



**Observations:**  
**Department of Housing, Local Government and Heritage**  
**Statement of Strategy 2021-2025**

October 2020



**Rialtas na hÉireann**  
Government of Ireland



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## 1. Introduction

Age Action welcomes the opportunity to input into the development of the Statement of Strategy 2021-2025 of the Department of Housing, Local Government and Heritage. It does so understanding that Ireland needs to plan for an ageing population that will see the number of people aged over 65 increase to close to 1.4 million by 2041,<sup>1</sup> from one-fifth to over one-third of the working population over the next two decades.

In making these observations on the next Statement of Strategy, Age Action draws on the statutory obligation on public bodies to eliminate discrimination, promote equality of opportunity and protect the human rights of those to whom they provide services and staff when carrying out their daily work under the Public Sector and Human Rights Duty.<sup>2</sup> We welcome its role to place 'equality and human rights at the heart of how a public body fulfils its purpose and delivers on its strategic plan'.<sup>3</sup>

Older people tell us that they want to age in the communities, with the choice to remain in their own homes for as long and independently as possible.

It is a time to re-evaluate and reassess the choice of housing available for older people in Ireland, to adopt a Whole of Government approach to planning for our ageing population, and to embed existing commitments in Departmental planning and strategies.

Age Action believes that we should have a choice to age in place which means the creation of age friendly environments, including the provision of support services locally.

Central to supports for an ageing population is the affordability of suitable housing. The housing policy of successive Governments has failed to deliver on affordable, secure and quality accommodation for hundreds of thousands of working families, young people, women, students, Travellers, older people, those with a disability and many others.

As we move forward to design, plan and implement housing policies under the new Departmental Strategy, it is important that the meaningful participation of older people is embedded across policies. By adopting a human rights-based approach to policy development, this direct participation will be enabled, and the policies will better meet the need of those they seek to affect.

There are a number of existing commitments to housing supports and planning in older age, including the Programme for Government, Housing Options for an Ageing Population Policy Statement and the National Positive Ageing Strategy. Age Action urges the Department to embed these existing commitments in their new Statement of Strategy in order to provide a clear framework for their prioritisation and delivery.

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<sup>1</sup> [http://rebuildingireland.ie/Rebuilding%20Ireland\\_Action%20Plan.pdf](http://rebuildingireland.ie/Rebuilding%20Ireland_Action%20Plan.pdf)

<sup>2</sup> Set out in Section 42 of the Irish Human Rights and Equality Commission Act 2014.

<sup>3</sup> IHREC (2019) *Implementing the Public Sector Equality and Human Rights Duty*. Available at [www.ihrec.ie](http://www.ihrec.ie).

## 2. Context

### 2.1 Policy Context

Suitable housing and environments for older people remains a priority policy issue.

The Programme for Partnership Government recognises the importance of planning to 'meet the accommodation and future healthcare needs of our diverse, ageing population' with an approach of supporting 'older people to live in their own home with dignity and independence, for as long as possible'.<sup>4</sup>

Goal Three of the National Positive Ageing Strategy states that it is the policy of the Government to 'Enable people to age with confidence, security and dignity in their own homes and communities for as long as possible'.<sup>5</sup> More specifically, objective 3.2 of this goal seeks to 'facilitate older people to live in well-maintained, affordable, safe and secure homes, which are suitable to their physical and social needs with key areas for action being housing grants for older people and people with a disability'.<sup>6</sup>

The Housing Options for Our Ageing Population Policy Statement launched in February 2019 by the Department of Housing, Planning and Local Government and the Department of Health<sup>7</sup> was a welcome effort to look at the spectrum of housing needs as we age, and also the close connection between housing and healthcare supports in older age. The Policy Statement clearly recognises the need for a continuum of housing choices and options for older people: a blend of good age friendly design, access to public and other services, and tailored flexible supports to enable older people to stay independent as long as possible.

At the time of writing, one report of the Implementation Group on Housing Options for Our Ageing Population Policy Statement was in the public domain.

