



Submission to the Dept of Housing, Local Government and Heritage on the National Housing Plan 2025-2030

May 1st, 2025

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About us

The Simon Communities of Ireland are a network of independent communities across the country that provide homeless, housing and treatment services to people facing the trauma and stress of homelessness. With a proud history of over 50 years responding to local needs, the Simon Communities of Ireland works to end long-term homelessness in Ireland and ensure that homelessness where it does occur is rare, short-term, and non-recurring.

The Simon Communities of Ireland (SCI) national office is a leading campaigner nationally in putting forward solutions for tackling homelessness. Our work engages with advocacy, policy and communications that is grounded in the experiences of our local services. We campaign for more effective policies and legislation locally, nationally and at a European level. SCI campaign for practical and sustainable solutions that tackle homelessness head on. Our advocacy and solutions are based on evidence, best practice, and the experiences of the people who use our services.

About this Submission

This submission draws from input from some of the Simon Communities across Ireland, some of our previous work together on [manifesto](#) asks and [other advocacy](#). We are member of the Irish Homeless Policy Group (IHPG) and the Irish Coalition to End Youth Homelessness (ICEYH) and therefore, support submissions by our peers in these collaborative working spaces also.

Accessibility

Please note that under Article 4.3 of the UN Convention on the Rights of Persons with Disabilities (UNCRPD), that public consultations should be accessible and allow submissions in accessible formats.

List of Acronyms

| | |
|--------|--|
| AHB | Approved Housing Body |
| CSO | Central Statistics Office |
| HAP | Housing Assistance Payment |
| ICEYH | Irish Coalition to End Youth Homelessness |
| IHPG | Irish Homeless Policy Group |
| SCI | Simon Communities of Ireland |
| SSHA | Summary of Social Housing Assessments |
| UNCRPD | UN Convention on the Rights of Persons with Disabilities |

Summary of Recommendations

1. Increase the delivery of social homes, ensuring over 55,000 homes are constructed each year to meet housing needs across Irish society, including at least 15,000 new social homes ready for occupancy to tackle the housing crisis and address homelessness.
2. Work towards the goal of 20% of housing being social and cost rental, in line with the recommendations of the Housing Commission Report, to meet both the deficit and future needs.
3. Build the right kinds of homes such as one-bed and two-bed homes for smaller households, and larger homes for families stuck in homelessness, Traveller families, and families with status trapped in Direct Provision for years.
4. Utilise existing housing stock for social and affordable housing
5. Expand the Repair and Lease Scheme and increase delivery targets
6. Reform and reset the Housing Assistance Payment (HAP) scheme as a short-term support, in line with recommendation 39 of the Housing Commission Report.
7. In the interim, increase HAP rates to reflect market rents and maintain the current level of tenancies in the system.
8. Prioritise homeless prevention services, including tenancy sustainment and diversion programmes, through increased funding and investment
9. Continue and build on the success of the tenant-in-situ scheme
10. Enhance data collection and reporting by expanding rough sleeper counts outside of Dublin
11. Enhance data collection and reporting by Local Authorities, to better capture hidden homelessness and the impacts of prevention and support services

Recommendations and Comments

- 1. Increase the delivery of social homes, ensuring over 55,000 homes are constructed each year to meet housing needs across Irish society, including at least 15,000 new social homes ready for occupancy to tackle the housing crisis and address homelessness.**
- 2. Work towards the goal of 20% of housing being social and cost rental, in line with the recommendations of the Housing Commission Report, to meet both the deficit and future needs.**
- 3. Build the right kinds of homes such as one-bed and two-bed homes for smaller households, and larger homes for families stuck in homelessness, Traveller families, and families with status trapped in Direct Provision for years.**

The Housing Commission report estimates a housing deficit of between 212,500 and 256,000 homes.¹ According to the latest Summary of Social Housing Assessments 2024 (SSHA) there are nearly 60,000 households who do not currently have their social housing needs met.² 14.7% of these households' basis of need for social housing is homelessness, up from 13.5% in 2023. A further 6.0% households on the social housing list are living in overcrowded or unfit accommodation.

