



10 Point Plan to Deliver *Housing for All*

Submission to the Department of Housing,
Local Government and Heritage



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In November 2019, *Social Justice Ireland* presented a paper at our Annual Social Policy Conference reviewing the progress of *Rebuilding Ireland*, the Government’s housing strategy¹. The Strategy was built on five pillars addressing homelessness; social housing; increasing construction; the private rented sector; and utilising existing housing. If underpinned by progressive policies, these five pillars would have delivered on key areas of housing need. Unfortunately, our review found this Strategy was not delivering under any of its five pillars.

Any new Housing Strategy must address these deficiencies and take a fresh approach to housing. We must move away from viewing housing as an asset and instead, return to housing as a social good, an essential component of ensuring a decent standard of living.

In this submission, we will outline our 10 Point Plan for to deliver *Housing for All* using the five pillar framework.

Pillar 1 – Address Homelessness

The number of individuals and families accessing emergency homeless accommodation has increased by over 26 per cent since July 2016 when *Rebuilding Ireland* was introduced. While incidences of family homelessness have decreased by 17 per cent since July 2016, this is largely due to emergency measures introduced during the pandemic and is expected to increase once these measures have been withdrawn. Additionally, the data used to report on homelessness is flawed, with a European Commission report calling it “statistical obfuscation if not corruption”.

Recent research from Canada², which has had a long-standing Housing First programme, has found that adults who experienced homelessness in childhood have greater difficulties retaining accommodation in adulthood than the rest of the population. In Ireland, Housing First is available (within limited capacity) to vulnerable homeless adults only. This provides both accommodation and wraparound services to support these adults in sustainable situations. With 3,000 children and young people under 25 accessing emergency accommodation in Ireland, Housing First with children and parental supports should be developed to prevent intergenerational homelessness.

Policy Proposal 1: Expand Housing First to families, providing wraparound services and supports for children and parents.

Another aspect of this pillar was the prevention of homelessness. Among the households at most risk of homelessness are those in mortgage arrears. As at 31 December 2020, there were 54,986 mortgages in arrears with an outstanding balance of €9.4 billion, of which €2.7 billion is arrears. Of these, 30,048 mortgages are in long-term arrears – 1 year or more. The outstanding balance on these mortgages is €6.1 billion, with arrears of €2.5 billion.

With 92.5 per cent of all arrears arising on mortgages in long-term arrears, it is clear that a long-term solution is needed. Recent narrative has focused on accelerating reposessions. This only serves to move these households into homelessness or social housing (if available).

Emergency homelessness accommodation for approximately 10,000 people cost the State €185.2 million in 2019. Neither the system, nor the Exchequer, could cope with an influx from 30,048 households.

¹ <https://www.socialjustice.ie/sites/default/files/attach/publication/6081/2019-11-27-chapter5-thechallengesofsuccess.pdf>

² <https://bmcpsonychiatry.biomedcentral.com/articles/10.1186/s12888-021-03142-0#:~:text=We%20found%20that%20participants%20who,was%20both%20significant%20and%20independent.>

In the absence of social housing availability from Local Authorities or Approved Housing Bodies, the social housing solution available to these 30,048 households would likely be the Housing Assistance Payment (HAP). As of Q4 2020, there were 59,821 active HAP tenancies at a cost to the Exchequer of €436 million for the year.

Table 1: 25-year cost comparison, Emergency Homeless Accommodation and HAP, and cost of mortgage purchase

Emergency Homelessness Accommodation 2019		Housing Assistance Payment 2020		Distressed Mortgages
<i>Cost for approx. 10,000 people for 1 Year</i>	<i>Additional Cost for 81,000 people for 25 years</i>	<i>Cost of 59,821 households for 1 year</i>	<i>Additional Cost for 30,048 households for 25 years</i>	<i>Outstanding Balance for 30,048 homes</i>
€185,212,907	€18.75 billion	€435,932,881.95	€5.5 billion	€6.1 billion

Source: Local Authority Regional Financial Reports (Emergency Homelessness Accommodation); HAP Exchequer Spend Landlord Payments 2019-2020 (HAP), Department of Housing, Local Government and Heritage; Residential Mortgage Arrears and Repossession Statistics, Central Bank of Ireland.

As HAP is tied to market rents, it is likely that these figures would increase over time. In either of the first two scenarios, Emergency Homelessness Accommodation or HAP, the State is left with no asset after 25 years having spent somewhere between €5.5 and €18.75 billion. By acquiring equity in the mortgaged properties by way of a debt for equity swap up to the cost of the outstanding loan, the State acquires equity in 30,048 properties. Some of these may be bought in full by the State, adding to its housing stock. This would provide a benefit to society and the State for considerably less than the 25 year leases currently being entered into.

Policy Proposal 2: Acquire an equity stake in properties in mortgage distress, leaving families in situ and increasing the State’s housing stock.

