



Locked Out of the Market XI

The Gap between Rent Supplement/HAP Limits and Market Rents

Snapshot Study

August 2018

Simon Communities in Ireland

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Introduction

This report summarises the results of a snapshot study¹ undertaken over three consecutive days in May 2018 (1st, 2nd, and 3rd) to track the number of properties available to rent within the Department of Social Protection Rent Supplement (RS) limits and Department of Housing, Planning and Local Government (DHPLG) Housing Assistance Payment (HAP) limits. Details were gathered from Daft.ie² for the following areas: Cork City Centre³, Dublin City Centre⁴, Galway City Centre⁵, Limerick City Centre⁶, Portlaoise, North Kildare,⁷ Athlone, Sligo Town⁸, Dundalk, Leitrim,⁹ and Waterford City Centre.¹⁰ This is the eleventh snapshot study of this kind and compares the findings to the previous snapshot studies undertaken.

The four categories examined are as follows:

- Single person;
- Couple;
- Couple/One Parent and One Child;
- Couple/One Parent and Two Children.

According to the *Daft.ie 2018 Quarter 1 Rental Report*, rents rose nationwide by an average of 11.5% in the year to March 2018 bringing rents to an all-time high. This is an increase from the 10.4% year-on-year increase recorded during Quarter 4 2017. This follows cumulative increases where rents have increased by approximately 70% since 2012. This most recent quarterly report shows that average national rents rose from €1,227 to €1,261 per month. According to Daft.ie there were fewer than 3,100 properties available to rent nationwide on April 1st, down over 15% on the same date a year ago and the lowest recorded for this time of year since Daft.ie began reporting.¹¹

¹ This is a snapshot study conducted over a three day period therefore findings are indicative of trends in asking prices in the wider rental market.

² Daft.ie is a property website that advertises the asking prices for properties available for sale and for rent. <http://www.daft.ie/about/>

³ Each city centre in daft is known as a "general area" and has a number of specific areas associated with it. Ads are placed in these specific areas. Cork City Centre contains properties to rent in Cork City Centre, Western Road and The Lough (daft.ie).

⁴ Dublin City Centre contains properties to rent in Temple Bar, Dublin 1, Dublin 2, Christchurch, IFSC, North Wall, Smithfield, Hanover Quay (daft.ie).

⁵ Galway City Centre contains properties to rent in Galway City Centre, Nun's Island, Bohermore and Woodquay (daft.ie).

⁶ Limerick City Centre contains properties to rent in Limerick City (daft.ie).

⁷ Areas of North Kildare include Ballitore, Ballymore Eustace, Celbridge, Clane, Johnstownbridge, Kilcock, Kildare, kill, Leixlip, Maynooth, Naas, Newbridge, Prosperous, Rathangan, Robertstown, Sallins, Straffan, The Curragh.

⁸ Areas of Athlone, Portlaoise, Dundalk and Sligo Town contains properties to rent within each of the townland boarder (daft.ie).

⁹ Areas of Leitrim contains properties to rent within the county boarder (Daft.ie).

¹⁰ Waterford City Centre contains properties to rent in Newtown, Ballyaneen, Waterford City, Belview Port, Ballytruckle, Ballygunner, Carrigeen, Ballinamona. (daft.ie)

¹¹ Daft.ie 2018 Q1 Rental Price Report, <https://www.daft.ie/report/2018-Q1-rentalprice-daftreport.pdf>.

Main Findings

Property Availability

- There were 530 properties available to rent with no minimum cost during the three-day snapshot study period, a minor decrease since the previous study in February 2018 when 532 properties were available to rent across all 11 areas. In March 2017 600 properties were available.
- This is a decrease of 54% when compared to May 2015, the first Locked Out of the Market study when there were 1150 properties available¹².
- Ninety-two percent (489 properties) of all properties available to rent were above Rent Supplement/Housing Assistance Payment limits, similar to February 2018 when this figure was 93%. This figure was 88% in March 2017.
- Just 8% of all properties available to rent (41 properties) were available within the limits for the four categories included in this study, increasing from 7% in the February 2018 study.¹³ This was 12% in March 2017.
- These figures clearly indicate that increases in RS/HAP limits introduced in July 2016 are ineffectual, impacting the viability of social housing provision under the Rent Supplement and Housing Assistance Payment schemes.

The number of available properties within RS/HAP limits in regional towns has significantly decreased from 13 properties in February 2018 to 6 properties in this most recent study indicating further displacement from urban centres and people compromising with greater commutes to find a place to call home.

- There were four properties available to rent within Rent Supplement/Housing Assistance Payment RS/HAP limits across all study areas for a single person. This represents an increase of 1 property since February 2018. These properties were located in Athlone (1), Dundalk (2) and Sligo (1). Only 2 properties were available in this category in March 2017.
- Four properties were available to rent within RS/HAP limits across all 11 areas for a couple over the course of the study representing an increase of 1 property since February 2018. These properties were located in Cork City Centre (2) and Dundalk (2). Seven properties were available in this category in March 2017.
- Of particular concern, no properties were available across all four categories in three study areas (Galway City Centre, Limerick City Centre, Portlaoise) and just one property was available across all categories in five study areas (Athlone, Dublin City Centre, North Kildare, Sligo Town, Waterford City Centre). This is the lowest recorded point in a downwards trend that has been declining since RS/HAP limits were increased in July 2016.

¹² Locked Out of the Market I, published May 2015.

¹³ The four RS/HAP limit categories looked at were: Single Person; Couple; Couple/One Parent with One Child; One Parent/One Parent with Two Children.

Regional Variation

- Significant regional variation is evident across the study findings in terms of numbers of properties available within Rent Supplement/Housing Assistance Payment (RS/HAP) limits. Fewer properties are available within urban centres and regional towns with the vast majority of available properties found in commuter belt towns.
 - The number of properties available within RS/HAP limits in urban centres (8 properties) is unchanged since February 2018.¹⁴ This has decreased significantly since March 2017 when 28 properties were available within limits in urban centres.
 - The number of available properties within RS/HAP limits in regional towns has significantly decreased from 13 properties in February 2018 to 6 properties in this study.¹⁵ In March 2017 17 properties were available within limits in regional towns.
 - In commuter belt towns, the number of properties available within RS/HAP limits has increased from 18 properties in February 2018 to 27 properties in May 2018.^{16,17} This mirrors the findings from March 2017 when 27 properties were also available in commuter belt towns.

Household types

- Of the 41 properties available to rent across the 11 study areas within all four categories of Rent Supplement/Housing Assistance Payment (RS/HAP) limits the following were available;
 - Single persons: Four properties were available within RS/HAP limits for a single person. This is an increase of 1 property from February 2018 and represents 10% of the total properties available within RS/HAP limits. Just 2 properties were available in this category in March 2017.
 - Couples: Four properties were available to rent within the RS/HAP limits for a couple, representing a minor increase of 1 property since February 2018. The percentage share of total properties available within RS/HAP limits for couples stands at 10%, up from 8% recorded in February 2018. Seven properties were available in this category in March 2017 representing a reduction of 3 properties in the intervening period.
 - Couple/one parent plus one child: Twenty properties were available for a couple/one parent and one child within the RS/HAP limits representing 49% of all available properties within RS/HAP limits across all four study categories. This is a minor increase of 3 properties since February 2018. It should be noted that 9 of these properties were one-bedroom units, the suitability of which for this family type is open to question. Availability in this category has plummeted since March 2017 when 44 properties were available.
 - Couple/one parent plus two children: Thirteen properties were available within RS/HAP limits for a couple/one parent and two children. This is a decrease of 3 properties when compared with February 2018 and amounts to 31% of all available properties within RS/HAP limits. In March 2017 19 properties were available in this category.

¹⁴ Urban centres include Cork City Centre, Dublin City Centre, Galway City Centre, Limerick City Centre and Waterford City Centre.

¹⁵ Regional towns include Sligo Town, Leitrim and Athlone.

¹⁶ Commuter belt towns include North Kildare, Portlaoise and Dundalk.

¹⁷ In Census 2016, Kildare, Louth and Laois were amongst the top ten counties of usual residence of workers commuting to Dublin City and suburbs. Census of Population 2016 – Profile 6 Commuting in Ireland, <http://www.cso.ie/en/releasesandpublications/ep/p-cp6ci/p6cii/p6www/>.

Recommendations

It is widely acknowledged that the primary solution to the ongoing housing and homelessness crisis lies in the construction and delivery of social and affordable housing across all elements of the housing sector. The findings presented above illustrate the inadequacy of the current approach to social housing provision utilising the private rental sector through the Housing Assistance Payment and Rent Supplement schemes. In the absence of large-scale strategic State delivery of social housing and the continued reliance on the private rental sector for the provision of social housing tenancies, we encourage the Department of Housing, Planning and Local Government and the Department of Employment Affairs and Social Protection to consider the following recommendations. These recommendations are specific to the operation of the Rent Supplement and the Housing Assistance Payment schemes and the regulatory and policy mechanisms that underpin the private rental sector.