Figures from the SSHA do not represent every household in need of a social home, as they do not include households on transfer lists who for example, wish to move from a HAP tenancy to a more secure social housing tenancy, provided by either a Local Authority or an Approved Housing Body (AHB).³ HAP households are living in an increasingly precarious private rental market, with households continuously entering homelessness due to landlords selling their properties. As of Q3 2024, more than 54,000 households are actively living in HAP tenancies.⁴ This cohort do not have stability or security in their housing and therefore should not be deemed as having their social housing needs met. This was recognised by the Parliamentary Budget Office, who introduced the term 'ongoing need' to more fully capture the cohort of households with an existing need for long-term, secure, state-supported housing.⁵ We estimate the ongoing need as at least 114,363 households.⁶

It is critical that the delivery of housing reflects the composition of households with social housing needs. The Housing Commission Report highlights the limited

¹ Report of the Housing Commission. [Available here.](#)

² Summary of Social Housing Assessments (SSHA) 2024. [Available here](#)

³ We note that the Housing Commission report set out that those in HAP should be counted in the housing needs assessment. We support this position as it set out in clearer terms the scale of challenge to be addressed.

⁴ [Housing Provision – Tuesday, 1 Apr 2025 – Parliamentary Questions \(34th Dáil\) – Houses of the Oireachtas](#)

⁵ Social Housing 'Ongoing Need' – Update 2022. [Available here.](#)

⁶ This includes the 59,941 households identified by the SSHA and 54,422 HAP active HAP tenancies according to a recent PQ.

availability of one-bedroom properties in the community – which are necessary to support single adults experiencing homelessness. One-adult households remain the majority household group on the main social housing list, growing from 57.4% (33,746 households) in 2023⁷ to 60.8% (36,416 households) in 2024.⁸ One-adult households also make up 22% of HAP tenancies,⁹ and as of December 2024, there were 6,847 (46% of the total homeless population) single adults living in emergency accommodation.¹⁰ There are also far too many people spending lengthy periods in emergency accommodation – as of December 31st, 2024, 3,291 households were living in emergency accommodation for a year or longer.¹¹ One-bedroom properties are also critical for the delivery of Housing First programmes, which provide direct access to permanent housing and wraparound services (e.g. health, mental health, and addiction services) and have shown success in ending long-term homelessness in both Ireland and abroad. The Housing Agency reported an 86% tenancy sustainment rate in 2023, demonstrating the impact of these vital services in ending long-term homelessness.¹²

4. Utilise existing housing stock for social and affordable housing

Utilising existing housing stock for social and affordable housing offers a huge opportunity to bring additional units onstream sustainably. There is no concise figure on the level of vacancy, with various sources reporting varying levels depending on the different methodologies adopted. According to the Central Statistics Office (CSO),¹³ on the night of Census 2022 there were 164,433 vacant properties across Ireland. Just under 48,000 dwellings which were vacant in 2016 were still vacant in 2022. Furthermore, 23,072 dwellings were vacant in 2011, 2016 and 2022. The latest Geo Directory report¹⁴ for Q4 2024 recorded 80,689 vacant residential properties across the country. The counties with the highest vacancy rates are Leitrim (11.8%) and Mayo (10.6%). The counties with the lowest vacancy rates are Dublin (1.2%) and Kildare (1.5%). A further 20,092 buildings were classified as derelict.

Even if just a quarter of the 80,689 vacant homes were returned for social housing use, social housing need would reduce by more than 20,000 households across the country. For context, this is almost equivalent to all households who have been on the social housing waiting list for over 4 years. This could be achieved

⁷ The Housing Agency (2024) Summary of Social Housing Assessments 2023.

⁸ The Housing Agency (2025) Summary of Social Housing Assessments 2024.

⁹ DHLGH (2024) HAP Performance Indicators – 2022.

¹⁰ [gov.ie - Homeless Report - December 2024](https://www.gov.ie/en/publications-and-statistics/publication/10000-homeless-report-december-2024/)

¹¹ [gov.ie - Homeless Quarterly Progress Report for Q4 2024](https://www.gov.ie/en/publications-and-statistics/publication/10000-homeless-quarterly-progress-report-for-q4-2024/)

¹² [Press Release: Housing First successful in ending long term homelessness | The Housing Agency](https://www.housingagency.ie/press-releases/press-release-housing-first-successful-in-ending-long-term-homelessness/)

¹³ Census of Population 2022 Profile 2 – Housing in Ireland. [Available here.](https://www.cso.ie/en/census2022/profiles/)

¹⁴ Residential Buildings Report Q4 2024. [Available here.](https://www.residentialbuildingsreport.ie/)

through a more ambitious repair and lease scheme and the increased use of compulsory purchase orders by local authorities, both of which discourage vacancy.

