



Action Plan for Housing and Homelessness

## Review of Rebuilding Ireland Action Plan

### Cover Template for Submissions

**Name of Organisation: Simon Communities in Ireland**

#### **No: Specific Questions (Optional) / Brief Overview of area of concern**

#### **Response**

**Q1:** Do the objectives set out in the Rebuilding Ireland Action Plan remain relevant and valid - see page 5 of accompanying information note - and are there other priorities we should also be focussing on over the medium term?

-There needs to be a greater focus on the Department of Housing, Community and Local Government and Local Authorities building social housing.  
-Needs to be a greater focus on building affordable housing.  
-The national roll out of Housing First needs greater attention.  
-Funding for the Pillar 1 Step-up/Step-down and addiction treatment facilities.

**Q2:** What further action should now be considered in order to prevent homelessness, to find more permanent solutions for those in emergency accommodation and to help individuals and families to remain living in their own homes?

-A new cross-departmental National Homelessness Sub-Strategy under the auspices of Rebuilding Ireland is required with ring fenced funding for implementation. This sub-strategy would complement and build upon existing commitments contained in Rebuilding Ireland including prevention, nationwide implementation of Housing First and addressing multiple and complex needs.

**Q3:** What further action should be taken to increase both the scale and speed of delivery of Social Housing? Are there new delivery models or mechanisms to accelerate output?

-Triple direct capital expenditure funding to €1 billion per annum to enable the rapid building within 16 months of 5,000 additional social housing units by Local Authorities and AHB's with a longer- term commitment of building 10,000 units per annum .  
-Resource and protect the Capital Assistance Scheme (CAS) as a key mechanism for the delivery of social housing to special needs groups, particularly people who are homeless.

**Q4:** What additional initiatives or policy tools can best activate housing lands and deliver new housing supply to buy or rent at more affordable levels?

-Amend the vacant site levy and introduce immediately to reduce the number of exemptions available to owners of development land subject to a loan on the property in question.  
-Local Authority vacant site registers should allow for targeted identification of sites for compulsory purchase.

	-Applications for financing under LIHAF must be conditional on the delivery of affordable housing at a set price point.
<b>Q5:</b> How can we encourage increased supply of rental accommodation and foster a sustainable sector that meets the needs of all tenants across the different rental market segments?	-Full rent certainty is required. Consideration must be given to index linking rents to the Consumer Price Index (CPI). Fast track the existing commitment to move towards indefinite leasing as a matter of urgency. -Landlords with more than three properties should not be able to invoke Section 34 of the RTA in order to issue notice of termination to tenants.
<b>Q6:</b> What further actions should be taken to identify, target and encourage the greater use of existing vacant properties for both social <u>and</u> private housing purposes?	-Introduce a vacant property tax for homes empty for more than 12 months. The <i>Repair and Leasing</i> and <i>Buy and Renew</i> schemes should be reviewed with targets revised upwards and ensuring the schemes can attract the greatest number of homeowners possible. -Increase the rent payable to property owners engaged with the Repair and Leasing scheme to 92-95% of market rent.



## **Submission to the review of *Rebuilding Ireland***

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***11<sup>th</sup> August 2017***

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## Introduction

The Simon Communities in Ireland welcome the opportunity to contribute to this timely review of the *Rebuilding Ireland: Action Plan on Housing and Homelessness*. Our housing sector is in crisis with all elements of showing signs of being broken. The private market has failed. Social housing construction in recent decades has halted and mortgage debt and rents have spiralled. The results have had devastating consequences on the lives of hundreds of thousands of citizens. There are 8,941 men, women and children living in emergency accommodation and the numbers are growing. The damage and the trauma done are untold. A child who is homeless is more likely to become homeless again as an adult. People are being offered short term, emergency solutions when we know that the best way of ending homelessness is Housing First; where a person is moved immediately into permanent housing with support as needed.

According to the most recent data available, 8,941 people are currently living in emergency accommodation, including 3,206 adults without dependents in their care and 1,365 families composed of 1,840 adults and 2,895 children. This is in addition to the many thousands of households living in precarious tenancies experiencing ongoing housing instability. Despite the coordinated response outlined in the *Rebuilding Ireland: Action Plan for Housing and Homelessness*, more is required to arrest the increasing numbers of households entering homelessness because of the malfunctioning housing system and underlying social inequality and poverty. Crucially, households currently trapped in emergency accommodation must be supported to leave homelessness behind. We need where possible to keep people in their homes, preventing homelessness from happening in the first place. We need whole of Government support to ensure that the housing and homeless crisis to remain at the very top of the Government agenda.

## Homelessness and Housing Insecurity – a nationwide crisis

According to the *European Typology of Homelessness and Housing Exclusion* (ETHOS) as developed by FEANTSA, homelessness includes:

- rooflessness (being without shelter of any kind, sleeping rough);
- houselessness (with a place to sleep but temporary in institutions or shelter);
- living in insecure housing (threatened with severe exclusion due to insecure tenancies); and
- living in inadequate housing (in caravans on illegal campsites, in unfit housing, in extreme overcrowding).<sup>1</sup>

This broad typology captures the complexity of the ongoing homelessness crisis. People become homeless for a wide range of complex and overlapping reasons. The underlying causes of homelessness include poverty, inequality and a lack of affordable housing, often coupled with systems failures and individual circumstance. Many of the people the Simon Communities work with every day have often been disadvantaged and isolated from a young age; the state has failed them, time and time again. Homelessness can happen as the result of a crisis or an accumulation of crises in a person's life. It can build up over time, sometimes years and can have a lasting impact on a person's mental and physical health and their overall wellbeing.

The housing crisis is the primary barrier to solving long-term homelessness and ending the use of emergency accommodation as the State's primary response to homelessness. The failure to deliver affordable housing through strategic Local Authority social housing construction has been a leading cause of homelessness and a major impediment to exiting homelessness for low-income households. New social housing construction is again tied to the private construction sector, which saw social housing output plummet by 92% with the onset of the financial crisis in 2008.<sup>2</sup> As such, new social housing construction is stuck in a cycle mirroring the boom bust dynamics of the private housing system.<sup>3</sup> As private housing construction stutters to recover the state has turned to the overburdened private rented sector for the provision of new social housing tenancies, heavily subsidised through the Housing Assistance Payment (HAP) and Rent Supplement (RS) Schemes. However, as private market rents spiral upwards and supply falls to historic lows, these payments are becoming increasingly ineffectual leaving recipients locked out of a crowded and increasingly competitive market, increasing their risk of entering or re-entering homelessness. The recent Simon Communities *'Locked Out of the Market VII'* snapshot study revealed that 88% of rental properties in 11 study areas nationwide were beyond the reach of those depending on RS and HAP payments for their housing.<sup>4</sup>

## Constitutional protection for the right to housing

The absence of a rights based approach to housing in Ireland has contributed to the ever-growing numbers of people entering homeless. To tackle the housing and homelessness meaningfully crisis and to prevent its recurrence, the Simon Communities believe the State must fully embrace the constitutional protection of the right to housing. A constitutional right to housing would provide a clear floor of protection in respect of access to basic adequate housing for all, and would guide all future State housing policy, decision-making, implementation and budgetary allocation. Constitutional protection of the right to housing would include State obligations to reasonably protect and fulfil the right in the spirit of its obligations under the *International Covenant on Economic, Social and Cultural Rights* (ICESCR), in addition to providing legal mechanisms for

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<sup>1</sup> FEANTSA, *'Ethos Typology on Homelessness and Housing Exclusion'*, <http://www.feantsa.org/en/toolkit/2005/04/01/ethos-typology-on-homelessness-and-housing-exclusion>.

<sup>2</sup> Norris M, Byrne M, *'Social housing's role in the Irish property boom and bust'*, P- 16-17, 2016, UCD Geary Institute for Public Policy Discussion Paper Series, <http://www.ucd.ie/geary/static/publications/workingpapers/gearywp201615.pdf>.

<sup>3</sup> Ibid.

<sup>4</sup> Simon Communities in Ireland, *'Locked Out of the Market VII – The Gap between Rent Supplement and Hap Limits and Market Rents'*, May 2017, [http://www.simon.ie/Portals/1/EasyDNNNewsDocuments/160/LockedOutVII\\_SimonCommunity.pdf](http://www.simon.ie/Portals/1/EasyDNNNewsDocuments/160/LockedOutVII_SimonCommunity.pdf).

citizens to vindicate their right to housing before the courts. In the interim, pursuing the progressive realisation of the right to housing across all housing related policy where incremental legislative change can have considerable impact on citizens' access to adequate housing.

A constitutional right to housing would not provide a right to a key to a home for all citizens. A constitutional right to housing would form a legal safeguard against which all-State housing policy and decision-making can be measured, challenged, and against which the progressive realisation of the right to adequate housing can be pursued through policy, legislative, and budgetary mechanisms. Such a right to housing would acknowledge in a meaningful way Ireland's commitment to the *International Covenant on Economic, Social and Cultural Rights*, in keeping with our international obligations in this regard and would provide a readymade legal framework from which could pursue the progressive realisation of the right to housing.<sup>5</sup> Often people who are homeless are deprived of other basic human rights on top of their right to adequate housing.<sup>6</sup> Without access to stable and quality housing it can be difficult, if not impossible, to realise a whole host of socio-economic and cultural rights including the right to employment, education and health.

## Housing First

### *Improved outcomes for people experiencing homelessness*

The 2013 Homelessness Policy Statement marked the Government's first policy commitment to pursue a housing-led<sup>7</sup> approach to solving long-term homelessness.<sup>8</sup> Housing First offers housing without preconditions and includes a range of supports focussed on harm minimisation and supporting recovery and empowerment through Assertive Community Treatment (ACT) teams. The success of such initiatives depends not just on housing but also, crucially, on drug and/or alcohol, mental health, and community integration services being available to people who were formerly homeless. There are two key aspects to the Housing First<sup>9</sup> approach - immediate provision of housing without pre-conditions or no requirement of housing 'readiness' and the provision of support in housing at the level required, for as long as necessary. With Housing First, the goal is to move people out of homelessness as quickly as possible into permanent housing where tailored support services are more effective. These approaches, once properly resourced and implemented, improve the outcomes and quality of life for people who are homeless, or at risk of homelessness in Ireland.

To date, emergency accommodation has formed the basis of Ireland's response to the homeless crisis including the use of private hotels, B&B's and emergency dormitory shelter beds. As a strategy, this fails to address homelessness effectively. Without the necessary supports in place, people experiencing homelessness are often unable to access or sustain a home or access support services. There can be issues accessing mental health services, attending primary health care facilities or utilising mental health housing programmes for active drug and/or alcohol users. People can be deemed ineligible for housing payments such as Rent Supplement, the Rental Accommodation Scheme or Housing Assistant Payment scheme if they had rent arrears in the past three years or a criminal record in the last two years. This runs contrary to

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<sup>5</sup> Padraic Kenna, 'National Perspectives on Housing Rights – Ireland', P.6, <https://www.nuigalway.ie/media/housinglawrightsandpolicy/National-perspectives-on-housing-rights.pdf>.

<sup>6</sup> Ibid Pp. 21-23.

<sup>7</sup> The terms Housing First and Housing Led are often used interchangeably for the purpose of this document we use the term Housing First. The Housing First/Housing Led typology includes Pathways Housing First, Communal Housing First and Housing First Light (Pleace, 2013).

<sup>8</sup> DECLG, Homelessness Policy Statement, 2013,

[http://www.homelessdublin.ie/sites/default/files/publications//Homeless\\_Policy\\_Statement\\_2013.pdf](http://www.homelessdublin.ie/sites/default/files/publications//Homeless_Policy_Statement_2013.pdf).