1. Rent Supplement & HAP

- Prioritise people who are homeless as having the greatest level of social housing need.
- Increase Rent Supplement and HAP limits to allow households in receipt of these payments to compete fairly in the private rental sector.
- Increase these payments by at least 4% in Rent Pressure Zones (RPZ's), as the majority of rents in these areas will increase by 4% per annum.
- Ongoing monitoring and adjustment of RS/HAP limits on a bi-annual basis is required to ensure alignment with private market rents.
- Single people and couples should be specifically targeted given the disproportionate impact inadequate RS/HAP limits are having on these households' ability to access affordable housing.
- Additional funding is required to extend the HAP Placefinder service to all Local Authorities nationwide.
- Ensure there is an awareness of discretionary uplifts (flexibility) and that they are easily available to those that are in receipt of these payments when required.¹⁸
- Extend the Homeless HAP Scheme nationwide for those at risk of or currently experiencing homelessness.
- Upon termination of a HAP tenancy, the onus should be on the Local Authority to find appropriate, alternative housing options as with RAS tenancies in the past. This should not be the responsibility of hard pressed, stressed households that may have varying financial and personal capacity to do so.
- Review the policy approach that determines a household's social housing need as met once in receipt of HAP. In the absence of sufficient security of tenure in the private rental sector, this approach does not reflect the perilous reality of many HAP tenancies.

2. Rent Certainty and Rent Predictability

- Full rent certainty is required. Index linking rents to the Consumer Price Index must be considered.

¹⁸ Housing Assistance Payment, 'The Experience of Citizens Information Services', p. 16, http://www.citizensinformationboard.ie/downloads/social_policy/HAP_Report_CIB_2017.pdf.

- A published register of all rents is required to assist active enforcement, ensure compliance and to combat inflationary rent increases at the commencement of new tenancies.
- Amend the Residential Tenancies Act to remove the maximum 3 year period for which an area can be designated as a Rent Pressure Zone (RPZ). Removing RPZ designations would lead to rapid rent increases creating further volatility in the sector, leading to further homelessness.
- In the absence of full rent certainty, extend Rent Pressure Zones nationwide as a matter of priority to reflect the national scale of the rental crisis. Ongoing monitoring based on local electoral area boundaries is essential to gauge the impact of the measure.
- Active enforcement of Rent Predictability measures by the Residential Tenancies Board (RTB) is required to ensure compliance within RPZ's. Expedite legislation to introduce new enforcement measures as a matter of priority.

3. Security of Tenure

- Legislate to remove and replace paragraph (b) of section 34 of the *Residential Tenancies Act* (RTA). This paragraph contains the pertinent text that allows a landlord to terminate a tenancy without reason following a Part IV tenancy. This should be replaced with an appropriate provision that implements the Government's commitment to introduce indefinite leasing.
- Tenants of Buy-to-Let (BTL) properties in receivership must have full protection. Appropriate legislation should be fast-tracked to bring this significant cohort of the private rental sector within the scope of the RTA and the numerous rights and protections contained therein and in the legislative pipeline.
- The Residential Tenancies Board (RTB) should closely monitor terminations relying on Section 34 reasons to ensure landlords are acting in good faith and in compliance with the standards contained in the Planning and Development (Housing) and Residential Tenancies Act 2016.^{19,20}
- Amend measures to prevent the simultaneous serving of termination notices on large numbers of residents in a single development to include cases of simultaneous termination of less than 5 tenancies.
- We welcome the publication by the RTB of guidelines for good practice on the 'Substantial Change' exemption in RPZ's. The RTB must ensure strict monitoring and enforcement of these guidelines in landlord-tenant dispute proceedings where substantial refurbishment or substantial change is cited as a reason for a rent review or rent setting of a new tenancy.
- Roll out a national public awareness campaign to ensure all stakeholders are aware of the new guidelines and their associated obligations. In particular, ensure landlords and tenants are aware of the implications and obligations attached to the Rent Predictability measures.
- Expedite legislation to extend periods of notice for a tenancy termination as is currently being considered at cabinet.
- Adequately resource the RTB in terms of staffing and expertise to undertake its ever-growing mandate.

¹⁹ Planning and Development (Housing) and Residential Tenancies Act 2016, P. 46, <http://www.oireachtas.ie/documents/bills28/acts/2016/a1716.pdf>.

²⁰ Section 34 reasons for termination include: (1) Non suitability of the dwelling for the accommodation needs of the tenant; (2) Sale or transfer of the property by the owner; (3) Landlord requires the property for their occupation or for family member occupation; (4) Substantial refurbishment of the property; (5) Change of use of the dwelling requiring planning permission.

4. Rented Sector Deposits

- Amend, commence and implement the Deposit Protection Scheme, provided for in the 2015 amendments to the RTA, immediately.
- To address the requesting of unreasonable deposits at the commencement of tenancies, legislate for a statutory maximum of one month's deposit payment at the commencement of a new tenancy.

5. Private Rented Supply

- Balance the leveraging of Local Authority lands in RPZs for the delivery of affordable rental units by securing significant conditionality from investors in terms of security of tenure, rent certainty, quality of housing and amenities in addition to developer contributions similar to existing Part V contributions for social housing (minimum 10%).
- Develop a dedicated affordable rental scheme in which affordable rents are determined at a maximum of one third of a household's net income.
- To ensure the delivery of as many cost-rental units as possible, fully resource and support Approved Housing Bodies (AHBs) to engage with the model.

6. Private Rented Standards

- Introduce an NCT style inspection system for all rental properties. This requires resources to ensure expanded inspection coverage and the imposition of significant penalties for breaches of standards.
- Put in place measures to prevent vulnerable tenants entering homelessness following inspections of properties finding large-scale violations of rental accommodation standards.
- Introduce additional landlord quality requirements to certify their rental property complies with regulations in relation to standards for rental accommodation, overcrowding and fire safety as a matter of priority.

Findings

Presented below are the findings from the three-day snapshot study. An overall picture of the 11 study areas is in *Table 1* below, showing the average number of properties available to rent in each area over the three days of this study (May 1st, 2nd, and 3rd 2018). It displays the total number of properties available within Rent Supplement /Housing Assistance Payment limits across each of the four household categories: single person, couple, couple/one-parent with one child and couple/one-parent with two children.

Figure 1 shows the percentage share of available properties for couples/singles and family household categories across the eleven Locked Out studies in this series. The total number of available properties without limits per study is visible beneath the corresponding study month. This is followed by *Figure 2*, *Figure 3* and *Figure 4*, which illustrate the percentage breakdown of properties available per household category in May 2018, February 2018 and March 2017. Regional variation in the distribution of available properties within RS/HAP limits for May 2018, February 2018 and March 2017 is displayed in *Tables 2, 3 and 4*. Finally, there follows a breakdown of tabular and summary findings from each area examined in this study period with like for like comparisons with the findings from the corresponding study in February 2018 and March 2017.²¹ The individual area tabular findings show the number of new available properties to rent for the four household types over the three days of the study period.²²

²¹ Three studies in this series were carried out in 2017 – March, August and November.

²² We are always working to improve this report and the accessibility of the information based on feedback. In this report we include rent ranges per each of the 11 regions for one and two bedroomed properties where available, contrasted with those properties which fell within RS/HAP limits.

Table 1: Available properties to rent within RS/HAP limits across 11 study areas on May 1st, 2nd, and 3rd 2018

LOCATION	Average number of properties available to rent with no min cost	Single person: Total number of properties available to rent within RS/HAP Limits	Couple: Total number of properties available to rent within RS/HAP Limits	Couple/One Parent + 1 Child: Total number of properties available to rent within RS/HAP Limits	Couple/One Parent + 2 Children: Total number of properties available to rent within RS/HAP Limits
Athlone	19	1	0	0	0
Cork City Centre	49	0	2	4	0
Dublin City Centre	199	0	0	1	0
Dundalk	37	2	2	11	11
Galway City Centre	18	0	0	0	0
North Kildare	41	0	0	1	0
Leitrim	26	0	0	2	2
Limerick City Centre	26	0	0	0	0
Sligo town	15	1	0	0	0
Portlaoise	13	0	0	0	0
Waterford City Centre	87	0	0	1	0
Total:	530	4	4	20	13

Figure 2, Figure 3 and Figure 4 below illustrate the percentage breakdown of properties available per household category in May 2018, February 2018 and March 2017. The pie charts demonstrate that single people and couples remain disproportionately affected with regard to availability of properties within RS/HAP limits in these two specific categories. Only four properties were available to rent for single persons and couples in May 2018. The percentage share of properties available for a couple/one parent and one child has increased to 49% of the total number of properties available within the RS/HAP limits, up 6% since the February 2018 study. Thirty-one percent of properties available within RS/HAP limits were available for a couple/one parent and two children, down 10% since the November 2017 study. These findings suggest the private rented market remains volatile. The increase in RS/HAP limits in July 2016 and the application of discretion (flexibility) are having a greater impact for these household types in terms of access and availability of properties. Of particular concern is the lack of available properties for single people and couples with further measures required to improve access to private rented homes for these household types.

