



Submission to the Review of Rebuilding Ireland

11 August 2017

Introduction

Threshold is a national housing charity with regional advice centres in Dublin, Cork and Galway. We provide frontline services across Ireland to people with housing problems in the private rented sector. Our primary objective is to prevent homelessness by advocating for tenants via our advice line and national Tenancy Protection Service. It is our experience that the best way to deal with the problem of homelessness is to prevent people from becoming homeless in the first place. Threshold's goal is to provide a strategic, targeted service to give people the support and advocacy required to keep their home. We provide crisis intervention for our clients where they are threatened with eviction. We advocate for a fair, sustainable rental market with a clear emphasis on supporting, informing and advocating for vulnerable tenants.

Our vision is an Ireland where everyone has access to affordable, secure, suitable and good quality housing.

Do the objectives set out in the Rebuilding Ireland Action Plan remain relevant and valid and are there other priorities we should also be focussing on over the medium term?

Threshold advocates for a rights based approach to housing and regards adequate housing as a human right. Housing was recognized as part of the right to an adequate standard of living in the 1948 Universal Declaration of Human Rights and in the 1966 International Covenant on Economic, Social and Cultural Rights. Everyone should have the right to live somewhere in security, peace and dignity. Access to adequate housing is a precondition for the enjoyment

of other human and socio economic rights, including the rights to work, health, privacy and education. We call upon the Department of Housing, Planning and Local Government (DHPLG) to ensure that human dignity and the right to adequate housing is placed at the centre of government policy.

The past few years have witnessed an acceleration of what has been called the ‘financialisation of housing.’¹ This is a process whereby housing is treated as a commodity; a means of accumulating wealth and as security for financial instruments that are traded and sold on global markets. Capital investment in housing increasingly disconnects housing from its social function of providing a place to live in dignity and hence undermines the realisation of housing as a human right.

It is important that housing as a human right, and as fundamental to the exercise of other rights, is the guiding principle of housing policy.

The objectives set out in the Rebuilding Ireland Action Plan remain relevant, and while there have been areas where the means to achieve those objectives have fallen short, the objectives are laudable and should be retained.

What further action should now be considered in order to prevent homelessness, to find more permanent solutions for those in emergency accommodation and to help individuals and families to remain living in their own homes?

The provision of independent advice and advocacy services to tenants has an important role to play in preventing homelessness, particularly amongst vulnerable and at risk households. This is evidenced by the success of Threshold’s Tenancy Protection Service (TPS). Current Government policies, focused on investing in increased emergency homeless services, may run contrary to the aim of *Rebuilding Ireland* to provide more lasting solutions to homelessness through increased preventative measures.²

¹*Report of the Special Rapporteur on adequate housing as a component of the right to an adequate standard of living, and on the right to non-discrimination in this context.* UN Human Rights Council, Thirty-fourth session, 27 February-24 March 2017.

<https://documents-dds-ny.un.org/doc/UNDOC/GEN/G17/009/56/PDF/G1700956.pdf?OpenElement>

² In June 2017 a further investment into the provision of emergency accommodation of €10 million was announced. According to figures from the Dublin Region Homeless Executive almost €39 million was spent accommodating homeless families in hotels and B&Bs in Dublin in 2016, which is more than double the amount spent in 2015.

Homelessness is not just an issue affecting Dublin³ and the number of ‘hidden homeless’ or people accessing Threshold services identifying as staying with family/friends, ‘sofa surfing’, living in informal house-shares, overcrowded family homes, and short-term lets have increased in recent years. There is a strong need for the Tenancy Protection Service to be promoted nationally in the public domain to target these vulnerable groups. There is also a need for streamlined homelessness prevention funding to be introduced to enhance Threshold’s advocacy capacity. This would enable Threshold’s expert staff to represent clients before the Residential Tenancies Board (RTB) if they are at risk of losing their home. Threshold strongly contends that such preventative measures are a much more cost-effective approach than paying for emergency accommodation.

