

Transport

Q47: Is the level of transformation required of our transport behaviour patterns well understood and what more can be done to demonstrate the benefits of modal shift? How can the overall impact of wider decarbonisation measures be measured most effectively (e.g. capturing wellbeing impacts, health impacts, liveability, permeability, etc.)?

[REDACTED], Society of St Vincent de Paul:

The interaction between transport patterns, modal decisions and household income is not sufficiently considered in Ireland's transport adaptation planning. At SVP, our members see the impact of a lack of affordable and practical options for households, particularly rural households, have for their transport needs. This centres on the availability, affordability and accessibility of the public transport options available, and the resulting requirement to have and use a car.

The impact of income must be better understood and incorporated into policy. Otherwise, many households will be unable to make the modal shifts envisioned under current plans, leaving them at the risk of an increasing burden from the cost of private car use with no alternatives available.

The challenge:

In many rural areas the infrequency of public transport services mean that it isn't possible to rely on these services to access essential needs including medical appointments, education, shopping or work. According to NTA Connecting Ireland, around 1.2 million people are either not served at all or are served by a limited level of public transport service, and the report also states that 2 in 5 villages are not connected to their nearby bigger town (<https://www.nationaltransport.ie/wp-content/uploads/2021/10/NTA-Connecting-Ireland-Report.pdf>). Community Law and Mediation have reported that according to the Pobal Index, the North-West, West and South-West have particularly high levels of transport disadvantage, and around half of rural settlements that aren't served by the Rural Transport Service are deprived or very deprived (<https://communitylawandmediation.ie/wp-content/uploads/2022/03/Environmental-Justice-in-Ireland-230322-1.pdf>).

The cost:

Lack of public transport options causes forced car ownership in rural areas leading to a significant increase in household expenses. For example, the cost of running a family car has been calculated to reach an average of €10,500 a year. (<https://www.irishrurallink.ie/wp-content/uploads/2018/12/IRISH-RURAL-LINK-Poverty-and-Social-Inclusion-The-Case-for-Rural-Ireland-FINAL-REVISED-241016.pdf>)

The MESL Research Centre has provided further detail on the impact of living rurally on a household's transport costs. They found that due to recent reduction in public transport costs, urban households' transport costs (calculated based on not needing a car) have decreased by 9%. However, rural households – where car ownership is required – have seen costs of transport increase by 37% in one year. This is despite a reduction in the cost of car insurance. (https://www.budgeting.ie/download/pdf/vpsj_mesl_pre-budget_2023_submission.pdf)

Focussing on the costs for older people, the MESL Research Centre states: 'The need for a car adds €83 to the Minimum Essential Standard of Living (MESL) costs of an older person living alone in a rural area. Improved public transport options for rural areas, would enable a MESL without the current reliance on (and cost of) a private car. This is crucial to enable people in rural areas to have an adequate income when reliant on social welfare, and particularly for older people to realise the full value of the free travel pass' (ibid). They note that the additional costs of requiring a car pushed single pensioner households into income inadequacy. If they did not incur this additional €83 per week cost, their income would be considered adequate to meet a minimum standard of living.

This clearly demonstrates the relationship between transport policies and poverty reduction (or exacerbation).

The impact:

In a survey of SVP's membership to explore the issues facing rural households (carried out in early 2020), 25% of surveyed conference members answered that lack of public transport contributes to households in rural areas are struggling to manage. Almost 39% of responding conference members said that public transport is one of the main barriers to employment for people living in rural areas.

The cost of travel can present as a significant barrier to taking up employment alongside the cost of childcare. In *Stories of Struggle* (2018) which researched the impacts of living below a Minimum Essential Standard of Living, a participant explained that she had "found a job as a Carer but I had to travel and I had to work days and nights. I couldn't continue working because of the different hours, I started with twenty hours a week and this went down to just eight. I couldn't afford childcare and travel. A combination of childcare and travel is a big expense for the odd hours."

(<https://www.svp.ie/social-justice/publications-submissions/publications/stories-of-struggle-2018.aspx>)

The interaction between the availability of public transport and where people can realistically seek employment has been explored in the UK by the Joseph Rowntree Foundation. They highlighted the importance of frequent and reliable bus services, and found jobseekers were limited in where they could look for paid employment due to the cost of getting to work, where the wages offered from certain jobs may not be able to cover transport costs. The research showed that 'Transport issues affect different groups to varying extents with evidence to show that age, ethnicity and, in particular, gender can exacerbate the barriers to accessing and using transport' (<https://www.shu.ac.uk/-/media/home/research/cresr/reports/j/jrf-addressing-transport-barriers.pdf>).