Figure 1: Percentage share of available properties for Singles/Couple & Family Categories across the Locked Out Series May 2015 – Feb 2018

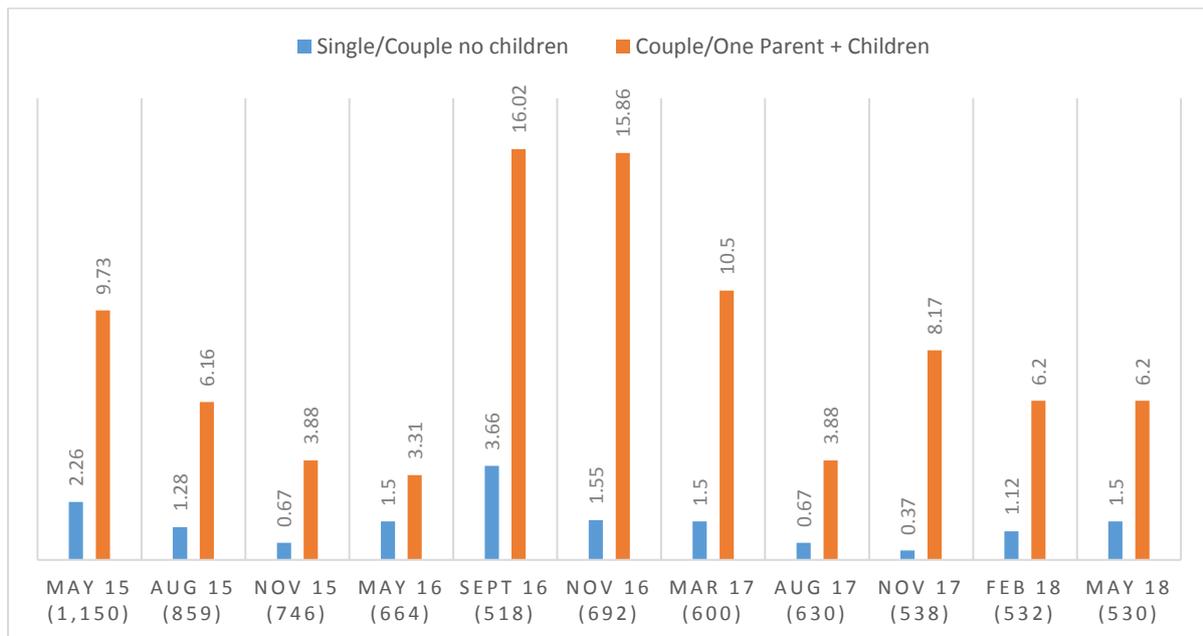


Figure 2: Number of Properties by RS/HAP Household Category May 2018

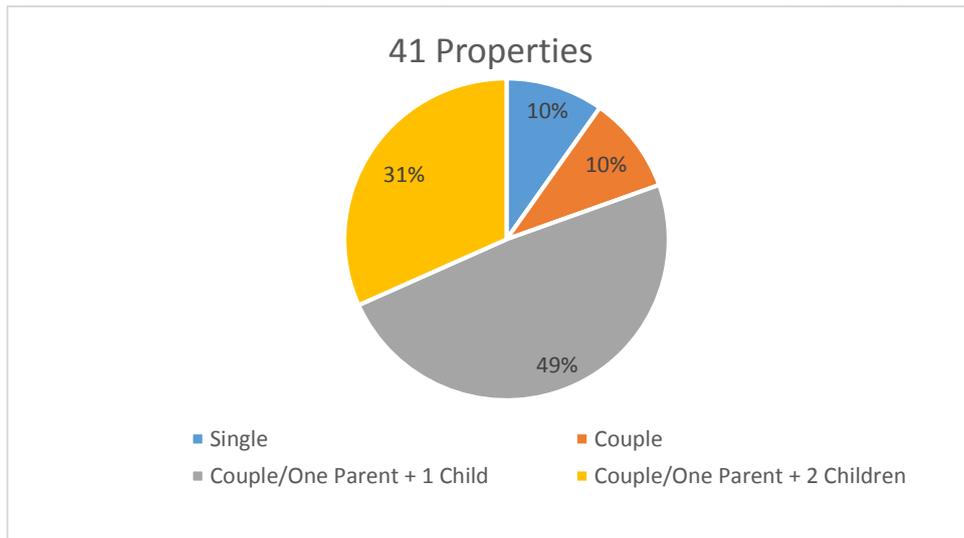


Figure 3: Number of Properties by RS/HAP Household Category February 2018

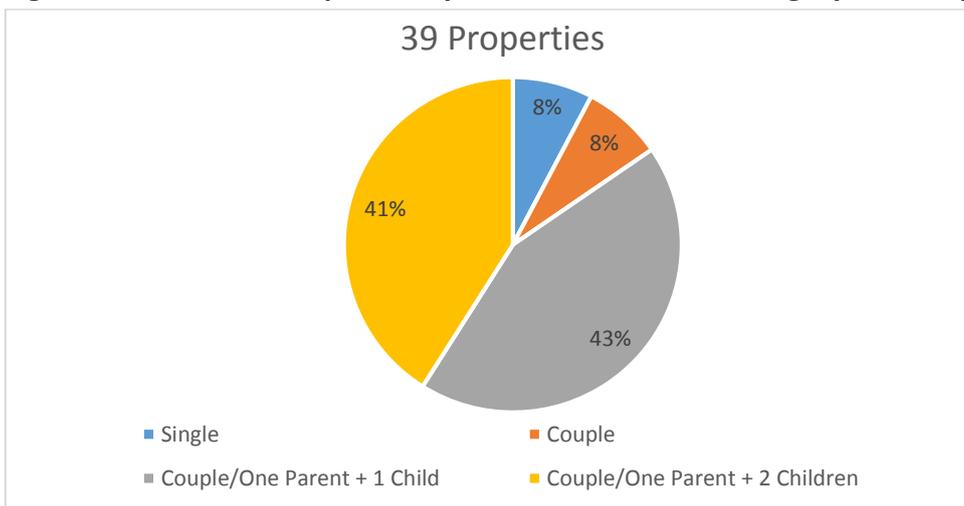


Figure 4: Number of Properties by RS/HAP Household Category March 2017

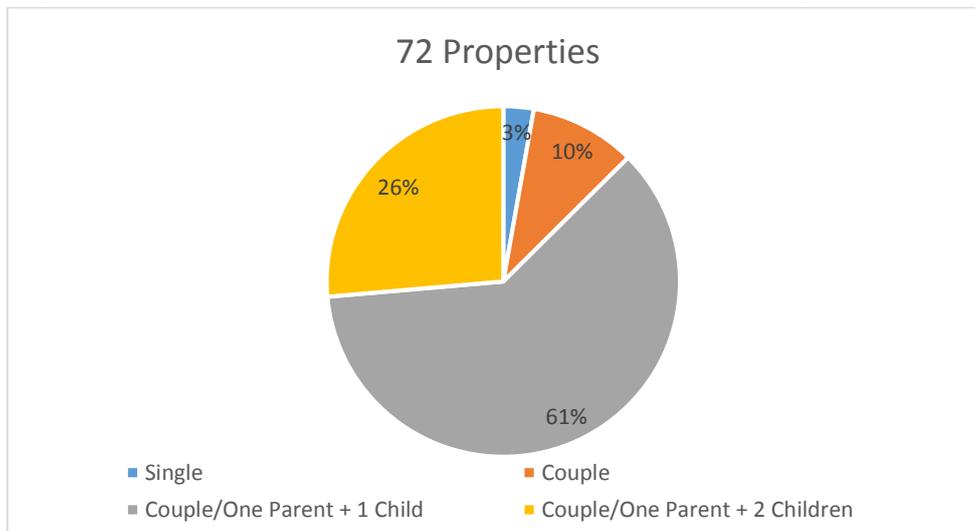


Table 2: Available properties by Household Category & Regional Distribution May 2018

Household Category/Composition Category	Available Properties
Properties available within Single Person limits	Urban Centres ²³ (0) Commuter Belt ²⁴ (2) Regional Towns ²⁵ (2)
Properties available within Couple limits	Urban Centres (2) Commuter Belt (2) Regional Towns (0)
Properties available within limits for a couple/one parent + 1 child	Urban Centres (6) Commuter Belt (12) Regional Towns (2)
Properties available within limits for a couple/one parent + 2 children	Urban Centres (0) Commuter Belt (11) Regional Towns (2)

Table 3: Available properties by Household Category and Regional Distribution February 2018

Household Category/Composition Category	Available Properties
Properties available within Single Person limits	Urban Centres ²⁶ (1) Commuter Belt ²⁷ (0) Regional Towns ²⁸ (2)
Properties available within Couple limits	Urban Centres (2) Commuter Belt (0) Regional Towns (1)
Properties available within limits for a couple/one parent + 1 child	Urban Centres (4) Commuter Belt (7) Regional Towns (6)
Properties available within limits for a couple/one parent + 2 children	Urban Centres (1) Commuter Belt (11) Regional Towns (4)

²³ Urban centres include Cork City Centre, Dublin City Centre, Galway City Centre, Limerick City Centre and Waterford City Centre.

