



Locked Out of the Market VIII

The Gap between Rent Supplement/HAP Limits and Market Rents

Snapshot Study

August 2017

Simon Communities in Ireland

Contents

Introduction.....	3
Main Findings.....	4
Recommendations	6
Findings	8
Summary of findings for each location.....	14
Athlone	14
Cork City Centre	15
Dublin City Centre	16
Dundalk.....	17
Galway City Centre	18
North Kildare	19
Co. Leitrim	20
Limerick City Centre.....	21
Portlaoise.....	22
Sligo Town.....	23
Waterford City Centre	24
Discussion and conclusions	25
About Simon Communities	29

Introduction

This report summarises the results of a snapshot study undertaken over three consecutive days in August 2017 (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, Community and Local Government (DHPCLG) Housing Assistance Payment (HAP) limits. Details were gathered from Daft.ie¹ for the following areas: Cork City Centre², Dublin City Centre³, Galway City Centre⁴, Limerick City Centre⁵, Portlaoise, North Kildare,⁶ Athlone, Sligo Town⁷, Dundalk, Leitrim,⁸ and Waterford City Centre.⁹ This is the eighth snapshot study of this kind and compares the findings to the previous snapshot exercise undertaken in March 2017. Furthermore, to illustrate the decreasing impact and effect of increased RS/HAP limits in July 2016, comparative findings from the snapshot study carried out in August 2016 will also be presented.¹⁰

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 2017 Quarter 1 Rental Report, rents rose by an average of 13.4% between January and March 2017, just less than the previous quarterly increase of 13.5%, which was the biggest annual increase on record. During this period, average national rents rose from €1,111 to €1,131. There were fewer than 3,100 homes to rent nationwide on May 1st 2017, down from 4,000 homes recorded three months previously.¹¹

¹ Daft.ie is a property website that advertises properties for sale and for rent. <http://www.daft.ie/about/>

² 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).

³ Dublin City Centre contains properties to rent in Temple Bar, Dublin 1, Dublin 2, Christchurch, IFSC, North Wall, Smithfield, Hanover Quay (daft.ie).

⁴ Galway City Centre contains properties to rent in Galway City Centre, Nun's Island, Bohernmore and Woodquay (daft.ie).

⁵ Limerick City Centre contains properties to rent in Limerick City (daft.ie).

⁶ 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.

⁷ Areas of Athlone, Portlaoise, Dundalk and Sligo Town contains properties to rent within each of the townland boarder (daft.ie).

⁸ Areas of Leitrim contains properties to rent within the county boarder (Daft.ie).

⁹ Waterford City Centre contains properties to rent in Newtown, Ballyaneen, Waterford City, Belview Port, Ballytruckle, Ballygunner, Carrigeen, Ballinamona. (daft.ie)

¹⁰ Waterford City Centre did not feature in the August 2016 snapshot study. Direct comparisons with the August 2016 snapshot study are used at national and study area level to illustrate the decreasing impact and effect of increased RS/HAP limits introduced from the 1st of July 2016.

¹¹ Daft.ie 2017 Q1 Rental Report, <https://www.daft.ie/report/2017-Q1-rental-daft-report.pdf>.

Main Findings

- There were 630 properties available to rent with no minimum cost in all eleven study areas, an increase of 30 properties since the March 2017 study. This represents a 45% decrease when compared to our first study in May 2015 and a 22% increase compared to our study a year ago in August 2016 when the first Locked Out of the Market study was carried out and there were 1150 properties available.
- Just 9% of properties available to rent¹² were within the RS/HAP limits compared to 12 % in our March 2017 study and 20% a year ago in our August 2016 study.
- These figures clearly indicate that increases in RS/HAP limits introduced in July 2016 are becoming increasingly ineffectual, impacting the viability of social housing provision under the Rent Supplement and HAP schemes.

These findings demonstrate that the benefit of the increase in RS/HAP limits from July 2016 continues to decline, as private rental sector rents continue to rise while rental supply remains low. This confirms the need to constantly monitor and adjust RS/HAP limits to keep them aligned with market rents in the absence of full Rent Certainty.

- Of the 11 study areas, only Cork City Centre had property availability for all 4 household categories. However, there were just 8 properties available to rent within limits, 4 properties less than in March 2017.
- Just 1 property was available to rent within RS/HAP limits across all 11 areas for a single person over the course of the study representing a decrease of 1 property since March 2017. This property was located in Cork City Centre. This represents a continuation of a worrying trend, which has seen the proportion and number of available properties for single people drop across multiple Locked Out studies since August 2016 when 8 properties were available for this household category.
- Two properties were available to rent within RS/HAP limits across all 11 areas for a couple over the course of the study representing a decrease of 5 properties since March 2017. These properties were located in Dundalk (1) and Cork City Centre (1).
- Significant regional variation and fluctuation is evident across the study findings in terms of numbers of properties available within RS/HAP limits.
 - The number of properties available to rent within RS/HAP limits in urban centres has dropped by 50% since our last study in March 2017 and by 33% since our study a year ago. There were 28 such properties available to rent in March 2017 and 21 properties in August 2016 following the rollout of increased RS/HAP limits.
 - The number of properties available to rent within RS/HAP limits in regional towns has dropped from 17 properties recorded in March 2017 to 16 properties in August 2017. In August 2016, 19 properties were available within RS/HAP limits in regional towns.
 - The number of properties available to rent within the RS/HAP limits in commuter belt towns has dropped from 27 in March 2017 to 24 in August 2017.¹³ Commuter belt towns have experienced the most significant drop in property availability within RS/HAP limits having dropped by 61% (38 properties) in August 2016.

¹² There were 7 properties, all in Waterford, where the landlord requested 'students only' thus these properties were excluded.

¹³ Commuter belt towns include North Kildare, Portlaoise and Dundalk.