### 2.2 Demographic Changes

According to the most recent 2016 Census figures, the number of people aged over 65 saw the largest increase of population since 2011. This age group has increased since 2011 by 19.1% (to 637,567). The number of people aged over 85 increased by 15.6% (to 67,555).<sup>8</sup>

At present, just over 13% of the total population is over 65 years of age.<sup>9</sup> Each year in Ireland, the over 65 age group increases by 20,000 people.

The number of people aged over 65 is projected to increase very significantly to close to 1.4 million by 2041,<sup>10</sup> from one-fifth to over one-third of the working population over the next two decades. The Department of Health's Capacity Review outlines that, on

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<sup>4</sup> Government of Ireland (2020) *Programme for Government, Our Shared Future*.

<sup>5</sup> Department of Health (2013) *National Positive Ageing Strategy*. Available at [www.health.gov.ie](http://www.health.gov.ie).

<sup>6</sup> Ibid. p. 54

<sup>7</sup> See

[https://health.gov.ie/wp-content/uploads/2019/02/HousingOptionsforanAgeingPopulationEng\\_Web\\_compressed.pdf](https://health.gov.ie/wp-content/uploads/2019/02/HousingOptionsforanAgeingPopulationEng_Web_compressed.pdf).

<sup>8</sup> See

<http://cso.ie/en/media/csoie/newsevents/documents/pressreleases/2017/prCensussummarypart1.pdf>

<sup>9</sup> See <http://www.cso.ie/en/releasesandpublications/er/q-cv/qnhscimeandvictimisationq32015>

<sup>10</sup> See [http://rebuildingireland.ie/Rebuilding%20Ireland\\_Action%20Plan.pdf](http://rebuildingireland.ie/Rebuilding%20Ireland_Action%20Plan.pdf)

the basis of the CSO's moderate population projection scenario (M2F2), the 65-74 age cohort will increase by 42.9%, the 75-84 age cohort will see an increase of 75.9% and the 85+ cohort will see an increase of 95.5% by 2031 from 2016 figures. Regional projections for 2016-2031 show the number of older persons (over 65) will almost double in every region over that time period.<sup>11</sup>

Older people are not a homogenous group, and present with varying needs and preferences.

Census data shows older people are more likely to be living in owner-occupied housing than other tenures, although an increasing number of older people are now renting. Census 2016 data showed that the vast majority of older people in Ireland own their own home (88%), either without a mortgage or other loan (81%) or with a mortgage or home loan (5.4%).<sup>12</sup> Overall, 395,522 of those over 65 households in Census 2016 lived in private households. While the majority of older people do live in owner-occupied housing with no mortgage,<sup>13</sup> just over 9% of people over 65 (35,974) were renting (2% from private landlord, 6% from local authority and just under 1% from AHBs) Of the 395,522 over 65s living in private households, 239,436 (or 60.5%) did not live alone while 156,086 lived alone (39.4%).

While there has been an assumption that older people close to, and in receipt of, the State pension age are generally mortgage-free home owners, it is clear that this is no longer true with many still carrying large mortgages, in mortgage arrears or living in precarious private rentals with no security of tenure in older age. Census 2016 showed us that 22,674 of over 65 households still had a mortgage. Data released for the first time by the Central Bank of Ireland in 2019 showed over 20,000 over 50s were in mortgage arrears; over 7,000 of this number aged 60-69, over 2,000 aged over 70.<sup>14</sup>

### 3. Recommendations

**Recommendation 1: Include a commitment in the new Statement of Strategy to adopt a rights-based approach to housing planning to enable the participation of people in the design, implementation and monitoring of decisions that affect their lives**

Age Action supports and advocates for equality and human rights for all older people. Everything we do is based on a recognition of the diversity of identity and situation among older people and a concern for equality for all older people.

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<sup>11</sup> <http://www.cso.ie/en/releasesandpublications/er/rpp/regionalpopulationprojections2016-2031>

<sup>12</sup> Note: Census 2016 housing data refers to households. CSO (2017). *Census 2016 Profile 1 - Housing In Ireland*. Available at [www.cso.ie](http://www.cso.ie).

