



Title	Review of Rebuilding Ireland Action Plan
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Review of Rebuilding Ireland Action Plan
Cover Template for Submissions

Key Documents: [Rebuilding Ireland Action Plan for Housing and Homelessness \(July 2016\)](#)
Information Note on Review of Rebuilding Ireland Action Plan (July 2017)

Name of Organisation / Respondent:
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No.	Specific Questions (Optional) / Brief Overview of area of concern	Response
Q.1	Do the objectives set out in the <i>Rebuilding Ireland Action Plan</i> remain relevant and valid - see page 5 of accompanying information note - and are there other priorities we should also be focussing on over the medium term?	<p>The Rebuilding Ireland Plan assumes capacity, competency and functioning systems in the construction sector and property market. As a priority these assumptions must be interrogated.</p> <p>The Rebuilding Ireland plan does not align with government policy in the area of climate change, energy efficiency and green procurement. Opportunities to support these policy objectives through the housing programme are missed.</p>
Q.2	What further action should now be considered in order to prevent homelessness, to find more permanent solutions for those in emergency accommodation and to help individuals and families to remain living in their own homes?	
Q.3	What further action should be taken to increase both the scale and speed of delivery of Social Housing? Are there new delivery models or mechanisms to accelerate output?	See below. As a priority provide technical and procurement training/ advice and on-going active supports to client bodies and decision makers (incl. local authorities, AHBs, etc). Prioritise procurement methods that are client body/ design-led rather than developer-led to achieve better outcomes, more control of delivery process and better value for money.
Q.4	What additional initiatives or policy tools can best activate housing lands and deliver new housing supply to buy or rent at more affordable levels?	<p>Affordable housing is achievable. Issues to be considered include: better procurement systems, design innovation, technical improvements, standardisation of components, training and technical supports (to reduce overheads), improvements in systems of quality control and consumer protections, rationalisation of insurances, and other areas. Note: Problems with affordability are related to 'development costs' as well as 'construction costs' and therefore all models of procurement should be evaluated.</p> <p>Risk assess all policy changes and regulatory change (including Planning, Building Standards, taxation) to ensure that land-speculation and land-hoarding is not supported.</p> <p>Interrogate Part V (10% affordable housing) requirement and introduce affordable housing scheme (based on income limits). Consider Part V requirements on the basis of % floor area rather than % of units.</p> <p>Recognise and incorporate an assessment of life-cycle energy costs in housing. Reducing energy bills improves affordability for the life-time of the building.</p>
Q.5	How can we encourage increased supply of rental accommodation and foster a sustainable sector that meets the needs of all tenants across the different rental market segments?	Improve and standardise inspections for safety and occupant protection (align overlapping inspection systems for Building Control and Residential Tenancy Board requirements).

Q.6	What further actions should be taken to identify, target and encourage the greater use of existing vacant properties for both social and private housing purposes?	<p>Introduce occupancy standards/ limits at planning permission stage and publish national standards for appropriate and safe levels of occupancy.</p> <p>Facilitate design innovation for more flexible housing typologies (other than market standard 1/2 bedroom apartments and 3/4 bedroom houses).</p> <p>Streamline regulatory systems for efficiency and cost saving and to overcome barriers to re-use and conversion of existing buildings.</p> <p>Facilitate design innovation for more flexible apartment typologies.</p>
No.	Add your own summary of your areas of concern below:	Indicate your preferred resolution to these concerns
1	Publish accurate data : Accurate data for new residential construction is not currently published; a proxy (electricity meter connections) is used as an inaccurate indicator of construction activity.	Accurate real-time data on new housing completions (by address, local authority, type and floor area) is available in the BER (Building Energy Rating) Register as a public statutory record. The BER data should be published monthly as an accurate measure of new build housing. Note: Planning Permissions (building permits) are not an accurate predictor of construction activity, as advised by EuroStat (http://ec.europa.eu/eurostat/statistics-explained/index.php/Construction_permit_index_overview)
2	Introduce transparent reporting : Rebuilding Ireland reporting is inconsistent and the source data and methodology are not readily available.	Report and publish data and methodologies/ changes in methodologies on a regular basis to a consistent format and make raw data available for research and analysis.
3	Set realistic and achievable targets : The 2017 review document says that the target is: "25,000 homes per year by 2020 – in effect, doubling output from 2015 levels". The 2016 Rebuilding Ireland report set a higher target of "an average of 25,000 homes are produced every year in the period to 2021".	The new build housing output in 2015 was likely less than 4,000, not 12,500 based on reliable data sources available.
4	Actively undertake risk assessment to manage the programme, including research into institutional capacity, construction industry capacity and constraints.	Undertake active risk- assessment including research, monitoring and management of all aspects of delivery, including current capacity of the house-building and construction sectors, training/ education/ apprenticeships, local authority resources, institutional capacity, supply of labour (design professions and construction) supply of materials, technical innovation, quality assurance systems, consumer protections, insurance provision etc.and increase capacity and output to this target presents very serious risks (these include risks to the economy, a likelihood of very high construction inflation, poor quality standards, labour and material shortages, etc.)
5	Prioritise value for money and life-time costing of housing	Recognise and incorporate an assessment of life-cycle energy costs in housing. Reducing energy bills improves affordability for the life-time of the building. Expand research of 'construction costs' to include all models of procurement (i.e. not only develop-led speculative build procurement) and all aspects of cost (overhead, training, technologies, labour, transactional costs, regulatory costs, etc).

6	Prioritise incentives and supports (design, technical, financial) for universal access and adaptable housing for the people with disabilities	Private market provision is inadequate to provide for these needs.
7	Build sustainable, resource efficient housing that incorporates available technologies and design innovation	The Rebuilding Ireland plan does not align with the government Climate Mitigation Plan, and does not include measures to ensure compliance with the Energy Performance in Building Directive (EPBD), including mitigation of financial penalties for non-compliance.
8	Introduce appropriate independent cost-effective inspection and enforcement systems to ensure safety, occupant health and environmental protection.	The 2014 BCAR (Building Control Amendment Regulations) do not provide for independent oversight of compliance of housing design or housing construction. Systems of enforcement are inadequate.
9	Introduce adequate and robust mechanisms of consumer protection and redress for house-buyers.	Consumers have few legal rights in the event of defects and no new legal protections for defective materials (such as pyrite).
10	Prioritise re-use and conversion of existing buildings (residential, commercial and institutional) with appropriate regulatory change.	Regulatory change is required to streamline the administrative processes for existing buildings (Planning Permission, Fire Safety Certificate, Disability Access Certificate, BCAR etc).

Appendices:

Submission to Oireachtas Committee on Housing and Homelessness (Parts 1-4), Submission to Public Consultation on Part L (Energy Standards), Submission to National Risk Register