

Housing Commission Public Consultation

CIB Response April 2023

1. *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?*

CIB-funded services (Citizen Information Services (CISs), Money Advice and Budgeting Service (MABS), the National Advocacy Service for People with Disabilities (NAS)) regularly highlight housing difficulties experienced by citizens. Feedback from these services refers mainly to matters relating to access to social and affordable housing and people in mortgage arrears. For example, of the 75,414 housing specific queries to CISs in 2022¹, over half, 52% were related to local authority/social housing issues, and of these almost 30% were related to the Housing Assistance Payment (HAP) (11,552). A regular and recurring issue refers to people relying on HAP-supported private rented housing.

- a) CIB is strongly of the view that the State needs to invest directly in the provision of social housing to a substantially greater extent that it does at present.
- b) CIB notes the continued existence of housing development potential related to the more proactive use of vacant houses, disused commercial properties, and ‘hoarded’ sites.
- c) While acknowledging that there are some problems with the private rental sector as it operates at present, CIB believes that it has greater potential as a provider of accommodation in the wider, non-social housing market. This will require a change in culture about the necessity to ‘own’ one’s own home. Also, the private rented sector should be used only as a last resort for people with a social housing need.
- d) An enhanced state-funded social housing sector has the potential to lessen the pressures that exist across all parts of the private housing sector (owner and rental), thereby increasing accessibility and affordability.
- e) The provision of adequate resources aimed at enabling the upgrading and adaptation of housing (both owner-occupied and rented) for people with changing accommodation needs should be extended and enhanced. This should reduce demand for new-build accommodations.

2. *What measures / interventions are needed to improve the affordability of private rental accommodation?*

CIB is of the view that the most viable and long-lasting mechanism in the medium to long-term for consolidating the private rented sector is through increased investment by the State in direct build social housing.

¹CISs dealt with 790,000 queries from members of the public on all aspects of rights and entitlements in 2022.

- a) The private rental housing sector in Ireland requires greater integration into overall housing policy and planning. Both landlords and tenants have yet to become attuned to the processes and demands of longer-established rental cultures as exist elsewhere in Europe.
- b) The private rental sector needs substantial reform in terms of tenure, rent certainty and appropriate standards if it is to be a socially and culturally acceptable long-term housing option.
- c) There should be continued and enhanced use of targeted tax incentives aimed at landlords who make their property available for social and affordable schemes.
- d) Caution should be exercised in the design of any incentives aimed at encouraging the rental of properties owned by, for example, older people who are temporarily or for indeterminate periods in residential care. This practice could be open to exploitation and abuse by persons other than the owner themselves.
- e) To help deal with the current crisis in the private rented sector, CIB believes the following measures should be introduced:
 - The zoning of more land for housing.
 - The abolition of 'no-fault' evictions.
 - The introduction of further legislation to improve long-term security of tenure.
 - The introduction of an arrears management strategy, like the mortgage arrears framework provisions.
 - Revision of HAP rent limits in line with market rents.
 - Expansion of Rent Pressure Zones and greater enforcement of such zones.
 - Additional measures (e.g., tax) to incentivise landlords to remain in or enter the market.
 - Fully implement existing standards for the private rented sector.
 - More curbs on short-term letting.

3. What measures / interventions are needed to improve the affordability of housing for first-time buyers?

- a) CIB strongly supports schemes and strategies that facilitate and support first-time buyers. However, CIB cautions against encouraging people to enter financial commitments that are likely to be beyond their means. Shared-ownership schemes and such like are more likely to encourage well-considered decisions and do not unduly funnel limited finances toward privately held capital assets.
- b) There should be specific provision in affordable housing policy aimed at enabling people with a disability or a mental health difficulty to purchase affordable accommodation that adequately meets their needs.
- c) The continuing exodus of small landlords from the market exacerbates the chronic shortage of available accommodation country wide. The favourable tax treatment for larger institutional landlords needs to be reviewed in the context of reducing the burden of tax on small landlords. Another effect of making the purchasing of houses by investors from abroad less attractive might be price reductions that would allow more people to buy their own homes. However, clearly any taxation changes in respect of the property market need to be carefully balanced.
- d) Cost rental, under which a reduced rent is paid based on the cost of construction, management, and maintenance, is seen by CIB as an important initiative in delivering affordable long-term rental housing. This approach should be enhanced and expanded. While many people still aspire to buy, and homeownership is part of the traditional Irish financial life cycle, the cost rental model clearly has many attractions.

