



# Simon Communities of Ireland Submission to the Department of Housing, Local Government and Heritage Statement of Strategy 2023 – 2025

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## Introduction

The Simon Communities of Ireland welcome the opportunity to make a submission to the Department of Housing, Local Government, and Heritage Statement of Strategy 2023 – 2025. Strategy Statements are important guiding documents. It is important in the context of the current and deepening crisis in housing and homelessness that the Department is taking the time to do a mid-term review of its current 2021 – 2025 Strategy Statement. A lot has changed since the statement was published and it is important that this is reflected within this framework for the department’s work.

Ireland has emerged from a global pandemic with a strong economy but a worsening housing and homelessness crisis. We have record levels of homelessness, we are unable to provide accommodation for hundreds of people seeking international protection, and there is an increased housing insecurity for people at all levels of society. Emergency homeless accommodation run by the Simon Communities’ across Ireland is at capacity. Services are also seeing people in full-time employment forced into homelessness due to the chronic shortage of affordable housing.

The Simon Communities of Ireland have over 50 years’ experience of providing homeless, housing and support services to people facing the trauma and stress of homelessness. The Department of Housing has a central role to play in reducing and eradicating homelessness in Ireland. This submission will provide suggestions and recommendations for the Department’s Statement of Strategy through the lens of providing long-term, sustainable policies and practices that can see progress towards ending homelessness.

## Recommendations under ‘Mission, Values and Goals’

**End Homelessness by 2030:** The revision of the Department’s Strategy is an opportunity to reaffirm its commitment and determination to end homelessness. In June 2021, Ireland along with all the other EU member states signed a declaration that committed them to working to end homelessness by 2030.

In June 2021, there were 8,014 men, women and children in emergency homeless accommodation. Since then, homelessness has increased by 46.5% (3,728 people) and we now have 11,742 in homelessness<sup>1</sup>; an unthinkable increase in such a short period of time. The Lisbon Declaration adopted by Ireland acknowledges that homelessness is one of the most extreme forms of social exclusion, negatively affecting people’s physical and mental health, wellbeing, and quality of life, as well as their access to employment and access to other economic and social services. We have seen the Government proactively react to crises with co-ordination and success through its response to the Covid-19 pandemic. It is possible for the Government to achieve its goal of ending homelessness by 2030, but it will require a crisis response.

To reaffirm the Department’s role and commitment to end homelessness by 2030, the Simon Communities of Ireland recommend that this strategy make the following addition to ‘Our Goals’:

- To provide a framework to work towards ending homelessness by 2030 through the sustainable reduction of homelessness that involves implementing sustainable homeless prevention strategies, structured collaboration between Departments and agencies, and by ensuring access to adequate, safe and affordable housing for all.

## Recommendations under ‘Strategic Goal A’

Strategic Goal A aims to provide a framework that ensures a sustainable housing system in Ireland with a supply of good quality housing to match needs. Below are recommendations from the Simon Communities of Ireland for consideration under this Strategic Goal to tackle the ongoing housing and homelessness crisis.

**Recognise and incorporate new measures:** Following the lifting of the eviction ban, a number of measures were quickly put in place to deal with the high number of people in homelessness and the potential increase in the number of households at risk of homelessness as thousands of renters in the private market are at risk of losing their tenancy in the coming weeks and months. These measures are designed to prevent homelessness, and to increase supply of social homes. In consideration of the updated strategy – as well as looking to long-term sustainable solutions such as increasing new build social housing – there also needs to be a clearly articulated commitment to the development of short- to medium-term emergency measures to deal with the immediacy of the crisis at hand.

- **Recommendation:** Outline and provide for short- to medium-term actions that will be prioritised by the Department to mitigate against the immediacy of the housing and homelessness crisis.

**Support the Delivery of New-Build Social Homes:** The current Statement of Strategy under Objective Two of Strategic Goal A committed to ‘support the delivery of 50,000 social homes with an emphasis on new builds. In the two years since the publication of the original Strategy, 19,432 social

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<sup>1</sup> Available at: <https://www.gov.ie/en/collection/80ea8-homelessness-data/>

homes were delivered as new-builds or through acquisition and leasing; 5,138 below the 24,570 target.<sup>2</sup>

The meeting and surpassing of targets – particularly through the delivery of new-build homes through the Local Authority – needs to be prioritised in the upcoming strategy. There is an overreliance on the private sector to provide new-build social homes through 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.<sup>3</sup> While these are valuable ways of providing social housing, an overreliance on the private sector is not sustainable.

- **Recommendation:** Examine and remove blockages that restrict Local Authorities delivering new-builds.
- **Recommendation:** Revise and increase social housing new build targets based on meeting ongoing demand and taking account of anticipated and population growth.

**HAP and RS rates:** The Programme for Government commits to “ensure that Rent Supplement and Housing Assistance Payment (HAP) levels are adequate to support vulnerable households, while we increase the supply of social housing”.<sup>4</sup> We welcome the reiteration of this action under Objective 4 of the current strategy and we believe that it is important that this is restated and actioned under the new strategy.