- Of the 54 properties available to rent across the 11 study areas within all four categories of RS/HAP limits;
 - Single persons: One property was available within RS/HAP limits for a single person. This is a decrease of 1 property since from March 2017. The percentage share of total properties available within RS/HAP limits for single persons remains disproportionately low at 2%, a drop of 1% since the March 2017 study. In August 2016, following the increase of the RS/HAP limits, just 8% (8 properties) of all available properties within RS/HAP limits were in the single person household category.
 - Couples: Just two properties were available to rent within RS/HAP limits for a couple – five less than our previous study in March 2017. The percentage share of all properties available to rent within RS/HAP limits for couples stands at just 4%, a significant fall of 6% since our March 2017 study. A year ago, in our August 2016 study, the percentage share stood at 11%.
 - Couple/one parent plus one child: Twenty-nine properties were available for a couple/one parent and one child during the study period. This represents 53% of the percentage share all available properties but is a decrease of 15 properties when compared to March 2017. Note that 9 of these properties were one-bedroom units, the suitability of which for this family type is open to question. In August 2016, this figure stood at 48% (49 properties) of all available properties within RS/HAP limits.
 - Couple/one parent plus two children: Twenty-two properties were available within RS/HAP limits for a couple/one parent and two children. This is a minor increase of 3 properties when compared with March 2017 and amounts to 41% of all available properties within RS/HAP limits. In the corresponding study in August 2016, 33% (34 properties) of all available properties within RS/HAP limits were recorded in this household category.
- Average rent for a one-bedroom property was 90% higher than the average RS/HAP limits for a single person across the 9 locations for which data was available.¹⁴ This ranged from 13% higher in Dundalk to 213% higher in Galway City Centre. A year ago, in our August 2016 study, the average rent for a one-bedroom property was 29% higher than the average RS/HAP limits for a single person, rising to 35% higher in our March 2017 study.
- Average rent for a two-bedroom property was 38% higher than the average RS/HAP limits for a couple/one-parent with two children across all 11 locations. This ranged from 18% less than RS/HAP limits in Dundalk to 106% higher in Dublin City Centre. A year ago, in our August 2016 study, the average rent for a two-bedroom property was 3% higher than the average RS/HAP limits for a couple/one parent and two children rising to 17% higher in our March 2017 study than the average RS/HAP limits.

¹⁴ It was not possible to calculate the average rent for a one-bedroom property in Portlaoise or Leitrim over the course of the study period due to a lack of supply for this category at all price points.

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. In the absence of large-scale strategic State delivery of social housing, and the continued reliance on the private rented sector for the provision of social housing tenancies, we encourage the Department of Housing, Planning, Community and Local Government and the Department of 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 rented sector.

1. *Rent Supplement & HAP*

- People who are homeless must be prioritised as having the greatest level of social housing need.
- Ongoing monitoring and adjustment of RS/HAP limits every six months is required to ensure alignment with private market rents.
- Single people and couples should be specifically targeted in this regard given the disproportionate negative impact inadequate RS/HAP limits are having on these households' ability to access affordable housing.
- Ensure that discretionary uplifts are easily available to those in receipt of RS/HAP payments when required.
- Where a tenancy is terminated 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 decision that determines a household's social housing need met once in receipt of HAP. In the absence of sufficient security of tenure in the Private Rented Sector, this approach does not reflect the perilous reality of many HAP tenancies.

2. *Rent Certainty and Rent Predictability*

- Full rent certainty is required. Consideration must be given to index linking rents to the Consumer Price Index (CPI). Further research is required to examine the viability of this rent certainty measure in addition to exploring alternative methods of rent certainty successfully employed in other jurisdictions.
- In the absence of full rent certainty, rent predictability must be extended 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.
- Allowable rent increases in Rent Pressure Zones (RPZ's) should be restricted to the current 4% per annum. Under no circumstances, should allowable rent increases be revised upwards. This position must be central to the ongoing review of the Rent Predictability Measure.
- Active enforcement of the Rent Predictability measure by the Residential Tenancies Board (RTB) is required to ensure compliance within RPZ's. A public awareness campaign is required to provide clarity and to ensure landlords and tenants are aware of the implications and obligations attached to the Rent Predictability measure.
- A register of current sitting rents is now required to ensure active enforcement, compliance and to combat inflationary rent increases applied at the commencement of new tenancy agreements.

3. Security of Tenure

- Fast track the existing commitment to move towards indefinite leasing as a matter of urgency.
- The RTB should closely monitor terminations relying on Section 34 reasons to ensure landlords are acting in good faith and in compliance with the new standards contained in the Planning and Development (Housing) and Residential Tenancies Act 2016.¹⁵
- Landlords with more than three properties should not be able to invoke Section 34 of the RTA in order to issue notice of termination to tenants.
- Measures to prevent the simultaneous serving of termination notices on large numbers of residents in a single development should be amended to include cases of simultaneous termination of less than 5 tenancies.
- Tenants of Buy-to-Let (BTL) properties in receivership must have full protection. All landlord obligations should transfer to the receiver and subsequently to the new property owner.

4. Rented Sector Deposits

- Implement the Deposit Protection Scheme, provided for in the 2015 amendments to the Residential Tenancies Act, immediately.
- To address the issue of unreasonable deposits being requested at the commencement of tenancies, legislate for a statutory maximum of one month's deposit paid at the commencement of a new tenancy.

5. Private Rented Supply

- The commitment to develop a cost rental model for the rental sector needs urgent action and implementation.
- Develop an affordable rental model to provide housing for those who do not qualify for social housing and cannot afford to access housing in the private sector.
- The 'Build to Rent' model is a positive inclusion in the *Rental Strategy*. The State should seek to acquire further social housing provision through developer contributions similar to Part V social housing contributions.

¹⁵ Planning and Development (Housing) and Residential Tenancies Act 2016, P. 46, <http://www.oireachtas.ie/documents/bills28/acts/2016/a1716.pdf>.

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 (August 1st, 2nd, and 3rd 2017). It displays the total number of properties available within RS/HAP limits across each of the four household categories: single person, couple, couple/one-parent with one child, and couple/one-parent with two children. The average cost of a one-bed and two-bed property is also included for each location.

