



YOU'RE NOT ALONE

ALONE Submission to the Department of Housing
Strategy 2025

Department of Housing

27 March 2025



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To whom it may concern,

ALONE welcome this opportunity to provide input to the Department of Housing's forthcoming strategy. As an organisation and Approved Housing Body (AHB) who supported almost 44,000 older people across our services in 2024, we see the impact of the support provided by the Department of Housing on a regular basis. We would also like to voice our appreciation to the Department for your ongoing commitment to engagement with NGOs and AHBs.

As you will be aware, Ireland has an ageing demographic. Meanwhile, homeownership among those aged 65 and older has fallen from 87% in Census 2016 to 83% in Census 2022, with further declines anticipated in the years ahead, and the number of those living in the private rental market has spiked by 83%. There has also been a 38% increase in the number of older people living in social housing since 2016, while the number of people aged 70+ on the social housing waiting list has almost doubled in the last ten years. Ireland's ageing population will significantly impact housing demand, especially for one- and two-bedroom units that support rightsizing, accessible social housing, and housing with support options. We need to act now to prevent the housing crisis among older people from getting much worse in the years ahead.

We have five objectives and a range of associated actions which we believe should be considered within the Department's new statement of strategy. These are explained in further detail throughout this submission. The objectives are:

1. Support the delivery of a spectrum of housing options for older people in line with 'Housing for All' and the 'Housing Options for our Ageing Population' policy statement
2. Support the delivery of high-quality homes
3. Deliver Capital Private House Grants schemes
4. Provide for development of effective AHB policy and statutory regulation
5. Provide sufficient access to in-person and telephone services

We hope to continue to engage with the Department on a regular basis throughout the lifetime of the next strategy. Should you have any queries about the recommendations in this submission, or any other aspect of ALONE's work, please do not hesitate to contact us.

Kind regards,

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Submission from ALONE to the Department of Housing's Statement of Strategy 2025-2028

Strategic Goal A: To provide a framework that ensures a sustainable housing system in Ireland with a supply of good quality housing to match the needs of all our people

1. Include a new objective: “Support the delivery of a spectrum of housing options for older people in line with ‘Housing for All’ and the ‘Housing Options for our Ageing Population’ policy statement”.

Based on the assumption that the new Strategy will be developed in a similar format to the strategy for 2024-2025, ALONE's primary recommendation is that **delivery of housing for older people is a key objective** under Overarching Strategic Goal A. We believe that this would be in line with commitments made in the Programme for Government to provide “Practical Housing Options for Positive Ageing”, and the appointment of the new Minister of State with responsibility for both Older People and Housing.

This objective should promote Government policy and could take the form: “Support the delivery of a spectrum of housing options for older people in line with ‘Housing for All’ and the ‘Housing Options for our Ageing Population’ policy statement”.

The actions associated with this objective should include those already committed to across various policies and the Programme for Government, and several additional actions listed below.

Action	Details	Recommendations
Action 1: Implement, fund, and report on all outstanding actions in the Joint Policy Statement, ‘Housing Options for our Ageing Population’.	The 2019 Joint Policy Statement aimed to ensure that older people have a greater choice of accommodation that meets their health and social care needs. It promoted a range of housing options to help older people plan ahead and choose the right home. However, while this objective was included in <i>Housing for All</i> , it was not designated as a priority action, meaning progress was not tracked	Reinstate housing actions for older people as priority actions under <i>Housing for All</i> , ensure they are reported on, and complete outstanding actions.

	or reported. The 2024 Fine Gael policy document, <i>A New Vision for Positive Ageing</i> , acknowledged that while useful research was conducted, it has not been embedded in national programs or local authority planning.	
Action 2: Establish a distinct unit across the Departments of Housing, Local Government and Heritage, and Health to address the housing and care needs of older people.	This unit must have a published Terms of Reference with clear goals and outcomes. It would work within and across the Departments of Housing and Health to plan for housing and care needs, ensuring proper investment in supports for independent and supported living. It would also improve coordination between the Department of Housing and the HSE.	Establish a cross-departmental unit to facilitate policy implementation and support the Minister of State for Older People and Housing.
Action 3: Define and develop a policy on housing with onsite supports for older people, with targets based on the Demonstrator Project.	The <i>Draft National Planning Framework (2024)</i> emphasises the need for integrated health and social care to support older people in independent living. The Inchicore Housing with Support demonstrator project, supported by Dublin City Council, the HSE, and government departments, provides a model for onsite care-integrated housing. The project will be tenanted in 2025. A comprehensive evidence review published ALONE supports this approach. Targets suggested by ALONE and Social Justice Ireland recommend delivering 1,721 Housing with Supports units by 2040 at a cost of €4.3 billion.	Establish a national definition and policy for Housing with Support, incorporating learnings from the Demonstrator Project, and set clear delivery targets to facilitate replication, ensuring local areas, AHBs, and the private sector can successfully adopt and implement the model.
Action 4: Require that at least 25% of all new social housing builds meet age-friendly and universal design standards.	The <i>Housing Agency/ISAX 2016</i> report recommended that Local Authorities set minimum requirements for age-friendly housing. ALONE and Threshold suggest that at least 25% of new social housing should follow universal design principles, as one in four social housing applicants is aged 50+. ALONE and Social Justice Ireland recommend the Government build 82,500 social housing units by 2040. This includes building 1,640 social housing units via Approved Housing Bodies (AHBs) per year for older people until 2040, costing €4.3 billion. Social housing	Mandate that 25% of new social housing be built to universal design standards and ensure local authorities reflect the needs of older applicants in social housing allocation.