<sup>9</sup> In 2014 research undertaken by Mental Health Commission of Canada as part of the *At Home/Chez Soi study*, the largest ever study examining the effectiveness of the Housing First approach compared with the traditional staircase approach. The study followed more than 2,000 people who were homeless over a two year period across 5 Canadian cities. The findings were very clear: The Housing First intervention was twice as effective as the staircase approach in ending homelessness for people who had been long-term homeless with complex support needs. Furthermore, the intervention led to significant cost savings when compared with traditional interventions<sup>9</sup>. The key to the success of Housing First is its comprehensive model of support for the most 'hard core' people who are homeless with the highest level of needs.

the ethos of Housing First approaches and presents a real risk of institutionalisation for people in emergency accommodation.

#### *Cost effectiveness of Housing First*

Historically, an emergency-led strategy has not been effective with people spending considerable periods of their lives trapped in emergency accommodation involving the spending of high levels of statutory funding on homelessness services that have not always delivered satisfactory outcomes for households and in the long-run led to additional problems of institutionalisation and dependency. The failure to deliver positive sustainable outcomes despite large-scale statutory expenditure has been described as “the litmus test in delivering value for money”<sup>10</sup>; however, in the absence of the local and national political and financial commitment to Housing First we remain reliant on an emergency led response. In contrast to this approach, the rollout of Housing First for chronically homeless people who make repeated and sustained use of emergency shelters have demonstrated positive and sustainable quality of life outcomes for people and offers some cost effectiveness and exchequer savings.<sup>11</sup>

#### *Reduced Emergency Accommodation Usage*

Reduced use of emergency homeless shelters by chronically homeless people who often account for the majority of repeated and sustained emergency homeless shelter use achieves significantly better outcomes and cost savings. The average cost of providing each bed in Supported Temporary Accommodation is approximately €29,000 per annum, not inclusive of all additional statutory and non-statutory expenditure by other state and non-state bodies.<sup>12</sup> In Dublin, O’Donohue-Hynes (2015)<sup>13</sup> found that from 2012 to 2014, of the 7,254 people that used emergency accommodation just 13% (924) could be considered long stay<sup>14</sup> shelter residents. However, this group accounted for 52% of emergency bed nights.<sup>15</sup> Remarkably, Cork Simon’s most recent data shows similar findings - 14% of residents in its emergency shelter in 2016 met the government’s definition of long-term homelessness, and this group accounted for 37% of shelter bed nights.

#### *Better quality of life outcomes - Reduced health care costs*

Reductions in the use and presentations to emergency medical and mental health services deliver significant cost savings as chronically homeless people availing of Housing First have direct access to primary health care and mental health services. This has a dual benefit of improving the general health of people who are homeless in addition to reducing hospital admissions resulting in reduced overall cost to the healthcare system. In one study, a general practitioner and nurse led response to improving hospital care for homeless people led to a 30% reduction in hospital bed days following the first year of service.<sup>16</sup>

#### *Cost savings across multiple jurisdictions*

Housing First demonstrates significant cost savings across multiple jurisdictions in which it operates. In the United States, a large-scale study in New York found that 95% of the costs of providing Housing First were covered by the savings to health, criminal justice and other services, offsetting nearly the entire cost of implementing the programme.<sup>17</sup> Elsewhere in the United States, a pilot Housing First programme targeting

<sup>10</sup> Eoin O’Sullivan, ‘Ending Homelessness – A Housing-Led Approach’, P. 24, <http://www.drugs.ie/resourcesfiles/reports/EndingHomelessness.pdf>.

<sup>11</sup> Nicholas Pleace and Joanne Bretherton, ‘The Case for Housing First in the European Union: A Critical Evaluation of Concerns about Effectiveness’, P. 25, [http://housingfirstguide.eu/website/wp-content/uploads/2016/03/The-case-for-Housing-First-in-the-EU-np\\_and\\_jb.pdf](http://housingfirstguide.eu/website/wp-content/uploads/2016/03/The-case-for-Housing-First-in-the-EU-np_and_jb.pdf).

<sup>12</sup> Ibid 11, P. 23.

<sup>13</sup> O’Donoghue Hynes (2015) *Patterns of homeless emergency accommodation use in Dublin: how do we compare?* Paper presented at European Research Conference Families, Housing and Homelessness Dublin, 25th September 2015

<sup>14</sup> Long Stay\* or chronically\* homeless according to typologies developed by \*Aubrey et al (2013) Kahn and & Culhane (2004)

<sup>15</sup> Total number of emergency bed-nights available” is the total number of emergency beds available in a given period.

<sup>16</sup> Hewett N, Halligan A, Boyce T. A general practitioner and nurse led approach to improving hospital care for homeless people. *BMJ*. 2012;345:e5999.

<sup>17</sup> Nicholas Pleace, European Observatory on Homelessness/FEANTSA, ‘Housing First’, P. 22, [http://www.feantsaresearch.org/download/housing\\_first\\_pleace3790695452176551843.pdf](http://www.feantsaresearch.org/download/housing_first_pleace3790695452176551843.pdf).



veterans experiencing homelessness resulted in a 54% reduction in the cost of inpatient healthcare in addition to a 32% reduction in outpatient health care costs.<sup>18</sup> In Finland, a study of a supported housing unit demonstrated that housing with intensified support halved the use of social and health care services compared to service use during periods of homelessness. This led to average savings of €14,000 per resident per annum with total annual savings for 15 residents in the unit in question amounting to €220,000 per year.<sup>19,20</sup> In Canada, the Calgary Homeless Foundation reported annual cost savings of approximately \$2.5 million, achieved through the delivery of Housing First for 72 homeless people, equating to an average cost saving of \$34,000 per person. This dramatic reduction was largely due to significant reductions in police interactions, incarcerations and hospital stays.<sup>21</sup>

### *Housing First targets*

In 2016, the Simon Communities welcomed the *Rebuilding Ireland* commitment to triple Housing First targets to deliver 300 tenancies by the end of 2017. As of May 2017, 62 Housing First tenancies were in place with an additional 50 tenancies in the process of transitioning from emergency accommodation to supported tenancies in the community.<sup>22</sup> Despite this progress, we remain concerned about the national rollout of Housing First especially given the dearth of available housing options that could slow the delivery of the targeted 300 tenancies by years end. The *Repair and Lease* and *Buy and Renew* schemes focusing on vacant/empty homes are possibly the most suitable means of securing sustainable housing options to deliver sufficient housing supply to satisfy current and future Housing First tenancies.

### *Budgetary shortfall for essential supports*

It is disappointing that Budget 2017 commitments to deliver additional funding for the provision of additional care and case management assessment and intensive addiction and mental health programmes for people using homeless services will fall €2 million short of the €6 million 2017 budgetary target. Prioritising people with the longest experience of homelessness and those with the most complex support needs for housing at the earliest opportunity is vital. The Simon Communities know from experience and international evidence that this group is the most vulnerable to entrenchment in emergency shelters and rough sleeping with detrimental effects on their physical and mental health. We call for the full delivery of this commitment in 2018.

## **Affordable Housing Supply**

The review of *Rebuilding Ireland* must critically assess implementation to date, exploring both progress made and, crucially, targets not reached since the publication of the plan in July 2016. Importantly, this review also provides an opportunity to reaffirm the State's long-term vision for the delivery of affordable housing across all tenure types to deliver sustainable communities nationwide. The Simon Communities believe that this vision should focus on the increased provision of housing to meet different income thresholds supported through State intervention where necessary. The current ideology underpinning the housing system is one of over reliance on the private market for the delivery of housing for all tenure types, which has resulted in the commodification of housing. A large majority of *Rebuilding Ireland*'s planned social housing provision will be delivered through private market based responses, i.e. new HAP tenancies and through acquisitions and leases from the private market. We know that increased private sector supply will not deliver affordability or the required housing and tenure mix in the short to medium

<sup>18</sup> Montgomery A.E., Hill L., Culhane D.P., Kane V., 'Housing First Implementation Brief', P. 5, VA National Center on Homelessness Among Veterans/U.S. Department of Veterans Affairs, 2014, <https://www.va.gov/homeless/nchav/docs/Housing-First-Implementation-brief.pdf>.

<sup>19</sup> Ministry of the Environment (2011) *Asunnottomuuden vähentämisen taloudellisetvaikutukset*. Helsinki: Ministry of the Environment.

<sup>20</sup> Ibid 11, P. 30.

<sup>21</sup> Calgary Homelessness Foundation, 'The Cost Benefits of Housing First', <http://calgaryhomeless.com/wp-content/uploads/2014/06/The-Cost-Benefits-of-Housing-First.pdf>.

<sup>22</sup> DHPCLG, *Rebuilding Ireland Quarter 3 Progress Report*, [file:///C:/Users/eamonn/Downloads/Third\\_Quarterly\\_Progress\\_Report\\_RBI\\_31\\_May\\_2017%20\(5\).pdf](file:///C:/Users/eamonn/Downloads/Third_Quarterly_Progress_Report_RBI_31_May_2017%20(5).pdf).

term. It is critical that affordability is understood as being determined by household income and ability to dictated by the market as per Rebuilding Ireland current definition *'Housing affordability is measured by examining the proportion measured household income that is spent to meet own housing need whether purchasing a home or renting'* (2016,p27). In addition, the human cost of homelessness and housing instability the lack of affordable housing to buy or rent is *'...a deterrent to skilled workers wishing to return to Ireland and to the executives of foreign companies considering Ireland as a location'* (Drudy, PJ; 2016, p5)<sup>23</sup>. This is supported by Goodbody stockbroker's latest quarterly Irish Economy Health Check<sup>24</sup> which highlights capacity constraints in the area of housing and infrastructure.

Proactive State intervention is required to deliver affordable housing across all tenure types. Resource Local Authorities and Approved Housing Bodies (AHB's) to build new social housing units to meet ever-increasing demand as illustrated by the 91,600 households included in the most recent Social Housing needs assessments. In this regard, we fully support the establishment of a new semi-state Irish Affordable Homes Company as proposed by both National Economic and Social Council (NECC) in 2014<sup>25</sup> and the Nevin Economic Research Institute (NERI) in 2017<sup>26</sup>. The guaranteed return of affordable housing units at a set price must be the underlying condition of the granting of funding to private developers through the Local Infrastructure Housing Activation Fund (LIHAF).

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<sup>23</sup> Drudy, PJ (2016) The Housing Problem and the Case for Rent Regulation in the Private Rented Sector <https://www.oireachtas.ie/parliament/media/committees/32housingandhomelessness/Drudy-Submission-to-Committee-on-Housing-and-Homelessness-May-2016.docx>

<sup>24</sup> <http://www.rte.ie/amp/895865>

<sup>25</sup> NESCC (2014) *Social Housing at the Crossroads: Possibilities for Investment, Provision and Cost Rental* No: 138 [http://files.nesc.ie/nesc\\_reports/en/138\\_Social\\_Housing.pdf](http://files.nesc.ie/nesc_reports/en/138_Social_Housing.pdf)

<sup>26</sup> Healy, T & Goldrick-Kelly, Paul (2017) *Ireland's Housing Emergency - Time for a Game Changer* <https://www.nerinstitute.net/research/irelands-housing-emergency-time-for-a-game-changer/>

## Pillar 1: Homelessness

The continuous increases in the numbers of individuals and families in emergency accommodation need to be addressed urgently. Comprehensive early intervention and prevention measures are required to keep those at risk of homelessness in their homes and to alleviate the precariousness of their tenancies. Strategic investment is required to increase housing supply and access to affordable, safe and secure housing for all, particularly for those at risk of homelessness or those attempting to exit homelessness. New social housing construction is of paramount importance in this regard in addition to the review and enhancement of vital State housing payments.