²⁴ Commuter belt towns include North Kildare, Portlaoise and Dundalk.

²⁵ Regional towns include Athlone, Leitrim and Sligo Town.

²⁶ Urban centres include Cork City Centre, Dublin City Centre, Galway City Centre, Limerick City Centre and Waterford City Centre.

²⁷ Commuter belt towns include North Kildare, Portlaoise and Dundalk.

²⁸ Regional towns include Athlone, Leitrim and Sligo Town.

Table 4: Available properties by Household Category and Regional Distribution March 2017

Household Category/Composition Category	Available Properties
Properties available within Single Person limits	Urban Centres (1) Commuter Belt (1) Regional Towns (0)
Properties available within Couple limits	Urban Centres (4) Commuter Belt (1) Regional Towns (2)
Properties available within limits for a couple/one parent + 1 child	Urban Centres (22) Commuter Belt (12) Regional Towns (0)
Properties available within limits for a couple/one parent + 2 children	Urban Centres (1) Commuter Belt (13) Regional Towns (5)

Summary of findings for each location

Athlone

Table 4: Athlone – properties available within RS/HAP limits

Date:	Total Number of properties available to rent	Single Person: Total number of properties available to rent within RS/HAP limits of €450	Couple: Total number of properties available to rent within RS/HAP limits of €470	Couple/One Parent + 1 Child: Total number of properties available to rent within RS/HAP limits of €600	Couple/One Parent + 2 Children: Total number of properties available to rent within RS/HAP limits of €625
01/05/2018	19	1	0	0	0
02/05/2018	19	0	0	0	0
03/05/2018	17	0	0	0	0
TOTAL		1	0	0	0

Athlone Summary

- There was an average of 19 properties available to rent in Athlone in this study period, an increase of 8 properties since the February 2018 study. Property availability has fallen significantly since March 2017 when 38 properties were recorded.
- Only one property available to rent within RS/HAP limits across all 4 categories in this study period representing a minor increase since February 2018 when no properties were available across all four categories. Three properties were available across all 4 categories in March 2017.
- Rents for a two bedroom property in Athlone ranged from €675 to €875 for 5 properties, all of which were beyond RS/HAP limits.
- The only one-bedroom property available to rent cost €433 per month.
- Rents increased in Co. Westmeath by an average of 11.2% in the year to Q1 2018.²⁹
- Since RS/HAP limits were increased in Q3 2016³⁰, rents in Westmeath have increased by 18% according to Daft.ie quarterly reports.³¹

²⁹ Daft.ie Rental Price Report, Q1 2018, <https://www.daft.ie/report/2018-Q1-rentalprice-daftreport.pdf>.

³⁰ Rent Supplement and HAP limits were increased from July 2016 <https://www.welfare.ie/en/pressoffice/Pages/pr280616.aspx>

³¹ Daft.ie Quarterly Rental Price Report Q3 2016, <https://www.daft.ie/report/q3-2016-rental-daft-report.pdf>.

Cork City Centre

Table 5: Cork City Centre properties available within RS/HAP limits

Date	Total Number of properties available to rent	Single Person: Total number of properties available to rent within RS/HAP limits of €485	Couple: Total number of properties available to rent within RS/HAP limits of €575	Couple/One Parent + 1 Child: Total number of properties available to rent within RS/HAP limits of €700	Couple/One Parent + 2 Children: Total number of properties available to rent within RS/HAP limits of €725
01/05/2018	46	0	1	3	0
02/05/2018	53	0	1	1	0
03/05/2018	49	0	0	0	0
TOTAL		0	2	4	0

Cork City Centre Summary

- There was an average of 49 properties to rent in Cork City Centre over the course of the study period. This is a minor increase of 2 properties when compared to February 2018. Forty-nine properties were available in March 2017.
- There were 6 properties available within RS/HAP limits in Cork City Centre over this study period, representing an increase of 3 properties since February 2018. This is a reduction of 50% since March 2017 when 12 properties were available.
- There were no properties available to rent within the RS/HAP limits for a single person over the three days of the study, mirroring the findings from February 2018.
- There were 2 properties available within RS/HAP limits for a couple during this study period. In February 2018, no properties were available in this category.
- Four properties in total were available within RS/HAP limits for a couple/one parent and one child. This is an increase of 2 properties when compared to February. All of these properties were one-bedroom units, the suitability of which for a family of this size is open to question.
- No properties were available within RS/HAP limits for a couple/one parent and two children, representing a decrease of 1 property since the previous study in February 2018.
- Rent in Cork City Centre ranged from €650 to €1378 for the 15 one-bedroom properties available with 11 properties above RS/HAP limits.
- Rent in Cork City Centre ranged from €845 to €1710 for 20 two-bedroom properties, all of which were above RS/HAP limits.
- Rents increased in Cork City by an average 9.3% in the year to Q1 2018.³²
- Since RS/HAP limits were increased in Q3 2016, rents in Cork City Centre have increased by 11% according to Daft.ie quarterly reports.³³

³² Ibid 29.³³ Daft.ie Quarterly Rental Price Report Q3 2016, <https://www.daft.ie/report/q3-2016-rental-daft-report.pdf>.

Dublin City Centre**Table 6: Dublin City Centre properties available within RS/HAP limits**

Date:	Total Number of properties available to rent (no minimum cost)	Single Person: Total number of properties available to rent within RS/HAP limits of €660	Couple: Total number of properties available to rent within RS/HAP limits of €900	Couple/One Parent + 1 Child: Total number of properties available to rent within RS/HAP limits of €1250	Couple/One Parent + 2 Children: Total number of properties available to rent within RS/HAP limits of €1275
01/05/2018	197	0	0	1	0
02/05/2018	201	0	0	0	0
03/05/2018	199	0	0	0	0
TOTAL		0	0	1	0

Dublin City Centre Summary

- There was an average of 199 properties available to rent in Dublin City Centre over the study period. This figure remains unchanged from the previous study in February 2018. Property availability has increased in Dublin City centre since March 2017 when 167 properties were available to rent.
- There was only one property available within RS/HAP limits in Dublin City Centre in this study period, a decrease of 3 properties since February 2018. In March 2017, 8 properties were available within RS/HAP limits across all four categories.
- There were no properties available to rent within RS/HAP limits for a single person, representing a continuation of the findings from the February 2018 study period.
- No properties were available to rent within RS/HAP limits for a couple. This is a decrease of 2 properties since the February 2018 study.
- There was 1 property available to rent within RS/HAP limits for a couple/one parent and one child in May 2018 representing a decrease of 1 property since February 2018. This property was a one-bedroom unit, the suitability of which for a family is questionable.
- There were no properties available to rent within RS/HAP limits for a couple/one parent and two children across the three days of this study. This figure remains unchanged since the August 2015 study.
- Rents in Dublin City Centre ranged from €750 to €4,008 for the 67 one-bedroom properties available, 66 of which were above RS/HAP limits.
- Rents in Dublin City Centre ranged from €1,300 to €4,983 for the 84 two-bedroom properties available, all of which were above RS/HAP limits.
- Rents increased in Dublin City Centre by an average of 13.8% in the year to Q1 2018.³⁴
- Since RS/HAP limits were increased in Q3 2016, rents in Dublin City Centre have increased by 22% according to Daft.ie quarterly reports.³⁵

³⁴ Ibid 29³⁵ Ibid 33.