<sup>13</sup> Census 2016 data shows that the majority of older people are living in owner-occupier housing and owning their own home (88%, of which 81% have no mortgage or loan)

<sup>14</sup> Irish Times (18 November 2019) 'Mortgage arrears may follow 20,000 into retirement'. Available at <https://www.irishtimes.com/news/ireland/irish-news/mortgage-arrears-may-follow-20-000-into-retirement-1.4085908?mode=sample&auth-failed=1&pw-origin=https%3A%2F%2Fwww.irishtimes.com%2Fnews%2Fireland%2Firish-news%2Fmortgage-arrears-may-follow-20-000-into-retirement-1.4085908>.

Any policy should be informed by the needs and voice of the people it seeks to serve.

We know that older people are currently less likely than people of other ages to use the internet or to have good digital skills. While there has been an increase in those aged 55-74 who are online in recent years, this group largely has below basic digital skill levels<sup>15</sup> which means they are unlikely to be able to use the internet independently or safely: 43% have digital skills below basic levels, and 24% have never been on the internet.<sup>16</sup> It is estimated 50% of over 70's in Ireland have never used the internet.<sup>17</sup> A third (33%) of those aged 60-74 in Ireland have never been on the internet.<sup>18</sup>

To ensure the voices of all are represented and reflected in planning, we urge the new Strategy to adopt a specific policy of meaningful engagement with those offline and across age cohorts in the design and implementation of new measures and policies.

**Recommendation 2: To include the provision of housing for an ageing population among the most pertinent aspects of the Department's business to which human rights and equality considerations apply**

All public bodies in Ireland have a legal obligation to promote equality, prevent discrimination and protect the human rights of their employees, customers, service users and everyone affected by their policies and plans through the requirement for Public Sector Equality and Human Rights Duty.

Age Action urges the inclusion in the new Strategy of a commitment to employ a rights-based approach to housing planning in Ireland which will ensure that older people are included in the design, implementation and monitoring of decisions that affect their lives.

Embedding a human rights-based approach in the design of programmes across Government also serves to empower people to aware of, and claim, their rights over their own lives and in wider decision-making across the course of their lives.

In the context of a rapidly growing population and existing Government commitments in the area, the broadening by the Department in its next Statement of Strategy of the identified most pertinent aspects of its business to which human rights and equality considerations apply is needed, to include the provision of appropriate housing for an ageing population.

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<sup>15</sup> Eurostat defines basic digital skills through a competence framework that can be simplified as: being able to find information about goods and services, send an email, buy something online and use word processing software. [https://ec.europa.eu/eurostat/cache/metadata/en/tepsr\\_sp410\\_esmsip2.htm](https://ec.europa.eu/eurostat/cache/metadata/en/tepsr_sp410_esmsip2.htm)

<sup>16</sup> Eurostat (2019) *Digital skills: Individuals level of digital skills*. Available at: <https://ec.europa.eu/eurostat/web/digital-economy-and-society/data/database>

<sup>17</sup> Central Statistics Office (2020) *Impact of COVID-19 on ICT usage by Households*. Available at: <https://www.cso.ie/en/releasesandpublications/ep/p-ictc19/impactofcovid-19onictusagebyhouseholds/frequencyofinternetusage/>

<sup>18</sup> Eurostat (2019). *ICT usage in households and by individuals: Individuals: Internet use*. Available at: <https://ec.europa.eu/eurostat/web/digital-economy-and-society/data/database>

**Recommendation 3: To prioritise the delivery of existing Government commitments in the Statement of Strategy, such as the Programme for Government, Housing Options for an Ageing Population Policy Statement and the National Positive Ageing Strategy**

More diverse housing options are needed - across private home ownership, the private rental sector and social housing - suitable for an ageing population.

We are pleased to see a number of commitments to suitable housing for an ageing population in the Programme for Government, notably to work to provide a range of options for independent living in older age, and the critical commitments to hold a constitutional referendum on housing and to establish a Commission on Housing to examine issues such as tenancies and standards.