Threshold has serious reservations about the administration of the Housing Assistance Payment (HAP) scheme at present. Delays in either the transfer of tenants to, or the establishment of, HAP tenancies are resulting in arrears thus jeopardising the landlord/tenant relationship and placing tenancies at risk. There are reports that Cork County Council is still trying to process HAP applications back dated to April of this year. Moreover many landlords who currently have tenants in receipt of RS are hesitant to move to the HAP scheme contrary to the housing assistance equality provision introduced in January 2016. This worrying trend has been highlighted by Irish Commission for Human Rights and Equality. In 2016 the new housing assistance ground topped the list of queries about discrimination received by the Workplace Relations Commission (WRC) under the Equal Status Acts⁴.

Consideration should be given to ensuring that the HAP scheme can provide discretionary uplifts where necessary, similar to the Interim Tenancy Sustainment Protocol in operation for Rent Supplement clients, to ensure top-ups by tenants are a last resort. In addition ‘Homeless HAP’ should be extended to other urban centres across the country.

Rent Supplement continues to be the appropriate payment for people under certain circumstances and Threshold strongly urges that Rent Supplement continue to exist in parallel with the Housing Assistance Payment scheme and suggests that it is not appropriate that it be phased out. The purpose of Rent Supplement is to provide short term income support for people living in private rented accommodation who cannot provide for the cost of their accommodation and meet the eligibility criteria.

³ The latest homeless figures highlight that there were 280 homeless persons in Limerick, 269 in Cork and 174 in Galway.

⁴ Available at <https://www.ihrec.ie/app/uploads/2017/06/IHREC-Annual-Report-2016.pdf>

It is apparent from our services that some individuals who should be able to apply for Rent Supplement are being told they have to apply for HAP instead. This is particularly worrying when an individual or family is at risk of homelessness and cannot avail of Rent Supplement on the ‘substantial change in circumstance’ ground. Quick access to Rent Supplement under these circumstances is vital for those who could afford the rent at the beginning of their tenancy but find themselves unable to continue to pay the rent because of a substantial change in their circumstances, such as unemployment, during their tenancy.

The current gap between HAP and Rent Supplement limits and market rents means that households in receipt of this payment, both within and outside the RPZs, are struggling to meet current market rents. A survey carried out by Threshold in 2014 found that 44 per cent of clients in receipt of RS were paying top-ups.⁵ We are seeing a repeat of this trend among our current clients in receipt of HAP. It is our experience that many of these tenants face extreme financial strain which can put tenancies at risk in the longer term, as well as the risk of hardship and going without household essentials in the shorter term. Top-up payments are typically drawn from a tenant’s social welfare payments, meaning that limited financial resources for food, clothing and utilities will be reduced to unsustainable levels with households at risk of deprivation.

What further action should be taken to increase both the scale and speed of delivery of Social Housing? Are there new delivery models or mechanisms to accelerate output?

Threshold is an Approved Housing Body (AHB) and as such has direct experience of the difficulties AHBs face in acquiring property. Since 2010 government support for AHBs has been significantly reduced. Prior to the recession AHBs were grant funded by government at 100% of the cost of delivery. At the moment limited funding is being made available with grant funding only now available for special needs housing. This has led to a very difficult operating environment and has constrained AHBs from providing social housing. In England the transition from 100% grant funding took place over a period of 20 years and the sector had greater time to adjust and reorient to the new resourcing regime.

The Capital Advanced Leasing Facility (CALF) and the Payment and Availability (P and A) scheme are the main funding mechanisms available to the sector. Both schemes are predicated on the purchase of empty property. Consideration should be given to a review of

⁵ Threshold, Advisory Report on Rent Supplement, October 2014.
<https://www.threshold.ie/publications/threshold-advisory-report-on-rent-supplement/>

the funding model to allow AHBs to purchase tenanted properties. It is our experience that an increasingly high proportion of tenant evictions are for the purposes of sale. In many cases these tenants are at risk of homelessness. While the current system requires nomination by the Local Authority, if AHBs were allowed to purchase tenanted property under the CALF and P and A scheme, on the understanding that the Local Authority would have the right to nominate at the end of the tenancy, it would have the dual benefit of increasing the available stock of property for AHBs and preventing eviction for the purpose of sale.