5. Expand the Repair and Lease Scheme and increase delivery targets

The Repair and Lease Scheme targets vacant properties in need of repair for use as social housing. Local authorities pay the up-front cost of repairs, and the property is then leased for social housing, with the cost of repairs offset against rental earnings over a period of 5-25 years. The expansion of the Repair and Lease Scheme offers the potential to offset some of the loss of Housing Assistance Payment (HAP) properties. It is welcome that the government has initiated a pilot expansion of the scheme targeting the conversion of vacant/institutional premises in June 2022, and in July 2023, increased the loan available for repair works under the scheme to €80,000 per individual home provided.

As seen in Table 1 below, current targets for the Repair and Lease Scheme are exceptionally low. Latest figures indicate that since the initiation of the scheme, there have been 640 dwellings delivered through the scheme.¹⁵ However, there have been 3,343 applications. Delivery accounts for just 19% of applications, highlighting that the demand for the scheme is there, and the low rate of delivery through the scheme needs to be explored and rectified. SCI highlight how this scheme can be improved further, through learnings from local authorities who have successfully rolled out the scheme at scale.

| Year | 2022 | 2023 | 2024 | 2025 | 2026 |
|-------|------|------|------|------|------|
| Units | 120 | 130 | 130 | 140 | 140 |

Table 1 – Repair and Lease Scheme Targets – Housing for All

Waterford County Council has delivered 351 out of the total 640 dwellings delivered through the scheme since its initiation, accounting for 54% of national delivery. In 2023 alone, Waterford County Council delivered 129 of the 174 dwellings delivered through the scheme, accounting for 74% of national delivery. Waterford County Council are clearly leading the way in tackling vacancy with a ‘whole-of-authority’ approach, facilitated through a steering committee on vacancy. Members of the committee include members of the housing team, vacant homes officers, regeneration officers, planning officials etc. Waterford County Council are leaders in tackling vacancy, and this best practice should be supported across local authorities.

SCI call for a renewed ambition for the repair and lease scheme across all local authorities as part of the National Housing Plan 2025-2030, with a ‘whole of authority’ approach. This scheme has the potential to activate thousands of properties for social housing use, while also tackling the blight of vacancy across

¹⁵ Repair and Leasing Schemes Statistic 2017-2024, [Available here](#)

Ireland. Given the success in Waterford County Council, we recommend a target of an average of 100 units delivered through the scheme per local authority per year. We recognise that this is a considerable uplift from current targets, and that it is likely that some local authorities will have the capacity to deliver more than 100 dwellings, and some will have the capacity to deliver less.

- 6. Reform and reset the HAP scheme as a short-term support, in line with recommendation 39 of the Housing Commission Report.**
- 7. In the interim, increase HAP rates to reflect market rents and maintain the current level of tenancies in the system.**

Simon Communities of Ireland have continuously shown the inadequacy of current HAP payments through our quarterly *Locked Out of the Market* reports. These reports track the number of properties advertised to rent within HAP limits across sixteen study areas over a three-day period. Figure 1 below shows a long-term comparison of the findings of the *Locked Out of the Market* reports from the start of 2020. The availability of rental properties generally, as well as HAP properties, increased significantly during the COVID-19 restrictions. Following the lifting of restrictions, a clear decline can be observed. Although the availability of properties generally has increased since mid-2022, this has not coincided with a similar increase in the availability of HAP properties. This is a concerning trend and highlights how new supply remains largely out of reach for those on low incomes who are reliant on HAP.