Figure 1, *Figure 2* and *Figure 3* follow, illustrating the percentage breakdown of properties available per household category in August 2017, August 2016 and again, for comparative purposes, in March 2017. Regional variation in the distribution of available properties within RS/HAP limits for August 2017 is displayed in *Table 2* and for March 2017 in *Table 3*. 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 March 2017 in addition to findings from the August 2016 study, which was carried out following the publication of the revised RS/HAP limits in July 2016. The individual area tabular findings show the number of new available properties to rent for the four household types over the three consecutive days of the study period.

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

LOCATION	Average number of properties available to rent with no min cost	Average monthly rent ¹⁶ one-bed property vs RS/HAP Limit for single person		Average monthly rent two-bed property vs RS/HAP Limit for Couple/One-parent + 2 Children		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
		€666	€450	€774	€625				
Athlone	43	€666	€450	€774	€625	0	0	0	1
Cork City Centre	62	€948	€550	€1248	€925	1	1	5	1
Dublin City Centre	202	€1945	€660	€2620	€1250	0	0	3	0
Dundalk	35	€650	€575	€858	€1050	0	1	10	9
Galway City Centre	22	€1800	€575	€1511	€875	0	0	0	0
North Kildare	90	€950	€575	€1350	€1050	0	0	2	2
Leitrim	38	€N/A	€340	€432	€475	0	0	7	8
Limerick City Centre	11	€762	€420	€941	€700	0	0	1	0
Portlaoise	23	€N/A	€420	€850	€610	0	0	0	0
Sligo town	22	€650	€460	€724	€575	0	0	0	0
Waterford City Centre	82	€568	€430	€732	€575	0	0	1	1
Total	630	€933		€1095		1	2	29	22

¹⁶ Average rents of properties advertised on Daft.ie in June, July and August 2017

Figure 1, Figure 2 and Figure 3 below illustrate the percentage breakdown of properties available per household category in August 2017, August 2016 and March 2017. The pie charts demonstrate that single people and couples continue to be disproportionately affected with regard to availability of properties within RS/HAP limits in these two specific categories. Only 1 property was available to rent for a single person in August 2017, a drop of 1 property on the findings from March 2017 and a more significant drop of 7 properties since August 2016. The percentage of properties available for couples has decreased from 10% in March 2017 to 4% in August 2017. In August 2016, the percentage of properties available for couples stood at 11% of the total available within RS/HAP limits. The percentage share of properties available for a couple/one parent and one child has decreased to 53% of the total number of properties available within the RS/HAP limits, down 8% since the March 2017 study. Forty-one percent of properties available within RS/HAP limits were available for a couple/one parent and two children, up 15% since the March 2017 study. These findings suggest that the increase in RS/HAP limits and the application of discretion (flexibility) are having a greater impact for these household types in terms of access and availability of properties. Further measures are therefore required to improve access to private rented homes for single people and couples.

Figure 1

Number of Properties by RS/HAP Household Category August 2017

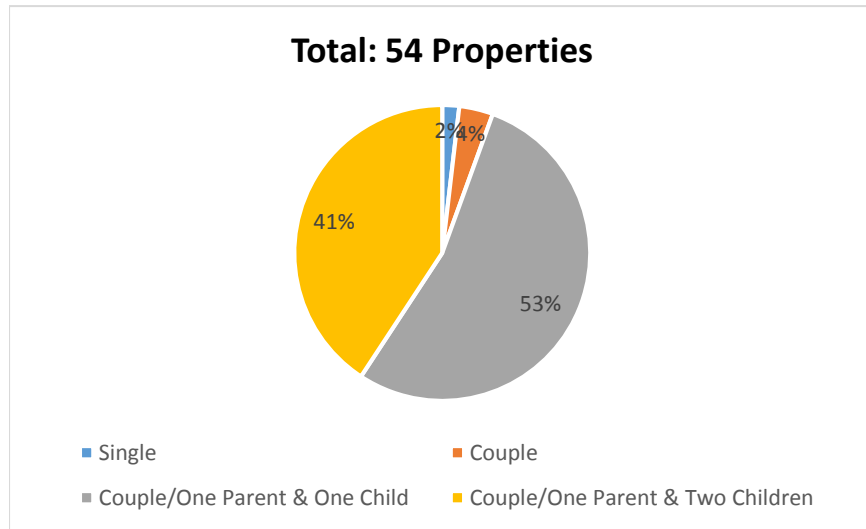


Figure 2

Number of Properties by RS/HAP Household Category August 2016

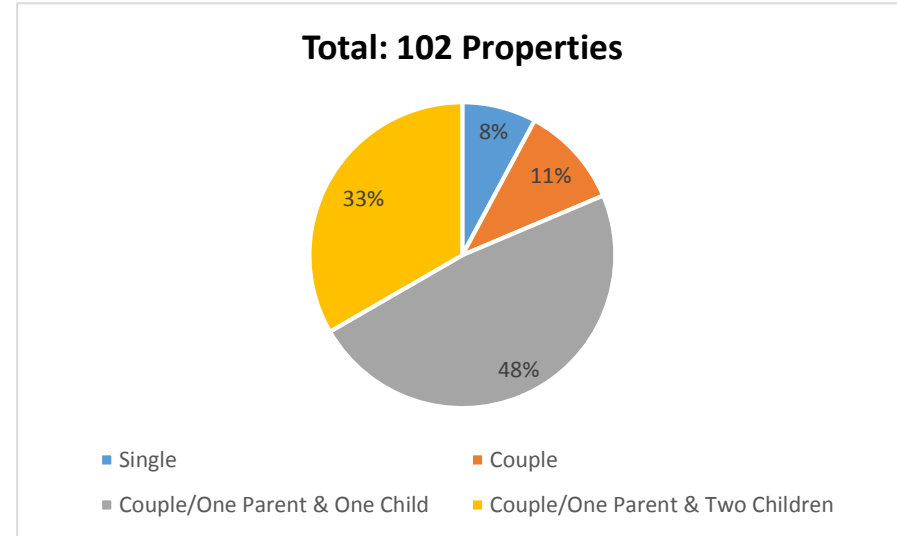


Table 2: Available properties by Household Category and Regional Distribution August 2017

Household Category/Composition Category	Available Properties
Properties available within Single Person limits	Urban Centres ¹⁷ (1) Commuter Belt ¹⁸ (0) Regional Towns ¹⁹ (0)
Properties available within Couple limits	Urban Centres (1) Commuter Belt (1) Regional Towns (0)
Properties available within limits for a couple/one parent + 1 child	Urban Centres (10) Commuter Belt (12) Regional Towns (7)
Properties available within limits for a couple/one parent + 2 children	Urban Centres (2) Commuter Belt (11) Regional Towns (9)

Table 3: 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 (10)
Properties available within limits for a couple/one parent + 2 children	Urban Centres (1) Commuter Belt (13) Regional Towns (5)

¹⁷ Urban centres include Cork City Centre, Dublin City Centre, Galway City Centre, Limerick City Centre and Waterford City Centre.

