

Submission to Government's National Housing Plan 2025-2030

To: Department of Housing, Local Government and Heritage
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Section 1:

Introduction

The Society of St Vincent De Paul (SVP) welcomes the invitation to make a submission for consideration in drafting the new National Housing Plan. However, we are concerned about the short consultation period and the limited time for completion. To tackle all the issues that exist and persist in the Irish housing system requires real collaboration between all stakeholders and sufficient time to mutually explore solutions.

SVP is the largest charity of social concern in Ireland with over 10,000 members in 1200 local Conferences. The Society's mission is to provide friendship and support to those experiencing poverty and social exclusion, to promote self-sufficiency and to work for social justice.

As an organisation working with people impacted by poverty and marginalisation, and visiting people in their homes, SVP are uniquely placed to observe the most pressing matters for people. The current reality for the people we visit is that many households are grappling with precarious living conditions and a constant fear of eviction and homelessness. These struggles are having a profound effect on individuals, families and children, disrupting their financial stability, impacting negatively on their mental well-being and overall quality of life.

We support and build empowering relationships with many individuals and groups impacted by housing insecurity and homelessness; lone parent women and their children, people with disabilities, young people, Travellers and Roma community, people experiencing long-term unemployment and people living in poverty or at risk of poverty.

We have set out a number of policy proposals below, based on our experience and research which we believe can make a substantial difference if adopted. We understand that one of the key objectives of the new plan will be to increase the overall supply of housing. We also endorse this view, however, it is vital that the new housing plan also has a clear implementation plan of how it intends to address the current issues in the housing system, particularly the rising numbers of people experiencing homelessness.

Section 2:

SVP's vision for New Housing Strategy

Increase the provision of social housing stock and affordable cost rental homes for low-income households, inclusive of new builds and vacant housing, to represent 20% of total housing stock in line with The Housing Commission's recommendations.

Introduce a dedicated homeless prevention budget including the provision for a prevention support worker in each Local Authority and a Rent Arrears fund to support private tenancies experiencing financial difficulty.

Ensure the housing and accommodation needs of refugees and asylum seekers are reflected in the long-term planning for housing and services.

Long term homelessness is ended by 2030 and every child currently experiencing homelessness has access to a child support worker.

Section 3: Social and Cost-Rental Housing

A core recommendation from the Housing Commission's 2024 report¹ is that social and cost-rental housing be increased to 20% of the national stock. Achieving at least 20% will result in individuals and families having a greater choice of 'where' and 'how' they live. To make this aspiration a reality, increased investment is required in every budget to 2030. It would create benefits for the physical, emotional and psychological health of the households that we currently support, who are facing daily challenges and struggles living in insecure and unsuitable accommodation, particularly for those living in emergency accommodation.

¹ Government of Ireland (Gov.ie) Report of the Housing Commission 'Housing Commission Report' [gov - Report of the Housing Commission \(www.gov.ie\)](https://www.gov.ie/en/publications-and-resources/publication/housing-commission-report/)

Ireland's social housing supply is just below 10% of the overall housing stock. According to Housing Europe, this is far lower than our European peers such as Austria (24%), France (17%), Sweden (16%), and the Netherlands (29%).²

The Housing for All commitment to providing an additional 12,000 social housing units annually by 2030 would make a significant contribution to solving the housing and homeless crisis. However, the targets have been missed with a deficit of almost 4,000 homes not built in the past three years alone. Housing targets that are consistently not being met will be rendered meaningless. The new housing plan must ensure that targets that are missed will be actioned in the following year.

Table:

Housing for All New Build Targets and Delivery 2022-2024

| Year | Target | Output | Shortfall |
|--------------|--------------|--------------|-------------|
| 2022 | 9000 | 7433 | 1567 |
| 2023 | 9100 | 8110 | 990 |
| 2024 | 9300 | 7871 | 1429 |
| Total | 27400 | 23414 | 3986 |

| | State | Dublin | Cork | Galway | Limerick | Waterford |
|---------------------------------|-------|--------|------|--------|----------|-----------|
| Social Housing (%) | 9.4 | 13.2 | 17.7 | 11.6 | 9.2 | 13.2 |
| Rented Privately (%) | 18.2 | 29.7 | 26.3 | 35.5 | 18.0 | 15.7 |
| Owner Occupied (All) (%) | 67.6 | 49.7 | 50.3 | 46.7 | 67.9 | 66.8 |

Source: [WEB-Cluid-Housing-Towards-a-Sustainable-Rental-Sector-in-Ireland-Understanding-the-Key-Challenges-and-Opportunities.pdf](#)