People experiencing homelessness are not a homogenous group. They are a diverse group of people that include women, young men, families, those with complex mental and physical health needs and people with problematic drug and alcohol use. Understanding this diversity and individuals' unique pathways into and experiences of homelessness is crucial to ensure we can respond to their individual and complex needs. Providing people experiencing homelessness with adequately resourced, flexible and ongoing supports is crucial. The support offered needs to incorporate the three dimensions of housing support, clinical support and supports towards community reintegration, as necessary.

### **1.1 Overarching Recommendation:**

- *National Homeless Sub-Strategy:* A new cross-departmental National Homelessness Sub-Strategy under the auspices of *Rebuilding Ireland* is required with ring fenced funding for implementation. This sub-strategy would complement and build upon existing commitments contained in *Rebuilding Ireland* including prevention, nationwide implementation of Housing First and addressing multiple and complex needs. This strategy should acknowledge that people experiencing homelessness are not a homogenous group and that a broad spectrum of diversity exists regarding people's experiences of homelessness focusing on homelessness amongst single people; families; women; young people and drug/alcohol users.

### **1.2 Current and Future Homelessness Prevention Measures**

Preventing more individuals and families from entering homelessness is crucial. The launch of the *Abhaile* mortgage arrears advice service in October 2016 was welcome, including the allocation of €15 million to fund the scheme to the end of 2019. Similarly, we welcome the nationwide launch of the Threshold Tenancy Protection Service. This service plays a crucial role in keeping people in their homes and in preventing entries into homelessness from the private rented sector. However, additional early intervention and prevention measures are required given the sheer scale of the crisis.

### **Recommendations:**

- Expand the scope of funding under Section 10 of the Housing Act 1988 to support those who are at risk of homelessness to help sustain tenancies in addition to providing rapid re-housing so that a person's experience of homelessness ends as quickly as possible. This funding is currently restricted to assisting those who have experienced homelessness. This legislative change should be prioritised in conjunction with the development of the aforementioned sub-strategy.
- Make funding for information and advice services fully available to provide much needed advice to households to remain in their homes. As needed, allocate additional funding to maintain the *Abhaile* service beyond 2019 to assist current and future homeowners struggling to cope with mortgage arrears.
- Funding should be ring fenced to ensure the continued operation of the Tenancy Protection Service. This is particularly pertinent given the volatility in the private rented sector.

- Expand the Homeless HAP scheme nationally. This scheme currently supports 1,711 households who have moved out of emergency accommodation into stable tenancies as of July 2017.<sup>27,28</sup>

### ***1.3 Emergency Accommodation:***

Historically, emergency accommodation has formed the basis of the State's response to the housing and homelessness crisis. The use of private hotels, B&B's and emergency shelter beds fails to address the complexity of homelessness effectively. The diversity of experience and complexity of need of people living in emergency accommodation is not adequately addressed, acting as a barrier in accessing vital mental health services, primary health care facilities and drug and alcohol treatment and detox programmes. This lack of holistic supports runs contrary to a Housing First approach and can lead to the further institutionalisation of people living in emergency accommodation.

#### **Recommendations:**

- Emergency Accommodation in the short term – ideally averaging no more than 7-10 days. Similarly, Family Hubs only be use in the short term with a three-month time limit. On entering emergency accommodation or a Family Hub, households must be immediately supported to source and maintain a tenancy in housing in the wider community.
- Put in place a five-year plan aimed at reducing the time spent in emergency accommodation to an average of 7-10 days per person. This should be part of the aforementioned sub-strategy.
- Report quarterly on the average length of stay per person/family in emergency accommodation and hubs subject to agreed reduction targets for the following year.
- Ensure funding for emergency hotel rooms and B&B's is additional to the homeless budget (Section 10 funding) and ring-fence so funding is not diverted from Housing First services and other homeless services that are already stretched to capacity.
- There is a need for ring-fenced funding for specialist voluntary services such as Homeless Action Teams to ensure appropriate visiting and on-site support is provided to those in private emergency accommodation, Family Hubs and longer term sustainable tenancies on exiting homelessness.

### ***1.4 Housing First***

Five years on from the Government's initial commitment in the *Homeless Policy Statement* (2013) to pursue a Housing Led (First) approach to solving long-term homelessness, budgetary provision must be made available to deliver existing Housing First targets and expand this approach nationwide.<sup>29</sup> We know that when properly resourced and implemented as part of the fully integrated response to homelessness, Housing First can deliver significantly improved outcomes and quality of life for people experiencing long-term homelessness. Effective interagency, interdisciplinary and multidisciplinary working is essential to the success of Housing First approaches.

#### **Recommendations:**

- Budget 2018 should provide additional resources to allow for the extension of Housing First targets nationally beyond the 300 tenancies committed to by the end of 2017.
- Adequate funding across relevant Government Departments required ensuring the expansion of Housing First with the necessary wraparound support. Critical departments include the Department of Health/HSE, Department of Social Protection and the Department of Finance.

<sup>27</sup> Dáil Éireann Debate, Vol. 927 No. 3,

<http://oireachtasdebates.oireachtas.ie/debates%20authoring/debateswebpack.nsf/takes/dail2016110800064>.

<sup>28</sup> The Housing Assistance Payment for Homeless Households or Homeless HAP Pilot, which is operated by the Dublin Region Homeless Executive (DRHE) on behalf of the Dublin local authorities, provides discretion to exceed the HAP rent limits for homeless households, if this is necessary in order to source suitable accommodation. To qualify for HAP under the pilot scheme, a household must be accepted as homeless within the meaning of section 2 of the Housing Act 1988 by one of the 4 Dublin local authorities.

<sup>29</sup> DHPCLG, Homelessness Policy Statement, February 2013, <http://www.housing.gov.ie/sites/default/files/migrated-files/en/Publications/DevelopmentandHousing/Housing/FileDownload%2C32434%2Cen.pdf>.

- We encourage the DHPCLG to set and publish adequate tenancy targets with regard to the roll out of Housing First nationwide.

*1.4.1 Support in Housing:* Adequate support in housing is critical to the success and sustainability of exits from homelessness and Housing First approaches. Such approaches must be flexible, person centred, open ended and adequately resourced. The support offered needs to be three dimensional including housing support, clinical support and supports towards community reintegration, as necessary. This combined support allows Housing First tenants to maintain their tenancies, improve their general health and well-being and seek education and employment opportunities if/when they choose to. Learnings from the initial and expanded rollout of Housing First must be captured and shared widely amongst housing and homelessness service providers and stakeholders. Where necessary, allocate funding to facilitate this.

#### **Recommendation:**

- Adequate funding must be allocated to support work with vulnerable households once they have moved into social housing e.g. Support to Live Independently (SLI) and intensive case management associated with Housing First Initiatives for people with complex needs being rehoused. This support ensures better outcomes for the tenant and increases the stability of the tenancy.

*1.4.2. Clinical Support:* Resource alcohol and drug services to target the needs of people who are homeless with alcohol and/or drug related problems. The allocation of an additional €3 million in Budget 2017 to support drugs and social inclusion measures was welcome. It is disappointing that Budget 2017 commitments to deliver additional funding for the provision of additional care and case management assessment and intensive addiction and mental health programmes for people using homeless services will fall €2 million short of the €6 million 2017 budgetary.

#### **Recommendations:**

- Fund the Pillar 1 Step-up/Step-down and addiction treatment facilities committed by Minister Coveney and Minister Harris<sup>30</sup> in September 2016. Ensure that the revenue and capital costs for the operation and development of this facility are in place in Budget 2018, as committed to in September 2016, (see appendices for more details).
- At a minimum, the funding shortfall outlined above must be made available through Budget 2018 bringing total spending to €8 million in line with the revised commitment contained in the *Rebuilding Ireland Third Quarterly Progress Report*.<sup>31</sup>
- Ring-fenced funding must be put in place for the immediate and full implementation of the new National Drugs Strategy ‘*Reducing Harm, Supporting Recovery – a health led response to drug and alcohol use in Ireland 2017 – 2025*’.
- There must be full delivery of this commitment in Budget 2018 in addition to ring-fenced funding to implement *A Vision for Change* or its successor strategy.
- Increase funding for mental health services to 8.24% of the national health budget as recommended in *A Vision for Change*. This should include the dedicated ring-fencing of funding streams for the full implementation of the commitments contained in *A Vision for Change*.
- Develop ‘Specialist Adult Teams’ to manage the combination of complex and problematic drug and alcohol use and mental health issues as recommended in *A Vision for Change* and the ‘National

<sup>30</sup> [http://merriestreet.ie/en/News-Room/Speeches/Speech\\_by\\_Minister\\_for\\_Health\\_Simon\\_Harris\\_TD\\_at\\_Press\\_Briefing\\_on\\_Pillar\\_1\\_of\\_the\\_Government's\\_Action\\_Plan\\_on\\_Housing\\_and\\_Homelessness\\_.html](http://merriestreet.ie/en/News-Room/Speeches/Speech_by_Minister_for_Health_Simon_Harris_TD_at_Press_Briefing_on_Pillar_1_of_the_Government's_Action_Plan_on_Housing_and_Homelessness_.html)

<sup>31</sup> DHPCLG, ‘*Third Quarterly Progress Report*’, June 2017, P.20, [file:///C:/Users/eamonn/Downloads/Third\\_Quarterly\\_Progress\\_Report\\_RBI\\_31\\_May\\_2017%20\(1\).pdf](file:///C:/Users/eamonn/Downloads/Third_Quarterly_Progress_Report_RBI_31_May_2017%20(1).pdf).

Clinical Programme for the Assessment and Management of Patients Presenting to Emergency Departments following Self Harm’ and ensure interagency responses.

- The proposal in the *Implementation Plan on the State’s Response to Homelessness* to provide a dedicated Community Mental Health Nurse in each ISA10 area to support the needs of people who are homeless or at risk of homelessness needs to be actioned.<sup>32</sup> This is supported in the *Report of the Committee on Housing and Homelessness* (2016).<sup>33</sup>
- Prioritise trauma informed practices and counselling services including greater resourcing of social work, community and family services as a means of reducing the prevalence of problematic drug and/or alcohol use and earlier drug taking by those that have experienced adverse traumatic experiences in childhood.

*1.4.3 Community Integration:* Engagement in employment, education and training offers people a means of generating independent income, opportunities for developing social networks, and a way to enhance skills and self-esteem, among other benefits. This is particularly important for people who are long-term unemployed, a category that applies to many people who are homeless.

### Recommendations

- The Social Protection System must ensure supports for people exiting homelessness include measures aimed at assisting them to access education, employment and training opportunities.
- Existing *Back to Work* and *Education and Training Programmes* must work more effectively to include people who have experienced homelessness. Ring-fenced funding and make placements on these schemes available to ensure greater participation by people who have experienced homelessness. The Homeless Community Employment Schemes within the Community Services Programme are prime example of where this approach can be delivered given people experiencing homelessness are named as a programme target group.
- Secure and quality employment must be available once study or training programmes are completed.
- Any special CE schemes need to operate with greater flexibility than current special drugs projects with more achievable social inclusion goals

### 1.5 Women and Homelessness

The scope of the current housing and homelessness crisis ensures there is a wide diversity of experience amongst women that enter homelessness. Women’s entry into homelessness can occur for many reasons, at any time of life, alone or within a family. The ‘*Women, Homelessness and Service Provision*’ research captured 60 participants’ varying circumstances at the point of becoming homeless. Recurring themes in the women’s narratives were childhood trauma and exposure to domestic violence, in addition to early childhood experiences of homelessness. Of the 60 participants, the majority grew up with adversity and in family environments characterised by tension and/or conflict and where economic hardship was an everyday reality. Many participants recalled home-based challenges including experiences of domestic violence and/or child sex abuse. Several of the study participants also reflected on the lack of intervention in their lives as children, which may have served to protect them and prevent future trauma and harm. Twenty percent of the women involved had spent either short or prolonged periods of their childhood in state care. Fifty percent of the women had experienced homelessness on multiple occasions. On eventual access to homeless or domestic violence services, women had frequently reached a crisis point in their lives and the

<sup>32</sup> Implementation on the State’s Response to Homelessness, May 2014 to December 2016, <http://www.housing.gov.ie/sites/default/files/migrated-files/en/Publications/DevelopmentandHousing/Housing/FileDownload%2C38053%2Cen.pdf>.