¹⁸ Commuter belt towns include North Kildare, Portlaoise and Dundalk.

¹⁹ Regional towns include Athlone, Leitrim and Sligo Town.

Summary of findings for each location

Athlone

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

Date:	Total Number of properties available to rent	Average Monthly Rent for one-bedroom property (over 3 days) vs RS/HAP Limit for Single Person		Average Monthly Rent for two-bedroom property (over 3 days) vs RS/HAP Limit for Couple/one parent + 2 Children		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
		€666	€450	€774	€625				
01/08/2017	42	€666	€450	€774	€625	0	0	0	0
02/08/2017	45					0	0	0	0
03/08/2017	43					0	0	0	1
TOTAL						0	0	0	1

Athlone Summary

- There was an average of 43 properties available to rent in Athlone in this study period, an increase of 2 properties since the March 2017 study. In the corresponding study in August 2016, there was an average of 28 properties available.
- Only one property was available to rent across all 4 categories in this study period. This property was available in the couple/one parent and two children category. This is down from 3 properties in March 2017 and down from 2 properties recorded in August 2016.
- The average rent per month for a one-bedroom property in Athlone over this study period was €666. Average rent for a two-bedroom property was €774.
- The average rent for a one-bedroom property was 48% more than the RS/HAP limit for a single person, while a two-bedroom property was 24% more than the RS/HAP limits for a couple/one parent with two children.
- Rents increased in Co. Westmeath by an average of 14.7% in the year to Q1 2017.²⁰

²⁰ Daft.ie Quarterly Rental Report Q1 2017, <https://www.daft.ie/report/2017-Q1-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	Average Monthly Rent for one-bedroom property (over 3 days) vs RS/HAP Limit for Single Person		Average Monthly Rent for two-bedroom property (over 3 days) vs RS/HAP Limit for Couple/one parent + 2 Children		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
		€948	€550	€1248	€925				
01/08/2017	63	€948	€550	€1248	€925	1	1	3	0
02/08/2017	62					0	0	2	1
03/08/2017	60					0	0	0	0
TOTAL						1	1	5	1

Cork City Centre Summary

- There was an average of 62 properties to rent in Cork City Centre over the course of the study period. This is a decrease of 18 properties when compared to March 2017. In August 2016, there were 58 properties available in total in Cork City Centre.
- There were 8 properties available within RS/HAP limits in Cork City Centre over this study period. This represents a drop of 4 properties when compared to March 2017 and a drop of 2 properties when compared to August 2016.
- There was 1 property available to rent within the RS/HAP limits for a single person over the three days of the study, an increase of 1 property on the findings from March 2017.
- There was 1 property available within RS/HAP limits for a couple. This is a decrease of 2 properties when compared to the March 2017 study.
- Five properties in total were available within RS/HAP limits for a couple/one parent and one child. This is a decrease of 4 properties when compared to March 2017. Four of these properties were one-bedroom units, the suitability of which for a family of this size is open to question.
- One property was available within RS/HAP limits for a couple/one parent and two children, representing a minor increase of 1 property since the previous study in March 2017.
- The average rent per month for a one-bedroom property in Cork City Centre over the study period was €948. The average rent per month for a two-bedroom property over the study period was €1248.
- The average rent for a one-bedroom property was 72% higher than the RS/HAP limit for a single person, while the average rent for a two bedroom was 35% higher than the RS/HAP limit for a couple/one parent and two children.
- Rents increased in Cork City by an average 10.4% in the year to Q1 2017²¹.

²¹ Daft.ie ibid

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)	Average Monthly Rent for one-bedroom property (over 3 days) vs RS/HAP Limit for Single Person		Average Monthly Rent for two-bedroom property (over 3 days) vs RS/HAP Limit for Couple/one parent + 2 Children		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
		€1945	€660	€2620	€1275				
01/08/2017	201	€1945	€660	€2620	€1275	0	0	3	0
02/08/2017	204					0	0	0	0
03/08/2017	202					0	0	0	0
TOTAL						0	0	3	0

Dublin City Centre Summary

- There was an average of 202 properties available to rent in Dublin City Centre over the study period. This is up from 167 properties recorded in March 2017. A total of 206 properties were available in Dublin City Centre in August 2016.
- There were 3 properties available within RS/HAP limits in Dublin City Centre in this study period, a drop of 2 properties since March 2017 and a drop of 3 property since August 2016.
- There were no properties available to rent within RS/HAP limits for a single person, representing a continuation of the findings from the March 2017 study period.
- There were no properties available to rent within RS/HAP limits for a couple. This figure remains unchanged since the November 2016 study.
- There were 3 properties available to rent within RS/HAP limits for a couple/one parent and one child in August 2017. All of these properties were one-bedroom units, the suitability of which for a family is questionable. This is a reduction of 5 properties since March 2017, when 8 one-bedroom properties were available to rent within limits.
- 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.
- The average rent per month for a one-bedroom property in Dublin City Centre over the three days of the study was €1945. The average rent for a two-bedroom property was €2,620.
- Average rent for a one-bedroom property was 195% more than RS/HAP limit for a single person, while a two-bedroom property was 106% more than RS/HAP limit for a couple/one parent with two children.
- Rents increased in Dublin City Centre by an average of 16.2% in the year to Q1 2017²².

