Threshold submission to the Review of the Housing

Assistance Payment Limits

April 2026

Threshold
preventing homelessness

Contents

Introduction 2
The challenge 2
Recommendations 3
Misalignment of HAP rates and prevailing rents 4
Keeping up to date with legislation 4
Impact on households eligible for HAP 5
Conclusion 6

Introduction

Founded in 1978, Threshold provides independent advice and advocacy to people experiencing housing difficulties. Our mission is to advise tenants, prevent homelessness and advocate for a right to housing for all. We provide free expert advice through our National Freephone Helpline, email service and in-person outreach clinics and office locations. Each year, Threshold supports approximately 20,000 households facing challenges in their tenancies.

Threshold welcomes this opportunity to contribute to the review of Housing Assistance Payment (HAP) rent limits, which we believe need to be increased. Threshold recognises that this review relates solely to the HAP rent limits and as such the recommendations set out relate only to this matter. Threshold is keen to see a review of the HAP scheme in its entirety and would welcome opportunities to contribute to such a review.

The challenge

The clear misalignment between HAP rent limits and prevailing market rents is driving housing insecurity, hindering exits from homelessness and increasing the risk of homelessness.

While Local Authorities have a level of discretion to approve a higher rate in certain circumstances, there are inconsistencies in how this is applied, with no guarantee that the payment will be increased if the landlord increases the rent, if local rents go up or if affordable options in the area become scarce.

Recommendations

Threshold recommends:

- Aligning HAP rent limits with current market rents
- Making regular and responsive adjustments to rates based on up-to-date local rent data
- Providing greater regional flexibility to reflect variations in housing costs
- Reducing renters' reliance on discretionary "top-up" payments by ensuring base HAP rates are realistic and sufficient
- Increasing HAP payments on foot of a lawful rent increase

Threshold also supports recommendations from the Housing Commission that the maximum subsidies available under HAP reflect current rental asking prices.[1] In addition, Threshold supports the recommendation from the Economic and Social Research Institute that HAP rates be linked to rents of new tenancies in the relevant local authority area.[2]

These measures would help ensure that HAP recipients can access accommodation in their local communities without undue financial strain.

[1] Housing Commission. "Report of The Housing Commission". 2024. https://assets.gov.ie/static/documents/housing-commission-report.pdf (accessed 24/03/2026)
[2] Doolan, M., Roantree, B., and Slaymaker, R. "Low-income renters and housing supports". ESRI Research Series 141. 2022. https://doi.org/10.26504/rs141 (accessed 24/03/2026)

Misalignment of HAP rates and prevailing rents

Since the national roll-out of HAP in 2017, the standardised average rent for new tenancies has increased by approximately 50% in Dublin and the Greater Dublin Area and by approximately 83% outside of the GDA. As such, average rents have increased substantially.[3]

The shortfalls between average asking rents and HAP rates are substantial, even when a 35% uplift is applied to the payment. This shortfall ranges from approximately €400 for a couple or a single person (with a rate uplifted to that of a couple) renting a one-bed apartment in Co. Kilkenny, to a shortfall of €1,350 for family of five renting a three-bed apartment in Galway City. Even in Dublin, where a 50% increase can be applied, the shortfall is substantial. For example, in North County Dublin, the shortfall on an increased HAP payment for a single person or couple seeking a one-bed apartment is approximately €400. For a three-child family seeking a three-bed apartment in the same area, the shortfall is €825 when compared to average asking rents.[4]

Keeping up to date with legislation

Recent legislative changes allow landlords to reset rents to full market levels between tenancies from March 2026, in certain circumstances.[5] At present, there is no equivalent mechanism to adjust HAP rent limits or payments in line with this change. This risks creating

[3] Residential Tenancies Board. *RTB/ESRI Rent Index – data set* (Q2 2017 and Q3 2025). Author's own calculations. (accessed 24/03/2026)
[4] Authors own calculations utilising data from Daft.ie *Irish Rental Report Q4 2025,* *https://ww1.daft.ie/report/2025-Q4-rentalprice-daftreport.pdf?d_rd=1* and Citizens Information *Housing Assistance Payment*, https://www.citizensinformation.ie/en/housing/renting-a-home/help-with-renting/housing-assistance-payment/. (both accessed 24/03/2026)
[5] Department of Housing, Local Government and Heritage, *Government Reforms to the Rental Sector – Starting 1 March 2026*, published November 4, 2025; last updated March 1, 2026, accessed

a widening affordability gap for the members of our society who are most disadvantaged, in terms of housing options and accessibility.

This leaves a clear policy inconsistency, whereby rising market rents are facilitated, while HAP limits remain insufficient to reflect these realities. Maintaining static HAP thresholds that do not correspond to actual rent costs will create a situation where the State is effectively pushing already financially vulnerable and disadvantaged groups into further distress and hardship.

The consequences of this misalignment are evident in practice. Many households eligible for HAP are unable to secure suitable accommodation, particularly in high-demand urban areas. As a result, individuals and families are increasingly at risk of prolonged stays in emergency accommodation or entering homelessness.

Impact on households eligible for HAP

Evidence from the Simon Communities of Ireland "*Locked Out of the Market*" report (December 2025) highlights the severity of this issue. Across 16 areas surveyed, just 31 properties were available within any HAP limits, all of which fell within the higher discretionary rates, representing only 3% of all properties available to rent at that time. This

March 19, 2026, https://www.gov.ie/en/department-of-housing-local-government-and-heritage/publications/government-reforms-to-the-rental-sector-starting-1-march-2026/.

was a 25% reduction compared with December 2024, demonstrating the continued tightening of rental supply.[6]

The gap between HAP limits and market rents also places significant financial pressure on tenants. Many households are required to make up the shortfall through discretionary or informal top-up payments, which increases their exposure to financial hardship and housing instability. This undermines the core objective of HAP as a support designed to ensure access to secure and sustainable accommodation.

Conclusion

A realistic and evidence-based adjustment of HAP rent limits is essential to ensure that the scheme functions effectively. Without such reform, the gap between State support and market rents will continue to widen, further limiting access to housing for those most in need.

The Scheme to Support National Organisations is funded by the Government of Ireland through the Department of Rural and Community Development.

[6] Simon Communities of Ireland. "Press Release: Simon Communities of Ireland Report Finds No HAP-Eligible Properties in 16 Areas." *Simon Communities in Ireland*, 12 February 2026. https://www.simon.ie/press-release-simon-communities-of-ireland-report-finds-no-hap-eligible-properties-in-16-areas/ (accessed 25/03/2026)