



**Submission to the Joint Oireachtas Committee on
Housing, Local Government and Heritage on Planning:
Provision of housing for older people (including Fair Deal)**

4 March 2022, Oireachtas reference HLGH-i-372



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Age Action is Ireland's leading advocacy organisation on ageing and older people. Age Action advocates for a society that enables all older people to participate and to live full, independent lives.

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First and foremost, most older persons want to "age in place". That is, they want to age in the communities where they have built their lives, and in many cases that means ageing in their family home .

Through our work with older persons, we know that most of them want to age in place. For example, our Care and Repair service helps people with small modifications to their homes. We were also involved with a recent study which showed that 78% of respondents stated that it was very important to them to remain in their homes as they grow older,¹ which was also the finding of a 2015 survey by Age Friendly Ireland.² However, the research also found that some people:

"highlighted the tenuous nature of their living arrangements and their sense of alienation from place. This was particularly the case for the participants who were renting, who had recently moved locations to be closer to children, or who found the limited facilities and social opportunities in their rural environments restrictive".³

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Age Action's core concern is for all older persons to have choice and control over where and how they live. Planning, housing standards and housing supports all play a huge role in determining people's quality of life as they age.

We would like to see housing and planning take a rights-based approach, built around the core aim of empowering people to age in place and to access all of the shops and services they need to live independently. A right to adequate housing is not just about general principles but also active measures to address the needs of those furthest behind, and to ensure equality of outcome.

A rights-based approach means greater effort is needed by public bodies to engage older persons in the conversation about their housing needs and ensure meaningful participation. At a minimum, this involves adhering to the DPER principles and guidance.⁴ Tokenism must be avoided, and the aim should be to achieve international best practice, which can be articulated as follows:

¹ O'Sullivan, S, Buckley, M, Desmond, E, Bantry-White, E, and Cassarino, M (2022) *Agency and Ageing in Place in Rural Ireland*. University College Cork and Age Action. [forthcoming]

² Age Friendly Ireland (2016) *Housing for Older People: Future Perspectives*. Available at https://www.dublincity.ie/sites/default/files/media/file-uploads/2018-07/Housing-for-Older-People_-_Executive-Summary.pdf

³ O'Sullivan, S, Buckley, M, Desmond, E, Bantry-White, E, and Cassarino, M (2022) *Agency and Ageing in Place in Rural Ireland*. University College Cork and Age Action. [forthcoming]

⁴ <https://assets.gov.ie/5579/140119163201-9e43dea3f4b14d56a705960cb9354c8b.pdf>

“...meaningful participation requires a long-term commitment by public authorities, together with their genuine political will, an emphasis on agency and a shift in mindset regarding the way of doing things”.⁵

There is also a need to recognise the diversity of circumstances among older persons, such as different challenges facing those in rural versus urban environments, and also differences between different age groups of older people. This should be reflected in data, policy, and practice.

Due to the costs and timelines involved, housing and planning are areas of policy that take years to implement. As such, we need to have regard to not only the million people in Ireland today aged 60 or older, but also to those who will be older persons in twenty or forty years’ time, and who will be affected by the decisions we take.

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National policy acknowledges the fundamental principle of ageing in place. For example, the *Housing Options for Our Ageing Population* strategy states:

“A key principle underpinning Government housing policy is to support older people to live in their own home with dignity and independence for as long as possible.”

The *Housing for All* strategy reiterates the goal of “Increasing the housing options available to older people to facilitate ageing in place, with dignity and independence.” Not least this is to be delivered through Local Authority Housing Delivery Action Plans, delivering housing in line with Age Friendly and Universal Design principles, and reviewing the grant programmes that assist older people to live independently. For detail, see the seven action points under Housing Policy Objective 6 in *Housing for All*.

Age Action welcomes many of the provisions in national policy documents, but we want to highlight some areas of concern as well as to indicate where more detail is needed to ensure policy objectives can be achieved.

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Universal Design and Age Friendly principles are explained in detail by the National Disability Authority’s centre for excellence in Universal Design,⁶ as well as by the local government agency Age Friendly Ireland.⁷ The main point we would make here is that all housing should be based on Universal Design and Age Friendly principles. Every home that is not designed in this way is potentially one where older persons or people with disabilities are unable to visit as a guest, let alone live in independently. Permitting the planning and development of non-compliant housing reduces the choice and opportunities available to a large and growing section of society.

⁵ https://www.ohchr.org/Documents/Issues/PublicAffairs/GuidelinesRightParticipatePublicAffairs_web.pdf

⁶ <https://www.universaldesign.ie>

⁷ <https://agefriendlyhomes.ie/about/>

In relation to Local Authority plans, we are opposed to the apparent assumption that **social housing for older persons** should be segregated from other social housing. If all social housing was built according to Universal Design and Age Friendly principles, most people could remain in the communities where they have built their lives and their social connections. Moving people to bespoke older person housing potentially isolates them from their former neighbours and can move them further away from their local shops, GP and other services.