This situation would echo SVP's experience, demonstrating the importance of adequate public transport coverage to enable people to access employment.

Q56: What expectation or level of public transport service is appropriate in rural communities and what other key measures can support a transition to sustainable modes?

[REDACTED], Society of St Vincent de Paul:

Availability:

It is necessary to provide a level of service that demonstrates that public transport is a viable and practicable alternative to car use.

While the specific level of service will differ for each local area (and therefore the needs of the local community in terms of routes and timing should be carefully researched and monitored) to allow people to rely on public transport, the level of service might have to initially exceed demand while demand grows. This is a sound investment in a more sustainable future transport network, as well as investment in an essential public service that reduced people's living costs and enables people to access more opportunities.

As an illustrative example, to enable someone to use public transport to get to work, it may not be sufficient that one bus will be available to get them home, as if there is any change in their timing (for example, a change of shift, needing to reach childcare early), or any disruption in the transport service, they have no way of getting home.

Affordability:

SVP welcomed the recent reduction by Transport for Ireland (TFI) in their public transport fares by 20% on average on TFI services. Leap card fares for young adults and students in full-time third level education have reduced by half. (<https://about.leapcard.ie/fares-reductions>) Reducing the cost of public transport is an important support to those who rely on the services, and it should remain a priority for Government. We believe the government should be more ambitious than the current 20% reduction and should provide assurance that this reduction will remain in place long term.

Safety and Accessibility:

The experience of public transport has an impact on the ability of people to make use of this service in safety.

Research by Transport Infrastructure Ireland has shown that in Ireland 1 in 3 public transport users have seen or experienced some form of harassment or violence while using public transport. This report explored the experiences of women who have found public transport unsafe due to racism and xenophobia. The report concludes that this discrimination 'has significant impacts on women's mobility' including the financial penalty from not being able to access public transport services safely (https://www.tii.ie/technical-services/research/TII-Travelling-in-a-Womans-Shoes-Report_Issue.pdf)

Disability Federation Ireland have called for improvements in services so that disabled people are able to use public transport and meet their transport needs. Being unable to access these essential services on an equal basis contributes to disabled people and their families experiencing exclusion from essential services. DFI's analysis has shown that 1 in 4 people with a disability do not use public

transport as it is inaccessible, locking them out of equal access to mobility services (<https://www.disability-federation.ie/publications/transport-and-disability-the-facts/>).

In order for public transport to meet the needs of all groups who need it, it must be a safe and accessible service, taking account of the requirements and experiences of all groups.

Q58: What are the key elements of a just transition in transport? Are there certain cohorts that should be given exemptions / insulated from potential increased costs?

Society of St Vincent de Paul:

So far the impact of income has not been adequately incorporated into transport adaptation policy. For a just transition in transport, the impacts of transport poverty must be properly considered so that policies do not lead to households who cannot afford to see their costs increase without realistic alternatives to bring costs down through modal shift.

Transport poverty occurs when there is a lack of access to mobility services necessary for participation in society, resulting from the inaccessibility, unaffordability or unavailability of transport (Lucas et al., 2016:

https://www.researchgate.net/publication/292975806_Transport_poverty_and_its_adverse_social_consequences). Limited access to transport services reduces a household's ability to participate in society, including in economic opportunities.

It is essential that as steps are taken to increase public and active transport and reduce private car use, policies are poverty and equality proofed. This must take account of the potential for adverse impacts on people in poverty (recognising the different experiences included in this group) but also on maximising the benefits that could be realised.

Within the context of a just transition, and the immediate context of the rising cost of living which is disproportionately experienced by low-income, rural and older households, these households must be insulated from rising costs related to transport.

Built Environment

Q28: Currently SEAI provides approx. 50% of the grant of retrofit to Landlords, Housing for All commits to introducing a minimum BER for rented properties from 2025 onwards. What further supports can be put in place to address the split incentive when retrofitting rental properties (residential and commercial)?

[REDACTED] Society of St Vincent de Paul:

Since the announcement in Housing for All that there will be minimum BER requirements in the Private Rented Sector, there has not been further action to prepare the sector for the changes that must take place. It is vital that the Government set out a clear plan, with timelines and deadlines, and sources of support for both Landlords and Tenants.