e) The following schemes should be developed and expanded:

- The *Tenant in Situ* scheme.
- *Project Tosaigh* where the Land Development Agency has full ownership of homes for affordable cost rental.
- *Croí Cónaithe (Cities) Scheme*.
- The Local Authority Affordable Purchase Scheme.
- The *First Home Scheme*.

4. *What is required to address the costs of construction of housing in order to improve the affordability of housing in the longer term?*

CIB does not have sufficient data/evidence to provide a considered commentary in this area. However, since the lack of supply to meet obvious demand is the central conundrum of the Irish housing system at present and since the cost of land and building are critical factors, CIB believes that there is a need for the Government to carry out further detailed research on all aspects of the costs of building and the planning processes. This would include analysing the impact of issues like planning delays, particularly those caused by judicial reviews of planning decisions which affect both the public and private sectors. Also, the National Economic and Social Council has pointed to land use as a central issue and argues that breaking the land trap – the bidding for land and the building of economically marginal and expensive properties – is vital.

Another relevant factor is the operation of Part V which includes both social and affordable homes and, in this sense delivers communities with a mix of tenure types. It is critically important that developers understand and adhere to these social housing requirements and that Local Authorities ensure that this is the case. In this context, a 2021 Clúid Report, *Planning Gain and Obligations: Promise and Performance of Part V*, noted that there are very wide disparities between local authorities and between projects due to differences of approach and requirements. This is particularly evident in payments for ‘soft’ development costs, profits, and private finance. The report found that current practices lack transparency and argued that there are inadequate systems for negotiating, verifying, and auditing financial arrangements.

5. *What changes to building standards and regulations, if any, are required to address the quality of housing?*

CIB has a concern about the effect that poor quality, design shortcomings and inadequate application of standards and regulations has on the quality of life of people with disabilities and other vulnerable groups. There is a need to ensure that housing provision – both in terms of new-build and with existing buildings – meets standards that meet the particular and evolving needs of people.

- a) There needs to be better application of universal design, lifetime adaptable and a future-proofing approach (following Universal Design Guidelines) to ensure that the housing needs of people with disabilities are met; this will result in a reduced need for retrofitting and better provision for a changing and ageing demographic.
- a) At a minimum, a quota of new houses should be built to wheelchair liveable standards.
- b) Development and application of building standards, especially in social housing and other rented accommodation, that are conducive to meeting changes in tenant and occupier needs.
- c) Adequate resources must be provided for the inspection of accommodation and the enforcement of standards and regulations, across all accommodation types, particularly

where these standards and regulations concern the needs of people who require or who are likely to require additional accessibility features.

- d) Existing approaches tend to assume that 'one size/type fits all'. This is no longer an acceptable or functional assumption. Design, delivery, and regulation must acknowledge the need to, and benefits of, setting standards that can cater for the various and evolving needs of all citizens.
- e) There is potential for more proactive integration of technology to enable ageing in place and to support independent living by people with disabilities.

6. What actions can be taken to increase capacity in the construction sector to better meet the increasing demand for housing?

CIB does not have sufficient data/evidence to provide a considered commentary in this area other than to state that the need to attract more construction workers to come to Ireland or Irish emigrants with relevant skills to return is evident. Some form of incentives should be considered to achieve this.

7. 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?

CIB recognises that many rural communities can experience population decline and reduction of services where housing provision is limited or problematic. This can result from stringent planning controls, competition from people purchasing second or holiday homes, or from policies aimed at concentrating development nearer to facilities and services. There are also challenges involved in balancing environmental protection and viable provision of public services with the provision of dispersed one-off housing in rural areas.