Dundalk**Table 7: Dundalk properties available within RS/HAP limits**

Date	Total Number of properties available to rent	Single Person: Total number of properties available to rent within HAP limits of €575	Couple: Total number of properties available to rent within HAP limits of €650	Couple/One Parent + 1 Child: Total number of properties available to rent within HAP limits of €975	Couple/One Parent + 2 Children: Total number of properties available to rent within HAP limits of €1050
01/05/2018	36	1	1	10	9
02/05/2018	37	1	1	1	2
03/05/2018	37	0	0	0	0
TOTAL		2	2	11	11

Dundalk Summary

- There was an average of 37 properties available to rent in Dundalk during this study period, representing an increase of 6 properties when compared to February 2018. Thirty-three properties were available in March 2017.
- There were 26 properties available to rent within RS/HAP limits during this study period, representing a significant increase of 9 properties since February 2018. Thirty-three properties were available to rent within RS/HAP limits in Dundalk in March 2017.
- There were 2 properties available to rent within RS/HAP limits for a single person across the three days of the study. In February 2018, no properties were available within this category.
- There were 2 properties available to rent for a couple across this study period. In February 2018, no properties were available to rent within RS/HAP limits for a couple in Dundalk.
- There were 11 properties available to rent within RS/HAP limits for a couple/one parent and one child. This figure represents an increase of 5 properties since February 2018. .
- There were 11 properties available to rent within RS/HAP limits for a couple/one parent and two children. This figure mirrors the findings from the February 2018 study.
- Rents in Dundalk ranged from €520 to €750 for the 6 one-bedroom apartments available, 2 of which were above RS/HAP limits.
- Rents in Dundalk ranged from €800 to €3,500 for the 16 two-bedroom properties available, 5 of which were beyond RS/HAP limits.
- Rents increased in Co. Louth by an average of 13.5% in the year to Q1 2018.³⁶
- Since RS/HAP limits were increased in Quarter 3 2016, rents in Dundalk have increased by 23% according to Daft.ie quarterly reports.³⁷

³⁶ Ibid 29.³⁷ Ibid 33.

Galway City Centre

Table 8: Galway City Centre – properties available within RS/HAP limits

Date	Total Number of properties to rent	Single Person: Total number of properties available to rent within RS/HAP limits of €575	Couple: Total number of properties available to rent within RS/HAP limits of €650	Couple/One Parent + 1 Child: Total number of properties available to rent within RS/HAP limits of €850	Couple/One Parent + 2 Children: Total number of properties available to rent within RS/HAP limits of €875
01/05/2018	18	0	0	0	0
02/05/2018	17	0	0	0	0
03/05/2018	18	0	0	0	0
TOTAL		0	0	0	0

Galway City Centre Summary

- There was an average of 18 properties available to rent in Galway City Centre³⁸ over the study period representing an increase of 3 properties since February 2018. This represents a reduction of 10 properties when compared to March 2017 when 28 properties were available.
- There were no properties available within RS/HAP limits in Galway City Centre during this study period. This mirrors the finding of the February 2018 study. Two properties were available within RS/HAP limits in Galway City Centre in March 2017.
- There were no properties available within RS/HAP limits for a single person over the course of the study period. This matches the findings of the February 2018 study.
- There were no properties available for a couple during this study period, reflecting the findings of the February 2018 study.
- No properties were available to rent over the three days of the study within RS/HAP limits for a couple/one parent and one child. Again, this reflects the findings of the February 2018 study.
- There were no properties available within RS/HAP limits for a couple/one parent and two children during the study period. This figure remains unchanged since February 2018.
- Rents in Galway City Centre ranged from €850 to €1,000 for the 3 one-bedroom properties available, all of which were beyond RS/HAP limits.
- Rents in Galway City Centre ranged from €1,100 to €1,750 for the 10 two-bedroom properties available, all of which were beyond RS/HAP limits.
- Rents increased in Galway City by an average of 13.6% in the year to Q1 2018.³⁹
- Since RS/HAP limits were increased in Q3 2016, rents in Galway City Centre have increased by 18% according to Daft.ie quarterly reports.⁴⁰

³⁸ The definition 'Galway City Centre' refers to the search parameters used by Daft.ie which also includes the wider Galway City area.

³⁹ Ibid 29.

⁴⁰ Ibid 33.

North Kildare

Table 9: North Kildare – properties available within RS/HAP limits

Date	Total Number of properties available to rent	Single Person: Total number of properties available to rent within RS/HAP limits of €575	Couple: Total number of properties available to rent within RS/HAP limits of €650	Couple/One Parent + 1 Child: Total number of properties available to rent within RS/HAP limits of €975	Couple/One Parent + 2 Children: Total number of properties available to rent within RS/HAP limits of €1050
01/05/2018	40	0	0	0	0
02/05/2018	41	0	0	1	0
03/05/2018	42	0	0	0	0
TOTAL		0	0	1	0

North Kildare Summary

- There was an average of 41 properties available to rent across North Kildare during this study period. This is a significant decrease of 25 properties on the findings from the February 2018 study and a dramatic decrease on March 2017 when 103 properties were available.
- There was only 1 property available to rent within RS/HAP limits in North Kildare mirroring the findings from the February 2018 and March 2017 studies.
- No properties were available to rent within RS/HAP limits for a single person over the study period, mirroring the findings from February 2018.
- No properties were available for a couple across the three days of this study, representing no change since February 2018.
- One property was available within RS/HAP limits for a couple/one parent and one child over the study period representing no change since February 2018. This was a one-bed property, the suitability of which for this family type is questionable.
- There were no properties available within RS/HAP limits for a couple/one parent and two children during this study period representing no change since February 2018.
- Rents in North Kildare ranged from €950 to €1,150 for the 4 one-bedroom properties available, all of which were beyond RS/HAP limits.
- Rents in North Kildare ranged from €1200 to €1,450 for the 6 two-bedroom properties available, all of which were beyond RS/HAP limits.
- Rents increased in Co. Kildare by an average of 10.2% in the year to Q1 2018.⁴¹
- Since RS/HAP limits were increased in Q3 2016, rents in Kildare have increased by 16% according to Daft.ie quarterly reports.⁴²

⁴¹ Ibid 29.⁴² Ibid 33.

Co. Leitrim

Table 10: Co. Leitrim – properties available within RS/HAP limits

Date	Total Number of properties available to rent	Single Person: Total number of properties available to rent within RS/HAP limits of €340	Couple: Total number of properties available to rent within RS/HAP limits of €370	Couple/One Parent + 1 Child: Total number of properties available to rent within RS/HAP limits of €450	Couple/One Parent + 2 Children: Total number of properties available to rent within RS/HAP limits of €475
01/05/2018	29	0	0	2	2
02/05/2018	25	0	0	0	0
03/05/2018	24	0	0	0	0
TOTAL		0	0	2	2

Co. Leitrim Summary

- There was an average of 26 properties available to rent in Co. Leitrim over this snapshot study period, a significant decrease of 12 properties when compared to February 2018. Thirty-three properties were available to rent in March 2017.
- There were only 4 properties available to rent in Leitrim across the four categories of RS/HAP limits over the three days of the study. This is a decrease of 5 properties compared to February 2018 and a decrease of 7 properties when compared to March 2017.
- No properties were available to rent within the RS/HAP limits for a single person during the study period. There were no properties available to rent within these limits during the February 2018 study.
- No properties were available to rent within the RS/HAP limits for a couple during the study period mirroring the findings from February 2018.
- There were 2 properties available to rent within RS/HAP limits for a couple/one parent and one child. This is a decrease of 3 properties since the February 2018 study.
- Two properties were available within RS/HAP limits for a couple/one parent and two children. This is a decrease of 2 properties since the February 2018 study, which recorded 4 properties in this category.
- Rents in Leitrim ranged from €470 to €490 for the 2 one-bedroom properties available, both of which were beyond RS/HAP limits.
- Rents in Leitrim ranged from €400 to €580 for the 9 two-bedroom properties available, 7 of which were beyond RS/HAP limits.
- Rents increased in Co. Leitrim by an average of 5.5% in the year to Q1 2018.⁴³
- Since RS/HAP limits increased in Q3, rents in Co. Leitrim have increased by 8% according to Daft.ie quarterly reports.⁴⁴

⁴³ Ibid 29.⁴⁴ Ibid 33.

Limerick City Centre

Table 11: Limerick City Centre – properties available within RS/HAP limits

Date	Total Number of properties available to rent	Single Person: Total number of properties available to rent within RS/HAP limits of €420	Couple: Total number of properties available to rent within RS/HAP limits of €450	Couple/One Parent + 1 Child: Total number of properties available to rent within RS/HAP limits of €650	Couple/ One Parent + 2 Children: Total number of properties available to rent within RS/HAP limits of €700
01/05/2018	25	0	0	0	0
02/05/2018	26	0	0	0	0
03/05/2018	26	0	0	0	0
TOTAL		0	0	0	0

Limerick City Centre Summary

- There was an average of 26 properties available to rent in Limerick City Centre over the 3 days of this snapshot study. This is an increase of 2 properties since the February 2018 study, which recorded 24 properties. In March 2017, property availability stood at 29 properties.
- There were no properties available within RS/HAP limits in Limerick City Centre mirroring the findings from February 2018 and represents a reduction of 1 property since March 2017.
- There were no properties available to rent over the three days within the RS/HAP limits for a single person in Limerick City Centre. This mirrors the findings of the February 2018 study.
- There were no properties available to rent over the three days within the RS/HAP limits for a couple in Limerick City Centre. This mirrors the findings of the February 2018 study.
- There were no properties available within RS/HAP limits for a couple/one parent and one child during this study period, representing no change since February 2018.
- There were no properties available to rent within the RS/HAP limits for a couple/one parent and two children over the three days of this study mirroring the findings of the February 2018 study.
- The only one-bedroom property to rent in Limerick City Centre was available for €1,100 per month, significantly beyond the reach of households in the first three categories of this snapshot study.
- Rents in Limerick City Centre ranged from €800 to €1,600 for the 18 two-bedroom properties available, all of which were beyond the reach of RS/HAP limits.
- Rents increased in Limerick City by an average of 17.1% in the year to Q1 2018.⁴⁵
- Since RS/HAP limits were increased in Q3 2016, rents in Limerick City Centre have increased by 21% according to Daft.ie quarterly reports.⁴⁶

⁴⁵ Ibid 29.⁴⁶ Ibid 33.