² Housing Europe The State of Housing in Europe 2023 [The State of the Housing in Europe 2023 | Housing Europe](#) (Ireland page 66)

Recommendations:

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|--|---|
| Goal: Improve the supply and quality of social and affordable cost-rental accommodation | Action: |
| | <p>We welcome the Housing Commission's recommendation for a targeted increase in the proportion of social and cost-rental housing to 20% of the national stock. The Department of Housing, Local Government and Heritage must urgently reform current procedures to remove barriers to delivering social housing, particularly those relevant to cities. This must include funding approval and procurement procedures.³</p> |
| | <p>Implement a strategy to address housing target shortfalls going forward.</p> |
| | <p>The construction of social housing must match the demographics on the social housing needs assessment, and the Department of Housing should address geographical disparities with Local Authorities:</p> <p>Build the right type of homes such as one-bed and two-bed homes for smaller households, and larger homes for families stuck in homelessness; Traveller families, and families with status trapped in Direct Provision for years.</p> |
| | <p>Increase funding to Local Authorities to ensure existing social housing stock is adhering to minimum standards and are energy efficient.</p> |

³ Government of Ireland (Gov.ie) Report of the Housing Commission 'Housing Commission Report' [gov - Report of the Housing Commission \(www.gov.ie\)](https://www.gov.ie/en/publications-and-resources/publication/housing-commission-report/)

Section 4:

Ending Homelessness

We welcome the Government's commitment in the Programme For Government to the Lisbon Declaration. It is important now that the new housing plan sets out how it can work towards ending homelessness by 2030.

SVP welcomes the proposals put forward by Focus Ireland on ending long term homelessness by 2030 by ensuring that social housing supply is utilised to reduce the increasing numbers of people experiencing homelessness.

Section 5:

Understanding the causes of homelessness and

Introducing Homeless Prevention Measures

Investment in homeless prevention is paramount to preventing an increase in homelessness. There continues to be a lack of understanding or acknowledgement that providing funding and resources to tackle homelessness and preventing homelessness requires the same determination.

There needs to be homeless prevention measures that are tailored to the specific risks faced by different age cohorts, and specific groups experiencing disadvantage and marginalisation, in particular, lone parents and children. In addition, prevention strategies and associated investment need to be informed by an adequate empirical evidence base.

Ireland continues to fall behind other European countries in the manner it defines and counts the number of people experiencing homelessness. 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. From March 2024 to March 2025, female homelessness increased by 13.5% compared to an increase in male homelessness

of 8.81%.⁴ This is largely driven by an increase in family homelessness. In the same period, homelessness among one parent families increased by 16.85%.

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. They are also more likely to experience hidden homelessness and less likely to engage with services.⁵ This is not reflected in current homeless policy or legislation regarding who we consider to be homeless. Therefore, we are not adequately addressing the problem and cannot fully respond to the 'why' particular groups are experiencing an increase in homelessness, if at the outset we are not addressing the 'who' of homelessness. Lone parent women, in particular, face risks of poverty; for example, - unemployment, low paid employment, precarious employment and lack of affordable and accessible childcare arrangements.

We need a more accurate figure of the amount of people who need short and long term accommodation from the State. The monthly data reports published by the Department of Housing, Planning and Local Government only count people in local authority managed emergency accommodation. As such, they do not provide a comprehensive picture of the number of people 'who' are experiencing homelessness.

Expanding the definition of homelessness is required to include people 'couch-surfing', people staying with family in over-crowded accommodation, women and children in domestic violence refuges and people living in direct provision who have received refugee status. Most European member states 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. The Department of Housing, Local

⁴ Department of Housing , Local Government and Heritage (April 2025) Monthly Homeless Data [Homelessness data](#)

⁵ Trinity College Dublin (2017) "Homelessness among women in Ireland highest in Europe" [Homelessness among women in Ireland highest in Europe - News & Events | Trinity College Dublin \(tcd.ie\)](#)

Government and Heritage should consider using the ETHOS Light classification system to count the number of people experiencing homelessness, including hidden homelessness.⁶

In addition, with the increasing numbers of households becoming homeless from the private rental sector, we need to have a homeless prevention plan focused on those households who are at risk of homelessness. We do need to see local authorities being able to take an even more proactive role in homeless prevention. For example, in 2014, the Welsh assembly introduced legislation that placed an obligation on local authorities to prevent homelessness.⁷

In 2023, 84% of all section 10 funding was spent on emergency accommodation, amounting to approximately €286.3 million. In contrast, only 5.5% or €18.9 million was spent on homeless prevention. Whilst we know that funding for emergency accommodation is vital, if we are to prevent homelessness occurring in the first place, an increase in the funding for homeless prevention measures is required. (Homeless Prevention proposals highlighted below)

