tcd.ie/news_events/articles/homelessness-among-women-in-ireland-highest-in-europe/7995/)

<sup>16</sup> According to the annual ARA (Housing Finance and Development Centre of Finland) study of 15 November 2017, 415 homeless people were counted rough sleeping or in emergency accommodation (ETHOS 1.1 and 2.1), 244 in hotels (ETHOS 3.1), 428 in medical institutions (ETHOS 6.2) and 5,528 provisionally accommodated with family or friends (ETHOS 8.1).

government departments contribute to ending homelessness and a cross-Governmental strategy is needed.

**SVP Recommendation:**

1. The Department of Housing, Local Government and Heritage should consider using the ETHOS Light classification system to count the number of people experiencing homelessness, including hidden homelessness.
2. The Department of Housing, Local Government and Heritage set a high level objective to end homelessness using the Ethos Light definition.

***To support LAs in responding to the needs of tenants, in particular those with distinct needs such as persons with a disability and older people, and improving the quality of social housing stock***

The stated objective of national housing policy is that every household should have access to secure, good quality housing suited to their needs at an affordable price in a sustainable community.<sup>17</sup> SVP Members visit people in their homes, both local authority housing and housing owned by private landlords. Through home visitation work to vulnerable and marginalised households members have witnessed families using their low incomes to fund repairs in their homes while going without essentials such as food. Many of the households SVP support have complex needs arising from their low incomes, poor educational opportunities, and poor health status, we consider these issues to be the most important to be addressed if people are to find a way out of poverty. Yet, many live in stressful, debilitating housing conditions that mean they live in a state of worry.

In Ireland, 12.6% of the population, equal to 611,982 people were living in these substandard conditions in 2017.<sup>18</sup> All rented dwellings in Ireland, public or private, are subject to a number of key regulations introduced to respond to the perceived low standard of rental housing stock in Ireland, notably the Housing (Standards for Rented Houses) Regulations 2019.<sup>19</sup> The regulations require landlords, with limited exceptions, to ensure that rental properties meet certain minimum standards regarding issues such as structural condition, sanitary facilities, heating, lighting and ventilation.

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<sup>17</sup> <https://www.housing.gov.ie/housing/housing-policy>

<sup>18</sup> <https://www.socialjustice.ie/sites/default/files/attach/publication/5756/2019-03-28nationalsocialmonitor-europeanedition-final.pdf?cs=true>

<sup>19</sup> S.I. 17/17- Housing (Standards for Rented Houses Regulations 2019)  
<http://www.irishstatutebook.ie/eli/2019/si/137/made/en/print>

In 2018, local authorities had 134,880 dwellings in their ownership at the year end.<sup>20</sup> Having regard to Census 2006, Kenna noted ‘almost 20% of local authority housing was without central heating, a higher proportion than any other tenure’.<sup>21</sup> Yet, more than a decade later, the provision of substandard local authority housing appears to persist.

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*‘We visit an elderly couple in an old flat complex in the city centre. The flats are cold and damp. There are regular problems with the drainage. We have assisted clients with buying furniture and fittings over the years as they need to be replaced regularly because of dampness and mould’. (SVP Member 2019) (Local Authority Tenancy)*

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*‘The constant smell of sewerage outside our clients homes is awful. It is a local authority housing estate. We have assisted them to make complaints to the local authority but there is no improvement. It is going on years. The same tenants had their rental contribution increased recently’ (SVP Member 2019).*

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**SVP Recommendation:**

1. Commence a deep retrofit programme of Local Authority Housing, as it estimated that approximately 30% of social housing stock is more than 40 years old, which would equate to approximately 40,000 units.<sup>22</sup>

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<sup>20</sup> <http://noac.ie/wp-content/uploads/2019/10/NOAC-Performance-Indicator-Report-2018-1.pdf>

<sup>21</sup> Pdraig Kenna, Housing Law, Rights and Policy (Clarus 2011) 750.

<sup>22</sup> <http://noac.ie/wp-content/uploads/2017/05/NOAC-Management-and-Maintenance.pdf>

## Conclusion

A new Statement of Strategy will provide an opportunity to draft meaningful actions and objectives that will improve the lives of people affected by homelessness and housing insecurity. SVP recommends that housing should be provided by Local Authorities and AHBs who are equipped to deliver affordable and secure housing for low income households. We would hope to see in the Department's strategy going forward a move away from a reliance on the private sector to provide families with suitable, adequate, and affordable housing. We look forward to continuing to work with the Department and other stakeholders to realise that objective.