Supports for “right-sizing” were flagged by the Taoiseach in mid-2021, including tax incentives and grants,⁸ but there is a lack of detail in *Housing for All*. Age Action has identified three major problems. Firstly, we want to avoid older persons being put under unfair pressure to give up their family home. “Right-sizing” must always be a person’s choice. Secondly, many residential areas have a relative uniformity of housing stock. As a result, it is often impossible for older persons to find a suitable unit within their own community, particularly in rural areas. It is counter-productive for older persons to be required to leave their communities and social networks behind to find somewhere suitable for their needs. Thirdly, there is a significant barrier to this policy because the main lending institutions do not provide suitable financial products to enable older persons to borrow on the value of their home as an asset, in order to make an offer on another property. Banks typically only offer loans based on income not assets, and they have maximum ages for mortgage products that exclude most older persons.

The quality of housing occupied by older persons is a major concern. According to EU surveys, more than one in eight persons aged 65 or older (13.3%) live “in a dwelling with a leaking roof, damp walls, floors or foundation, or rot in window frames or floor”. One study found that 45% of older persons (60+) lived in properties with a Building Energy Rating (BER) of E, F or G, rising to 57% for people aged 75 or older.⁹ If 45% of those aged 60 or older live in these properties, meaning over 450,000 individuals, then most low BER homes must be occupied by persons aged 60+. Age Action estimates that at least 300,000 houses with a BER of E, F or G are occupied by older persons (including half of them occupied by older persons living alone), with older persons 75+ more likely to be living in houses with a low BER. From wealth surveys reported by the CSO, we know that half of older persons have savings of €5,800 or less,¹⁰ implying that many homeowners have very little capacity to afford major home repairs, retrofitting or other capital expenses.

Home heating is of particular concern to older persons, especially those who spend more time at home (as most have during the COVID-19 lockdowns). In one year, between December 2020 and December 2021, the cost of energy rose by 27%, and energy costs are now 34% higher than December 2016.¹¹ Energy costs – especially

⁸ <https://www.independent.ie/irish-news/taoiseach-micheal-martin-there-will-be-new-incentives-for-older-people-to-downsize-and-free-up-homes-for-families-40574160.html>

⁹ <https://www.esri.ie/system/files?file=media/file-uploads/2016-12/WP489.pdf>

¹⁰ <https://data.cso.ie/table/HFC11>

¹¹ Consumer Price Index, CSO <https://data.cso.ie/table/CPM16>

home heating – are a major cost for older persons. In Census 2016, one in 50 (2%) of these households had no central heating, and nearly one in seven (13.7%) relied on burning coal or peat for heating. Half of older person's homes (49.4%) use oil as their primary heating fuel, and a further quarter (25.9%) use natural gas. While three in ten older persons receives Fuel Allowance to assist them with these costs, there are many older persons on low incomes who do not qualify for that support. For context, more than half (51.3%) of older persons (65+) have incomes in the bottom 40% of the income distribution, among whom nearly half (48.6%) of those living alone have incomes in the bottom 20%.¹²

Age Action has called for a successor to the *Strategy to combat energy poverty 2016-2019* to comprehensively address energy poverty among older persons and others affected. Our analysis can be summarised as follows.

Dwellings with BER of E, F or G are:

- (a) the least energy efficient,
- (b) the most expensive to keep warm,
- (c) the most expensive to retrofit for energy efficiency, and
- (d) mostly occupied by people aged 60+.

Older person households are:

- (a) more likely to spend time at home,
- (b) more likely to need warmth for health reasons,
- (c) more likely to be on a low, fixed income,
- (d) the least likely to have a significant level of savings,
- (e) the least likely to use electricity for home heating, and
- (f) likely in some cases to be in remote rural areas at risk of losing electricity connections after adverse weather events (and therefore needing to use alternative fuels than electricity).

Due to the combination of means test and the low level of savings held by most older households, most older persons will be unable to avail of state schemes to support home retrofitting despite having the greatest level of need. Improving the BER of many older persons' homes will only be possible with enhanced grant aid and/or bundling of grant aid with affordable loans schemes.

Grants programmes for accessibility are an essential policy to empower people to live independently at home. Overall, 35.2% of people aged 65 or older has a disability. Because the oldest people in Ireland are more likely to have a disability or impairment, and are more likely to live alone, Age Action estimates that between 250,000 and 350,000 households have a requirement for some level of extra accessibility in the home, at varying levels of severity. In the period 2014-2020, a total of 24,695 housing aid grants for older people were allocated by local authorities, along with 13,478 mobility aid grants. Some portion of the grants for a person with a disability may also have benefited older persons. These grants assist people to install anything from handrails, ramps and accessible showers, through to downstairs

¹² <https://data.cso.ie/table/SIA41> and <https://data.cso.ie/table/SIA38>

bedrooms or bathrooms. However, the level of capital allocated through these grants is significantly lower than it was in previous periods, and more investment through these grants is needed to catch up with unmet demand.