Portlaoise

Table 12: Portlaoise- properties available within RS/HAP limits

Date	Total Number of properties available to rent	Single Person: Total number of properties available to rent within RS/HAP limits of €420	Couple: Total number of properties available to rent within RS/HAP limits of €433	Couple/One Parent + 1 Child: Total number of properties available to rent within RS/HAP limits of €580	Couple/One Parent + 2 Children: Total number of properties available to rent within RS/HAP limits of €610
01/05/2018	12	0	0	0	0
02/05/2018	14	0	0	0	0
03/05/2018	14	0	0	0	0
TOTAL		0	0	0	0

Portlaoise Summary

- There was an average of 13 properties available to rent in Portlaoise over the May 2018 study period, a decrease of 2 properties when compared to February 2018. Eighteen properties were available to rent in Portlaoise in March 2017.
- There were no properties available to rent within the RS/HAP limits across all categories over the three days of this study period. This finding has remained consistent since the first Locked Out Study in May 2015.
- Rents in Portlaoise ranged from €850 to €900 for the 4 two-bedroom properties available, all of which were beyond RS/HAP limits.
- Rents increased in Co. Laois by an average of 11.5% in the year to Q1 2018.⁴⁷
- Since RS/HAP limits increased in Q3 2016, rents in Co. Laois have increased by 19% according to Daft.ie quarterly reports.⁴⁸

⁴⁷ Ibid 29.⁴⁸ Ibid 33.

Sligo Town**Table 13: Sligo Town – properties available within RS/HAP limits**

Date	Total Number of properties available to rent	Single Person: Total number of properties available to rent within RS/HAP limits of €460	Couple: Total number of properties available to rent within RS/HAP limits of €490	Couple/One Parent + 1 Child: Total number of properties available to rent within RS/HAP limits of €550	Couple/One Parent + 2 Children: Total number of properties available to rent within RS/HAP limits of €575
01/05/2018	14	1	0	0	0
02/05/2018	16	0	0	0	0
03/05/2018	16	0	0	0	0
TOTAL		1	0	0	0

Sligo Town Summary

- There was an average of 15 properties available to rent in Sligo town over the May 2018 study period. This represents a significant decrease of 9 properties when compared with the February 2018 study period and a 50% decrease when compared with the findings from March 2017 when 30 properties were available.
- There was only 1 property available within RS/HAP limits in Sligo town during this study period representing a decrease of 3 properties since February 2018. Three properties were available across all four categories in March 2017.
- There was one property available to rent within the RS/HAP limits for a single person during this study period, a decrease of 1 property since February 2018.
- There were no properties available to rent within RS/HAP limits for a couple. This is a decrease of 1 property since February 2018.
- There were no properties available within RS/HAP limits for a Couple/One Parent and one Child during this study period, representing a decrease of 1 property since February 2018.
- There were no properties available within RS/HAP limits for a Couple/One Parent and two Children during the study period, representing no change since February 2018.
- Rents in Sligo ranged from €450 to €693 for the 4 one-bedroom properties available three of which were beyond RS/HAP limits.
- Rents in Sligo ranged from €650 to €775 for the 5 two-bedroom properties available, all of which were beyond RS/HAP limits.
- Rents increased in Co. Sligo by an average of 5.5% in the year to Q1 2018.⁴⁹
- Since RS/HAP limits increased in Q3 2016, rents in Co. Sligo have increased by 11% according to Daft.ie quarterly reports.⁵⁰

⁴⁹ Ibid 29.⁵⁰ Ibid 33.

Waterford City Centre

Table 14: Waterford City Centre – properties available within RS/HAP limits

Date	Total Number of properties available to rent	Single Person: Total number of properties available to rent within RS/HAP limits of €430	Couple: Total number of properties available to rent within RS/HAP limits of €450	Couple/One Parent + 1 Child: Total number of properties available to rent within RS/HAP limits of €550	Couple/One Parent + 2 Children: Total number of properties available to rent within RS/HAP limits of €575
01/05/2018	87	0	0	1	0
02/05/2018	89	0	0	0	0
03/05/2018	90	0	0	0	0
TOTAL		0	0	1	0

Waterford City Centre Summary

- There was an average of 87 properties available in Waterford City Centre over the course of the three days of this snapshot study, a significant increase of 25 properties when compared to the February 2018 study. Sixty-seven properties were available to rent in Waterford City Centre in March 2017.
- Only 1 property was available to rent within RS/HAP limits across all four categories during this study period mirroring the findings of February 2018. Four properties were available within RS/HAP limits in March 2017.
- There were no properties available to rent within RS/HAP limits for a single person during the May 2018 study period, a decrease of 1 property since February 2018.
- There were no properties available to rent within RS/HAP limits for a couple over the three days of the snapshot study, reflecting the findings of the February 2018 study.
- There was one property available within RS/HAP limits for a Couple/One Parent and one child, representing an increase of 1 property when compared to February 2018.
- There were no properties available within RS/HAP limits for a Couple/One Parent and two children, mirroring the findings from February 2018.
- Rents in Waterford City Centre ranged from €500 to €750 for the 12 one-bedroom properties available, all of which were beyond RS/HAP limits.
- Rents in Waterford City Centre ranged from €650 to €950 for the 17 two-bedroom properties available, all of which were beyond RS/HAP limits.
- Rents increased in Waterford City Centre by 14.6% in the year to Q1 2018.⁵¹
- Since RS/HAP limits increased in Q3 2016, rents in Waterford City Centre have increased by 18% according to Daft.ie quarterly reports.⁵²

⁵¹ Ibid 29.

⁵² Ibid 33.

Discussion and conclusions

Reliance on the PRS for the delivery of significant numbers of social housing tenancies reinforces its importance in the broader housing system. The PRS is not working for private renters or those in receipt of Rent Supplement/Housing Assistance Payment (RS/HAP) payments. According to the most recent *Daft.ie Quarter 1 2018 Rental Report*, the average nationwide rent now stands at €1,261 per month representing a year-on-year increase of 11.5%.⁵³ The number of properties available to rent within the PRS stands at fewer than 3,100 properties, down over 15% on Quarter 1 2017 and the lowest recorded for that time of year. The combination of these factors has created an incredibly expensive and competitive market place, rendering RS/HAP payments ineffectual, and making it increasingly difficult for recipients of these payments to secure a home.

Over Reliance on the Private Rental Sector

The Private Rental Sector is under increasing pressure to deliver social housing through the Rent Supplement (RS) and Housing Assistance Payment (HAP) schemes. There are approximately 70,000 households in receipt of state housing benefits.⁵⁴ The most recent figures from the *2017 Social Housing Needs Assessment* shows there are 86,000 households on the social housing waiting list.⁵⁶ Approximately two thirds of these households (66.6%) are living in the private rental sector, 38% of whom are not in receipt of Rent Supplement. It is essential that Local Authorities, with the support of Approved Housing Bodies (AHB's), get back into the business of building and acquiring social housing on the scale required to meet ever-growing housing need.

Direct build social housing presents a far greater return on State investment, and is thus a more cost-efficient policy choice than investment in private rental subsidies such as HAP and Rent Supplement, particularly in the absence of security of tenure. This is all the more apparent in light of recent projections that Government will spend €3 billion on rent subsidies over the next five years.⁵⁸ Long-term strategic thinking and investment is required. In 2017, Local Authorities built 780 new social housing units, an increase on the previous year but significantly short of the 3,200 unit target contained in *Rebuilding Ireland*.⁵⁹ During this period, AHB's delivered 298 new social housing units. As of Quarter 1 2018, Local Authorities had delivered 166 new build units, with AHB's delivering 167 in the same period.⁶⁰ Social housing construction and delivery is not happening quickly enough; accelerating the pace significantly will have a meaningful impact on the housing and homelessness crisis.