<sup>33</sup> Report of the Committee on Housing and Homelessness, June 2016, <http://www.oireachtas.ie/parliament/media/committees/32housingandhomelessness/Final-Report-pdf>.

vast majority had multiple, complex needs.<sup>34</sup> Seventy-three percent reported being mothers while 21% of the mothers had one or more of their children placed in the care of a relative or the HSE. The primary barrier to housing stability for the participants was the lack of affordable housing options and the absence of continuing support available on exiting homelessness services.<sup>35</sup>

**Recommendations:**

- Women experiencing homelessness must be included as a named target group.
- Put in place gender specific homeless services and strategies to meet women's specific needs that will ultimately support them to access and maintain stable housing. Existing services modelled on the male experience may inadvertently lead to further marginalisation, trauma and distress.
- There is a clear need to establish targeted services for women and trauma informed responses to deal with the complexity of need.

**1.6 Young People**

Young people's pathways into and experiences of homelessness differ from older demographics. Risk factors identified include experiences of abuse, neglect and family instability, crisis and breakdown. Family conflict (both emotional and physical) and problematic drug and alcohol use within the family unit are significant contributing factors associated with young people's transition into housing instability and homelessness. Structural factors that give rise to increased risk of youth homelessness include poverty, unemployment, lack of affordable housing and insufficient social protection supports.<sup>36</sup> Recent research carried out by Dr Paula Mayock and Sarah Parker of Trinity College Dublin has charted the pathways through homelessness of young people in Dublin over a two-year period. The research found that only a quarter of the study participants tracked over that period found stable accommodation, citing the lack of affordable housing as the primary barrier to exiting homelessness and moving into sustainable housing.<sup>37</sup>

**Recommendations:**

- Homelessness policy needs to directly address the situations of young homeless people, recognising that their experiences and needs differ from those older adults, and include a more strategic approach to improving young people's access to housing and relevant support services.
- The development and expansion of housing models and options for young people – including housing first approaches requires urgent attention.
- All housing programmes targeting young people must be subject to rigorous evaluation to ensure a systematic, evidence based understanding of which models are best suited to meeting the developmental, social, educational and residential needs of homeless young people.

**1.7 Rapid Build Housing**

Rapid Build Housing (RBH) delivery is severely behind schedule. According to the most recent data available, only 22 RBH units have been delivered. This is worryingly short of the targeted delivery of 200 units by Q4 2016 and the delivery of a further 800 units by Q4 2017. The latest Rebuilding Ireland Quarterly progress report is a tacit admission that these targets will not be met.

**Recommendations:**

- Emergency budgetary measures must now be taken to ensure the delivery of Rapid Build Housing targets nationally within the agreed timescales.

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<sup>34</sup> Mayock et al, 'Women, Homelessness and Service Provision', 2015, Simon Communities in Ireland, P. 54. [http://www.simon.ie/Women\\_Homelessness\\_and\\_Service\\_Provision/#/1/](http://www.simon.ie/Women_Homelessness_and_Service_Provision/#/1/).

<sup>35</sup> Ibid, P. 55.

<sup>36</sup> Mayock et al, 'Young People, Homelessness and Housing Exclusion', 2014, P. 8, <https://www.focusireland.ie/wp-content/uploads/2016/04/Mayock-Parker-and-Murphy-2014-Young-People-Homelessness-and-Housing-Exclusion-FULL-BOOK.pdf>.

<sup>37</sup> Dr. P. Mayock and S. Parker, 'Living in Limbo – Homeless Young People's Paths to Housing', May 2017, <https://www.focusireland.ie/wp-content/uploads/2016/05/Mayock-and-Parker-2017-Living-in-Limbo-Homeless-Young-Peoples-Paths-to-Housing-FINAL-BOOK.pdf>.

### ***1.8 Mortgages in Distress***

According to the most recent figures from the Central Bank, over 76,000 principle dwelling mortgage accounts are in arrears. Forty-three percent of all mortgage arrears are in arrears for over 720 days. Additionally, at the end of March 2017, 20,009 or 16% of buy-to-let mortgages were in arrears of more than 90 days. Key legislative mechanisms to address mortgage arrears remain underused. A prime example is the Mortgage write down mechanism under the personal insolvency legislation that potentially allows for the write-down of the debt on the family home to its current market value, allowing the borrower to remain the owner.

#### **Recommendations:**

- Continued investment in the recently amended Mortgage-to-Rent scheme is required to ensure its future viability.
- Fully resource Approved Housing Bodies (AHB's) to engage with the Mortgage-to-Rent scheme to increase national coverage to provide the services required under the scheme. In the interim period, put in place alternative options for those living in areas with little or no AHB coverage.
- Make additional resources available to implement the commitments contained in the *Programme for Partnership Government* including a review of the thresholds and processes for Personal Insolvency Arrangements; the establishment of a dedicated mortgage arrears courts service; and the amendment of the Code of Conduct on Mortgage Arrears to include an obligation on mortgage providers to provide sustainable arrears solutions.
- Greater use of Mortgage write-down must be encouraged amongst mortgage providers.



## Pillar 2: Accelerate Social/Public Housing

Investment in social and affordable housing must become a budgetary priority of the State and the European Union. As mentioned, increased private sector supply will not impact affordability in short/medium term and the private market cannot deliver the required housing mix. Proactive state intervention is essential across all tenure types. Critically, Local Authorities get back into the business of building and acquiring social housing on the scale required to meet ever-growing housing need with the support of Approved Housing Bodies (AHB's). Direct build social housing presents a far greater return on state investment, and is thus a more cost-efficient policy choice than investment in private rental subsidies such as HAP and Rent Supplement. Long-term thinking and investment is required. In 2016, 2,204 new social housing units were delivered. This includes 652 newly built social houses funded through the Social Housing Investment Programme (SHIP), the Capital Acquisition Scheme (CAS) and the Capital Advanced Leasing Facility (CALF), and a further 1,552 social houses acquired by Local Authorities. Social housing construction and delivery is not happening quickly enough; the pace must be accelerated to have a quick and meaningful impact on the housing and homelessness crisis.

### *2.1 Housing Supply*

#### **Recommendations:**

- Triple direct capital expenditure funding to €1 billion per annum to enable the rapid building within 16 months of 5,000 additional social housing units by Local Authorities and AHB's<sup>38</sup> with a longer-term commitment of building 10,000 units per annum<sup>39</sup>.
- There needs to be prioritisation of housing options, which can be delivered quickly including rapid builds and vacant/empty homes.
- Local Authorities and AHB's must be resourced to build social housing stock to meet low and middle-income households' housing needs. In 2016, only 652 Local Authority built houses were delivered.
- The Government must seek further flexibility from the European Commission on the application of the EU fiscal rules regarding the financing of social housing.

### *2.2 Rent Supplement/HAP limits*

The most effective way to prevent homelessness is to increase availability and access to social and affordable housing.<sup>40</sup> An increasing number of people are entering homelessness from the private rented sector. Spiralling rents and historically low supply has created a competitive and crowded market place, rendering State housing payments increasingly ineffectual. In 2018, 17,500 new HAP tenancies are to be created. Budgetary allocation for the delivery of these tenancies and the maintenance of existing HAP tenancies must be cognisant of rising private market rents and chronic low supply, factors that can severely impact on the availability and sustainability of social housing tenancies. In the absence of social housing provision, and to ensure the effectiveness of RS/HAP payments, we encourage the Government to consider the following recommendations.

#### **Recommendations:**

- Increase budgetary allocation to allow for bi-annual monitoring and adjustment of RS/HAP limits to ensure alignment with rising private market rents.

<sup>38</sup> Hearne, R and Murphy (2017) Investing in the Right to a Home: Housing, Hap's and Hubs [https://www.maynoothuniversity.ie/sites/default/files/assets/document/Investing%20in%20the%20Right%20to%20a%20Home%20Full\\_1.pdf](https://www.maynoothuniversity.ie/sites/default/files/assets/document/Investing%20in%20the%20Right%20to%20a%20Home%20Full_1.pdf)

<sup>39</sup> Healy and Goldrick-Kelly (2017) *ibid*

<sup>40</sup> Maher, C and Allen, M, 'What is Preventing us from Preventing Homelessness? A Review of the Irish National preventative Strategy', European Journal of Homelessness, P. 131, <http://www.feantsaresearch.org/download/policy-review-2-31193700354879610979.pdf>.

- Fully resource Community Welfare Officers and Local Authorities to make urgent discretionary uplift payments under RS and HAP schemes. This is particularly pertinent in Rent Pressure Zones (RPZ's) where tenants could face a 4% rent increase per annum over the next three years.
- Single people and couples should be specifically targeted given the disproportionate negative impact inadequate RS/HAP limits are having on these households' ability to access affordable housing.
- With the termination of a HAP tenancy, the onus should be on the Local Authority to find appropriate, alternative housing options as with RAS tenancies in the past. This should not be the responsibility of hard pressed, stressed households that may have varying financial and personal capacity to do so.
- Review the policy approach that determines a household's social housing need met once in receipt of HAP. In the absence of sufficient security of tenure in the Private Rented Sector, this approach does not reflect the perilous reality of many HAP tenancies.

### ***2.3 Support Approved Housing Bodies (AHB)/Voluntary Co-operations to access finance***

Approved Housing Bodies are a vital component of the social housing system. The review of social housing delivery as part of the wider *Rebuilding Ireland* review must seek to maximise the input and expertise of Approved Housing Bodies considering their proven record in the delivery of affordable housing.

#### **Recommendations:**

- Resource and protect the Capital Assistance Scheme (CAS) as a key mechanism for the delivery of social housing to special needs groups, particularly people who are homeless. This should be an open, annual rolling process, which would be available to AHB's as opportunities arise.
- Increase the Housing Agency capital expenditure funding for the purchase of vacant housing portfolios for the delivery of social housing units by AHB's.
- Support AHB's/Voluntary Co-Operatives to act quickly when opportunities arise. Explore mechanisms to improve access to finance, for example review and revision of the Capital Advanced Leasing Facility (CALF) to make it more financially viable.
- There is an urgent need to explore new funding models and mixed funding models including private finance, State funding and AHB's/Voluntary Co-Operatives working in partnership. Explore proposals made by the Irish League of Credit Unions in light of upward lending limits they can make available for the provision of social and affordable housing.

### **Pillar 3: Build More Homes**

The delivery of affordable housing for low and middle-income families must receive greater priority. *Rebuilding Ireland* contains a number initiatives intended to boost private housing delivery. The hoarding of development land and derelict sites is the primary barrier to delivering new supply and affordable housing. As house prices continue to rise, the price of development land increases in tandem, leading to prolonged hoarding of vital development land in anticipation of greater profits following eventual sale. This blockage in the delivery of critical supply is of utmost concern in light of the Daft.ie quarter 2 House Price Report that found that house prices in Ireland have risen more in the first six months of 2017 than in the whole of last year.<sup>41</sup> Recommendations addressing this and other housing supply issues below.