- a) The demand for (one-off) rural housing is, to an extent, driven by the absence of alternatives in villages and small towns. The demise of businesses in villages and towns has resulted in a degree of dereliction and decay. Interventions aimed at re-inventing these previously commercial streetscapes as living spaces could reinvigorate small settlements in addition to providing a range of accommodation types.
- b) Many rural areas have a high proportion of unoccupied and disused houses and properties. Initiatives and incentives aimed at restoring such houses could add to the building stock without unduly creating a new environmental impact. The Government grant scheme towards the renovation of vacant and derelict properties should be expanded to deal with rapidly rising construction costs and more proactively promoted.
- a) While environmental concerns suggest that one-off rural housing is undesirable on several counts, it is suggested that replacement of abandoned or derelict houses with new buildings is a productive and acceptable compromise.
- b) Greater research and innovation, in conjunction with grant-aid for the use of new technologies, can contribute to overcoming many environmental challenges, for example, that of adequate sewage systems.
- c) Taxation measures are needed to balance local access and affordability against holiday and second-home acquisition.

8. *What measures, if any, are needed in order to regulate local authority provided social housing in Ireland?*

CIB is of the view that the direct provision of social housing by local authorities is crucial to meeting social housing needs. CIB notes considerable variation in performance across local authorities in meeting the housing of people with disabilities.²

- a) There is a need to escalate the direct local authority social housing building programme in a strong, focused, and proactive manner.
- b) There would be considerable benefit to be gained from including communities, tenants, and owners in the design, locating of, delivery and management of social housing.
- c) Local authorities should be given additional access to and powers to access and realise the potential of public land banks, vacant properties, and other unused assets with potential for housing.
- d) Local authorities could more effectively collaborate with other agencies in meeting the housing needs of disadvantaged groups, particularly in the case of people with disabilities, people experiencing mental health difficulties and Travellers. There is a need for enforceable protocols and practices that ensure high levels of such cooperation.
- e) Local authorities should have more rigorous reporting mechanisms in respect of the delivery of social housing for disadvantaged groups, levels of inspection of private rental properties and application of building standards.
- f) Social housing provision should aim, *inter alia*, to ensure that such housing allows for integration rather than segregation or clustering. There needs to be greater mainstreaming within social housing provision in the general context of building integrated communities.
- g) Local authorities must ensure that the design of the housing that they provide, or commission meets the highest universal design standards.
- h) The specific issue of Traveller accommodation has been regularly highlighted by CIB - Travellers are at a much higher risk of overcrowding and homelessness.

9. *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).*

- a) Some Local Authorities and AHBs have collaborated successfully in the development of affordable homes on a relatively small scale, via building on local authority land. There is significant scope to extend this route.
- b) CIB recognises that AHBs have an excellent track record in specialist housing and can play a pivotal role in housing people, especially those who require housing with support. This could be further incentivised through additional funding.
- c) CIB is of the view that AHBs perform best and deliver optimum results when focused on meeting the needs of specific target groups, while recognising the need to avoid clustering and 'ghettoisation'.

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https://www.citizensinformationboard.ie/downloads/social_policy/The_Right_Home_The_Housing_Needs_of_People_with%20Disabilities.pdf

- d) The role of AHBs in housing and supporting tenants needs to be further expanded while simultaneously ensuring the highest standards and best practice in accommodation design, construction, maintenance, and management.
- e) The role of AHBs should continue to focus on meeting the housing provision and tenancy maintenance needs of groups who require additional supports, while allowing for a proportion of non-targeted groups which is necessary for purposes of social mix and integration.
- f) Threshold provides a vital role in supporting private sector tenants to assert their rights as tenants, especially regarding illegal evictions. In 2022, CIB and Threshold jointly published a report on the private rented sector.³
- g) Additional research should be carried out on the role of AHBs in meeting the requirements of vulnerable population groups and on the relative merits of the various models of support housing which are now operational.
- h) Enhanced funding from the Voluntary Capital Assistance Scheme should be granted to AHBs which are building to the standards of Lifetime Adaptable Housing and providing housing with supports.

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https://www.citizensinformationboard.ie/downloads/social_policy/Renting_and_risk_the_vulnerabilities_of_renting.pdf