It is clear the Real Estate Investment Trusts (REITs) have not increased the supply of property at the lower end of the market. The largest REIT in the state, with a portfolio of 2381 apartments, has an average rent of 1459 euros per month. The current rental market incentivises REITs to invest in higher-end properties where the return is greater. A comprehensive examination should be undertaken of the taxation and regulatory regime surrounding REITs with a view to incentivising investment in the lower end of the market, which provides a significant portion of social housing via the HAP and Rent Supplement schemes.

What additional initiatives or policy tools can best activate housing lands and deliver new housing supply to buy or rent at more affordable levels?

According to the CEO of NAMA Brendan McDonagh, only 6% of land bought from Nama has been built on. Speaking at the launch of the 2016 annual report he commented that the agency had sold enough land to build 50,000 homes but just 3,000 have actually been delivered⁶. Similar comments have been made by the chief executive Ires REIT who has suggested that land hoarding is inhibiting the development of rental properties.⁷ According to the 2014 Residential Land Availability Survey there are 17,434 hectares of residential zoned lands nationally, which could support the construction of over 414,000 dwellings. There is sufficient zoned land in the Dublin Local Authorities to build a total of 116,705 new houses and apartments. A further Residential Land Availability Survey is planned for 2017 and must be expedited.

⁶<http://www.independent.ie/business/irish/nama-chief-makes-dramatic-accusations-of-land-hoarding-amid-housing-shortage-crisis-35777828.html>

⁷ <http://www.constructionnetworkireland.com/ires-development-plans-stifled-land-hoarders/>

It is clear that there is sufficient zoned land in the state to have a major impact on the lack of supply in all sectors of the housing market. The Housing Agency should be tasked with examining the issue of land hoarding, the extent of the practice and potential solutions. In addition to a vacant site levy, whose rate should be increased from the scheduled three per cent, consideration should be given to the compulsory purchase of hoarded land for social housing in line with the recommendations of the 1973 Kenny Report. This recommended that the compensation paid where there is compulsory purchase of land for the purposes of building social houses, would be the existing value of the land plus 25%.

It is increasingly difficult for developers to acquire finance for the development of residential property. Banks are, correctly, more constrained in the quantum and type of funding they provide to the market. This is the result of increased regulation and the requirement to hold higher capital against their loan books. Non-bank lenders operate a different business model which may not be suitable for all developments. While there is an obvious and urgent need to avoid the mistakes of the past, sufficient capital must be made available to the construction of property. Consideration should be given to the use of Part V mechanisms to provide up-front payments for use as seed capital for development of residential property.

How can we encourage increased supply of rental accommodation and foster a sustainable sector that meets the needs of all tenants across the different rental market segments?

Maintaining supply in the Private Rental Sector is paramount in the current housing and homelessness crisis. It is our experience that small scale landlords, those with one or two properties, house the overwhelming majority of vulnerable tenants in Ireland. The introduction of attractive tax measures for small scale landlords is necessary to reverse the trend of market exits. Lessons need to be learned from the past whereby tax measures on rental income had a detrimental effect on small scale landlords, who by their very nature were treated less advantageously than institutional landlords, REITS or non-bank entities. Previous general changes to the tax code such as the introduction of USC and PRSI obligations on rental income have made it more difficult for small scale landlords to survive in this sector. Threshold favours tax incentives which increase supply, security and quality in the PRS for low income households. We also advocate for strong tax compliance and the introduction of deductible expenses focused on upgrading existing rental stock above minimum standards and in line with energy efficiency standards.

Threshold supports initiatives to drive supply of affordable accommodation such as mixed tenure and cost rental accommodation. This is a crucial part of a co-ordinated approach to addressing affordability issues, in tandem with the long term rent certainty measures and increased security of tenure.