#### **3.1 Vacant Sites**

The 3% levy on vacant sites introduced under the Urban Regeneration and Housing Act 2015 is inadequate given rapidly increasing land prices. The vacant site levy presents no real deterrent to those hoarding vacant development land.

##### **Recommendation:**

- Amend the vacant site levy and introduce immediately to reduce the number of exemptions available to owners of development land subject to a loan on the property in question. The levy should apply until occupation of the site and be implemented immediately.<sup>42</sup>

#### **3.2 Compulsory acquisition of development land**

Consideration should be given to the acquisition of development land for the delivery of social and affordable housing. The hoarding of vital development land is driving up the cost of delivering new housing supply, reducing affordability at all price points.

##### **Recommendations:**

- Local Authority vacant site registers should allow for targeted identification of sites for compulsory purchase.
- Revisit the recommendations of the *Kenny Report* (1973) and the *Ninth Progress Report of the All-Party Oireachtas Committee on the Constitution* (2004) to determine the level of compensation paid to land owners that are subject of Compulsory Purchase Orders.

#### **3.3 Local Infrastructure Housing Activation Fund**

Successful applications by developers to access finance through the Local Infrastructure Housing Activation Fund (LIHAF) must be conditional on the provision of affordable housing in the resultant residential developments. Applying a 20% affordable housing target to the most recent *Rebuilding Ireland* projections would lead to the construction and delivery of approximately 4,600 affordable housing units across 15 Local Authorities.<sup>43</sup> Some return on the State's considerable investment of €226 million in the fund must be realised.

##### **Recommendation:**

- Applications for financing under LIHAF must be conditional on the delivery of affordable housing at a set price point.

<sup>41</sup> Daft.ie, Q2 House Price Report, <https://www.daft.ie/report/2017-Q2-houseprice-daft-report.pdf>.

<sup>42</sup> Green Party Derelict and Vacant Sites Bill 2017, <http://www.oireachtas.ie/documents/bills28/bills/2017/1617/b1617s.pdf>.

<sup>43</sup> *Rebuilding Ireland Quarter 3 Progress Report*, June 2016, P. 5, [file:///C:/Users/eamonn/Downloads/Third\\_Quarterly\\_Progress\\_Report\\_RBI\\_31\\_May\\_2017%20\(7\).pdf](file:///C:/Users/eamonn/Downloads/Third_Quarterly_Progress_Report_RBI_31_May_2017%20(7).pdf).

## Pillar 4: Improve the Rental Sector

Ireland's private rented sector is not working for the vast majority of private renters or recipients of State housing payments. According to the *Daft.ie quarter 1 Rental Report*, the average nationwide rent now stands at €1,131 per month, up 52% since 2012. Property availability within the private rented sector has plummeted to match record lows with fewer than 3,100 properties available to rent nationwide on the 1<sup>st</sup> of May, a significant drop of 82% since 2012.<sup>44</sup> People who rent have very little security of tenure and can face increases in rent that they cannot meet. Many people who are becoming homeless are coming from the private rental sector. They have lost their home and cannot afford to put a roof over their heads. Some stay with extended family and, when that fails, they enter homelessness. Increased rent certainty and security of tenure are the primary means of stemming the flow of people from the private rented sector into a situation of homelessness.

### Recommendations:

#### 4.1 Rent Certainty and Rent Predictability

- Full rent certainty is required. Consideration must be given to index linking rents to the Consumer Price Index (CPI). Further research is required to examine the viability of this rent certainty measure in addition to exploring alternative methods of rent certainty successfully employed in other jurisdictions.
- In the absence of full rent certainty, extend rent predictability nationwide as a matter of priority to reflect the national scale of the rental crisis. Ongoing monitoring based on local electoral area boundaries is essential to gauge the impact of the measure.
- Allowable rent increases in RPZ's should be restricted to the current 4% per annum. Under no circumstances should rent increases beyond 4% be allowed. This position must be central to the ongoing review of the Rent Predictability Measure.
- Active enforcement of the Rent Predictability measure by the RTB is required to ensure compliance within RPZ's. A public awareness campaign is required to provide clarity and to ensure landlords and tenants are aware of the implications and obligations attached to the Rent Predictability measure.
- A register of current sitting rents is now required to ensure active enforcement, compliance and to combat inflationary rent increases applied at the commencement of new tenancies.

#### 4.2 Security of Tenure

- Fast track the existing commitment to move towards indefinite leasing as a matter of urgency.
- The RTB should closely monitor terminations relying on Section 34 reasons to ensure landlords are acting in good faith and in compliance with the new standards contained in the Planning and Development (Housing) and Residential Tenancies Act 2016.<sup>45</sup>
- Amend measures to prevent the simultaneous serving of termination notices on large numbers of residents in a single development to include cases of simultaneous termination of less than five tenancies.
- Tenants of Buy-to-Let (BTL) properties in receivership must have full protection. All landlord obligations should transfer to the receiver and subsequently to the new property owner.

<sup>44</sup> Daft.ie, Quarter 1 Rental Report, May 2017, <https://www.daft.ie/report/2017-Q1-rental-daft-report.pdf>.

<sup>45</sup> Planning and Development (Housing) and Residential Tenancies Act 2016, P. 46, <http://www.oireachtas.ie/documents/bills28/acts/2016/a1716.pdf>.

- We support NESC's recommendations for a simple regime for taxation of rental income, providing clear incentives for long-term investment in the provision of good quality rental homes with secure tenancies.
- Landlords with more than three properties should not be able to invoke Section 34 of the RTA in order to issue notice of termination to tenants.
- Any incentives for landlords must be met with increased conditionality in terms of security of tenure and rent certainty

#### **4.3 Tenant Services**

- Roll out the enhanced rent supplement payment service provided by the Tenancy Protection Service nationally to ensure those who need to access additional rent supplement payments can do so without unnecessary delay. There is a need to set and publish specific targets for the rollout of this service as a matter of priority.
- Implement the Deposit Protection Scheme, provided for in the 2015 amendments to the Residential Tenancies Act, immediately.
- To address the issue of unreasonable deposits being requested at the commencement of tenancies legislate for a statutory maximum of one month's deposit and one month's rent in advance to be paid at the commencement of a new tenancy.

#### **4.4 Supply**

- The commitment to develop a cost rental model needs urgent action and implementation.
- Develop an affordable rental model to provide housing for those who do not qualify for social housing and cannot afford to access housing in the private sector.
- We support the recommendation proposed by both NESC (2015) and the Nevin Institute (NERI 2017) to establish a new semi-state Irish affordable Homes Company with the necessary resources.
- To provide as many affordable housing units as possible, Approved Housing Bodies (AHBs) must be fully resourced and supported to engage with the cost-rental and affordable rental models. Consider tax incentives for cost rental and affordable providers and link to conditionality in terms of security of tenure. At a minimum, this should include mortgage interest relief, local property tax deductibility and access to current and future home renovation schemes.
- The 'Build to Rent' model is a positive inclusion in the *Rental Strategy*. The State should seek to acquire further social housing provision through developer contributions similar to Part V social housing contributions.

#### **4.5 Quality Standards**

- The introduction of new standards relating to the safety of private rental accommodation is welcome. Enforcement of these new standards by Local Authorities, as part of the new, shared service approach to inspection of private rented accommodation, is crucial. Further regulation is required to improve standards in relation to energy efficiency, minimum health standards and control of damp in private rental accommodation.
- The commitment to deliver a more efficient and effective shared service approach to inspections is welcome. Stakeholders in the rental sector, including those renting through the HAP scheme, must have the opportunity to influence new guidelines. There must be effective enforcement procedures to back up new inspection mechanisms; this will ensure rental accommodation returns to standard.
- Put in place mechanisms to protect tenants from any adverse consequences arising from inspection and enforcement procedures. Inspection of HAP tenancies should take place prior to the

commencement of the tenancy, to prevent households losing their tenancy due to substandard accommodation.

- Annual inspections should examine key indicators identified in the revised standards in a similar manner to the National Car Test (NCT)

## Pillar 5: Utilise Existing Housing

According to Census 2016, there are 183,321 vacant housing units in the State. Urgent and sustained action is required to address this dysfunctional level of vacancy in the Irish housing stock to unlock solutions to the current housing and homelessness crisis. This is the low hanging fruit and can quickly ensure the provision of homes for those who need them most. It is critical that any measures introduced in this regard are reasonable, targeted, and that relationships required for their implementation are managed sensitively allowing for the balancing of party's respective rights and needs where possible. A full examination of property vacancy in Ireland can be found in the recent Simon Communities in Ireland report '*Empty Homes: Unlocking Solutions to the Housing and Homelessness Crisis in Ireland*'.<sup>46</sup>

### Recommendations:

#### *Empty Homes Strategy*

- Fast track the implementation of the Empty Homes Strategy once published. It is disappointing that publication has been delayed.

#### *5.1.1 Data and Monitoring*

- Vacant Housing Register: The proposed vacant housing register must be accurately populated and classified based on housing type and readiness for reuse. Establish a real-time database with formal communication and data sharing structures between relevant bodies to ensure the effectiveness of the register in reducing vacancy in private and social housing stock.
- Maintain Local Authority Vacant Site, Derelict Site and Dangerous Structures registers and make centrally available in an accessible online format. Data must be transparent, verifiable, up-to-date, subject to regular inspection and monitoring.
- Development of a register of ownership of land and housing led by Local Authorities held centrally by DHPCLG or the Housing Agency.
- There are numerous reasons cited for vacancy including probate, property left through death of relatives, and investment. This area requires targeted research. We need to identify who the owners are, what the most common reasons for property vacancy are, and what the main barriers are to sale, lease or letting. The Housing Agency and the DHPCLG should undertake the required research making clear recommendations for urgent implementation in this regard.

#### *5.1.2 Taxation*

- Introduce a vacant property tax for homes empty for more than 12 months. Calculate the tax based on property value or potential rental income and increased the longer a property remains vacant. Redirect revenue raised through the vacant property tax to fund further vacancy reduction measures and social housing output.

#### *5.1.3 Planning and Regulatory Environment*

- The current planning and regulatory environment needs major overhaul. A simple change of use, for example from commercial to residential use, can involve three different approvals (planning, fire and disability access), and four statutory appointments, all on different timescales, submission requirements and fees (which may involve up to three different people).<sup>47</sup> Significant potential housing supply remains locked behind this considerable bureaucracy. Address the considerable

<sup>46</sup> Simon Communities in Ireland, '*Empty Homes: Unlocking Solutions to the Housing and Homelessness Crisis*', March 2017, <http://www.simon.ie/Portals/1/FINAL%20Empty%20Homes%20-%20Unlocking%20solutions%20to%20the%20housing%20and%20homeless%20crisis%2001022017.pdf>.

<sup>47</sup> Sirm et al Ibid

regulatory and planning burdens as a matter of urgency to include consideration of establishing a one-stop-shop.

#### **5.1.4 Vacant Property Incentive Schemes**

- The *Repair and Leasing* and *Buy and Renew* schemes should be reviewed with targets revised upwards and ensuring the schemes can attract the greatest number of homeowners possible.
- Increase the rent payable to property owners engaged with the *Repair and Leasing* scheme to 92-95% of market rent.
- Make additional resources must be made available to AHB's to assist with the identification of vacant properties and their respective owners. This dual identification process is both time and resource intensive.
- Where a vacant property owner chooses not to engage with the *Repair and Leasing* scheme, assess the viability of purchasing that property under the *Buy and Renew* scheme.