	allocation should also reflect the increasing number of older applicants.	
Action 5: Develop clear central guidelines for housing need assessments and require local authorities to deliver housing designed for older people	Under <i>Housing for All</i> , Local Authorities were required to develop Housing Delivery Action Plans. However, a 2022 ALONE review found inconsistencies in planning for age-friendly housing. Some local authorities had no targets, and most committed to developing 5% or less of their housing to age-friendly standards. The highest target found was 16.5% (Donegal County Council). There is a requirement to deliver clearer central guidelines for housing needs assessments, which take the demographics of a local area into account.	Mandate local authorities to find suitable sites for housing specifically designed for older people, ensuring accessible options in communities.

Suggested objective: “Support the Delivery of High-Quality Homes”

We suggest that this objective is retained from the previous strategy but with one key action, as outlined here.

Action	Details	Recommendations
Action 1: Complete and publish the National Disability Authority (NDA) cost-benefit analysis on Universal Design.	As part of the commitment in the Joint Policy statement to introduce measures to increase use of universal design principles in new homes, a cost-benefit analysis of universal design was commissioned from the National Disability Authority, which was also required under the National Disability Inclusion Strategy 2017 to 2021. However, this analysis was never published and the action remains incomplete. As a first step to increasing delivery of universal design homes, the new strategy should commit to publishing the cost-benefit analysis.	Complete and publish the cost-benefit analysis on Universal Design with a view to completing the commitment to ensure that 30% of all new dwellings are built to incorporate universal design

Suggested objective: “Deliver Capital Private House Grants Schemes”

We suggest that this objective is retained from the previous strategy.

Action	Details	Recommendations
Action 1: Support local authorities to deliver increased levels of Housing Adaptation Grants for Older People and People with Disability Grants Schemes	As Ireland's population ages, demand will continue to increase for these grants and further increases will be required on an annual basis. Since 2010, the population aged 65+ has increased by 56.5% and will increase by a further 65 per cent by 2040 (a total increase of 158 per cent on 2010). ALONE and Social Justice Ireland estimate that investment of some €260m in grant aid will be required by 2040. We also recommend the addition of a further indicator; namely, ‘number on waiting lists for grants’. A commitment was made in the ‘Housing Options’ Joint Policy Statement to publish the waiting list data but this has not yet taken place.	Increase funding to housing adaptation grants on an annual basis to reach approximately €260m per annum by 2040, and publish waiting list data
Action 2: Implement the outstanding recommendations from the Housing Adaptation Grants Review report, particularly recommendation 6: Establish a time specific working group with representation from the Disabled Persons Organisations (DPOs), umbrella organisations and local authorities to further improve the application process.	In 2019, with support from ALONE, a revised single application form encompassing all three grant schemes was implemented to improve accessibility. However, improvements remain to be made to the accessibility of the application process for the grants, as identified in the Housing Adaptation Grants review report. Housing Adaptations were the highest area of housing need experienced by older people assessed by ALONE in 2024. We could recommend that the action is included in the next strategy, and reiterate our offer to participate in the working group to improve the application process or provide any other support we can in relation to these grants.	Establish a working group to improve the application for housing adaptation grants, support delivery of a staged grant payment process, and implement other outstanding recommendations from the Housing Adaptation Grants review report

Suggested objective: “Provide for development of effective AHB policy and statutory regulation”

We suggest that this objective, from the previous Strategy, is retained with the action below updated.

Action	Details	Recommendations
Action 1: To develop a long-term strategy for the AHB sector	Building on the Housing Commission's recommendation, ALONE believe that a clear vision for the sector should include consideration of the role of AHBs in providing housing for older people, individuals with disabilities, and other groups with specific housing needs, given significant changes and pressures in this area. As noted by the CEO of the Irish Council of Social Housing in 2024, “As a percentage of AHB delivery, the number of homes provided to older and disabled persons has declined in recent years... we need to rebalance that. We can’t overlook older people, who are a huge growth area.”	Review the role of AHBs in providing housing for older people and other groups with specific housing needs in strategy for the AHB sector.

Overarching Strategic Goal G: To provide a framework that assists the department, local authorities and agencies to enhance digital services and accelerate, alongside our partners, the implementation of the United Nations Sustainable Development Goals (SDGs) through the use of data and digital technologies.

Include a new objective: Provide sufficient access to in-person and telephone services

Action	Details	Recommendations
Action 1: Support the Department, local authorities and agencies to maintain and improve access to services in-person and via telephone	Given that Ireland has an ageing population, and 41% of people aged 75+ have never used the internet, ALONE recommend that providing sufficient access to in-person and telephone services is a key objective of the Department. Targets to improve use of digital services (such as that to enable 90% of applicable services provided by the Department to be consumed online by 2030) should be matched by actions and targets ensuring that those who continue to use in person and phone services receive the support they need to do so (for example, by implementing a universal design approach to customer communications).	Develop actions and targets to improve in- person and phone services in tandem with measures to improve usage of digital services