Threshold urges that any new subsidies or tax incentives to promote rental supply must be contingent on the provision of permanent and affordable rental accommodation. Such incentives should be time-bound, focussed on large urban areas where demand exceeds supply, and subject to regular review. We must ensure that any new measures ultimately increase supply and construction quantities rather than further stimulating demand and rent inflation in an already dysfunctional PRS.

Threshold supports the immediate introduction of a cost rental model proposed by the National Economic and Social Council in its 2014 report. Cost rental has the potential to provide greater certainty for Government in terms of social housing provision. It will help to address the difficulties that arise in the supply of local authority housing from borrowing constraints and on-going costs not being covered by differential rent. A cost rental sector of sufficient size means the cost of providing housing supports such as HAP would be more predictable and less subject to rapid cost increases.

Threshold would like to see stronger commitment in relation to Build-To-Rent schemes. We call for the development of a supportive regulatory and policy framework for these schemes with appropriated guidelines for all stakeholders and greater use of pathfinder sites.

Threshold eagerly awaits the recommendations of the Expert Group on Cost Rental, established by the Rental Strategy and due to report in Q4 2017. This group must complete its work within the expected timeframe and its report must be disseminated widely.

Threshold is particularly keen to ensure that sufficient subsidises are put in place at the outset of cost rental schemes to moderate high initial sinking costs. This is extremely important as rents will increase for some social housing tenants, who in many cases pay about 15% of their disposable income on differential rents at the moment.

Threshold has long been an advocate for rent certainty measures. Rapidly increasing rental inflation is the most significant challenge to security of tenure in the rental sector at present. One in five homes in Ireland is privately rented, yet this sector is also the most expensive and least secure form of housing in Ireland. The introduction of the rent certainty measures in

Rebuilding Ireland was a welcome step towards realising the long term vision of a sector that is affordable, secure and sustainable.

The Rent Pressure Zones (RPZs) have been in operation for a very short time; less than three months in some places. It is very difficult to assess the effect of the policy over such a short period, however early indications suggest that they are having a positive effect on the market. The Residential Tenancies Board (RTB) rent index for the first quarter of this year suggests that the rate of increase in private rents nationally is moderating and that rents in Dublin declined by 1.5%.

While the early indications are positive and encouraging there is too little data to give a complete picture of the effect of the measure. For many tenants the rent freeze introduced by the 2015 Residential Tenancies (Amendment) Act is still in place and they will not have experienced a rent review under the RPZ measures as yet. A proper analysis of the RPZ measures cannot be undertaken until a substantial majority of the renters in RPZ areas have undergone a rent review.

We have observed that in some cases, due to the shortage in supply, tenants are being forced to accept rent increases beyond the permissible level. This is particularly problematic in areas of high demand. In circumstances where there is limited supply, landlords may demand unlawful rents with impunity, secure in the knowledge that either the tenant accepts the unlawful rent or does not accept the accommodation. The legislation should be amended to clarify, and remove any ambiguity, surrounding this scenario. A clear legislative statement should be made that any agreement to pay rent above the formula amount is void *ab initio* (annulled from the very outset of the agreement) and any monies paid over on foot of such an agreement is held in trust by the landlord for the tenant. This would allow tenants to recover any overpaid rent and would be an effective counter avoidance measure.

It is clear that the enforcement of the rent predictability rules is problematic. Currently a tenant is entitled to know the previous rent on a property only after the tenancy has begun and there is no way for her or him to verify that this rent is correct. This loophole allows the minority of dishonest landlords to escape the RPZs completely. In so far as it does not prevent avoidance this rule must be changed. We suggest that a prospective tenant should be allowed to enter into a tenancy with reassurance that the rent charged is lawful. The RTB rent index should be made publically accessible and searchable. Its operation could be modelled on the Residential Property Price Register. This would allow a prospective tenant to verify

the previous rent on a property before taking up the tenancy. An additional benefit of allowing public access to the rent index would be that evidence drawn from it could be used in disputes before the RTB, which is not currently possible. Landlords are currently required to register the tenancy and are encouraged, but not required, to update the register when the rent changes. A simple legislative change should be made to require that rent reviews are recorded.