²² Daft.ie ibid

Dundalk

Table 7: Dundalk properties available within RS/HAP limits

Date	Total Number of properties available to rent	Average Monthly Rent for one-bedroom property (over 3 days) vs HAP Limit for Single Person		Average Monthly Rent for two-bedroom property (over 3 days) vs HAP Limit for Couple/one parent + 2 Children		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
		€650	€575	€858	€1050				
01/08/2017	36	€650	€575	€858	€1050	0	1	8	7
02/08/2017	36					0	0	2	2
03/08/2017	34					0	0	0	0
TOTAL						0	1	10	9

Dundalk Summary:

- There was an average of 35 properties available to rent in Dundalk during this study period, representing an increase of 2 properties when compared to March 2017. During the corresponding study period in August 2016 an average of 25 properties were available in Dundalk.
- There were 20 properties available to rent within RS/HAP limits during this study period, representing a drop of 6 properties since March 2017 and a drop of 5 properties since August 2016.
- There were no properties available to rent within RS/HAP limits for a single person across the three days of the study, representing a decrease of 1 property since the March 2017 study.
- There was 1 property available to rent for a couple across this study period, mirroring the findings of the March 2017 study.
- There were 10 properties available to rent within RS/HAP limits for a couple/one parent and one child. This is a decrease of 2 properties since March 2017.
- There were 9 properties available to rent within RS/HAP limits for a couple/one parent and two children. This represents a decrease of 3 properties since the March 2017 study.
- The average rent for a one-bedroom property in Dundalk over the course of the study period was €650. The average rent per month for a two-bedroom property in Dundalk over the study period was €806.
- Average rent for a one-bedroom property was 13% more than RS/HAP limit for a single person. Average rent for a two-bedroom property was 18% less than the RS/HAP limit for a couple/one parent with two children.
- Rents increased in Co. Louth by an average of 18.3% in the year to Q1 2017.²³

²³ Daft.ie ibid

Galway City Centre

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

Date	Total Number of properties to rent	Average Monthly Rent for one-bedroom property (over 3 days) vs RS/HAP Limit for Single Person		Average Monthly Rent for two-bedroom property (over 3 days) vs RS/HAP Limit for Couple/one parent + 2 Children		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
		€1800	€575	€1511	€875				
01/08/2017	24	€1800	€575	€1511	€875	0	0	0	0
02/08/2017	21					0	0	0	0
03/08/2017	21					0	0	0	0
TOTAL						0	0	0	0

Galway City Centre Summary

- There was an average of 22 properties available to rent in Galway City Centre over the three days of this study. This is a decrease of 6 properties when compared to March 2017 and an increase of 10 properties when compared to August 2016.
- There were no properties available within RS/HAP limits in Galway City Centre during this study period. This is a reduction of 2 properties when compared to March 2017 and August 2016.
- 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 March 2017.
- There were no properties available for a couple during this study period, reflecting the findings of the March study period.
- 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. This is a decrease of 2 properties when compared to March 2017.
- 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 March 2017.
- The average rent per month for a one-bedroom property in Galway City Centre over this study period was €1800.²⁴ Average rent for a two-bedroom property was €1511.
- Average rent for a one-bedroom property was 213% more than RS/HAP limit for a single person while a two-bedroom property was 73% more than RS/HAP limit for a couple/one parent with two children.
- Rents increased in Galway City by an average of 10.6% in the year to Q1 2017.²⁵

²⁴ Only one one-bedroom property was available at all price point in Galway City Centre during this study period.

²⁵ Daft.ie ibid

North Kildare

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

Date	Total Number of properties available to rent	Average Monthly Rent for one-bedroom property (over 3 days) vs RS/HAP Limit for Single Person		Average Monthly Rent for two-bedroom property (over 3 days) vs RS/HAP Limit for Couple/one parent + 2 Children		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
		€950	€575	€983	€1050				
01/08/2017	93	€950	€575	€983	€1050	0	0	2	2
02/08/2017	92					0	0	0	0
03/08/2017	86					0	0	0	0
TOTAL						0	0	2	2

North Kildare Summary:

- There was an average of 90 properties available to rent across North Kildare during this study period. This is a decrease of 13 properties on the findings from the March 2017 study and an increase of 1 property since the corresponding study in August 2016.
- There were 4 properties available to rent within RS/HAP limits in North Kildare, representing an increase of 3 properties since March 2017 but a sharp decrease of 33 properties since August 2016.
- No properties were available to rent within RS/HAP limits for a single person over the study period, mirroring the findings from March 2017.
- No properties were available for a couple across the three days of this study, mirroring the findings of the March 2017 study.
- Two properties were available within RS/HAP limits for a couple/one parent and one child over the study period. This marks an increase of 2 properties when compared to March 2017.
- There were two properties available within RS/HAP limits for a couple/one parent and two children during this study period. This is an increase of 1 property when compared to March 2017.
- The average rent per month for a one-bedroom property in North Kildare over the August 2017 study period was €950. The average rent for a two-bedroom property was €1,050.
- Average rent for a one-bedroom property was 65% more than RS/HAP limit for a single person while a two-bedroom property was 6% less than RS/HAP limits for a couple/one parent with two children.
- Rents increased in Co. Kildare by an average of 13.8% in the year to Q1 2017.²⁶

²⁶ Daft.ie ibid

Co. Leitrim

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

Date	Total Number of properties available to rent	Average Monthly Rent for one-bedroom property (over 3 days) vs RS/HAP Limit for Single Person		Average Monthly Rent of two-bedroom property (over 3 days) vs RS/HAP Limit for Couple/one parent + 2 Children		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
		€N/A	€340	€432	€475				
01/08/17	37	€N/A	€340	€432	€475	0	0	7	8
02/08/17	38					0	0	0	0
03/08/17	40					0	0	0	0
TOTAL						0	0	7	8