Recommendations:

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| Goal: End Long Term Homelessness by 2030 | Action: Implement action plan to Lisbon 2030 |
| | Prioritise and adequately resource a comprehensive homeless prevention plan and early intervention measures to prevent homelessness from occurring and reoccurring, Pathway to Lisbon 2030 Goal- Milestones should be set through collaboration between Department of Housing, relevant state agencies, local authorities, homeless organisations and civil society organisations. Similar processes should be set out at local level. This should be underpinned by an appropriate budget. |

⁶ ETHOS Light European Typology of Homelessness and Housing Exclusion [fea-002-18-update-ethos-light-0032417441788687419154.pdf \(feantsa.org\)](#)

⁷ National Assembly of Wales. "Housing (Wales) Act 2014". Legislation.gov.uk. <https://www.legislation.gov.uk/anaw/2014/7/contents/enacted>

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| | The Department of Housing, Local Government and Heritage set a high level objective of comprehensively addressing the 'who' and 'why' of homelessness using the Ethos Light definition of homelessness. |
| | Ensure that groups experiencing disadvantage and are at-risk of homelessness living in the private rental sector are given priority access to the Tenant-in Situ Scheme. |
| | <p>Reconvene the family homeless prevention sub-group as part of the National Homeless Action Committee to develop a family homeless action plan. This plan must include targeted actions to prevent and address homeless among one parent families in particular.</p> <p>The plan should have additional oversight from the Child and Well-Being Programme Office under its family homeless prevention strand and have a significant focus on early intervention and prevention.</p> |
| | <p>Commission the Housing Agency to carry out research on entry in and out of homelessness for families. This research should examine causes and pathways into family homelessness using existing data and new data collection streams.</p> <p>The research objectives should have a special focus on preventative measures for families entering homeless accommodation from the private rented sector and exit pathways for families spending significant lengths of time in emergency accommodation.</p> |
| | It is well documented that the impact of homelessness carries many negative consequences for the physical, psychological and emotional development of children which can have lifelong effects. Child support workers should be employed to help children navigate their journey in homeless services. |
| | Increase HAP rates to the rents advertised for new tenancies in each Local Authority. |
| | Increase Homeless HAP rates to support people to exit homeless accommodation. |

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| | Allocate a yearly budget specifically for homeless prevention, amounting to 20% of all homeless expenditure. |
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Section 6:

The Private Rental Sector

With one in five households now renting in the private rental sector,⁸ we need a long term strategy with the required investment to protect the health, wellbeing and quality of life for households renting. In our experience, it is the most vulnerable and households surviving on a low-income that continue to be most impacted by high rents and lack of available accommodation in the private rental sector.

The Housing Assistance Payment (HAP)

For the households we support, HAP is the main financial support for them while living in the private rental sector. However, it is not adequate and is putting severe financial and mental stress on low-income households. A key recommendation from the Housing Commission's report which SVP supports, is for the Government to review the maximum subsidies available under HAP to ensure they reflect current rental asking prices.⁹

"We recently supported a client who was unable to continue paying the €150 monthly top-up to their landlord and was at real risk of eviction. The client is living in private rented accommodation and received limited support from her local authority when she contacted them" SVP Member West Region 2025.

Rent Arrears

The recent EU SILC 2024 data shows that households in receipt of HAP had an 'at risk of poverty rate' of 21.5% before housing costs but this increased to 57.3% after they paid their

⁸ Cited in Society of Chartered Surveyors Ireland (2020) "A New Model for the Private Rented Sector in Ireland" https://scsi.ie/wp-content/uploads/2020/11/a_new_model_for_the_private_rented_sector_in_ireland-1.pdf

⁹⁹ Gov.ie Report of the Housing Commission May 2024 [Report of The Housing Commission](#)

housing costs.¹⁰ These renters, many of whom contact SVP are at severe risk of losing their home.

Private renters are the only group who face losing their home in a short period of time if they fall into rent arrears. The Mortgage Arrears Resolution Process (MARP) is in place for owner-occupiers in arrears. Local Authorities' tenants can engage in repayment plans over extended periods. In addition, Local Authority or Approved Housing Bodies tenants often have hardship clauses written into their contracts. There is a need to put a safety net in place for renters, such as a dedicated rent arrears fund, for households who are at greater risk of poverty, material deprivation and social exclusion, and are more likely to be burdened by debt. Putting such a measure would not only prevent households from the risk of eviction, it would be more cost effective than tenants entering homeless accommodation.