Rent certainty measures should become a permanent fixture in Ireland in order to promote a functioning housing market. We urge the government to ensure that the RPZs are rolled out nationally and beyond the three years envisaged by the current legislation. Low and middle income households are finding it increasingly difficult to access affordable private rented housing. Households who depend on social housing supports such as Rent Supplement and the Housing Assistance Payment are struggling to meet current market rents in RPZs. The problem is exacerbated for those renting outside the main urban areas who are not protected by the rent certainty measures. In our experience clients in these areas are facing substantial rent increases of 20, 30 and in some cases 40 per cent.

Rent predictability is good for the rental sector as a whole. Rent stability is vital in a context where we have seen rapid and unpredictable increases in recent years. A predictable return on investment suits investors and large institutional landlords and discourages short term property speculation. Predictability is important for the public finances since the state invests considerable sums in the rental sector via Housing Assistance Payment and rent supplement. Rent certainty measures allow for more certain fiscal planning because rents cannot exceed a determined level. Renting is increasingly the tenure of choice or necessity for families; especially young families, and so rent predictability means that families are protected from the erratic variations of the market and uncertainty around where they are going to live and go to school. Rent predictability is therefore good for communities and wider society.

Nevertheless, rent predictability without proper security of tenure is likely to significantly blunt the effect of rent predictability measures. Threshold calls upon the department to examine the grounds for eviction contained in s. 34 of the Residential Tenancies Act and to commission research into the efficacy of the anti-avoidance measures contained therein. Security of tenure must be robust if the RPZs are to be successful; the two principles cannot be separated.

Consideration should be given to removing the ‘sale of a property’ ground for terminating a tenancy in a rented property. This may be done by amending Section 34 of the Residential Tenancies Acts to introduce legal safeguards to give residential tenants the right, similar to tenants of commercial properties, to continue in their tenancy during and after the sale of a rented property.

Data from our services indicates that Section 34(b) of the Residential Tenancies Act is being abused. This section allows for ‘no reason’ evictions at the beginning of every further Part Four tenancy. We have noted a large increase in the numbers of evictions taking place pursuant to this section since the repeal of Section 42 which abolished termination in the first six months for no stated ground. It is our contention that the volume of terminations under this section is undermining the Rebuilding Ireland commitment to move towards indefinite tenancies and is creating an imbalance in the operation of the RPZs. ‘No reason’ evictions have no place in the vision for the rental sector set out in Rebuilding Ireland. The removal of section 42 was very welcome, but a possibility has arisen that the problem its repeal sought to alleviate has revived in terms of the increased use of section 34(b).

Threshold has serious concerns that the exemptions to the RPZ legislation have not been effectively implemented. We have encountered a number of landlords who are manipulating the “*substantial change*” exemption in the legislation. We are aware that the grounds for eviction contained in s.34 requires that a property is undergoing ‘substantial refurbishment or renovation’ while s.19 requires that a ‘substantial change in the nature of the accommodation’ has taken place before the property escapes the RPZ. Despite this distinction, our experience would suggest that some landlords are conflating the provisions, and relying upon ‘substantial renovation’ to increase the rent beyond the permitted level. There is no definition of ‘substantial change in nature’ but a plain reading of the act would suggest that the bar is set very high and that ‘substantial change in nature’ is not synonymous with ‘substantial refurbishment or renovation.’

Threshold calls for the immediate introduction of a Deposit Protection Scheme, as set out in the Residential Tenancies (Amendment) Act 2015, which includes a legal definition of deposit to cover one month rent only. This will make a real difference to the lives of tenants who face financial difficulties due to the unlawful retention of the deposit or who face the prospect of becoming homeless because they are unable to pay the rent for a new private

rented home. Deposit Protection Schemes are an effective, cheap and straightforward means of preventing homelessness. The retention of deposits and deposit disputes are a leading category of disputes referred to the RTB. The retention of a deposit, and the consequent inability to place a deposit on a new home, can be the first step towards homelessness.