SVP and Threshold produced a report on the actions that need to be taken to improve energy efficiency in the Private Rented Sector (<https://www.svp.ie/getattachment/b950a94b-f443-4982-a317-eee4afc7ebd8/Warm-housing-for-all-Strategies-for-improving-ene.aspx>). We urge the Government to make progress on these points, which emphasise the need to support and protect tenants at risk of energy poverty throughout this process to avoid adverse impacts on this group.

Key points and priorities from the report include:

- 1) Providing a comprehensive, long-term plan with clear milestones and funding would enable landlords to plan ahead, learn about changing requirements, and arrange financing.
- 2) To encourage early uptake of energy improvement measures, landlords whose properties may not require extensive work to reach BER level B2 should be encouraged to invest now in some 'easy win' measures. This can be done through a targeted awareness raising campaign.
- 3) As of February 2021, 86% of landlords owned one or two properties accounting for 53% of registered rental properties (Please see report for references). Smaller landlords may have more limited time, knowledge and awareness of how to access support around retrofitting. These landlords would benefit from a streamlined and "private-rent ready" One Stop Shop approach.
- 4) The Government need to take action on the announcement in Housing for All to introduce minimum energy efficiency standards by 2025. They should do this by making properties in the private rented sector eligible for funding equivalent to the 'Better Energy Warmer Homes Scheme,' for low-income tenants and their landlords, based on a tenant receiving the Housing Assistant Payment and having a long-term lease.
- 5) Protecting tenants at risk of 'renovictions' (eviction due to renovation), must be built into policy from the beginning, including ensuring the Residential Tenancies Board is fully equipped to proactively defend Tenants rights, enabling One Stop Shops to support Landlords to keep tenants in place, and providing funding to incentivise Landlords to maintain tenants (as in point 4 above).
- 6) To improve the capacity of local authorities to enforce standards, the report recommended an 'NCT for housing'. This would be based on certification from approved professionals and would allow

the integration of fire safety, energy regulations, tax obligations and RTB registration. As well as improving the experience of tenants in the private rented sector, the benefits of this system includes ensuring that state funding (via Housing Assistance Payments) are not subsidising substandard accommodation.

Q30: What immediate actions can we take to address the skills shortage in the construction sector, to facilitate meeting our annual retrofitting targets?

Society of St Vincent de Paul:

The need for a bolstered energy efficiency sector is good news for skills and employment. To harness the opportunity for a bolstered energy efficiency sector, which has the potential to offer regionally distributed skilled work for years to come, the Government should actively pursue progressive procurement policies.

Public investment via SEAI (as well as by Local Authorities in the social housing sector) should promote procurement decisions that enhance wider Government goals and shared aims, including payment of a Living Wage (calculated according to the cost of living) and creating high quality local employment opportunities.

Q32: Housing for All Commits to 100% funding to retrofit 40% of local authority housing stock to B2 by 2030 at a cost of 1.4 billion euro. How can we further support local authorities to help them deliver on social housing retrofit targets?

Society of St Vincent de Paul:

Targets for the retrofitting of local authority housing must be increased with a commitment that all social housing stock should be retrofitted by 2030. Without this commitment to outcomes – i.e. that all housing will be adequate – tenants will fall through the net.

Recent announcements indicate that approximately 36,500 social housing units will be retrofitted by 2030, which amounts to approximately a quarter of the total number of households renting from a local authority (143,000 units at the 2016 census count¹⁶) (<https://svp.ie/news-media/publications/social-justice-publications/svp-pbs-2023-the-cost-of-surviving.aspx>).

Even if these targets are reached, much of the LA housing stock remains unaccounted for. This will be apparent in the number of LA tenants still living in energy poverty, and still experiencing the health impacts of living in housing with leaks, damp or rot.

In order to create a truly just transition we need to see a more ambitious target for the deep retrofit of social housing by 2030. The number of local authority homes being retrofitted each year must be increased, with 10% of the LA target upgraded next year, and the ambition to reach minimum BER levels for all LA housing. The Government must lead by example. This would guarantee a minimum level of protection for those on the lowest incomes from the impacts of energy costs and energy poverty, as well as being a sound investment in state-owned infrastructure.