This snapshot study, looking at the asking rents facing households searching for new tenancies who may be reliant of Rent Supplement or HAP, has shown that any beneficial impacts of increases in

⁵³ Daft.ie, Quarter 1 2018 Price Rental Report, <https://www.daft.ie/report/2018-Q1-rentalprice-daftreport.pdf>.

⁵⁴ Oireachtas Debates, May 2018,

<http://debatesarchive.oireachtas.ie/debates%20authoring/debateswebpack.nsf/takes/dail2018052200086>.

⁵⁵ Oireachtas Debates, May 2018, <https://www.oireachtas.ie/en/debates/question/2018-05-22/576/>.

⁵⁶ Housing Agency, 'Summary of Social Housing Needs Assessment', 2017, <https://www.housingagency.ie/getattachment/Our-Publications/Latest-Publications/SHA-Summary-December-2017.pdf>.

⁵⁷ This headline figure does not include those households already in receipt of social housing support including those receiving support under the HAP scheme. Furthermore, this figure does not include households that have applied for a transfer from an existing form of social housing support.

⁵⁸ Irish Times, 'Government will spend €3bn on rent subsidies over next five years', November 2017,

<https://www.irishtimes.com/business/economy/government-will-spend-3bn-on-rent-subsidies-over-next-five-years-1.3280973>.

⁵⁹ Rebuilding Ireland: Action Plan for Housing and Homelessness, Graph 10, P.45,

http://rebuildingireland.ie/Rebuilding%20Ireland_Action%20Plan.pdf.

⁶⁰ DHPLG, Social Housing Output for Quarter 1 2018, July 2018, <https://www.housing.gov.ie/housing/social-housing/minister-murphy-publishes-social-housing-construction-status-report-and>.

RS/HAP limits introduced in July 2016 have been eroded by the continued volatility in the Private Rental Sector. These limits are increasingly inadequate, private market rents grow quarter by quarter while RS/HAP limits remain stagnant; discretion (flexibility) does apply but is not a sustainable policy solution. The number of properties available to rent within these limits represents 8% of all properties available to rent across the 11 study areas nationwide over the three days of this study. Over seven consecutive *Locked Out of the Market* snapshot studies since July 2016 when the limits were increased, availability of properties within RS/HAP limits has dropped from 20% in August 2016 to this most recent low of 8% in May 2018. Ninety-two percent of properties available to rent remained beyond the reach and choice of those in receipt of RS/HAP payments, marking the continuation of a worrying and unacceptable trend. The dearth of available properties for single people, a cohort that represents almost 45% of the households on the social housing waiting list and 37% of those trapped in emergency accommodation, is of utmost concern. Couples fare badly too, with just four properties available for this household type down from 7 in March 2017.

Ongoing review and adjustment of RS/HAP limits is necessary to counter the negative impact of private rental market volatility on the provision of social housing supports for those with the greatest need. Furthermore, it is clear that the majority of landlords in RPZs will increase their rents by the maximum 4% annually. Increased competition for available tenancies in the private rental sector is equally impacting those in receipt of State housing payments. Additional funding in Budget 2019 is required to extend the HAP Placefinder service to all Local Authorities nationwide. Households must be supported to find suitable tenancies quickly, especially when a HAP household receives notice to quit they need assistance to find an alternative home. It is important to note that households in receipt of HAP are considered to have their social housing need met. Recent reports indicate that households reliant on HAP face increased structural exclusion when competing to secure tenancies in the private rental sector.⁶¹ In the absence of the financial resources of other private renters or indeed the capacity and resilience to compete in this competitive market place, vulnerable households retreat from their tenancy search having experienced ongoing rejection by landlords at first contact or after having viewed a property.

Sector Volatility and Regional Variation

There was very limited improvement across the 11 study areas with only Athlone (1) and Dundalk (9) showing any improvement in terms of available properties within RS/HAP limits. An increase of 6 properties available in Dundalk demonstrates the ongoing market volatility and overshadows worrying decreases in property availability elsewhere. Cork City Centre, Dublin City Centre, Leitrim and Sligo Town all experienced a reduction in the number of properties available within RS/HAP limits. There was no change in availability within RS/HAP limits in Galway City Centre, North Kildare, Limerick City Centre, Portlaoise and Waterford City Centre. Of particular concern, Athlone, Galway City Centre, Portlaoise and Limerick City Centre recorded no properties available across all four-study categories, a record low across the eleven study Locked Out series. In addition, this was the same finding for Galway City Centre and Portlaoise for the fourth consecutive study. There was just one property available in Athlone, Dublin City Centre, North Kildare, Sligo Town and Waterford City Centre across all four-study categories. This is a record low since the increase of RS/HAP limits in July 2016.

⁶¹ Dr Rory Hearne and Dr Mary P. Murphy, *Investing in the Right to a Home: Housing, HAPs and Hubs*, June 2017, P. 21, <https://www.maynoothuniversity.ie/sites/default/files/assets/document/Investing%20in%20the%20Right%20to%20a%20Home%20Full%201.pdf>.

On a comparative level, there is regional variation between the findings of the previous study in February 2018 and this May 2018 study. Property availability in urban centres remains unchanged at 8 properties with a decrease of 3 properties in Dublin City Centre matched by an increase of 3 properties in Cork City Centre. Availability has increased in commuter belt towns (North Kildare, Portlaoise, Dundalk), rising from 18 properties in February 2018 to 27 properties in May 2018. In regional towns (Athlone, County Leitrim, Sligo Town), availability within RS/HAP limits has experienced a decrease from 13 properties in February 2018 to 6 properties in May 2018. What is clear is that the private rental sector remains very volatile and open to much fluctuation, which is having the greatest impacts on low-income households and on people in receipt of housing benefit payments.

Marginalised Demographics

The study shows that people who are single and couples are disproportionately affected by the inadequacy of RS/HAP limits and poor supply in the private rental sector. Only 4 properties were available for single people during this study period. Of similar concern, there were only 4 properties available for couples across the 11 study areas. There are 38,170 single person households on the social housing waiting list comprising 44.5% of the total number of households on the list. This is in addition to the 3,621 single people in emergency accommodation without dependents in their care. It must however be acknowledged that some of these will be separated couples due to the dearth of emergency accommodation designated for couples and some may be parents. The 2016 CSO *Survey on Income and Living Conditions* (SILC) report further illustrates the structural barriers and causes of homelessness amongst this cohort. In 2016, the at-risk of poverty rate for 1 adult households under 65 years of age was 35.7%. The deprivation rate experienced by this cohort was of similar concern at 29%, while the consistent poverty rate stood at 17.4%. The findings from this report and the statistics outlined above clearly show that single person households must be prioritised for social housing support.

Discretionary Payments and RS/HAP Limits

Discretionary uplifts (flexibility) of up to 20% are available in both the Rent Supplement and Housing Assistance Payment (RS/HAP) schemes as required, made on a case-by-case basis. Discretionary uplifts of up to 50% are also available to those exiting homelessness through the Homeless HAP scheme.⁶² This scheme currently supports 2,646 households who have moved out of emergency accommodation into stable tenancies as of February 2018.⁶³ Since 2014, according to the Department of Employment Affairs and Social Protection, 12,845 persons at risk of homelessness have been supported through increased discretionary RS payments using this case-by-case approach. As of March 1st 2017, Local Authorities were able to exceed the prescribed HAP rent limits on a case-by-case basis subject to guidelines.⁶⁵ As of Quarter 4 2017 6,883 (22%) of HAP recipients received discretionary uplifts above current HAP limits.⁶⁶ Although these uplifts are welcome and should continue, people are not always aware of this option, therefore further information should be available to applicants and recipients of both schemes. In addition, managing this on a case-by-case basis is burdensome and resource

⁶² Housing Assistance Payment, 'The Experience of Citizens Information Services', p. 16,

http://www.citizensinformationboard.ie/downloads/social_policy/HAP_Report_CIB_2017.pdf.

⁶³ Minister Eoghan Murphy Written Answers, 13 February 2018, <https://www.kildarestreet.com/wrans/?id=2018-02-13a.1825>.

⁶⁴ The Housing Assistance Payment for Homeless Households or Homeless HAP Pilot, which is operated by the Dublin Region Homeless Executive (DRHE) on behalf of the Dublin local authorities, provides discretion to exceed the HAP rent limits for homeless households, if this is necessary in order to source suitable accommodation. To qualify for HAP under the scheme, a household must be accepted as homeless within the meaning of section 2 of the Housing Act 1988 by one of the 4 Dublin local authorities.

⁶⁵ DHPCLG, Coveney announces Housing Assistance Payment (HAP) now available in Dublin,

<http://www.housing.gov.ie/housing/rebuilding-ireland/housing-assistance-payment/coveney-announces-housing-assistance-payment>.

