



Simon Communities of Ireland

Submission to the Housing Commission's consideration of long-term housing policy post 2030

The following responses were submitted to an online questionnaire hosted by the Housing Commission by the Simon Communities of Ireland.

In your opinion, what can the Government do to improve the supply of housing as to better meet the needs of first-time buyers, existing owner-occupiers and renters?

- **Revise housing targets and increase according to demand:** We have a huge deficit of housing to meet the demand of people living in Ireland. The State is making some progress providing housing; 2022 saw 29,851 units completed; 21% above 2022 Housing for All targets, and 45% above 2021's figure. However, these targets are not in line with current demand. Revised targets from the Government reflecting the actual demand will influence the allocation of finances, resources, and ambition in regulating our housing supply.
- **Enact a Constitutional Right to Housing:** The Constitution is a statement of fundamental values that the people of Ireland believe in. It shapes all Government policy and legislation. Housing is not reflected in these values. This gap has contributed to the ongoing homeless and housing crisis. The inclusion of a Right to Housing in our Constitution will place an onus on current and all future Governments to develop and implement policy and practice, which will meet the right to adequate housing for all, and safeguard against future housing crises from occurring.
- **Rapid-build modular housing:** The development and roll out of innovative building solutions have an important role to play in meeting the housing crisis. An important example of this is modular built housing. It requires less labour, produces housing units faster than traditional methods and can be 10-20% cheaper.
(<https://www.sciencedirect.com/science/article/abs/pii/S2210670721003760>)The carbon footprint of these houses is smaller than traditional houses due to less waste and higher energy efficiency (<https://www.sciencedirect.com/science/article/pii/S0959652622009209>).

In your opinion, what measures/interventions are needed to improve the affordability of private rental accommodation?

- **Increase supply of affordable homes:** Demand in the housing market is driving up rents. There are just 1,200 properties available to rent on Daft.ie across Ireland. There is a growing exodus of small landlords and an expanding need for rental accommodation. From this vantage point, increasing supply through market interventions is unlikely to have any cost mitigation impacts. While it may serve to stabilise rents it is unlikely to insert affordability into the system. State intervention that sees an expansion of public housing beyond the

traditional social housing model and more in line with countries like Austria will be more effective.

- **Increase Standard HAP rates:** The Simon Community's quarterly *Locked Out of the Market* Report shows a documented decrease in the number of properties available through the social housing support. Current HAP rates are not in line with prices in the rental market resulting in households on HAP paying unsustainable Top-ups on their rent directly to their landlord. This leaves them at risk of losing their tenancy. The Government introduced measures to support those who fall into arrears on their HAP payment, but more is needed to prevent this in the first place. Standard HAP rates need to be brought in line with current rental market rates. There is a need for rent reviews and maintenance for those currently in HAP tenancies in line with the legal entitlement of landlords to increase rents.
- **Rent Caps:** The Daft.ie rental report shows that the average national monthly rent now sits at €1,733; a 13.7% year-on-year increase. ESRI research shows that areas classified as RPZs have experienced slower rental price growth than non RPZ areas which means they are working to stabilise rents. The State should look at possibly expanding RPZs to additional areas of the country not protected by rent stabilisation.

In your opinion, what is required to address the costs of construction of housing in order to improve the affordability of housing in the longer term?

- Increase capacity in the construction sector to deliver on innovate building techniques. One possible answer may be an innovation fund that will support indigenous innovation in sustainable building techniques, ensuring a funding line and pre-orders that will support investment in the development of capacity in these important building techniques: such as Modular.

In your opinion, what changes to building standards and regulations, if any, are required to address the quality of housing?

