

Niamh Duff (PER)

Subject: FW: Housing Programme Capital Follow up

From: Niamh Duff (PER) <Niamh.Duff@per.gov.ie>

Sent: Thursday 10 September 2020 11:50

To: Janet Jacobs <Janet.Jacobs@housing.gov.ie>; Departmental Finance <Departmental.Finance@housing.gov.ie>

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Janet and colleagues,

Many thanks for the conference call yesterday morning. We have a few specific questions which we set out below. However we think the most important point to address at the moment is the proposed new shared equity scheme and the CALF like AHB funding.

Both of these are policy developments which, apart from the SOG presentation, we have not seen any material on. We have been following up with your Department on the progress being made with the affordable regs and we actively participate in the cost rental group but neither of these policy proposals have been discussed in these contexts.

Any new policy should be evidenced based and provide robust analysis of the policy and the proposed impact. In terms of characteristics it should be specific, time bound, measurable and targeted.

It is clear your intention is to revert to Government quickly on this and we are aware that it needs to revert to another SOG in the interim. Apart from the concerns we already voiced at SOG around the appropriateness of the shared equity scheme, which appears to us a demand side measure which is unnecessary in a market like ours which is chronically undersupplied, it does not appear that the policy proposal has been sufficiently analysed. Specifically in terms of addressing need. An effective affordable housing policy would deliver the right types of units in the right location at an appropriately affordable price. Also, from what we have seen to date, the proposed shared equity scheme does not appear to include any eligibility parameters, meaning the provision may not be targeted to those most in need.

We request you send your detailed policy proposal on the two initiatives immediately so we have time to review them and brief our minister accordingly.

Other specific requests in terms of the capital budget are set out below.

[REDACTED]

Happy to provide any clarifications on the above if necessary.

Thanks

Niamh