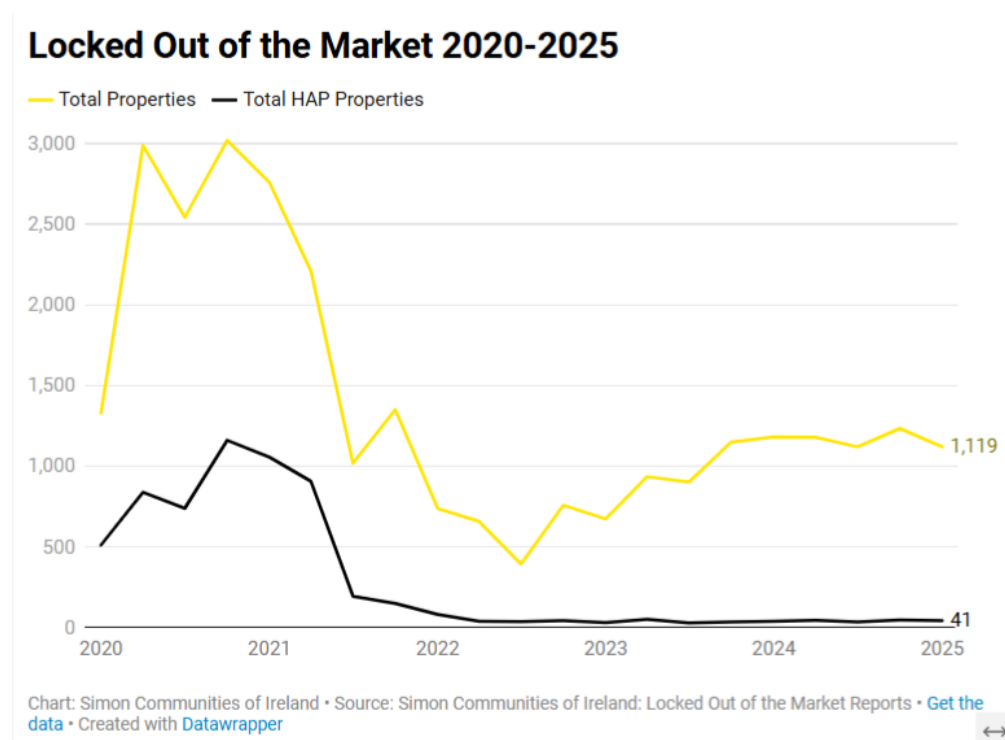


Figure 1: Locked Out of the Market Long-Term Comparison

Simon Communities of Ireland advocate for an increase in HAP payments to market level rents to bridge the gap until adequate levels of Local Authority and AHB social homes become available. HAP base rates must be uplifted to reflect current market rents. While Simon Communities of Ireland acknowledge that discretionary rates of HAP were increased in 2022, market rents have increased by 71% since HAP base rates were set in 2016.¹⁶ Therefore, even if local authorities implement full discretionary rates, HAP rates still fall far below current market rents.

SCI welcomes the Housing Commission's recommendation to reform the Housing Assistance Payment (HAP), resetting them as short- to medium-term support measures. HAP tenancies are insecure and therefore do not meet households' long-term housing need. As previously highlighted, households living in HAP tenancies should remain on social housing lists and should not be deemed as having their social housing needs met.

[Midlands Simon](#) responded directly to input to this submission by highlighting that they have seen an increase in demand for their services due to:

- *"Clients evicted from HAP supported housing by private landlords who want tenants that can pay more than the HAP scheme is offering."*

8. Prioritise homeless prevention services, including tenancy sustainment and diversion programmes, through increased funding and investment

Preventing homelessness in the first instance is the most sustainable way of reducing homelessness in the long-term. The Simon Communities of Ireland have long campaigned for the priority of homeless prevention policies and practices. It is well known that homelessness can have multiple negative impacts, including adverse effects on physical health, mental health, and overall wellbeing. For children, homelessness can negatively affect development, cognitive functioning, participation in education, and opportunities later in life. Investing in prevention can safeguard against the long-term damaging effects of homelessness.

We know that prevention measures work. Of those who engaged with Galway Simon's Prevention and Tenancy Sustainment services in 2023, 93% did not access emergency accommodation.¹⁷ Of those who engaged with Cork Simon's Pilot Diversion Programme, 44 out of 57 people avoided homelessness.¹⁸ According to the 2023 Homeless Financial Reports¹⁹ from Local Authorities:

¹⁶ Q2 2016 compared to Q2 2023 RTB Rent Index Reports, [Available here](#)

¹⁷ Galway Simon Community Annual Impact Report 2023, [Available here](#)

¹⁸ Cork Simon Community Annual Impact Report 2023, [Available here](#)

¹⁹ Local Authority Regional Financial Reports 2023. [Available here.](#)

- Just 7% of the total homeless spend was on prevention in 2023, this includes Category 1 spending: homeless prevention, tenancy sustainment and resettlement supports, and Category 5a: housing authority prevention services.
- There was a total underspend of €1,420,758 between these two prevention categories in 2022 (Category 1: €919,136, Category 5a: €501,622).