- **Increased Discretion needed:** Given the extent of the crisis we are in, every avenue for housing needs to be examined. While we do not want to compromise standards needed for adequate and safe housing, there are certain situations that need can be addressed to provide additional homes quickly to the market such as the reported 75 'ghost estates' unfinished from the Celtic Tiger. <https://www.rte.ie/news/2023/0125/1351805-ghost-estates-celtic-tiger/>
- **Increase Supply of Social Housing from Local Authorities:** There is an overreliance on the private sector to provide social homes through HAP, turnkey purchases and the Part V rule. (at the end of Q3 2022, Turnkeys represented 54% (1,452) and Part Vs represented 18% (294) of all social housing new-builds <https://www.oireachtas.ie/en/debates/question/2023-01-18/526/>). While these are valuable ways of providing social housing, an overreliance on the private sector is not sustainable. Blockages to Local Authorities providing new-builds directly needs to be examined and revised to ensure social homes can be successfully delivered.
- **Energy and Climate Crisis Considerations:** the cost of living is deeply affected by rising prices for heating and maintaining a warm and healthy home. According to the CSO's latest CPI report, in the last year the cost of electricity increased by 62.7%, gas by 86.1%, liquid fuels (home heating oil) increased by 17.3%, and solid fuels by 46.1%. <https://www.cso.ie/en/releasesandpublications/ep/p-cpi/consumerpriceindexfebruary2023/> These drastic increases can increase a household's risk of fuel poverty. Increased energy efficiency of new build homes and affordable

retrofitting solutions for older homes will reduce these costs and help low- middle-income households maintain stable tenancies.

In your opinion, what actions can be taken to increase capacity in the construction sector to better meet the increasing demand for housing?

- **Reallocations to residential construction:** Looking at figures from the recently published ESRI paper *Increasing future housing supply: What are the implications for the Irish economy?* suggests that a reallocation of resources from the commercial section of the construction sector to the residential section could help alleviate some of the potential labour constraints. Increasing and targeting investment in the construction sector towards residential building can help quickly increase capacity. The ESRI also suggests the addition of certain construction skills to the Critical Skills Employment Permit (CSEP) list. This policy has been successful in attracting ICT, health and engineering professionals and has potential to quickly increase capacity in the construction sector.
https://www.esri.ie/system/files/publications/QEC2022WIN_SA_Egan.pdf

In your opinion, what measures / interventions are needed for the development of rural housing, including one-off housing (a house built outside of a town / village that is not part of a group of houses / estate), in an environmentally and socially sustainable manner?

- **Consideration for the role of one-off housing:** according to the CSO, one-off housing accounted for 40% of houses granted planning permission in 2022 and 21% of all dwelling units granted planning permission (including apartments).
<https://www.cso.ie/en/releasesandpublications/ep/pp/planningpermissionsquarter4andyear2022/keyfindings/#:~:text=The%20total%20number%20of%20dwelling,made%20up%20the%20remaining%2049%25> In terms of delivery, one-off houses accounted for 19% of all homes – including apartments – delivered in 2022.
<https://www.cso.ie/en/releasesandpublications/ep/p-ndc/newdwellingcompletionsq42022/#:~:text=There%20were%2015%2C163%20scheme%20dwelling,and%2018.5%25%20were%20single%20dwellings>. One-off houses can have environmental concerns in terms of construction, but a high supply of one-off housing could be an indicator that the State and private developers are not providing sustainable housing in rural areas Ireland. While the future of one-off houses needs to be considered, the State needs to provide a sustainable long-term housing plan in Ireland’s rural areas in line with population change and need. That means providing housing suitable for an ageing population, housing developed through a universal lens, and housing suitable for families looking to live in rural Ireland. It is likely that this will be addressed in the upcoming updated Rural Housing Planning Guidelines is due to be published by the Department shortly as committed to in Housing for All: <https://www.oireachtas.ie/en/debates/question/2023-01-18/533/>

In your opinion, what measures, if any, are needed in order to regulate local authority provided social housing in Ireland?

- The Residential Tenancies Board is charged with overseeing the Private rental market and the Approved Housing Bodies tenancies. In time, it should have a similar role for Local Authority Rentals to ensure a party of esteem for all tenants. This needs to be developed in conjunction with the RTB

What do you believe is the optimum role of Approved Housing Bodies (AHBs), including their role regarding the housing needs of vulnerable groups? AHBs are independent, not-for-profit organisations that provide affordable rented housing for people who cannot afford to pay private sector rents or buy their own homes (examples of AHBs include Clúid, Respond and Threshold).

- There is more than one role for AHB's. In the European context, social housing is understood to be AHB housing. In the Irish context, the opportunities to see cost rental housing (for all the challenges of ensuring that this is supplied to households with affordable rents) to insert affordability into the housing system. There is also an important role to be played by specialist AHB's. As an example securing accommodation after experiencing homelessness for a long period of time may require specialised wraparound support. This may similarly be the case for some young people leaving the care system or those with enduring mental health challenges. An AHB with specialist experience in the relevant area of support could provide the most secure sustainable home in these instances.