Co. Leitrim Summary

- There was an average of 38 properties available to rent in Co. Leitrim over this snapshot study period. This is an increase of 5 properties when compared to March 2017 and a decrease of 6 properties when compared to August 2016.
- There were 15 properties available to rent in Leitrim across the four categories of RS/HAP limits over the three days of the study. This is an increase of 4 properties when compared to March 2017 and mirrors the findings of the August 2016 study.
- 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 March 2017 study.
- No properties were available to rent within the RS/HAP limits for a couple during the study period. This is a decrease of 2 properties when compared to March 2017.
- There were 7 properties available to rent within RS/HAP limits for a couple/one parent and one child. This is an increase of 1 since the March 2017 study.
- Eight properties were available within RS/HAP limits for a couple/one parent and two children. This is an increase of 5 properties since the March 2017 study when 3 properties were recorded in this category.
- It was not possible to calculate the average rent per month of a one-bedroom property in Co. Leitrim due to a lack of availability at all price points. The average rent per month for a two-bedroom property was €432.
- Average rent for a two-bedroom property was 9% less than the RS/HAP limit for a couple/one parent with two children.
- Rents increased in Co. Leitrim by an average of 9.2% in the year to Q1 2017.²⁷

²⁷ Daft.ie ibid

Limerick City Centre

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

Date	Total Number of properties available to rent	Average Monthly Rent for one-bedroom property (over 3 days) vs RS/HAP Limit for Single Person		Average Monthly Rent for two-bedroom property (over 3 days) vs RS/HAP Limit for Couple/one parent + 2 Children		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
		€762	€420	€941	€700				
01/08/17	11	€762	€420	€941	€700	0	0	0	0
02/08/17	11					0	0	0	0
03/08/17	10					0	0	0	0
TOTAL						0	0	1	0

Limerick City Centre Summary:

- There was an average of 11 properties available to rent in Limerick City Centre over the 3 days of this snapshot study. This is a decrease of 18 properties since the March 2017 study when 29 properties were available and a sharp decrease since August 2016 when 35 properties were available.
- In total, there was only 1 property available within RS/HAP limits in Limerick City Centre. This mirrors the findings from March 2017 but marks a reduction of 2 properties since August 2016.
- 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 March 2017 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 March 2017 study.
- There was only one property available within RS/HAP limits for a couple/one parent and one child during this study period. This marks an increase of 1 property since March 2017. This was a one-bedroom property, the suitability of which for this household type is questionable.
- 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. This represents a decrease of 1 property since the March 2017 study.
- The average rent per month for a one-bedroom property in Limerick City Centre over the March 2017 study period was €762 while it was €941 for a two-bedroom property.
- Average rent for a one-bedroom property was 81% more than RS/HAP limit for a single person while a two-bedroom property was 34% more than RS/HAP limit for a couple/one parent with two children.
- Rents increased in Limerick City by an average of 12.6% in the year to Q1 2017.²⁸

²⁸ Daft.ie ibid

Portlaoise

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

Date	Total Number of properties available to rent	Average Monthly Rent for one-bedroom property (over 3 days) vs RS/HAP Limit for Single Person		Average Monthly Rent for two-bedroom property (over 3 days) vs RS/HAP Limit for Couple/one parent + 2 Children		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
		€N/A	€420	€850	€610				
01/08/17	23	€N/A	€420	€850	€610	0	0	0	0
02/08/17	22					0	0	0	0
03/08/17	23					0	0	0	0
TOTAL						0	0	0	0

Portlaoise Summary

- There was an average of 23 properties available to rent in Portlaoise over the August 2017 study period, a decrease of 5 properties when compared to March 2017 and an increase of 2 properties when compared to August 2016.
- 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.
- It was not possible to calculate the average rent for a one-bedroom property in Portlaoise during the study period due to a lack of availability at all price points. The average rent for a two-bedroom property was €850.
- Average rent for a two-bedroom property was 39% more than RS/HAP limit for a couple/one parent with two children.
- Rents increased in Co. Laois by an average of 16.6% in the year to Q1 2017.²⁹

²⁹ Daft.ie *ibid*

Sligo Town

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

Date	Total Number of properties available to rent	Average Monthly Rent of one-bedroom property (over 3 days) vs RS/HAP Limit for Single Person		Average Monthly Rent of two-bedroom property (over 3 days) vs RS/HAP Limit for Couple/one parent + 2 Children		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
		€650	€460	€724	€575				
01/08/17	23	€650	€460	€724	€575	0	0	0	0
02/08/17	22					0	0	0	0
03/08/17	22					0	0	0	0
TOTAL						0	0	0	0

Sligo Town Summary:

- There was an average of 22 properties available to rent in Sligo town over the August 2017 study period. This represents a decrease of 8 properties when compared with the March 2017 study period and a decrease of 10 properties since August 2016.
- There were no properties available to rent within the RS/HAP limits across all categories over the three days of this study period. This represents a reduction of 3 properties since March 2017 and August 2016 respectively.
- In March 2017, three properties were available to rent within RS/HAP limits. These properties were in the Couple/One Parent and One Child category (2 properties) and the Couple/One Parent and Two Children category (1 property). In August 2016, three properties were available to rent within RS/HAP limits. Two properties were available within RS/HAP limits for a single person and 1 property was available within the Couple/One Parent and One Child category.
- The average rent per month for a one-bedroom property in Sligo town over this study period was €650 while it was €724 for a two-bedroom property.
- Average rent for a one-bedroom property was 41% more than RS/HAP limits for a single person while a two-bedroom property was 26% more than RS/HAP limit for a couple/one parent with two children.
- Rents increased in Co. Sligo by an average of 12% in the year to Q1 2017.³⁰

³⁰ Daft.ie ibid

Waterford City Centre

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

Date	Total Number of properties available to rent	Average Monthly Rent of one-bedroom property (over 3 days) vs RS/HAP Limit for Single Person		Average Monthly Rent of two-bedroom property (over 3 days) vs RS/HAP Limit for Couple/one parent + 2 Children		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
		€568	€430	€732	€575				
01/08/17	84	€568	€430	€732	€575	0	0	0	0
02/08/17	84					0	0	1	1
03/08/17	79					0	0	0	0
TOTAL						0	0	1	1