The Simon Communities of Ireland produce a quarterly *Locked Out of the Market* report that provides a regular snapshot of the availability of rental homes within standard and discretionary HAP limits. The report has documented a sustained decrease in the number of properties available within HAP limits with just 29 identified in the latest publication.<sup>5</sup> It is to be noted that none of these properties were available within a standard HAP limit.

It is important to acknowledge that there have been some welcome changes to the discretion and administration of HAP in recent months. Housing Circular 29.2022 informed local authorities of changes in the discretionary flexibility available in respect of the HAP rent limit:

- An increase in the HAP discretion rate from the current 20% to a maximum of 35% for all local authority areas to apply to both new and existing tenancies
- Additional flexibility allowing local authorities to apply a couple rate to a single person household, where required, in recognition of the shared one-bed need to apply to new tenancies only

More recently, measures were introduced to support households who fall into arrears on their HAP payment. However, more is needed to make HAP a viable option for low-income households given the current undersupply of social housing. 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. 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.

<sup>2</sup> Available at: <https://www.gov.ie/en/collection/6060e-overall-social-housing-provision/>

<sup>3</sup> <https://www.oireachtas.ie/en/debates/question/2023-01-18/526/>

<sup>4</sup> *Our Shared Future*, Available at: <https://www.gov.ie/pdf/?file=https://assets.gov.ie/130911/fe93e24e-dfe0-40ff-9934-def2b44b7b52.pdf#page=null>

<sup>5</sup> *Locked Out Executive Summary*, Available at: <https://www.simon.ie/e-publication/locked-out-executive-summary-march-2023/>

- **Recommendation:** bring standard HAP rates in line with current rental market rates. Conduct rent reviews and ensure maintenance of support for those currently in HAP tenancies in line with the legal entitlement of landlords to increase rents.

**Rental Market Reforms:** recent upheaval in the rental market is a particular concern for the Simon Communities. The eviction ban was introduced in October 2022 to alleviate pressure on homeless services operating at maximum capacity. Figures from the Department of Housing, Local Government and Heritage and Local authorities showed that the moratorium was working as we saw a reduction in the number of household entering homelessness and a stabilization in homeless figures.

While the eviction ban has been lifted, the pressures in the private rental market that were driving homelessness continue. The latest Daft.ie rental report<sup>6</sup> shows that the average national monthly asking rents are now €1,733; a 13.7% year-on-year increase. Figures from the RTB show that 9,070 NoTs were issued in the second half of 2022; 7,348 of these households face eviction over the next 3 months and 75.15% of these properties will cease to support the rental market as the landlord plans to either sell-up or take the property back into use for themselves or their family.<sup>7</sup>

ESRI research<sup>8</sup> 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 revitalization of this Strategy is an opportunity to refocus on the stabilisation of the private rental market. The Simon Communities of Ireland suggest that the Department insert within Action 4 of Strategic Goal A the need to facilitate sufficient availability and affordability within the rental sector through planning and stabilisation measures that benefit both tenant and landlord.

- **Recommendation:** Within Strategic Goal A, Action 2, insert the need to support the development of long-term policy that will create a secure, sustainable, and affordable private rental market

**Enact a Right to Housing:** In 2020, through the Programme for Government, a commitment was made to hold a referendum on housing during the lifetime of this Government. The Housing Commission, following input from a public consultation, were tasked with proposing a wording for a referendum that would insert the right to housing into the Irish Constitution. This wording was due to be presented to the Minister in January of this year, but has been delayed. 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. The upcoming strategy is an opportunity to re-affirm this commitment and place the delivery of adequate housing at the top of the Department's agenda.

- **Recommendation:** Reaffirm commitment to hold a referendum on the Right to Housing in the lifetime of this Government

<sup>6</sup> Daft.ie Rental Report, Q4 2022, Available at: <https://ww1.daft.ie/report/ronan-lyons-2022q4-daftrentalprice>

<sup>7</sup> RTB, *Notices of Termination (NoTs) received by the RTB, Q3 2022 - Q4 2022*, Available at: <https://www.rtb.ie/data-hub/notices-of-termination-received-by-the-rtb-from-q3-2022>

<sup>8</sup> ESRI, *Rental inflation and stabilisation policies: international evidence and the Irish experience*, Available at: <https://www.esri.ie/publications/rental-inflation-and-stabilisation-policies-international-evidence-and-the-irish>

## Recommendations under ‘Supporting the Delivery of Our Goals’

**Commit to a Whole-of-Government approach to homelessness as a high-level strategy:** The Department of Housing, Local Government and Heritage are mandated to support the sustainable and efficient delivery of well-planned homes, effective local government and vibrant inclusive communities. While a supply of secure affordable homes is central to tackling homelessness, it is not the only element. Homelessness does not exist in isolation. It is a complex, diverse experience that cannot be fully supported by one Department or agency alone. This is a barrier faced by the Simon Communities in Ireland in enacting a person-centred, trauma informed approach to care and support. Input is often needed from several Departments to ensure well-rounded support is provided to people in need. While this work has begun through the development of NHAC, clear structures and pathways need to be put in place to tackle homelessness across a number of Departments and agencies.