The crisis of homelessness in Ireland will not end unless adequate prevention policies and procedures are embedded in our housing system, notwithstanding the need for adequate move on through the provision of social housing. The Simon Communities of Ireland urge Government to prioritise prevention in the National Housing Plan 2025-2030.

Midlands Simon also listed the following cohorts/reasons for increased presentations to their services:

- *Low Threshold Clients with complex addiction and mental health needs, including from minority groups such as the Travelling community and young vulnerable adults.*
- *Clients evicted from BNB's using vouchers as provided by the county councils, but BNBs are now moving towards better paid non council supported customers.*
- *Offenders being released from the Midlands Prison and women from the midland's region being released from the Dóchas Centre in Mountjoy in Dublin, with no housing available.*
- *Young adults who upon reaching the age of 18 no longer come under the care of Tusla and therefore lose any housing supports from Tusla.*
- *Young adults who have been housed by adoptive parents under the adoption support scheme but when they turn 18 are longer covered under this adoption scheme and therefore can lose their housing with their adoptive parents.*
- *International protection applicants coming straight from Northern Ireland to the midland's region looking for housing accommodation.*
- *International protection applicants who are married and have new children being born in Mullingar hospital and therefore due to privacy and dignity and living space issues want to move out of government provided accommodation in asylum centres.*

9. Continue and build on the success of the tenant-in-situ scheme

Despite the increasing number of households being pushed into homelessness in recent years, the scale of the crisis would be much greater were it not for some significant areas of development and progress, including the Tenant in Situ Scheme.

Government must enhance these measures and build upon this progress to end homelessness by 2030, a goal Ireland agreed to work toward with the signing of the Lisbon Declaration in June 2021.

The tenant-in-situ scheme demonstrates the effective interventions needed in order to prevent homelessness in the context of the current housing situation in Ireland. According to Gov.ie data, 994 households were prevented from entering homelessness through the tenant-in-situ scheme in 2024.²⁰ Simon Communities of Ireland advocate for the continuation and expansion of the scheme at scale, so that at risk households can continue to avoid homelessness, while local authorities continue to grow their social housing stock.

10. Enhance data collection and reporting by expanding rough sleeper counts outside of Dublin

11. Enhance data collection and reporting by Local Authorities, to better capture hidden homelessness and the impacts of prevention and support services

Accurate data is essential to responding effectively to the homelessness crisis, as it can give an indication as to what interventions are working and where further support is needed. The current homeless figures only capture those accessing State-funded emergency accommodation. Thousands more are estimated to be experiencing 'hidden homelessness' (e.g. persons sleeping rough, in cars or in workplaces, persons couch surfing, squatting, or living in insecure or inadequate housing, etc.).²¹

The only official rough sleeper count in the State is conducted in Dublin. The most recent count found 134 persons sleeping rough over a 7-day period in November 2024. While official data is limited to Dublin, we know that many people are sleeping rough across the country. For example, in 2023, Cork Simon's outreach team supported more than 570 persons sleeping rough – an average of thirty persons per night. SCI recommend expanding rough sleeper counts to capture persons sleeping rough outside of the capital.

Local authorities are well-placed to provide valuable data. SCI urge that, as part of the National Housing Plan 2025-2030, Local Authorities provide quarterly, publicly available reports on the number of persons presenting for support due to homelessness, and, of these:

- The number that are subsequently assessed and regarded as experiencing homelessness under s.2 of the Housing Act 1988,

²⁰ Social Housing Activity by Local Authority 2024. [Available here](#)

²¹ Cunningham, Kevin, "Under the Radar: Unveiling Hidden Homelessness Across the Island of Ireland." Simon Communities of Ireland and Simon Community NI. May 2024. <https://www.simon.ie/e-publication/under-the-radar-unveiling-hidden-homelessness-across-the-island-of-ireland/>

- The number that are regarded as experiencing homelessness that are subsequently allocated emergency accommodation,
- The number that are regarded as experiencing homelessness but that are not allocated emergency accommodation, and the reasons given,
- The number that are not regarded as experiencing homelessness under s. 2 of the Housing Act 1988, and the reasons for this determination,
- The number of those that are not regarded as experiencing homelessness that are signposted to appropriate support or prevention services.