Looking at new builds, we are pleased to see a commitment to 'embed' ageing in place options for older people into the planning system, as the county and city development plans are redrawn this year and to develop demographic reporting tools/projections to better assess the needs of housing for an ageing cohort. The commitment to task local authorities to work with stakeholders on development and redevelopment of older person housing is also welcome. It is crucial that these commitments are reflected in the priority policy objectives and actions in the new Departmental Statement of Strategy.

The new Departmental Statement of Strategy must also focus on the urgent implementation of the Housing Options for Our Ageing Population Policy Statement. As highlighted in the Statement and in the lived experience we hear from older people here in Age Action, many older people want to right-size their homes and have greater choice over where they live in older age. The pledges in the Policy Statement to look at a variety of options to increase this choice is welcome. This must be reflected in the development of the Departmental Statement of Strategy and the commitments it makes to meeting the needs of our ageing population in both its approach and delivery.

We know that many older people report living in poor, older housing which is unsuitable for their needs, more difficult to heat, often in poor repair and costly to maintain. It can also have an acute impact on the health of older people. Many older people report living in poor, older housing stock which is unsuitable for their needs, more difficult to heat, often in poor repair and costly to maintain. Overall, 1 in 5 people aged 55 and over have reported problems with the facilities in their house (e.g. older heating systems) and 1 in 10 people reported problems with the conditions of their house.<sup>19</sup>

Age Action urges the Department to again include the specific and identified needs of an ageing population in its housing inclusion focus within the new Statement of Strategy, including new builds, the supply of affordable and suitable rental accommodation, retrofitting, supported living and the availability of long-term care.

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<sup>19</sup> Gibney S. et al (2018) *Positive ageing in age friendly cities and counties: local indicators report*. Dublin. Department of Health.

**Recommendation 4: To integrate a clear statutory scheme with centralised guidelines into the Statement of Strategy to support people on an equitable basis across the country in retrofitting their homes for safety and purpose, and to upgrade existing poor housing stock**

A crucial way to support people to age in place is to address the central role of the housing adaptation grants for older people.

We were pleased to see a national (Exchequer 80% and Local Authority 20% funding) allocation of €73.75 million made available in 2020 for Housing Adaptation Grants for Older People and People with a Disability living in private houses in early August – a disappointing 3.5% year-on-year increase.<sup>20</sup> However, currently there is an absence of a clear statutory scheme with centralised guidelines to support people on an equitable basis across the country in retrofitting their homes for safety and purpose, and to upgrade existing poor housing stock.

There were a number of commitments to looking at the housing adaptation grants in the 2018 Housing Options Policy Statement, notably to review the waiting lists, increase the funding, review the guidelines of the scheme, and streamline the application process and management of the scheme across all Local Authorities.

We are pleased to see progress in recent times on a simplified application form and streamlined process between local authorities, in line with the Public Sector Duty requirements to promote equality and prevent discrimination and protect the human rights of its customers.

Following substantial cuts in recent years, it is vital that the Housing Aid for Older People Scheme, as well as the other programmes under the Housing Adaptation Grants, are adequately resourced with the entitlement and application process reviewed to ensure accessibility for those in need. We remain concerned about the overall grant allocation in light of an ageing population. Strong volatility can be seen in the overall funding to the Scheme between 2010-2016, the number of payments made and the average grant amount. Overall grants and funding remained static for 2017-2018, the last published years. To meet demand, it is vital that the Housing Aid for Older People budget is restored to 2010 levels and that the changes introduced to the Housing Aid Scheme in January 2014 are reversed to ensure better access to grants for disadvantaged older people. The Housing Aid Scheme can be difficult – and prohibitive - for those on low income to access as they are required to make a co-payment, and in cases, to pay the costs upfront before reimbursement from their local authority.

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<sup>20</sup> Government of Ireland (6 August 2020) *Minister O'Brien announces over €73 million for Housing Adaptation Grant*. Available at [www.gov.ie](http://www.gov.ie). See <https://www.oireachtas.ie/en/debates/question/2019-04-09/608/> for 2019 figures.