Age Action identifies the urgent need for research in this area. No data is available to show the extent to which existing housing is accessible or inaccessible to its occupants. Likewise, no data is available on the extent to which occupants have modified their dwellings to address accessibility issues. However, there are reasons to believe that this is an important area of unmet need. Firstly, the known incidence of disability among older persons is several times greater than the level of adaptation grants and mobility grants given over a seven-year period. Secondly, anecdotally through our Information Service and Care and Repair Service, Age Action is aware of cases where individuals are unable to use part of their homes due to mobility/accessibility issues. Thirdly, the level of cost involved in installing mobility aids to a home are likely to be prohibitively expensive for older persons on lower incomes, especially those on relatively low incomes who do not satisfy the means test for a grant. Age Action's estimate is that over 50,000 households may have unmet need for home accessibility support.

Affordability of housing is a growing concern for older persons. Today, four in five older persons (80.8%) own their own home. In future, this will be a significantly lower percentage. Additionally, a larger proportion of older person are likely to reach their late 60s or 70s while still carrying significant mortgage debt. In 2019, 9,370 mortgage accounts held by people aged 60 or older were in arrears, with the majority in "deep arrears" (720+ days behind in payments).¹³ Affordability is also a major concern for the one in 42 older persons (2.4%) renting in the private sector, as their incomes cannot keep pace with rents. There are likely to be far more older renters in future, but there is no clear policy on how they will be given secure tenancies for life in a context where tenancies are still relatively short term and where rents keep going up. For example, annual rents increased by 8.3% in the third quarter of 2021.¹⁴ In terms of affordability, it should also be recalled that social housing tenants also pay rent, which can be a significant proportion of their weekly income, especially as many older persons do not receive a maximum rate State Pension.

The **Nursing Home Support Scheme (NHSS)** is anything but a "fair deal" in Age Action's experience and many people have told us of their negative experiences. The NHSS needs to be reformed, not least because it is unlikely to be a sustainable model of funding community-based care in the long term because it does not adequately cover the range of support needs that people may require.

The state spends €1.4 billion each year for "bed and board" basic nursing and personal care for nursing home residents, mostly to private providers. This does not cover additional supports that a person may need such as incontinence wear or

¹³ <https://www.irishtimes.com/news/ireland/irish-news/mortgage-arrears-may-follow-20-000-into-retirement-1.4085908>

¹⁴ <https://www.rtb.ie/news/rtb-publishes-the-rent-index-q3-2021>

special wheelchairs, and there is little access to other health and social care services. While the guidelines published by the Competition and Consumer Protection Commission are welcome, they are only guidelines.¹⁵ Age Action is aware of some people receiving letters from nursing home management advising them of additional charges because the NHSS does not cover the cost of their care.

In the context of housing and planning policy, the scheme is also based on the unsound assumption that most older persons will be homeowners and will be able to tap into the value of their home to fund nursing home care. An immediate question arises for how renters will be supported to afford nursing home care if they require it.

Other gaps in the policy framework include the need for a rights-based perspective, the lack of safeguarding legislation, and the delay in the full commencement of the *Assisted Decision-Making (Capacity) Act 2015*.

Planning for nursing homes is a related role of the Department of Housing, and research on best practice should be adhered to for both the building specifications for nursing and care homes, as well as their location. Nursing homes should not be planned as “warehouses”, but the core objective of supporting people to live as independently as possible should continue to drive policy. That includes building nursing homes that allow people to continue to exercise control over their own lives, as well as facilitating them to access local services and to receive visitors. While the NHSS is a large area of health expenditure, there needs to be much more focus on outcomes, quality of life domains and the built environment to reflect the will and preference of people who require nursing home care.¹⁶

Finally, there is also a need for legislation and enforcement to enlarge housing options for older persons, including the option of “**retirement villages**”. A retirement village is a facility with dwellings that accommodate older persons, and typically provides a range of additional services for leisure activities as well as health and social care. Ireland lacks legislation or regulation of retirement villages. In contrast, around 184,000 Australians live in retirement villages, representing 5.7% of those aged 65 or older.¹⁷ One analysis found that retirement villages saved 2.16 billion Australian dollars (€1.4 billion) through “delayed entry to aged care” as well as “residents requiring fewer hospital and GP visits, earlier discharge from hospital, and better mental health”.¹⁸ There is a need for a scoping exercise to identify whether this kind of development could be successful in Ireland, noting that these schemes are potentially self-funding if sufficient regulation is in place.

¹⁵ <https://www.ccpc.ie/consumers/wp-content/uploads/sites/2/2019/10/2019.05.15-Care-Home-Guidelines-May-Updated-FINAL.pdf>

¹⁶ Grey, T, Xidou, D, O'Donoghue, J, Kennelly S and O'Neill D (2022) Universal Design for Improving Quality of Life and Enhancing COVID-19 Infection Control in Existing Residential Care Settings for Older People, research report, TrinityHaus, School of Engineering, Trinity College Dublin. [forthcoming]

¹⁷ https://www.grantthornton.com.au/globalassets/1.-member-firms/australian-website/industry/hac/pdfs/gtal_2014_hac_national-overview-of-the-retirement-village-sector.pdf

¹⁸ https://www.grantthornton.com.au/globalassets/1.-member-firms/australian-website/industry/hac/pdfs/gtal_2014_hac_national-overview-of-the-retirement-village-sector.pdf