Q33: In addition to the existing financial supports and policy measures, are there any other incentives/assistance needed to help homeowners upgrade the energy efficiency of their homes?

Society of St Vincent de Paul:

Filling gaps in energy advice:

In order to support low-income households and those in energy poverty through the green energy transition, we recommend establishing a service of local Community Energy Advisors working in partnership with the Sustainable Energy Authority of Ireland and other local partners.

There is currently a notable advice gap available to households at risk of energy poverty to address their immediate energy needs (for example, understanding bills and navigating tariffs), through to introducing energy efficiency measures and accessing retrofitting funding. Community Energy Advisors would engage and inform hard to reach energy users who would most benefit from energy advice and energy efficiency upgrades across all tenure types. This advice service should approach energy poverty holistically and offer support through immediate assistance and quick-fix measures as well as supporting households towards larger retrofitting projects. At a time of energy crisis they could also liaise directly with income and financial support services to make sure households are accessing all the income support they are eligible for, such as Additional Needs Payments from DSP.

In a survey commissioned by UCC for MABS, 56% of recipients cited one-to-one advice as a measure that would encourage them to increase energy efficiency, 53% of respondents would like more information on the benefits. Quotes from participants mentioned support in the process, particularly citing help with forms which can be confusing, and wanting to talk to someone face to face. (<https://www.ucc.ie/en/media/research/iss21/ENERGISEpolicybriefingpdf.pdf>)

The study also found that respondents found friends and family the most trustworthy source of advice and referenced research which has found that sharing information in pre-existing social groups through discussion and participation encourages behaviour change.

Examples of Community Energy Advice exist in the UK, where the EnergyWorks Team in Manchester are an example of one-to-one support provided to energy poor households to improve their wellbeing and financial circumstances (<https://www.groundwork.org.uk/greendoctor/our-partners/energyworks-green-doctors-in-greater-manchester/>). Amongst other services the EnergyWorks team: Identifies the causes of heat loss, leaks, damp or mould in the home and installs 'quick' energy efficiency measures; Supports residents in applying for government financial support such as Warm Homes discount or emergency payments; Assists customers to sign up for Priority Service Registers, and supports in measures such as tariff switching; and provides onward referrals.

As such, they provide a service that tackles energy poverty holistically, and bridges what can be very siloed services between energy efficiency and building fabric aspects, income and financial challenges and experiences as a customer within a complex energy market.

Consumer protections:

In our joint report on improving energy efficiency in the Private Rented Sector, SVP and Threshold have recommended that there is a review of the current consumer protection mechanisms for property owners procuring retrofitting work, to ensure there is a comprehensive framework in place, and that consumers are aware of their rights. (<https://www.svp.ie/getattachment/b950a94b->

f443-4982-a317-eee4afc7ebd8/Warm-housing-for-all-Strategies-for-improving-ene.aspx)

Once a retrofit has been carried out, tenants will be the ones directly experiencing the end result. While the intent is for increased comfort, warmth, and affordability, in instances of poor-quality works, tenants may experience adverse impacts. These could range from increased running costs, for example a poorly installed heat pump resulting in higher electricity costs, inadequate ventilation, or poor quality or finish of other elements of retrofitting.

While preventative measures include specialist skills development and accreditation pathways, a clear framework is needed for consumer protection for property owners, including landlords, embarking on retrofitting. Research commissioned in Scotland suggested a comprehensive framework of consumer protection was needed from pre- to post-contractual and encompassing advice organisations, guarantee and warranty organisations, and ombudsman services (https://www.changeworks.org.uk/sites/default/files/CAS_Consumer%20protection_Final%20report.pdf).

An equivalent mapping exercise could be useful in Ireland. Ensuring this is in place and awareness is raised as early as possible, will increase confidence among property owners engaging in contracting retrofitting measures.

Q34: How could the roll-out of district heating be accelerated and what needs to be done to expand its coverage in Ireland?

[REDACTED], Society of St Vincent de Paul:

SVP are aware of a gap in consumer protections for domestic customers of district heating systems. Some of these customers are currently being supported by an SVP conference. These customers, who receive their heating supply as part of a group of households rather than as individual electricity or gas customers, are currently outside of the regulated energy market to heat their homes and yet are exposed to the rising cost of energy. This means that as they too face escalating heating costs this winter, they are not covered by essential protections regarding disconnection or regulations around affordable repayment options. They are also unable to save money by switching supplier.