German law provides a hardship defence for tenants. Under Irish law a landlord can only end a tenancy in accordance with the Residential Tenancies Act 2004 and if a tenant wishes to dispute the validity of the notice or the person issuing it they have 28 days within which to refer a dispute to the Residential Tenancies Board. Threshold proposes the insertion of a defence for tenants where they are given notice similar to the provision provided under German law, whereby if a landlord wants to terminate an open-ended tenancy for ordinary reasons, the tenant may object to the notice and seek continuation if it would constitute a hardship for her or her family. Hardship could arise, for example, on grounds of age, a serious disease or that substitute residential space cannot be procured on reasonable terms. In Germany if an agreement between the landlord and tenant cannot be reached the duration and the terms under which the tenancy is continued are determined by a judge. The decided duration usually amounts to between six months and a maximum of three years. Additionally a protocol should be established between the Residential Tenancies Board and relevant Local Authorities, so that a Local Authority is alerted when an over-holding case (a situation whereby a tenant remains in the property without legal grounds for doing so) identifies a bona fide inability to secure alternative accommodation as the source of the dispute.

A change in the law is required to protect tenants in cases where their landlord's property is being repossessed or where a receiver is appointed to a mortgaged property. The legal definition of 'landlord' needs to be changed to explicitly include both lending institutions and receivers so that the rights established under landlord and tenant law cannot be undermined or ignored as is currently the case. Threshold believes that a simple amendment to the definition of 'landlord' in the Residential Tenancies Act 2004, so as to explicitly include both receivers and lenders, would introduce a welcome degree of certainty for landlords, tenants, financial institutions and receivers. It would impose a requirement on a lender that has commenced repossession proceedings to terminate a tenancy in the manner provided for by the Residential Tenancies Act 2004. It would also impose a responsibility for repairs and the return of the tenant's deposit upon the expiry of the tenancy. In addition to this legislative change, Threshold is seeking the introduction of a code of conduct on buy-to-let mortgage arrears. A Central Bank of Ireland code of conduct on residential mortgage arrears (CCMA)

has been in place for all mortgage lenders since 2009. A code for buy-to-let arrears would: introduce a transparent process for financial institutions, landlords and tenants; set out the required steps for engagement with the landlord and tenant and the forms of communication required; and ensure that financial institutions respect and uphold tenants' rights.

The Residential Tenancies Acts should be amended to bring licensees under the remit of the Act. Licensees are one of the most vulnerable groups in the sector, with very limited rights. The establishment of the 'rent a room' scheme, while welcome, has placed many more people in a position where they have very limited recourse or security. It should be noted that the lack of RTB jurisdiction over licensees harms not only licences but property owners. It can be very difficult to evict an over holding licensee, with a property owner having to rely on legislation which was judged not fit for purpose in relation to leases in 2004.

Minimum standards and repair issues are one of the daily complaints Threshold deals with.⁸ Threshold is calling for the gradual ban on leasing of rented properties that do not meet minimum standards. Threshold advocates for the introduction of a certifications scheme or 'NCT' for rented housing as a step towards greater compliance. An integrated framework of physical standards improvements is a key component of an 'NCT' for housing, comprising of legal obligations in the following areas: energy efficiency, fire safety, tax obligations, and registration with the RTB. The burden of proof for compliance with minimum standards would rest with the landlord, who would be required to provide a certificate of fitness to the local authority.