**Recommendation 5: To include the needs of our ageing population in the commitments to new stock, and to commit to strategically future-proof new housing stock by building towards universal design principles as being mandatory for new builds**

Universal design standards for residential dwellings play an important part in enabling people to age in their own home, which is a vital part of protecting people in light of the current and possible future pandemics. Good quality, suitable and safe homes that are designed to adapt to our needs across the lifecycle help us to remain living in our communities where we have supports and social connections. It is estimated that 60% of new homes will be occupied by a person with some form of disability at some stage in its lifecycle.<sup>21</sup>

It is crucial that the needs of our ageing population are included in new stock, and that we commit to strategically future-proof new housing stock by building towards universal design principles as being mandatory for new builds.<sup>22</sup>

In line with Action 4.4 of the Housing Options for Our Ageing Population Policy Statement, we urge the continued progress on introducing at *first instance* a mandatory obligation by Government for 50% of apartments in any development required to be in excess of minimum sizes are built to universal design standards and suitable for older people, mobility impaired people and to develop a template layout guide for same. Of importance also is the delivery within the committed timeframe of Action 4.6 of the Housing Options Policy Statement for Government and industry to introduce measures to ensure that over a five year period, we will reach 30% of all new dwellings built to incorporate universal design principles to accommodate our ageing population.

**Recommendation 6: To prioritise the inclusion of adequate planning and investment for age-friendly towns and cities in the Statement of Strategy**

Age friendly environments mean that housing and communities that are 'safe, affordable, and facilitate multigenerational interaction; meet sensory, emotional, physical, social, behavioural, and health needs across the lifespan; and include appropriate transportation options—enabling every resident to thrive.'<sup>23</sup> They foster health and well-being and the participation of people as they age. They promote health and prevent or delay the onset of disease and functional decline.<sup>24</sup>

Ireland has been active for many years in the roll out of age friendly programmes, including environmental planning in cities and towns. In the context of a rapidly

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<sup>21</sup> Centre for Excellence in Universal Design. *Universal Design Guidelines for Homes In Ireland*. Available at <http://universaldesign.ie/Web-Content/Introduction.pdf>

<sup>22</sup> Age Action has previously called on Government to start with a requirement of 30% of all new dwellings as per existing Government commitments and 7% of all new social housing.

<sup>23</sup> See AARP International, 'Equity by Design' at <https://www.aarpinternational.org/resources/equity-by-design>

<sup>24</sup> WHO 'Age Friendly Environments' Available at <https://www.who.int/ageing/projects/age-friendly-environments/en/>.

growing older population, it is imperative that adequate priority and investment is given to the development of age friendly spaces at a local and city level.

## 5. Conclusion

Older people want to age in place - meaning the choice to remain in their own homes and in communities as long and independently as possible.

The vital role of adequate housing and associated healthcare care supports such as home care to enable people to age in place safely has been highlighted during COVID-19, with gaps in the system exacerbated.

It is a time to re-evaluate and reassess the choice of housing available for older people in Ireland, to adopt a Whole of Government approach to planning for our ageing population and to embed existing commitments in Departmental planning and strategies.

Older persons have long been subject to inadequate protection of their human rights and overlooked in national policies and programmes and this is particularly evident in terms of their inclusion in specific wide-spread housing policies and supports to enable them to age in place in their communities with access to the necessary supports. Looking forward, we have an opportunity to plan for a more inclusive, representative, and age-friendly society with the option of choice over where we live as we age.

## About Age Action

Age Action is the leading advocacy organisation on ageing and older people in Ireland. Our mission is to achieve fundamental change in the lives of all older people by eliminating age discrimination, promoting positive ageing and securing their right to comprehensive and high-quality services.

Age Action supports and advocates for equality and human rights for all older people. Everything we do is based on a recognition of the diversity of identity and situation among older people and a concern for equality for all older people. In addressing ageing, our work includes a concern to influence perspectives on and responses to ageing. This pursuit of equality and human rights is underpinned by our work to promote ageing in place, life-long learning, and health and wellbeing for older people, empowering them to live as active citizens.