#### **5.1.5 Compulsory Leasing Orders:**

- Use Compulsory Leasing Orders to acquire any shortfall in vacant properties not delivered through the *Repair and Leasing* or *Buy and Renew* schemes.

#### **5.1.6 Compulsory Purchase Orders (CPO's)**

- Use CPO's to acquire any shortfall in vacant properties not purchased through the Housing Agency Housing Purchase Initiative or the *Buy and Renew* scheme. Specifically target vacant properties on Local Authorities' derelict sites registers in this regard.

#### **5.1.7 Skills and Capacity:**

- Provide the necessary resources, finance and personnel, at national and Local Authority level to make an impact quickly, given the massive potential vacant, derelict and underused sites present in addressing the current housing shortage. This involves data collection and research; planning, regulatory and technical expertise; public awareness and outreach campaigns to identify, negotiate and liaise with property owners.



## Conclusion

The Simon Communities welcomed *Rebuilding Ireland: Action Plan for Housing and Homelessness* as the most comprehensive housing plan for decades in this State, bringing together social housing, private housing, the Private Rented Sector and homelessness. However, it is now clear that more is required to arrest the increasing numbers of households entering homelessness and experiencing housing instability because of the malfunctioning housing system and underlying social inequality and poverty. The Simon Communities in Ireland welcome the opportunity to contribute to this timely review of *Rebuilding Ireland: Action Plan on Housing and Homelessness*.

It is clear we cannot keep offering people short-term solutions with little attention paid to their longer-term needs. Ultimately, we need to fundamentally rethink our approach to housing. The pace of building social and affordable housing must be accelerated to have a quick and meaningful impact on people lives. Limited access to housing and support services is both increasing the risk of homelessness and is preventing people from moving out of homelessness. More must be done to prevent homelessness occurring as all elements of our housing sector show signs of being broken. The hoarding of development land and derelict sites is the primary barrier to delivering new supply and affordable housing. Strategic investment is required to increase housing supply and access to affordable, safe and secure housing for all, particularly for those at risk of homelessness or those attempting to exit homelessness. A new cross-departmental National Homelessness Sub-Strategy, under the auspices of *Rebuilding Ireland*, is required with ring fenced funding for implementation. This sub-strategy would complement and build upon existing commitments contained in *Rebuilding Ireland* including prevention, nationwide implementation of Housing First and addressing multiple and complex needs.

The review of *Rebuilding Ireland* must critically provide an opportunity to reaffirm the State's long-term vision for the delivery of affordable housing across all tenure types within sustainable communities nationwide. The time to act is now; people experiencing homelessness and housing instability have been waiting far too long.

## About Simon Communities

The Simon Communities in Ireland are a network of eight regionally based independent Simon Communities based in Cork, Dublin, Dundalk, Galway, the Midlands, the Mid West, the North West and the South East that share common values and ethos in tackling all forms of homelessness throughout Ireland, supported by a National Office. The Simon Communities have been providing services in Ireland for over 40 years. The Simon Communities deliver support and service to over 8,300 individuals and families throughout Ireland who experience – or are at risk of – homelessness every year.

Whatever the issue, for as long as we are needed, Simon's door is always open. For more information, please visit [www.simon.ie](http://www.simon.ie)

### Services include:

- Housing provision, tenancy sustainment & settlement services, housing advice & information services helping people to make the move out of homelessness & working with households at risk;
- Specialist health & treatment services addressing some of the issues which may have contributed to homeless occurring or may be a consequence;
- Emergency accommodation & support providing people with a place of welcome, warmth & safety;
- Soup runs & rough sleeper teams who are often the first point of contact for people sleeping rough.

### For further information please contact:

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## Appendix One: Summary of Recommendations

### Pillar 1: Homelessness

#### **1.1 Overarching Recommendation:**

- *National Homeless Sub-Strategy:* A new cross-departmental National Homelessness Sub-Strategy under the auspices of *Rebuilding Ireland* is required with ring fenced funding for implementation. This sub-strategy would complement and build upon existing commitments contained in *Rebuilding Ireland* including prevention, nationwide implementation of Housing First and addressing multiple and complex needs. This strategy should acknowledge that people experiencing homelessness are not a homogenous group and that a broad spectrum of diversity exists regarding people's experiences of homelessness focusing on homelessness amongst single people; families; women; young people and drug/alcohol users.

#### **1.2 Current and Future Homelessness Prevention Measures Recommendations:**

- Expand the scope of funding under Section 10 of the Housing Act 1988 to support those who are at risk of homelessness to help sustain tenancies in addition to providing rapid re-housing so that a person's experience of homelessness ends as quickly as possible. This funding is currently restricted to assisting those who have experienced homelessness. This legislative change should be prioritised in conjunction with the development of the aforementioned sub-strategy.
- Make funding for information and advice services fully available to provide much needed advice to households to remain in their homes. As needed, allocate additional funding to maintain the *Abhaile* service beyond 2019 to assist current and future homeowners struggling to cope with mortgage arrears.
- Funding should be ring fenced to ensure the continued operation of the Tenancy Protection Service. This is particularly pertinent given the volatility in the private rented sector.
- Expand the Homeless HAP scheme nationally. This scheme currently supports 1,711 households who have moved out of emergency accommodation into stable tenancies as of July 2017.

#### **1.3 Emergency Accommodation:**

- Emergency Accommodation in the short term – ideally averaging no more than 7-10 days. Similarly, Family Hubs only be use in the short term with a three-month time limit. On entering emergency accommodation or a Family Hub, households must be immediately supported to source and maintain a tenancy in housing in the wider community.
- Put in place a five-year plan aimed at reducing the time spent in emergency accommodation to an average of 7-10 days per person. This should be part of the aforementioned sub-strategy.
- Report quarterly on the average length of stay per person/family in emergency accommodation and hubs subject to agreed reduction targets for the following year.
- Ensure funding for emergency hotel rooms and B&B's is additional to the homeless budget (Section 10 funding) and ring-fence so funding is not diverted from Housing First services and other homeless services that are already stretched to capacity.
- There is a need for ring-fenced funding for specialist voluntary services such as Homeless Action Teams to ensure appropriate visiting and on-site support is provided to those in private emergency accommodation, Family Hubs and longer term sustainable tenancies on exiting homelessness.

### **1.4 Housing First**

- Budget 2018 should provide additional resources to allow for the extension of Housing First targets nationally beyond the 300 tenancies committed to by the end of 2017.
- Adequate funding across relevant Government Departments required ensuring the expansion of Housing First with the necessary wraparound support. Critical departments include the Department of Health/HSE, Department of Social Protection and the Department of Finance.
- We encourage the DHPCLG to set and publish adequate tenancy targets with regard to the roll out of Housing First nationwide.

#### *1.4.1 Support in Housing:*

- Adequate funding must be allocated to support work with vulnerable households once they have moved into social housing e.g. Support to Live Independently (SLI) and intensive case management associated with Housing First Initiatives for people with complex needs being rehoused. This support ensures better outcomes for the tenant and increases the stability of the tenancy.

#### *1.4.2. Clinical Support:*

- Fund the Pillar 1 Step-up/Step-down and addiction treatment facilities committed by Minister Coveney and Minister Harris in September 2016. Ensure that the revenue and capital costs for the operation and development of this facility are in place in Budget 2018, as committed to in September 2016, (see appendices for more details).
- At a minimum, the funding shortfall outlined above must be made available through Budget 2018 bringing total spending to €8 million in line with the revised commitment contained in the *Rebuilding Ireland Third Quarterly Progress Report*.
- Ring-fenced funding must be put in place for the immediate and full implementation of the new National Drugs Strategy ‘*Reducing Harm, Supporting Recovery – a health led response to drug and alcohol use in Ireland 2017 – 2025*’.
- There must be full delivery of this commitment in Budget 2018 in addition to ring-fenced funding to implement *A Vision for Change* or its successor strategy.
- Increase funding for mental health services to 8.24% of the national health budget as recommended in *A Vision for Change*. This should include the dedicated ring-fencing of funding streams for the full implementation of the commitments contained in *A Vision for Change*.
- Develop ‘Specialist Adult Teams’ to manage the combination of complex and problematic drug and alcohol use and mental health issues as recommended in *A Vision for Change* and the ‘National Clinical Programme for the Assessment and Management of Patients Presenting to Emergency Departments following Self Harm’ and ensure interagency responses.
- The proposal in the *Implementation Plan on the State’s Response to Homelessness* to provide a dedicated Community Mental Health Nurse in each ISA10 area to support the needs of people who are homeless or at risk of homelessness needs to be actioned. This is supported in the *Report of the Committee on Housing and Homelessness* (2016).
- Prioritise trauma informed practices and counselling services including greater resourcing of social work, community and family services as a means of reducing the prevalence of problematic drug and/or alcohol use and earlier drug taking by those that have experienced adverse traumatic experiences in childhood.

<p><b>1.4.3 Community Integration:</b></p> <ul style="list-style-type: none"> <li>• The Social Protection System must ensure supports for people exiting homelessness include measures aimed at assisting them to access education, employment and training opportunities.</li> <li>• Existing <i>Back to Work</i> and <i>Education and Training Programmes</i> must work more effectively to include people who have experienced homelessness. Ring-fenced funding and make placements on these schemes available to ensure greater participation by people who have experienced homelessness. The Homeless Community Employment Schemes within the Community Services Programme are prime example of where this approach can be delivered given people experiencing homelessness are named as a programme target group.</li> <li>• Secure and quality employment must be available once study or training programmes are completed.</li> <li>• Any special CE schemes need to operate with greater flexibility than current special drugs projects with more achievable social inclusion goals.</li> </ul>
<p><b>1.5 Women and Homelessness</b></p> <ul style="list-style-type: none"> <li>• Women experiencing homelessness must be included as a named target group.</li> <li>• Put in place gender specific homeless services and strategies to meet women’s specific needs that will ultimately support them to access and maintain stable housing. Existing services modelled on the male experience may inadvertently lead to further marginalisation, trauma and distress.</li> <li>• There is a clear need to establish targeted services for women and trauma informed responses to deal with the complexity of need.</li> </ul>
<p><b>2.6 Young People</b></p> <ul style="list-style-type: none"> <li>• The development and expansion of housing models and options for young people – including housing first approaches requires urgent attention.</li> <li>• All housing programmes targeting young people must be subject to rigorous evaluation to ensure a systematic, evidence based understanding of which models are best suited to meeting the developmental, social, educational and residential needs of homeless young people.</li> </ul>
<p><b>1.7 Rapid Build Housing</b></p> <ul style="list-style-type: none"> <li>• Emergency budgetary measures must now be taken to ensure the delivery of Rapid Build Housing targets nationally within the agreed timescales</li> </ul>
<p><b>1.8 Mortgages in Distress</b></p> <ul style="list-style-type: none"> <li>• Continued investment in the recently amended Mortgage-to-Rent scheme is required to ensure its future viability.</li> <li>• Fully resource Approved Housing Bodies (AHB’s) to engage with the Mortgage-to-Rent scheme to increase national coverage to provide the services required under the scheme. In the interim period, put in place alternative options for those living in areas with little or no AHB coverage.</li> <li>• Make additional resources available to implement the commitments contained in the <i>Programme for Partnership Government</i> including a review of the thresholds and processes for Personal Insolvency Arrangements; the establishment of a dedicated mortgage arrears courts service; and the amendment of the Code of Conduct on Mortgage Arrears to include an obligation on mortgage providers to provide sustainable arrears solutions.</li> <li>• Greater use of Mortgage write-down must be encouraged amongst mortgage providers.</li> </ul>