A more robust minimum standards regime which addresses the issue of fuel poverty must be legislated for. It is estimated that more than 55 per cent of private rented dwellings have poor energy efficiency, with a Building Energy Rating (BER) between D and G⁹. It is our experience that the most vulnerable tenants, who are on low incomes, live in the least energy-efficient accommodation, leading to health and safety concerns and energy poverty. Therefore, the poorest are paying most to keep warm. Improving the energy efficiency of the private rented sector must be carried out as part of wider improvements in physical standards. The benefits of highly energy efficient homes far exceed physical health, including income, mental health, environmental, skills and labour market, community and population health

⁸ In 2016, substandard accommodation was Threshold's number one issue, with 1,432 cases nationally.

⁹ Department of Communications, Energy and Natural Resources (2016): Strategy to combat energy poverty, <http://www.dccae.gov.ie/en-ie/energy/publications/Pages/Strategy-to-combat-energy-poverty.aspx>

gains. A consultation on minimum efficiency standards in the private rented sector was announced by the Minister for Communications, Climate Action and the Environment in March 2017¹⁰ however that consultation process has yet to begin. Threshold calls upon the Department of Communications, Climate Action and the Environment to expedite this important process and launch the consultation as soon as possible.

One of the greatest fire safety risks in private rented accommodation is overcrowded accommodation. In recent years we have seen egregious examples in the media such as so-called ‘budget’ accommodation targeting international students and migrant workers. What is less often reported, but is regularly seen through our services, is the increase of intergenerational overcrowding with several generations of the same family living under the one roof because of the lack of affordable accommodation. Census 2016 shines a light on the stark reality of the overcrowding situation showing that almost ten per cent of the population are living in homes with more persons than rooms. There is a strong need for the introduction of a legal definition for overcrowding in private rented accommodation.

What further actions should be taken to identify, target and encourage the greater use of existing vacant properties for both social and private housing purposes?

Despite the housing and homelessness crisis, latest figures from the Central Statistics Office show that up to 240,000 residential properties are currently empty in Ireland. More than 20,000 apartments and houses, excluding holiday homes, are vacant in Dublin city and suburbs, with nearly 9,000 of those in the city centre. Similarly, in areas of Cork and Galway city the vacancy rate is in excess of 25 per cent of the total housing stock.¹¹ The Urban Regeneration and Housing Act 2015 requires planning authorities to establish a Vacant Sites Register. The aim of the Register is to allow local authorities to impose a levy on property

¹⁰ Minister Naughten, Speech at Energy Action Fuel Poverty and Climate Action Conference, Croke Park, March 2017 <http://www.dccae.gov.ie/en-ie/news-and-media/speeches/Pages/Minister-Naughten-Speech-at-Energy-Action-Fuel-Poverty-and-Climate-Action-Conference.aspx>

¹¹ CSO, Census of Population 2016 - Preliminary Results- Housing <http://www.cso.ie/en/releasesandpublications/ep/p-cpr/censusofpopulation2016-preliminaryresults/housing/>

owners who fail to develop prime housing land.¹² While legislation in this area is welcome, the vacant sites levy prescribed at 3 per cent of the market value of a site, is too low and needs to be elevated to rate that ensures higher activation of vacant properties.¹³

National measures should be introduced to encourage owners to lease or sell properties to the local authorities, housing associations (AHBs) or community organisations who will refinance the refurbishment costs.

As suggested by the Housing Agency¹⁴ strategies to tackle long-term empty homes should be part of wider improvement schemes. In Ireland the work programme of the Joint Committee on Jobs, Enterprise and Innovation on ‘Policy Options to Support Business Growth and Job Creation and Retention in Town and Village Centres’ could be supported by a programme of targeting empty homes in rural towns and villages.

¹² <http://www.irishstatutebook.ie/eli/2015/act/33/enacted/en/html>. This Act came into effect on 1st January 2017. Under the legislation, property owners will then have 28 days to make a submission regarding the inclusion of the site on the register

¹³ Countries like Scotland, England and France penalise long-term vacancies by dramatically increase tax once your house is vacant for more than a year in an area of high population.

¹⁴ <http://www.housingagency.ie/getattachment/Our-Publications/Latest-Publications/16-05-17-Vacant-Homes-Paper-Housing-Agency.pdf>