Pillar 2 – Accelerate Social Housing

The *Summary of Social Housing Needs Assessments 2020* indicates that there are 61,880, a reduction from 68,693 in 2019 and a reduction of almost 30,000 on 2016 when the list was at 91,600 households.

However, almost half of the reduction since 2016 – 14,665 households – comes directly from transfers from Rent Supplement to HAP between 2016-2020 (Rent Supplement is included in the social housing waiting lists, HAP is not). The only thing that changed for these households is the name of their payment and the fact that it doesn’t go directly to the tenant any more, it goes to the landlord.

There were 59,821 HAP tenancies as of Q4 2020. If these households are added to the 2020 housing list figure, the real housing waiting list is 121,701 households (not including women and children in domestic violence refuges, households in Direct Provision and so on). This represents an increase of 33 per cent on 2016.

An increase in social housing stock is needed to sustain this sector and reduce house and rent prices into the future. Other European countries which we would like to emulate have a social housing stock that is 20 per cent of their total housing stock. In Ireland this is currently 9 per cent. As of Q3 2020, there were 34,554 Approved Housing Body (AHB) tenancies registered with the Residential Tenancies Board. According to the NOAC Performance Indicators Report 2019³, there were 138,905 dwellings in the ownership of Local Authorities as at 31st December 2019. That’s a total of 173,459 social housing

³ [NOAC-LAPIR-2019.pdf](#)

dwellings in the ownership of either Local Authorities or AHBs. By 2030, this number needs to at least double to meet a target of 20 per cent.

If Policy Proposal 2 was implemented, this would leave a deficit of 143,411 homes requiring a build target of 14,341 per year for the next ten years. With an average construction cost of €230,000, this would require an annual investment of €3.3 billion.

Policy Proposal 3: Build 14,341 social homes each year for the next 10 years at an annual investment of €3.3 billion.

In order to keep costs to a minimum, these social housing units must be built on land already in the ownership of the State. According to a 2014 Residential Land Availability Survey⁴, there was sufficient land in the ownership of the State to provide for the construction of 414,000 dwellings. Utilising less than half of this land would meet the 20 per target set out above. Rather than relying on private developers to provide ‘social housing solutions’ through acquisitions or leases, Local Authorities should be permitted to take charge of these lands and develop them for social housing. This would require a prohibition on the sale of State lands suitable for residential development.

Policy Proposal 4: Prohibit the sale of State lands suitable for residential development and use this land to build social housing.

Finally on this point, once the target of 20 per cent has been reached, policy must ensure that it is maintained and social housing which has been developed with the aid of Exchequer funding should not be sold on the private market. This is particularly the case with AHBs who, on the expiry of their funding term, can sell their properties on the open market. This is particularly a concern with regard to private funds entering the AHB market (such as the Government-backed Home for Life operating since 2018).

Policy Proposal 5: Ensure that AHBs retain their social housing stock and prohibit its sale on the private market by AHBs.

Pillar 3 – Build More Homes

The purpose of this Pillar was to deliver more homes at affordable prices. This is a key issue that has been lacking in housing policy over the past few decades. Average house prices have risen by almost 35 per cent since 2015⁵. The Affordable Housing Bill, currently passing through the Oireachtas, continues to rely heavily on demand-side subsidies which only serve to increase house prices, rather than make them truly affordable. Artificially increasing a buyer’s ability to purchase a home does not make that home affordable. It sustains a profit-driven market at the expense of buyers. Furthermore, the Shared Equity Scheme targets the same profile as the previous Government’s Help to Buy Scheme – first time buyers purchasing newly-built properties. The Help to Buy Scheme has been proven, not only by *Social Justice Ireland*, but by the Parliamentary Budget Office to disproportionately favour higher earners and sustain high property prices.

Policy Proposal 6: Address housing affordability on the supply-side rather than investing in demand-side schemes that artificially maintain high house prices.

Another driver of house price inflation is the introduction to the market of large-scale investors with purchasing power far beyond that of households. These investors are incentivised to enter the residential market due to favourable tax treatment, notwithstanding a move by the Minister for

⁴ [gov.ie](http://www.gov.ie) - Residential Land Availability Survey 2014 (www.gov.ie)

⁵ Residential Property Price Index, CSO, PxStat HPA13

Finance to curtail tax exemptions for REITs in Budget 2020. This move clearly did not go far enough, and more must be done to close loopholes and end tax exemptions for large-scale investment vehicles.

Policy Proposal 7: Close all tax loopholes for large-scale investment vehicles purchasing residential properties.

Pillar 4 – Improve the Rental Sector

The NOAC Performance Indicators 2019⁶ indicate that just under 10 per cent of rented properties were inspected in the year (32,196 of 324,188). Of those, over 93 per cent were not compliant with the regulations of which less than three in ten (29 per cent) became compliant in 2019. An increase in investment is needed to ensure that more inspections are conducted and compliance is enforced.