<p><b>Pillar 2: Accelerate Social/Public Housing</b></p>
<p><b>2.2 Housing Supply</b></p> <ul style="list-style-type: none"> <li>• Triple direct capital expenditure funding to €1 billion per annum to enable the rapid building within 16 months of 5,000 additional social housing units by Local Authorities and AHB's with a longer- term commitment of building 10,000 units per annum.</li> <li>• There needs to be prioritisation of housing options, which can be delivered quickly including rapid builds and vacant/empty homes.</li> <li>• Local Authorities and AHB's must be resourced to build social housing stock to meet low and middle-income households' housing needs. In 2016, only 652 Local Authority built houses were delivered.</li> <li>• The Government must seek further flexibility from the European Commission on the application of the EU fiscal rules regarding the financing of social housing.</li> </ul>
<p><b>2.2 Rent Supplement/HAP limits</b></p> <ul style="list-style-type: none"> <li>• Increase budgetary allocation to allow for bi-annual monitoring and adjustment of RS/HAP limits to ensure alignment with rising private market rents.</li> <li>• Fully resource Community Welfare Officers and Local Authorities to make urgent discretionary uplift payments under RS and HAP schemes. This is particularly pertinent in Rent Pressure Zones (RPZ's) where tenants could face a 4% rent increase per annum over the next three years.</li> <li>• Single people and couples should be specifically targeted given the disproportionate negative impact inadequate RS/HAP limits are having on these households' ability to access affordable housing.</li> <li>• With the termination of a HAP tenancy, the onus should be on the Local Authority to find appropriate, alternative housing options as with RAS tenancies in the past. This should not be the responsibility of hard pressed, stressed households that may have varying financial and personal capacity to do so.</li> <li>• Review the policy approach that determines a household's social housing need met once in receipt of HAP. In the absence of sufficient security of tenure in the Private Rented Sector, this approach does not reflect the perilous reality of many HAP tenancies.</li> </ul>
<p><b>2.3 Support Approved Housing Bodies (AHB)/Voluntary Co-operations to access finance</b></p> <ul style="list-style-type: none"> <li>• Resource and protect the Capital Assistance Scheme (CAS) as a key mechanism for the delivery of social housing to special needs groups, particularly people who are homeless. This should be an open, annual rolling process, which would be available to AHB's as opportunities arise.</li> <li>• Increase the Housing Agency capital expenditure funding for the purchase of vacant housing portfolios for the delivery of social housing units by AHB's.</li> <li>• Support AHB's/Voluntary Co-Operatives to act quickly when opportunities arise. Explore mechanisms to improve access to finance, for example review and revision of the Capital Advanced Leasing Facility (CALF) to make it more financially viable.</li> <li>• There is an urgent need to explore new funding models and mixed funding models including private finance, State funding and AHB's/Voluntary Co-Operatives working in partnership. Explore proposals made by the Irish League of Credit Unions in light of upward lending limits they can make available for the provision of social and affordable housing.</li> </ul>

<p><b>Pillar 3: Build More Homes</b></p> <p><b>3.1 Vacant Sites</b></p> <ul style="list-style-type: none"> <li>Amend the vacant site levy and introduce immediately to reduce the number of exemptions available to owners of development land subject to a loan on the property in question. The levy should apply until occupation of the site and be implemented immediately.</li> </ul> <p><b>3.2 Compulsory acquisition of development land</b></p> <ul style="list-style-type: none"> <li>Local Authority vacant site registers should allow for targeted identification of sites for compulsory purchase.</li> <li>Revisit the recommendations of the <i>Kenny Report</i> (1973) and the <i>Ninth Progress Report of the All-Party Oireachtas Committee on the Constitution</i> (2004) to determine the level of compensation paid to land owners that are subject of Compulsory Purchase Orders.</li> </ul> <p><b>3.3 Local Infrastructure Housing Activation Fund</b></p> <ul style="list-style-type: none"> <li>Applications for financing under LIHAF must be conditional on the delivery of affordable housing at a set price point.</li> </ul>
<p><b>Pillar 4: Improve the Rental Sector</b></p> <p><b>4.1 Rent Certainty and Rent Predictability</b></p> <ul style="list-style-type: none"> <li>Full rent certainty is required. Consideration must be given to index linking rents to the Consumer Price Index (CPI). Further research is required to examine the viability of this rent certainty measure in addition to exploring alternative methods of rent certainty successfully employed in other jurisdictions.</li> <li>In the absence of full rent certainty, extend rent predictability nationwide as a matter of priority to reflect the national scale of the rental crisis. Ongoing monitoring based on local electoral area boundaries is essential to gauge the impact of the measure.</li> <li>Allowable rent increases in RPZ's should be restricted to the current 4% per annum. Under no circumstances should rent increases beyond 4% be allowed. This position must be central to the ongoing review of the Rent Predictability Measure.</li> <li>Active enforcement of the Rent Predictability measure by the RTB is required to ensure compliance within RPZ's. A public awareness campaign is required to provide clarity and to ensure landlords and tenants are aware of the implications and obligations attached to the Rent Predictability measure.</li> <li>A register of current sitting rents is now required to ensure active enforcement, compliance and to combat inflationary rent increases applied at the commencement of new tenancies.</li> </ul> <p><b>4.2 Security of Tenure</b></p> <ul style="list-style-type: none"> <li>Fast track the existing commitment to move towards indefinite leasing as a matter of urgency.</li> <li>The RTB should closely monitor terminations relying on Section 34 reasons to ensure landlords are acting in good faith and in compliance with the new standards contained in the Planning and Development (Housing) and Residential Tenancies Act 2016.</li> <li>Amend measures to prevent the simultaneous serving of termination notices on large numbers of residents in a single development to include cases of simultaneous termination of less than five tenancies.</li> <li>Tenants of Buy-to-Let (BTL) properties in receivership must have full protection. All landlord obligations should transfer to the receiver and subsequently to the new property owner.</li> <li>We support NESCC's recommendations for a simple regime for taxation of rental income, providing clear incentives for long-term investment in the provision of good quality rental homes with secure tenancies.</li> </ul>

- Landlords with more than three properties should not be able to invoke Section 34 of the RTA in order to issue notice of termination to tenants.
- Any incentives for landlords must be met with increased conditionality in terms of security of tenure and rent certainty.

#### **4.3 Tenant Services**

- Roll out the enhanced rent supplement payment service provided by the Tenancy Protection Service nationally to ensure those who need to access additional rent supplement payments can do so without unnecessary delay. There is a need to set and publish specific targets for the rollout of this service as a matter of priority.
- Implement the Deposit Protection Scheme, provided for in the 2015 amendments to the Residential Tenancies Act, immediately.
- To address the issue of unreasonable deposits being requested at the commencement of tenancies legislate for a statutory maximum of one month's deposit and one month's rent in advance to be paid at the commencement of a new tenancy.

#### **4.4 Supply**

- The commitment to develop a cost rental model needs urgent action and implementation.
- Develop an affordable rental model to provide housing for those who do not qualify for social housing and cannot afford to access housing in the private sector.
- We support the recommendation proposed by both NESC (2015) and the Nevin Institute (NERI 2017) to establish a new semi-state Irish affordable Homes Company with the necessary resources.
- To provide as many affordable housing units as possible, Approved Housing Bodies (AHBs) must be fully resourced and supported to engage with the cost-rental and affordable rental models. Consider tax incentives for cost rental and affordable providers and link to conditionality in terms of security of tenure. At a minimum, this should include mortgage interest relief, local property tax deductibility and access to current and future home renovation schemes.
- The 'Build to Rent' model is a positive inclusion in the *Rental Strategy*. The State should seek to acquire further social housing provision through developer contributions similar to Part V social housing contributions.

#### **4.5 Quality Standards**

- The introduction of new standards relating to the safety of private rental accommodation is welcome. Enforcement of these new standards by Local Authorities, as part of the new, shared service approach to inspection of private rented accommodation, is crucial. Further regulation is required to improve standards in relation to energy efficiency, minimum health standards and control of damp in private rental accommodation.
- The commitment to deliver a more efficient and effective shared service approach to inspections is welcome. Stakeholders in the rental sector, including those renting through the HAP scheme, must have the opportunity to influence new guidelines. There must be effective enforcement procedures to back up new inspection mechanisms; this will ensure rental accommodation returns to standard.
- Put in place mechanisms to protect tenants from any adverse consequences arising from inspection and enforcement procedures. Inspection of HAP tenancies should take place prior to the commencement of the tenancy, to prevent households losing their tenancy due to substandard accommodation.
- Annual inspections should examine key indicators identified in the revised standards in a similar manner to the National Car Test (NCT).



<p><b>Pillar 5: Utilise Existing Housing</b></p>
<p><b>5.1 Empty Homes Strategy</b></p> <ul style="list-style-type: none"> <li>Fast track the implementation of the Empty Homes Strategy once published. It is disappointing that publication has been delayed.</li> </ul>
<p><b>5.1.1 Data and Monitoring</b></p> <ul style="list-style-type: none"> <li>Vacant Housing Register: The proposed vacant housing register must be accurately populated and classified based on housing type and readiness for reuse. Establish a real-time database with formal communication and data sharing structures between relevant bodies to ensure the effectiveness of the register in reducing vacancy in private and social housing stock.</li> <li>Maintain Local Authority Vacant Site, Derelict Site and Dangerous Structures registers and make centrally available in an accessible online format. Data must be transparent, verifiable, up-to-date, subject to regular inspection and monitoring.</li> <li>Development of a register of ownership of land and housing led by Local Authorities held centrally by DHPCLG or the Housing Agency.</li> <li>There are numerous reasons cited for vacancy including probate, property left through death of relatives, and investment. This area requires targeted research. We need to identify who the owners are, what the most common reasons for property vacancy are, and what the main barriers are to sale, lease or letting. The Housing Agency and the DHPCLG should undertake the required research making clear recommendations for urgent implementation in this regard.</li> </ul>
<p><b>5.1.2 Taxation</b></p> <ul style="list-style-type: none"> <li>Introduce a vacant property tax for homes empty for more than 12 months. Calculate the tax based on property value or potential rental income and increased the longer a property remains vacant. Redirect revenue raised through the vacant property tax to fund further vacancy reduction measures and social housing output.</li> </ul>
<p><b>5.1.3 Planning and Regulatory Environment</b></p> <ul style="list-style-type: none"> <li>The current planning and regulatory environment needs major overhaul. A simple change of use, for example from commercial to residential use, can involve three different approvals (planning, fire and disability access), and four statutory appointments, all on different timescales, submission requirements and fees (which may involve up to three different people). Significant potential housing supply remains locked behind this considerable bureaucracy. Address the considerable regulatory and planning burdens as a matter of urgency to include consideration of establishing a one-stop-shop.</li> </ul>
<p><b>5.1.4 Vacant Property Incentive Schemes</b></p> <ul style="list-style-type: none"> <li>The <i>Repair and Leasing</i> and <i>Buy and Renew</i> schemes should be reviewed with targets revised upwards and ensuring the schemes can attract the greatest number of homeowners possible.</li> <li>Increase the rent payable to property owners engaged with the <i>Repair and Leasing</i> scheme to 92-95% of market rent.</li> <li>Make additional resources must be made available to AHB's to assist with the identification of vacant properties and their respective owners. This dual identification process is both time and resource intensive.</li> <li>Where a vacant property owner chooses not to engage with the <i>Repair and Leasing</i> scheme, assess the viability of purchasing that property under the <i>Buy and Renew</i> scheme.</li> </ul>
<p><b>5.1.5 Compulsory Leasing Orders:</b></p> <ul style="list-style-type: none"> <li>Use Compulsory Leasing Orders to acquire any shortfall in vacant properties not delivered through the <i>Repair and Leasing</i> or <i>Buy and Renew</i> schemes.</li> </ul>

**5.1.6 Compulsory Purchase Orders (CPO's)**

- Use CPO's to acquire any shortfall in vacant properties not purchased through the Housing Agency Housing Purchase Initiative or the *Buy and Renew* scheme. Specifically target vacant properties on local Authorities' derelict sites registers in this regard.