Implementing a whole-of-government approach in line with the Department’s approach to tackling Climate change, Covid 19 and poverty. The Simon Communities of Ireland recommends that the upcoming strategy commit to implementing the same ambition for a whole-of-government approach to tackling homelessness and increasing inter-departmental communication and planning with the view to tackle and prevent complex issues such as homelessness.

- **Recommendation:** Increase inter-departmental and inter-agency work with the goal of reducing homelessness and increasing housing delivery.

## Recommendations under ‘Challenges, Risks and Opportunities’

**Housing and homelessness crisis:** the worsening housing and homelessness crisis needs to be recognized and listed within challenges, risks and opportunities. The accelerating housing and homelessness crisis has been a focal point of 2022 and is likely to continue through 2023 and beyond. This major societal challenge needs to be recognised and acknowledged as a key challenge within the upcoming strategy statement. The Simon Communities across Ireland are particularly concerned that this will see homelessness and ‘hidden’ homelessness grow in the coming weeks and months even beyond the current shocking levels.

**Rising Inflation:** Increasing costs of living has had a deep effect in 2022 resulting in Budget 2023 introducing emergency one-off payments to offset rising prices and protect households from falling into poverty. According to the Central Statistics Office, the Consumer Price Index (CPI) rose 7.7% between March 2022 and March 2023.<sup>9</sup>

Housing and associated housing costs are one of the main drivers of inflation in 2022 and 2023. The divisions with the largest increases over the last 12 months were housing, water, electricity, gas and other fuel with a 20.8% increase.<sup>10</sup>

High inflationary rates are expected to continue into 2023 and beyond increasing the risk of poverty, fuel poverty, and increasing the overall cost of living. The Simon Communities of Ireland recommends that this be highlighted as a key challenge within the Strategy.

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<sup>9</sup> Available at: <https://www.cso.ie/en/releasesandpublications/ep/p-cpi/consumerpriceindexmarch2023/>

<sup>10</sup> Available at: <https://www.cso.ie/en/releasesandpublications/er/cpi/consumerpriceindexdecember2019/>

## Summary of Recommendations

**To reaffirm the Department's role and commitment to end homelessness by 2030, the Simon Communities of Ireland recommend that this strategy make the following addition to 'Our Goals':**

- To provide a framework to work towards ending homelessness by 2030 through the sustainable reduction of homelessness that involves implementing sustainable homeless prevention strategies, structured collaboration between Departments and agencies, and by ensuring access to adequate, safe and affordable housing for all.

### Recommendations under 'Strategic Goal A'

- Recommendation: Outline and provide for short- to medium-term actions that will be prioritised by the Department to mitigate against the immediacy of the housing and homelessness crisis.
- Recommendation: Examine and remove blockages that restrict Local Authorities delivering new-builds.
- Recommendation: Revise and increase social housing new build targets based on meeting ongoing demand and taking account of anticipated and population growth.
- Recommendation: bring standard HAP rates in line with current rental market rates. Conduct rent reviews and maintenance for those currently in HAP tenancies in line with the legal entitlement of landlords to increase rents.
- Recommendation: Within Strategic Goal A, Action 2, insert the need to support the development of long-term policy that will create a secure, sustainable, and affordable private rental market.
- Recommendation: Reaffirm commitment to host a referendum on the Right to Housing in the lifetime of this Government.
- Recommendation: Increase inter-departmental and inter-agency work with the goal of reducing homelessness and increasing housing delivery.

### Recommendations under 'Challenges, Risks, and Opportunities'

- Recommendation: the housing and homelessness crisis and rising inflation are two risks/challenges that need to be acknowledged and recognised within the upcoming Statement of Strategy.

## About the Simon Communities of Ireland

The Simon Communities support over 22,000 men, women, and children. We have 50 years of experience providing homeless, housing and support services to people facing the trauma and stress of homelessness. We are a network of independent Communities based in Cork, Dublin, Dundalk, Galway, the Midlands, the Mid West, the Northwest and the Southeast, responding to local needs and supported by a National Office in the areas of policy, research, communications and best practice. We share common values and ethos in tackling homelessness and, informed by our grassroots services, we campaign for more effective policies and legislation regionally, nationally and at European level.

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

### Services include:

- Early Intervention, Homelessness prevention, tenancy sustainment and resettlement.
- Street outreach, emergency accommodation and harm reduction
- Housing with support and Housing First services

- Homeless specific health and wellbeing services (counselling; addiction treatment and recovery; physical and mental health supports)
- Personal development, education, training, and employment services
- Food banks, drop-in centres and soup runs.