Policy Proposal 8: Invest in Property Inspections and enforcements.

More than three in ten people in Ireland were renting in 2019. Nine per cent of the population were renting in the private rented market.⁷ The age profile of tenants is increasing, meaning that people are renting into older age. Addressing the affordability issues for house purchasers will mean that those who wish to purchase a home can do so; however for the proportion of the population who wish to continue to rent, there is a need for increased protections to support them to do so.

According to the Residential Tenancies Board, rent arrears / overholding; Deposit Retention; and breach of landlord obligations have consistently been among the top three dispute resolution case types for the past 18 months, even while restrictions were in place to prevent evictions.

If the private rented sector is to fulfil a role in sustainable housing policy into the future, legislation must be in place to ensure that tenants are properly protected, including deposit retention and greater enforcement powers of the RTB for breaches by landlords. Given an increased age profile, part of this protection must also be the introduction of long-term leases to provide security of tenure for older tenants.

Policy Proposal 9: Legislate to increase tenant protections and introduce long-term leases.

Pillar 5 – Utilise Existing Housing

The final Pillar of Rebuilding Ireland concerned the use of existing housing. According to the 2016 Census, there were in excess of 183,000 vacant properties (not including holiday homes) on Census night. An analysis by *Social Justice Ireland* in our socio-economic review ‘Social Justice Matters: a 2021 guide to a fairer Irish society’⁸ indicates that, in every county in Ireland, there are more vacant homes than homes on the official social housing waiting list. While utilising these properties where owners cannot be located may prove difficult, greater use of powers of compulsory purchase by Local Authorities would enable at least a proportion to be acquired by the State.

In addition, as at the end of 2019, 4,365 Local Authority dwellings were not tenanted, 3.15 per cent of overall stock. During 2019, some 3,381 properties were re-tenanted and €62 million was spent across all Local Authorities on works necessary to enable re-letting. To ensure sustainability of lettings, ensuring that services and infrastructure are in place, including community health networks; social care supports; community policing; safe spaces and so on should be prioritised.

⁶ [NOAC-LAPIR-2019.pdf](#)

⁷ Eurostat Database, [ilc_lvho021]

⁸ <https://www.socialjustice.ie/content/publications/social-justice-matters-2021-guide-fairer-irish-society>

Policy Proposal 10: Invest in the services and infrastructure to support housing developments, with particular focus on social housing developments.

Address Housing Data Deficits

We referred earlier to the denouncement of homelessness data in Ireland as “statistical obfuscation if not ‘corruption’.”⁹, however this statistical obfuscation persists across housing data.

- Data on homelessness does not account for couch surfers, people living with family or friends, or (as it once did) households temporarily accommodated in own-door accommodation by Local Authorities.
- Social housing waiting lists do not count households in receipt of HAP, but do count those in receipt of Rent Supplement. The number of households on social housing waiting lists across the country has officially decreased by over 30,000 since 2016. In reality, it has increased by more than that amount since then.
- The 2020 Social Housing Construction Statistics Report provides a ‘Total Cumulative Social Housing Delivery’ figure for HAP as 80,827. This includes all HAP tenancies started between 2016 and 2020, but does not account for exits or duplications caused by renewals. The real figure, according to the HAP Exchequer Spend Landlord Payments 2019-2020 report is 59,821.
- Construction reports consistently duplicate outputs by counting construction starts and construction completions as two datasets.

Ireland needs a housing strategy that is evidence-based. That evidence must be robust and reliable. As part of a new housing strategy, the Minister must commit to clarifying the data and ensuring that reports are consistent and accurate.

Social Justice Ireland’s 10 Point Plan to Delivery Housing for All

1. Expand Housing First to families, providing wraparound services and supports for children and parents.
2. Acquire an equity stake in properties in mortgage distress, leaving families in situ and increasing the State’s housing stock.
3. Build 14,341 social homes each year for the next 10 years at an annual investment of €3.3 billion.
4. Prohibit the sale of State lands suitable for residential development and use this land to build social housing.
5. Ensure that AHBs (Approved Housing Bodies) retain their housing stock as social housing and prohibit their sale on the private market by AHBs.
6. Address housing affordability on the supply-side rather than investing in demand-side schemes that artificially maintain high house prices.
7. Close all tax loopholes for large-scale investment vehicles purchasing residential properties.
8. Invest in Property Inspections and enforcements.
9. Legislate to increase tenant protections and introduce long-term leases.
10. Invest in the services and infrastructure to support housing developments, with particular focus on social housing developments.

⁹ Daly, M. (2019), ESPN Thematic Report on National strategies to fight homelessness and housing exclusion – Ireland, European Social Policy Network (ESPN), Brussels: European Commission.

Social Justice Ireland is an independent think-tank and justice advocacy organisation of that advances the lives of people and communities through providing independent social analysis and effective policy development to create a sustainable future for every member of society and for societies as a whole.



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