**5.1.7 Skills and Capacity:**

- Provide the necessary resources, finance and personnel, at national and Local Authority level to make an impact quickly, given the massive potential vacant, derelict and underused sites present in addressing the current housing shortage. This involves data collection and research; planning, regulatory and technical expertise; public awareness and outreach campaigns to identify, negotiate and liaise with property owners.

## Appendix Two: Pillar 1 Step-up/Step-down and addiction treatment facilities

### 1. Fund the Pillar 1 Step-up/Step-down and addiction treatment facilities committed by Minister Coveney and Minister Harris in September 2016

At the press briefing on Pillar 1 on 22<sup>nd</sup> September 2016, Minister Harris said that the government had “committed funding for an intermediate health-care step-down facility and the development of an addiction treatment unit by Dublin Simon at Usher’s Island in Dublin 8”. Dublin Simon Community has since received planning permission for the planned 100-bed medical residential treatment facility. It is essential that the funding to fulfil this commitment forms part of Budget 2018 to enable this critical project to mobilise in 2018 and to prepare to accommodate 100 vulnerable people.

1. This 100 bed low threshold addiction treatment facility at Ushers Island Dublin 8 ( Dublin Simon Community) development will consist of:
  - Alcohol and Benzodiazepine Addiction Detoxification Unit for people who are homeless.
  - A pioneering Rapid Access Alcohol and Drug Detoxification/Stabilisation service in partnership with Merchants Quay Ireland in Dublin for people who are homeless, chaotic and require a treatment option with no threshold.
  - Expansion of the remit of the HIV Stabilisation/Respite service to include all blood borne viruses in particular Hepatitis C.
  - Expansion of the Residential Addiction Recovery service and beds for people who are homeless.
  - Intermediate Care Step up/Step down Facility for hospital admission and discharge post-surgery and major treatment in partnership with GP’s for people experiencing homelessness.

The above services will be complemented by:

- Counselling services for homeless individuals engaging in addiction treatment.
- Low threshold residential addiction rehabilitation/recovery services for people who are experiencing homelessness.
- Aftercare services for those recovering from problematic drug or alcohol use.
- Addiction specific In-reach Homeless Action Teams involving Dublin Simon Community, the DRHE and the HSE.

### 2. Ensure that the revenue and capital costs for the operation and development of Ushers Island are in place in Budget 2018 as committed to in September 2016

Dublin Simon Community provides residential alcohol Detoxification, Recovery and Aftercare services for people who are homeless or at risk of becoming homeless. We also provide a Stabilisation/Respite Unit and a Counselling service. Collectively, our Treatment Service has been accessed by 527 people in the 18 months to June 2017. A further 507 people accessed our Counselling service in the same period.

Rebuilding Ireland committed to “...a particular emphasis on significant projects providing drug and alcohol detoxification programmes and enduring services supporting long-term recovery”. In this regard, government now needs to ensure that the €20m capital and €1.9m per annum revenue costs to develop and operate

Usher's Island are in place via the Budget 2018 process and thereby fulfil Rebuilding Ireland action item 1.15, "*We will improve mental health and primary care services for homeless person using the existing allocation of €2m, and we will increase the allocation of €6m in Budget 2017*", and action item 1.16, "*We will address the rehabilitation needs of homeless people with addition issues, through the new National Drugs Strategy*".

This will also fulfil the National Drugs Strategy 2017 – 2025, strategic action 2.1.16 "*Expand the availability and geographical spread of relevant quality drug and alcohol services and improve the range of services available, based on identified need.*

*a) Identifying and addressing gaps in provision within Tier 1, 2, 3 and 4 services*

*b) Increasing the number of treatment episodes provided across the range of services available, including:*

- *Low Threshold;*
- *Stabilisation;*
- *Detoxification;*
- *Rehabilitation;*
- *Step-down*
- *After-Care*

*c) Strengthening the capacity of services to address complex needs*".

### **Appendix Three: Housing and homelessness crisis in numbers**

- During one week in June 2017 (latest available figures), there were 7,941 men, women and children in emergency accommodation across the country. This included 3,206 adults with no dependents in their care and 1,365 families with 2,895 children (DHPCLG, June 2017).
- On the night of 4<sup>th</sup> April 2017, there were 161 people without a place to sleep in Dublin City. Unfortunately, Dublin is the only area where an official rough sleeper count takes place, making it difficult to get a countrywide rough sleeping picture (DRHE 2017).
- Homelessness and housing insecurity are more acute and visible in our cities but the Simon Communities are working at capacity countrywide – in urban and rural areas.
- There are 91,600 households on the social housing waiting list. Two-thirds of households on the list were living in the private rented sector and one fifth living with parents, relatives or friends. 5,159 households (5.6%) had at least one member considered homeless, a proportion that has doubled since 2013 (Housing Agency, 2016).
- Social housing commitments will take time to begin to deliver housing. This is far too long for the people we work with and those at risk of homelessness. In 2016, just 665 new social housing units were built.
- Average national rent now stands at €1,131, representing an increase of 52% since 2012. Property availability in the private rented sector has dropped by 82% since 2012 with fewer than 3,100 properties available to rent nationwide on May 1<sup>st</sup> 2017 (Daft.ie Rental Report Q1, 2017).
- *Locked Out of the Market VII* (May 2017 Simon Communities) found that 88% of rental properties are beyond the reach for those in receipt of state housing support.
- Over 76,000 principle dwelling mortgage accounts are in arrears. 43% of all mortgage arrears are in arrears of over 720 days (Central Bank of Ireland, May 2017).
- At the end of March 2017, 20,009, or 16%, of buy-to-let mortgages were in arrears of more than 90 days (Central Bank of Ireland, May 2017).
- 750,000 people are living in poverty in Ireland (*Poverty, Deprivation and Inequality* (July 2016) Social Justice Ireland Policy Briefing).
- Since 2007 the deprivation rate, which looks at the number of people forced to go without at least 2 of 11 basic necessities examined, in Ireland has doubled - 29% of the population or 1.3 million people are experiencing deprivation (Social Justice Ireland *ibid*).
- According to Census 2016, there are 183,312 vacant houses nationwide.

## Appendix Four: Homelessness, Health and Complex Needs

**Physical health:** The lack of a stable home can cause poor physical health. People who are homeless are more at risk of developing an illness than the general population.

A recent study on the health of homeless people by the Partnership for Health Equity '*Homelessness: An Unhealthy State*' found that 67.8% of participants in the study had a chronic physical health diagnosis, such as diabetes, high blood pressure, arthritis, heart disease, epilepsy, tuberculosis, and chronic respiratory & stomach problems.<sup>48</sup>

Blood borne viruses such as hepatitis and HIV are also high among people who are homeless and they are more at risk of contracting one of these diseases. A recent study by the Royal College of Surgeons in Ireland and Doctor Austin O'Carroll of Safetynet Dublin, '*Health and use of health services of people who are homeless and at risk of homelessness who receive primary healthcare in Dublin*' further supports these findings.<sup>49</sup>

**Mental health:** Mental health issues can be a reason for people becoming homeless in the first place while the experience of being homeless can affect a person's mental health, deteriorating the longer a person remains homeless.

'*Homelessness: An Unhealthy State*' reports 58% of participants had at least one mental health condition. Of a sample size of 596 participants,

- 52% of respondents were diagnosed with depression with 44% being treated for their depression.
- 39% of respondents were diagnosed with anxiety with 32% receiving treatment.
- 13.4% of participants had self-harmed in the past 6 months while 24.7% had self-harmed prior to the past six months.
- 29% of respondents had attempted suicide in the past six months while 28% had attempted suicide prior to the past six months. In acknowledgement of this, the National Office for Suicide Prevention 2020 strategy highlights people who are homeless as a priority group.

**Problematic drug and alcohol use:** Problematic drug and/or alcohol use can put people at an increased risk of homelessness, and can also be caused and/or exacerbated by traumatic experiences, including homelessness.

The *Homelessness: An Unhealthy State* report found there was a rise among participants in problematic drug and alcohol use in particular, as well as a dramatic rise in dangerous drinking among women who were homeless, a rise in illicit use of benzodiazepines, while poly-drug use among participants became the norm with a high use of prescribed sedatives. Cannabis was the drug most commonly used among current drug users followed by illicit use of benzodiazepines and heroin.

Some of the Simon Communities have seen an increase in the use of opiate drugs, prescription drugs (in particular, benzodiazepines) and synthetic benzodiazepines drugs. A Simon Communities Snapshot Study Report found that over 50% of respondents reported that they were current alcohol users, while 31% reported that they were current drug users.<sup>50</sup>

That health snapshot study found that alcohol use was highest among respondents living in high-support housing and emergency accommodation. The snapshot study also found the highest level of drug use was among people sleeping rough and those using emergency accommodation.

<sup>48</sup> O'Reilly, F., Barror, S., Hannigan, A., Scriver, S., Ruane, L., MacFarlane, A. and O'Carroll, A. (2015) Homelessness: An Unhealthy State. Health status, risk behaviours and service utilisation among homeless people in two Irish cities. Dublin: The Partnership for Health Equity. <http://www.healthequity.ie/#!report-launch/iuv63>

<sup>49</sup> <http://epubs.rcsi.ie/cgi/viewcontent.cgi?article=1079&context=gpart>

<sup>50</sup> Simon Communities in Ireland & Kathy Walsh, '*Simon Snapshot Report 2011*', P.28, <http://www.simon.ie/Portals/1/Simon's%20National%20Health%20Snapshot%20Study%20Report%202011.pdf>.

**Dual diagnosis and complex needs:** A person who is homeless may have multiple needs or complex needs<sup>51</sup>, such as problematic drug and/or alcohol use, mental health difficulties, physical health difficulties, personality or behavioural disorder, challenging behaviour and vulnerability. This makes it very difficult for people to be in contact with all the various services they may need at one time. If one issue were to be resolved, other issues would still be cause for concern (Homeless Link, 2002)<sup>52</sup>.

The *Homelessness: An Unhealthy State* report found that 47% of participants had a mental health diagnosis and a self-diagnosed drug and/or alcohol problem. Thirty-five percent of participants had a mental health diagnosis and current illicit drug use. People with dual diagnosis can find it very difficult to access services. They often fall between two stools with mental health services suggesting they deal with their drug issue first and vice versa. International best practice argues that the two issues be treated at the same time and in a co-ordinated way.

**Barriers to accessing healthcare for people experiencing homelessness:** People who are homeless and those that provide services for people who are homeless have reported many challenges that they face when trying to access services. Cutbacks in health and HSE budgets since the onset of the financial crisis have had a detrimental impact on access to services. Many people who are homeless only access health services when they are in crisis or when illness is well developed and severe, a point at which they access health care through emergency

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<sup>51</sup> A person with 'complex needs' is someone with two or more needs affecting their physical, mental, social or financial wellbeing (Turning Point, 2014) [http://www.turning-point.co.uk/media/636823/appg\\_factsheet\\_1\\_-\\_june\\_2014.pdf](http://www.turning-point.co.uk/media/636823/appg_factsheet_1_-_june_2014.pdf)

<sup>52</sup> As cited in Feansta Health Working Group paper (2013) '*Health and Well-Being for All Holistic Health Services for People who are Homeless*'.