It is essential this gap is closed for existing customers this winter. There must be specific measures to safeguard these customers who are in a vulnerable position within the energy market at a time of escalating prices. For these customers, and prior to any roll out of new district heating connections, there must be equivalent protections to other energy customers and provisions to ensure they fall under the remit of the Commission for the Regulation of Utilities.

A report by the European Consumer Organisation notes the need for consumer rights and protections if households are to benefit from district heating, pointing to Denmark as an example of best practice. https://www.beuc.eu/sites/default/files/publications/beuc-x-2021-044_consumer_rights_district_heating.pdf.

Q36: What policy levers are needed to encourage and support the retrofitting of shared properties e.g. apartments?

Society of St Vincent de Paul:

This theme was explored in the joint report between SVP and Threshold 'Warm Housing for All?' in 2021. (<https://www.svp.ie/getattachment/b950a94b-f443-4982-a317-eee4afc7ebd8/Warm-housing-for-all-Strategies-for-improving-ene.aspx>)

How a property is owned and managed has implications for the decision-making process required to invest in energy efficiency. There are a number of additional considerations for apartment owners, such as building management, communal decision-making and funding arrangement, all which must be factored into any energy improvement plans. In these scenarios, the number of stakeholders involved in retrofitting is increased thus limiting the agency of the individual landlord. Improving the energy efficiency of apartments requires a particular response and extends beyond the private rented sector to include owner-occupiers.

Apartments are a growing form of housing in Ireland, with 85% growth between 2002 and 2016. Apartments now making up 12% (just over 200,000) of all housing stock. (See report for references). Due to the more complex stakeholder environment of apartment retrofitting, funding is required for further exploration and consultation of the needs of this category of property owners. This needs to be viewed as an opportunity, as a well-designed retrofit programme for apartment blocks could successfully upgrade hundreds of properties under one project.

We therefore recommend consultation should be carried out with apartment owners via membership organisations and community networks to identify specific needs of this cohort to undertake retrofitting

Q37: Further to the existing supports financed by carbon tax revenues, how can we protect those who are currently experiencing fuel poverty and those who are at risk?

Society of St Vincent de Paul:

SVP have recently responded to the Department for the Environment, Climate and Communications' consultation for an Action Plan on Energy Poverty. (<https://svp.ie/getattachment/3fe7d61f-ffb6-4747-83cb-6fa84be3de4d/SVP-Submission-on-Energy-Poverty-Action-Plan-Consu.aspx>)

This included our recommendations related to energy efficiency, income supports, and consumer protections. This response detailed our priorities to support households through the immediate challenge of soaring energy costs, as well as addressing and ending energy poverty in the medium term.

While SVP welcome the funding trajectory of schemes such as free energy upgrades, we are concerned that unless the eligibility criteria of all measures funded through carbon tax revenue is addressed to reach all those at risk of energy poverty, the regressive nature of this tax is not being mitigated. This includes households on the Working Family Payment who do not receive Fuel Allowance, and private renters in receipt of Housing Assistance Payment who are not eligible for free energy upgrades.

1) The Fuel allowance is currently the main financial support for those in energy poverty and

provides a vital safety net to allow people to pay for their energy needs. It is also one of the main routes through which carbon tax revenue is directed towards energy poverty alleviation. However, current eligibility means it does not reach all those who require it. Eligibility must be extended to households including those on Working Family Payment and short term Jobseekers' payments.

2) There needs to be retrofitting sub- targets for particular groups and cohorts who are at the highest risk of energy poverty to make sure that improvements in energy efficiency are reaching all parts of society, including households in poverty, children in energy poverty, people with ill-health or disabilities, and addressing energy poverty in the Traveller community. As discussed in a previous answer, SVP are also concerned about tenants in the private rented sector and recommend progress is now made to prepare for the roll out of minimum BERs.

3) SVP would like to see a long-term preventative approach to mitigating the impact of the carbon tax on those in poverty and energy poverty. In our opinion, this should prioritise removing the burden of carbon taxation from those groups in the first place where possible. We believe that a social energy tariff would be an efficient and effective route to do this by enabling targeted support for households through their energy costs.

4) As discussed in a previous answer, we recommend introducing Community Energy Advisors. In order to support low-income households and those in energy poverty through the green energy transition, we recommend establishing a local energy advice service of working in partnership with the Sustainable Energy Authority of Ireland and networked with local organisations.