Waterford City Centre Summary:

- There was an average of 82 properties available in Waterford City Centre over the course of the three days of this snapshot study, an increase of 15 properties when compared to the March 2017 study. Waterford City Centre did not feature in the August 2016 study; therefore, no data is available to draw comparisons with these figures and the data below.
- There were no properties available to rent within RS/HAP limits for a single person during the March 2017 study period, a decrease of 1 property when compared to March 2017. A total of 7 properties within RS/HAP limits were advertised as student only accommodation.
- There were no properties available to rent within RS/HAP limits for a couple over the three days of the snapshot study, a decrease of 1 property when compared to March 2017.
- One property was available within RS/HAP limits for a Couple/One Parent and one child, representing a decrease of 2 properties when compared to the March 2017 findings.
- There was one property available within RS/HAP limits for a Couple/One Parent and two children, an increase of 1 property since March 2017.
- The average rent for a one-bedroom property in Waterford City Centre over the three days of the study was €568 and €732 for a two-bedroom property.
- Average rent for a one-bedroom property was 32% more than RS/HAP limits for a single person while a two-bedroom property was 27% more than the RS/HAP limit for a couple/one parent with two children.
- Rents increased in Waterford City Centre by 10.2% in the year to Q1 2017.³¹

³¹ Daft.ie, ibid.

Discussion and conclusions

As the housing and homelessness crisis deepens, the ongoing review of *Rebuilding Ireland* must critically analyse and evaluate the ideology underpinning this broad government strategy. Ireland's approach to housing provision has been disconnected - home ownership, the Private Rented Sector, social housing and homelessness have all been approached in isolation when in fact they are all integrally interconnected. There must be a move away from continued reliance on the private market for the delivery of affordable housing for those on low incomes, and social housing for those with long-term housing needs. In December 2016, we welcomed the introduction of the Rent Predictability Measure in electoral areas throughout the country. Prioritising the extension of this measure to all electoral areas nationwide would restrict increases in the cost of rent and the associated impact on the availability and affordability of tenancies especially for people in receipt of vital State housing payments. This is particularly pertinent given recent projections that national rents outside RPZs could rise by as much as 8-11% in Leinster, 9-10% in Munster and 7-9% in the Connaught/Ulster region during 2017.³²

It must be acknowledged that while rent increases are limited to 4% per annum for three years in RPZs, this amounts to 12.5% compound increase over three years that is considerable for hard-pressed households struggling to meet rent. Consideration must be given to index linking rent increases to the Consumer Price Index (CPI). At a minimum further research is required to examine the viability of this rent certainty measure in addition to exploring alternative methods of rent certainty successfully employed in other jurisdictions. The extension of the duration of the Part 4 Tenancy from 4 to 6 years is a welcome start in enhancing security of tenure. This measure and the commitment to move toward indefinite leasing are particularly welcome in light of recent research published by the UK Institute of Public Policy Research, which found that longer, more secure tenancies in the German rental market were more affordable, acting as a brake slowing the process of rent increases.³³

Much more needs to be achieved to end volatility in the Private Rented Sector which an increasing number of people rely on to call home.

Over Reliance on the Private Rental Sector

The Private Rental Sector is under increasing pressure to deliver social housing through Rent Supplement (RS) and the Housing Assistance Payment (HAP) scheme and there are 91,600 households on the social housing waiting list.³⁴ It is essential that Local Authorities return to get back into the business of building and acquiring social housing, on the scale required to meet ever-growing housing need with the support of Approved Housing Bodies (AHB's). In 2016, 2,204 new social housing units were delivered. This includes 652 newly built social houses funded through the Social Housing Investment Programme (SHIP), the Capital Acquisition Scheme (CAS) and the Capital Advanced Leasing Facility (CALF), and a further 1,552 social houses acquired by Local Authorities. Social housing construction and delivery is not happening quickly enough; the Government must accelerate the pace to have a meaningful impact on the housing and homelessness crisis.

This snapshot study has shown that the beneficial impact of increases in RS/HAP limits introduced in July 2016 are being undone at an increasing rate by continued volatility in the Private Rental Sector. These limits

³² Society of Chartered Surveyors of Ireland, *Residential & Commercial Property Review & Outlook 2017*, https://www.scsi.ie/policy_research/residential_commercial_property_market_review_2017_full.

³³ Institute of Public Policy Research, *Lessons from Germany: Tenant power in the rental market*, January 2017, Pp. 4, 17, <http://www.ippr.org/files/publications/pdf/lessons-from-germany-jan17.pdf?noredirect=1>.

³⁴ Housing Agency, *Summary of Social Housing Needs Assessment*, 2016, <https://www.housingagency.ie/Housing/media/Media/Publications/Summary-of-Social-Housing-Assessment-Needs-2016.pdf>.

are becoming increasingly inadequate as private market rents grow quarter by quarter. The number of properties available to rent within these limits represents 9% of all properties available to rent across the 11 study areas nationwide over the three days of this study. Over four 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 the most recent low of 9% in August 2017. Ninety-one 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. 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. Increased competition for available tenancies in the private rented sector is equally affecting those in receipt of State housing payments. A recent report by Dr Rory Hearne and Dr Mary Murphy of Maynooth University has highlighted the increasing structural exclusion of households reliant on HAP when competing to secure tenancies in the private rented sector. Without the additional financial resources of their peers 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 having viewed a property.³⁵

Sector Volatility and Regional Variation

There was very limited improvement across some of the areas included in this study including North Kildare and Leitrim. There was no change in availability within RS/HAP limits in Limerick City centre when compared to March 2017. The remaining 8 study areas all experienced a drop in the number of properties available within RS/HAP limits. Three study areas had no property availability for all household categories during this study period including Portlaoise, Galway City Centre and Sligo Town.