⁶⁶ Department of Housing, Planning, Community and Local Government, November 2017.

intensive not to mention very stressful for the households involved. Thus, we call for the increase in RS/HAP limits as a matter of urgency. In the meantime, there must be the necessary discretion and autonomy to exceed rent limits particularly where there are mitigating circumstances, the Citizens Information Board also supports this.⁶⁷ We further support the recommendation that clear guidelines are required for HAP applicants and recipients as to what qualifies as mitigating circumstances.⁶⁸

Security of Tenure & Rent Certainty

Increased RS/HAP limits, although a positive development, would not be enough alone to tackle the continuing housing and homelessness crisis. Full Rent Certainty is required and consideration must be given to index linking rents to the Consumer Prices Index (CPI). The introduction of the rent predictability measures through the Planning and Development (Housing) and Residential Tenancies Act was commendable but it is not sufficient given the extent of the crisis. In the interim, extending rent predictability to all electoral areas is a matter of priority.

We welcome the commitment contained in the recent *Rebuilding Ireland 2017 Status Report* (January 2018) that legislation on a new enforcement model is being progressed for enactment in early 2018.⁶⁹ This needs to happen as soon as possible in light of the further acknowledgement that non-compliance with the RPZ mechanism is leading to a higher presentation rate of families at emergency accommodation services.⁷⁰ The recent RTB publication of guidelines for good practice on the 'Substantial Change' exemption in RPZ's is similarly welcome.⁷¹ These guidelines must be matched with strict enforcement in RTB dispute proceedings between landlords and tenants, where the section 34 substantial change exemption has been cited as a reason for undertaking a rent review of an existing tenancy or the setting of a new rent level for a new tenancy. To ensure broad implementation, these guidelines should form part of any national awareness campaign being rolled out to inform all stakeholders of their obligations as per the new guidelines and the upcoming enforcement legislation.

Rent certainty must come with increased security of tenure. The commitment to move to indefinite leasing must be progressed as a matter of urgency. We welcome the *Rebuilding Ireland 2017 Status Report* update that work is underway to introduce an amendment to remove paragraph (b) of section 34 of the RTA, which would give effect to the Government's initial commitment in this regard. In the interim, tenants require greater protection from tenancy termination for reasons of sale or renovation of their rental property. The Deposit Protection Scheme, provided for in the 2015 amendments to the RTA, must be amended, commenced and implemented immediately to restrict the amount of deposit that is possible to request at the start of a new tenancy. This Status Report suggests that amending legislation will be enacted in 2018.⁷² This is particularly pertinent in light of recent reports that large commercial landlords are now requesting tenancy deposits equivalent to two months' rent.⁷³ In addition to reducing the affordability of rental accommodation for the general population, this practice effectively precludes RS/HAP recipients from accessing this pool of properties.

⁶⁷ Citizens Information Board, 'Housing Assistance Payment – The Experience of Citizens Information Services', September 2017, http://www.citizensinformationboard.ie/downloads/social_policy/HAP_Report_CIB_2017.pdf.

⁶⁸ Ibid 44, at P. 4.

⁶⁹ *Rebuilding Ireland 2017 Status Report*, Action 4.44 & 4.50, <http://rebuildingireland.ie/news/rebuilding-ireland-2017-status-report/>.

⁷⁰ Ministerial announcement at publication of RTB Rent Index, September 2017, <http://www.housing.gov.ie/housing/private-rented-housing/minister-eoghan-murphys-address-publication-rtb-q2-2017-rent-index-report-and-further-rental-sector-measures>.

⁷¹ RTB, 'Guidelines for Good Practice on the Substantial Change Exemption in Rent Pressure Zone Areas', https://onestopshop.rtb.ie/images/uploads/Comms%20and%20Research/RTB_Guidelines_for_good_practice_on_the_substantial_change_exemption_in_Rent_Pressure_Zones.pdf.

⁷² Ibid 49, Action 4.41.

⁷³ Charity calls for tenant protection as landlords demand two month deposits. <http://www.newstalk.com/AMP/Charity-calls-for-tenant-protection-as-landlords-demand-two-month-deposits->

We welcome recent announcements that a working group established by DHPLG is examining the feasibility of amending legislation to grant greater protections to tenants of properties in receivership that currently lie outside the protections of the RTA.⁷⁴ Appropriate legislation should be fast-tracked to bring this significant cohort of the private rental sector within the scope of the RTA and the rights and protections contained therein and in the legislative pipeline.⁷⁵ Similarly welcome is the Cabinet's consideration of the extension of lease termination notice periods. These additional timeframes could offer households significant additional time to secure new accommodation in the private rental sector independently or through Rent Supplement and HAP, ultimately preventing their presentation to emergency accommodation services.

Private Rental Sector Supply

Affordable supply side initiatives are required to improve tenure sustainability in the private rental sector for low to middle-income families and those exiting homelessness or at risk of losing their home. Caution is urged in the leveraging of Local Authority lands in RPZs for the delivery of affordable rental units; any such leveraging of land must be balanced by securing significant conditions from investors in terms of security of tenure, rent certainty, quality of housing and amenities. In addition, there must be developer contributions similar to existing Part V contributions for social housing (minimum 10%). A dedicated affordable rental scheme is required to drive this development with affordability set at a maximum of one third of a household's combined net income. The commitment to develop a cost rental model for the rental sector is encouraging. To ensure the delivery of as many affordable housing units as possible, Approved Housing Bodies (AHBs) must be fully resourced and supported to engage with the model.

Standards in the Private Rental Sector

Since the introduction of new safety standards for the private rental sector in July 2017, media investigations into standards in the private rental sector have laid bare some rogue landlords' flagrant disregard for all standards and safety considerations relating to rental accommodation. A *Primetime Investigates – Nightmare to Rent* programme (November 2017) illustrated the perilous nature of tenancies in the private sector whereby vulnerable tenants are subjected to severe overcrowding and a lack of basic facilities.⁷⁶ Census 2016 highlighted the potential for the recurrence of these conditions across the country with approximately 63,000 households in the private rental sector enumerated as being overcrowded with more persons than available rooms.⁷⁷ Further evidence of this phenomenon is clear in a recent report that found the average household size in the private rental sector has increased from 2.7 to 2.8 persons since the start of 2016.⁷⁸ Absolute scarcity in available properties and the increasing cost of rents is driving the formation of overcrowded households in the sector. Recent commitments to increase and ring fence funding to expand the rate of inspections in the private rental sector are welcome. However, the final target of 25% inspection coverage across the private rental sector means inspections will take place only every four years.⁷⁹ In light of rising market rents and dwindling supply, tenants may not wish to make direct complaints to the Local Authority for

⁷⁴ Ibid 46.

⁷⁵ Ibid 49, Action 4.18.

⁷⁶ Irish Times, 'Ireland's slum-like private rental sector exposed in undercover investigation', November 2017,

<https://www.irishtimes.com/news/social-affairs/ireland-s-slum-like-private-rental-sector-exposed-in-undercover-investigation-1.3278254>.

⁷⁷ Census of Population 2016, 'Profile 1 – Housing in Ireland', <http://www.cso.ie/en/releasesandpublications/ep/p-cp1hii/cp1hii/od/>.

⁷⁸ Savills, 'Shifting Ownership in Ireland's Private Rented Sector', December 2017, P.5, <http://pdf.euro.savills.co.uk/ireland-research/privaterentedsectorreport2017.pdf>.

⁷⁹ Ibid 46.

fear of losing their tenancies. Measures are therefore required to prevent vulnerable tenants in these situations from entering homelessness. We welcome the commitment to introduce a robust enforcement and sanctions regime in line with the change management plan for the RTB but have concerns about the urgency. Additional landlord requirements to certify their rental property complies with regulations in relation to standards for rental accommodation, overcrowding and fire safety are similarly welcome. Sanctions attached to these new requirements must be rigorously enforced to ensure compliance.

About Simon Communities

The Simon Communities in Ireland are a network of eight regionally based independent Simon Communities, based in Cork, Dublin, Dundalk, Galway, the Midlands, the Mid West, the North West and the South East, that share common values and ethos in tackling all forms of homelessness throughout Ireland, supported by a National Office. The Simon Communities have been providing services in Ireland for almost 50 years. The Simon Communities deliver support and service to over 11,000 individuals and families throughout Ireland who experience – or are at risk of – homelessness every year.

Whatever the issue, for as long as we are needed, Simon's door is always open. For more information, please visit www.simon.ie

Services include:

- Housing provision, tenancy sustainment & settlement services, housing advice & information services helping people to make the move out of homelessness & working with households at risk;
- Specialist health & treatment services addressing some of the issues which may have contributed to homeless occurring or may be a consequence;
- Emergency accommodation & support providing people with a place of welcome, warmth & safety;
- Soup runs & rough sleeper teams who are often the first point of contact for people sleeping rough.

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