This data, coupled with an enhanced rough sleeper count, will provide valuable information, capture impacts of support or prevention services, and inform further evidence-based policies and interventions.

Bureaucratic Barriers

In the midlands, Westmeath County Council receives the State funding and then distributes it to the other three county councils and relevant services. Midlands Simon have raised the issue of the delay in accessing 2025 funding. According to Westmeath County Council they have received the monies from Government, and it is sitting in their bank account since the 4th of January, but until they do their own internal audit report from last year (2024), they will not provide/release any monies. In the interim, there are ten properties in the midlands that are vacant and in need of refurbishment.

Concluding Notes

As mentioned above, SCI is a member of the IHPG. We would like to take this opportunity to re-iterate our 10 Key Actions on Homelessness for the new government and ask that these are also considered in the National Housing Plan 2025-2030. Some of these are repeating issues and actions that we have highlighted above.

1. Develop collaborative structures to end homelessness

Solving homelessness is a complex issue requiring persistent Government attentiveness and will require shared problem-solving. The next Government should agree on new collaborative structures, with Cabinet support, for developing and implementing a new homelessness strategy with local authorities, relevant State bodies and organisations at the frontline.

2. Build Enough Homes

Ensure that over 55,000 homes are constructed each year to meet housing needs across Irish society, including at least 15,000 new social homes to tackle the housing crisis and address homelessness. Work towards the goal

of 20% of housing being social and cost rental, in line with the recommendations of the Housing Commission Report, to meet both the deficit and future needs. Build the right kinds of homes such as one-bed and two-bed homes for smaller households, and larger homes for families stuck in homelessness, Traveller families, and families with status trapped in Direct Provision for years.

3. End Long-Term Homelessness by 2030

Set the goal of making sure no one is homeless for longer than 6 months by the end of the next Government term (2030), by dedicating 10% of new social housing supply to already long-term homeless households. Use the Housing Commission report as a key driver and policy roadmap to help achieve this ambitious goal.

4. Prioritise Homeless Prevention Measures

Prioritise and adequately resource a comprehensive homeless prevention plan and early intervention measures to prevent homelessness from occurring and reoccurring.

5. Ensure that nobody has to sleep rough, regardless of legal status

Ensure that there are sufficient emergency beds so that no one ever has to rough sleep. In particular, ensure that everyone who seeks international protection in Ireland is provided with suitable accommodation while their claim is being assessed. Guarantee greater coordination between departments, agencies, and local government so that every person in Ireland is guaranteed decent shelter, regardless of nationality, gender, or legal status.

6. Develop a strategy for Private Rental Sector

Devise and implement a strategy for the private rental sector, on foot of the previous Government's Private Rental Sector Review, setting out a clear vision for the sector and the role it will play in the wider housing landscape in the long-term. A well-rounded strategy, based on good-quality data, will ensure a balanced, fair, and sustainable rental market that benefits all.

7. Fully implement the Youth Homelessness Strategy

Implement the current National Youth Homelessness Strategy (2023-25) and develop a new ambitious successor strategy from 2026 to eliminate youth homelessness.

8. Introduce a range of measures to tackle issues facing homeless families

Commit to enacting the Homeless Families Bill (2017) which would ensure that local authorities place the best interests of the child at the centre of decision-making when supporting homeless families. Adopt a Housing First for Families approach to address the housing and support needs of families with more complex needs.

9. Improve Mental Health services for people experiencing homelessness

Improve mental health services for people experiencing homelessness – with

more focus on harm-reduction measures and increased HSE funding for mental health, drug, and alcohol interventions.

10. Improve the transparency of access to homeless services

Improve the transparency of access to emergency accommodation and homeless services, including the introduction of a new appeals system that would provide written reasons for any refusals to access emergency accommodation and social housing. Ensure that all local authority staff receive updated training to provide greater awareness of housing law.

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“The Scheme to Support National Organisations is funded by the Government of Ireland through the Department of Rural and Community Development”



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Registered Office: Coleraine House, Coleraine Street, Dublin 7. Registered Charity Number (RCN): 20020125.
Registration Number: 74038. Charity Number: 8273.