On a comparative level, there is regional variation between the findings of the previous study in March 2017 and the August 2017 study. In addition, to declining availability in urban centres, availability has declined in commuter belt towns (North Kildare, Portlaoise, Dundalk) dropping from 27 properties in March 2017 to 24 properties in August 2017. In regional towns (Athlone, County Leitrim, Sligo Town) availability within RS/HAP limits has decreased from 17 properties in March 2017 to 16 properties in August 2017. Availability is down in urban centres from 28 properties recorded in March 2017 to 14 properties in August 2017. What is clear is that the Private Rented Sector remains very volatile and open to much fluctuation, which unfortunately impacts negatively on those on low incomes or those in receipt of housing benefit payments the most.

Marginalised Demographics

The inadequacy of RS/HAP limits and poor supply in the private rented sector disproportionately affects single people and couples. These households are a priority; 44% of people on the social housing waiting list are single person households and 3,150 of those in emergency accommodation are recorded as single people 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. According to the most recent Daft.ie quarter one, rental figures, average rent has increased year-on-year by 13.4% to Q1 2017. This combination of increasing rents and decreasing property availability is reducing the beneficial impact of RS/HAP payments for vulnerable groups including people who are homeless, at risk of homelessness and those on low incomes. Data released by the Department of Social Protection shows increased RS/HAP limits are having little distributive impact on household income for

³⁵ 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>

households in receipt of these payments.³⁶ Those earning less than €285 per week will see a marginal increase of 0.7% in their weekly income following social welfare increases announced in Budget 2017. The impact for those earning less than €404 per week will be negligible as their household income rises by approximately 0.1%.³⁷

Discretionary Payments and RS/HAP Limits

Discretionary uplifts of up to 20% are available in both the RS and HAP schemes as required, made on a case-by-case basis. The beneficial impact of these discretionary uplifts payments is evident with the rollout of the Housing Assistance Payment for Homeless Households, piloted in Dublin. This scheme currently supports 1,711 households who have moved out of emergency accommodation into stable tenancies as of July 2017.^{38,39} According to the Department of Social Protection, increased discretionary RS payments have supported 11,939 persons at risk of homelessness since 2014, using this case-by-case approach.⁴⁰ As of March 1st 2017, Local Authorities can exceed the prescribed HAP rent limits on a case-by-case basis subject to guidelines.⁴¹ Four thousand, three hundred and forty-one HAP recipients (18.7%) of HAP received discretionary uplifts above current HAP limits as of quarter 2 2017.⁴² Although these payments and 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 intensive not to mention stressful for the households involved. The beneficial impact of discretionary uplifts is subject to regional variation depending on market rents. In some areas, discretionary uplifts can allow people to meet rising rents. For example, in Dundalk, a discretionary uplift of 20% would reverse the gap between RS/HAP limits and private market rents for a one-bedroom property. In Sligo Town, a similar discretionary uplift would close the gap between RS/HAP limits and private market rent for a two-bedroom property. In other areas however, even if a full 20% discretionary uplift were to apply, the gap between market rent and RS/HAP limits would not close. This is the case for one and two bed properties in Athlone, Cork City Centre, Dublin City Centre, Limerick City Centre, Galway City Centre and Waterford City Centre. Discretionary uplifts are not a sustainable, long-term policy solution to rising rents and ever decreasing availability of rental property. Review and adjustment of RS/HAP limits must take place on a bi-annual basis to ensure they are sufficient to meet rising market rents. This is particularly pertinent in current and future Rent Pressure Zones that could potentially see a year on year rent increase of 4% for new tenancies over a three-year period.

Security of Tenure & Rent Certainty

Increased RS/HAP limits, although a positive development, are not enough alone to tackle the continuing housing and homelessness crisis. Consideration must be given to index linking rents to the Consumer Price Index (CPI). At a minimum further research is required to examine the viability of this rent certainty measure in addition to exploring alternative methods of rent certainty successfully employed in other jurisdictions. Rent predictability must now be extended to all electoral areas as a matter of priority. While the introduction of the rent predictability measures through the Planning and Development (Housing) and Residential Tenancies Act is commendable it is not sufficient given the extent of the crisis.

³⁶ Department of Social Protection, *Social impact assessment of the welfare and income tax measures in Budget 2017*, November 2017, P. 7, <http://www.welfare.ie/en/downloads/SocialImpact2017.pdf>.

³⁷ Ibid.

³⁸ Dáil Éireann Debate, Vol. 927 No. 3,

<http://oireachtasdebates.oireachtas.ie/debates%20authoring/debateswebpack.nsf/takes/dail2016110800064>.

³⁹ 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 pilot 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.

⁴⁰ Department of Social Protection.

⁴¹ 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>.

⁴² Department of Housing, Planning, Community and Local Government.

Rent certainty must be matched with increased security of tenure. In the absence of indefinite leasing, the extension of Part 4 tenancies from four to six years is welcome. The commitment to move to indefinite leasing must be realised as a matter of urgency. In the interim, tenants require greater protection from tenancy termination for reasons of sale of their rental property. Increased protections for tenants of multi-unit developments are welcome but need urgent review to ensure those renting in smaller developments are adequately protected. The Deposit Protection Scheme which is provided for in the 2015 amendments to the Residential Tenancies Act must be amended, commenced and implemented immediately to restrict the amount of deposit which can be requested at the start of a new tenancy. This is particularly pertinent in light of recent reports that large commercial landlords are now requesting tenancy deposits equivalent to two months' rent.⁴³ 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.

Private Rental Sector Supply

Supply side initiatives outlined in the new *Strategy for the Rental Sector* are positive and if implemented correctly could have a significant impact on 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 rental units for low to middle-income families. The leveraging of such 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 to developer contributions similar to existing Part V contributions for social housing (minimum 10%). The commitment to develop a cost rental model for the rental sector is encouraging and an affordable rental model must be developed as a matter of a matter of priority. 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. Revised standards for the private rental sector are welcome but unfortunately fall short in terms of energy efficiency, minimum health standards and control of damp. The government should seize this opportunity to improve the private rental stock as more people make their home in the sector.

⁴³ Charity calls for tenant protection as landlord's demand two month deposits. <http://www.newstalk.com/AMP/Charity-calls-for-tenant-protection-as-landlords-demand-two-month-deposits->

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 over 45 years. The Simon Communities deliver support and service to over 8,300 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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