Private Rented Standards

Energy poverty and poor-quality housing in the private rental sector is a real concern for our members who carry out home visitations. Last year, SVP responded to almost a quarter of a million calls from members of the public experiencing financial difficulties. Many people requesting support from SVP are dealing with poor housing standards and energy poverty: every year, SVP spends approximately €5 million to assist those unable to adequately heat their homes.

Currently, households experiencing disadvantage and at risk of energy poverty in the private rental sector are unable to avail of the free energy upgrade scheme, as it is only available to the property owner. Improving energy efficiency in the private rental sector has the potential to reduce the number of tenants experiencing energy poverty. Homes in the private rental sector should be eligible for funding equivalent to the Better Energy Warmer Homes scheme, based on a tenant receiving HAP. Eligibility should be contingent on the landlord providing a long-term lease, and access to the grants should be conditional on passing an inspection to ensure the property and landlord is compliant with the Housing (Standards for Rented Houses) Regulations 2019.

¹⁰ Central Statistics Office (CSO) Survey on Income and Living Conditions (SILC) 2024 [Key Findings Survey on Income and Living Conditions \(SILC\) 2024 - Central Statistics Office](#)

“We are supporting a lone parent and her two young children who are living in a private rented house. It is in a terrible condition. There are mice in the walls and the attic. They have destroyed some of her clothes. She has contacted the Local Authority who have yet to contact the landlord”
SVP Member East Region 2025.

Recommendations:

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| Goal: A sector that can accommodate households who require a home in a safe and secure manner. | Action: A strategy for the Private Rented Sector |
| | Devise and implement a strategy for the private rental sector, on foot of the previous Government's Private Rental Sector Review, setting out a clear vision for the sector and the role it will play in the wider housing landscape in the long term. |
| | Align rent arrears arrangements for HAP tenants with those for social housing tenants, with a view to avoiding evictions into homelessness due to minimal accruals of arrears. |
| | Allow landlords in the private rental sector and who have tenants availing of HAP able to avail of the free energy upgrade scheme (conditional on the landlord providing a longer term lease). |
| | Create 'One Stop Shops' ¹¹ for the Private Rental Sector. One Stop Shops are a service, promoted at EU and national level, that support homeowners through the retrofitting process by providing a single point of contact. |
| | Introduce a 'Fit for Rent' certification system proposed by housing charity Threshold to ensure that private rental homes meet minimum standards. |

¹¹ SEAI Sustainable Energy Authority of Ireland [One Stop Shop services for homes](#) | [Home Energy Grants](#) | [SEAI](#)

Section 7:

People with ‘Status’ living in Direct Provision

Housing is a key part of integration for beneficiaries of international protection. Over 5,300 people in IPAS accommodation have received status to remain, however, they are stuck in direct provision due to a lack of suitable housing options. Since mid-2023, IPAS has implemented a policy of transferring status holders to remote or unsuitable accommodation, including tents. All those people have had their needs ignored in both housing and homeless policy and has created a lot of stress and anxiety as a result for them.

As well as having no proper accommodation to move to, these transfers frequently result in people losing vital integration supports like schools, employment and GPs. Our members are increasingly highlighting situations where families have been severely affected because of no clear plan or policy to support people with status. The current situation has also contributed to rising homelessness with an inadequate response from Government: in February 2025, DRHE reported that leaving Direct Provision was the leading cause of homelessness among single adults (22%).

We urgently need a cross- departmental plan to meet the needs of people who have had their claim for asylum upheld and are required to move out of Direct Provision. The new housing plan must also recognise these individuals and families when creating housing targets.

Section 8:

Concluding Remarks

The new housing plan must not only examine how we can increase the number of homes being built for current and future demand, it also must address the issues that currently exist in housing and homeless policy which is leading to thousands of individuals, families and children being negatively affected.

The impact and experience of homelessness can last a life time, and much more needs to be done to prevent it occurring in the first place.

Whilst a person is living in homeless accommodation, their basic needs should continue to be met. The upward trend in homelessness has persisted for more than ten years, highlighting a deepening systematic issue. We therefore need a system that can respond in a structured, compassionate and proactive manner in every local authority, with a clear plan and sufficient resourcing from the Department of Housing.

The issues in the private rental sector that are leading to homelessness and housing insecurity need to be fully addressed. The current issues for those households availing of HAP must be comprehensively addressed.¹²Overall, a clear vision is required for the private rental sector; what function should it cover in housing policy for the future.

We welcome the opportunity to work with the Minister, Department of Housing and all stakeholders involved in housing and homeless policy to ensuring that everyone in the State can live in homes that provides them with security, comfort and enhances their wellbeing. We are available for further consultation on the above points raised.

¹² SVP and Threshold (2019): “The Housing Assistance Payment: Making the Right Impact” [HAP-Report2019.pdf](#)
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