



BY EMAIL: NRRPConsultation@taoiseach.gov.ie

National Recovery and Resilience Plan
Public Consultation
Department of the Taoiseach
Government Buildings
Merrion Street Upper
Dublin 2
D02 R583

22 February 2021

Dear Sir or Madam,

Re: National Recovery and Resilience Plan – Public Consultation

We are an advocacy organisation for owners' management companies ("OMCs") of multi-unit developments ("MUDs"), their volunteer directors, and members. Information about our activities is available on our website www.apartmentownersnetwork.org.

This short submission highlights opportunities for the National Recovery and Resilience Plan ("the NRRP") available in the apartment and managed estates sector. We draw attention to observations on related matters in several of our recent submissions to Government.

The pandemic has led to more people spending more time at home. The built environment, and private and public amenities, affect physical and mental well-being. Citizens appreciate more than ever before the importance of high-quality dwellings.

Reduction of carbon use in the built environment is critical to meeting national Climate Action and Sustainability goals. The managed estate sector offers collective legal and financial structures to help to deliver on the objectives of the renewable agenda- decarbonisation, reduced energy consumption, as reflected in material underpinning the NRRP.

Responses to Consultation Questions

Question 1

Taking into account the guidance provided by the European Commission, what are the areas Ireland should prioritise for 1) investments and 2) reforms for inclusion in our National Recovery and Resilience Plan?

Response

- We note that plans should seek to address flagship areas identified for reforms and investments by the European Commission, including:
 - Power Up (renewable power generation)
 - Renovate (retrofitting/deep renovation)
 - Recharge and Refuel (electric and hydrogen chargers)
 - Modernise (digitisation of public administration)

The following recent submissions by the Apartment Owners' Network draw attention to the opportunities in the apartments and managed estate sector to address the above flagship areas:

State Agency	Consultation Subject
Department of the Environment, Climate and Communications	Micro-generation Support Scheme Consultation
Department of Public Expenditure and Reform	Review to Renew Review of National Development Plan
Department of Finance	Review of Home Building Finance Ireland

Papers consider the opportunities for energy retrofitting in multi-unit developments, supporting SMEs in the construction sector. De-carbonisation, and energy generation in managed estates are explored.

Submissions also refer to past papers in relation to policies such as the Waste Action Plan for a Circular Economy, and taxation, as relevant to the managed estate sector.

- With respect to the flagship area “*Modernise (digitisation of public administration)*”, we have called for the implementation of the recommendations of the 2019 report “*Owners' Management Companies - Sustainable Apartment Living for Ireland*”¹. Recommendations include regulation of the sector to:
 - Maintain a register of OMCs and process annual returns to incorporate additional return requirements, thereby ensuring compliance within the sector by OMCs
 - Collect data through the annual returns process in respect of expenditure trends, the size of the sector and monitor variances in service charge levels and collection
 - Provide a dispute resolution process through an online tribunal system

As the report discussed, benefits would accrue in terms of higher standards of governance, provision for long-term maintenance, and assurance in relation to construction standards and fire safety.

- We draw attention to the recommendations contained in the recent report of the Review Group on the Review of the Administration of Civil Justice². Recommendations include the digitisation and streamlining through technology of many practices and process in Ireland's courts system.

¹ *Owners' Management Companies - Sustainable Apartment Living for Ireland* (2019), The Housing Agency and Clúid Housing www.housingagency.ie/publications

² Report of the Review of the Administration of Civil Justice (2020) <http://www.civiljusticereview.ie/en/cjrg/pages/publications>

Question 2

Of the Country Specific Recommendations received by Ireland in 2019 and 2020, which are considered the most relevant for reflection upon in Ireland's National Recovery and Resilience Plan?

Response

- Recommendation 2 of the 2020 Country Specific Recommendations for Ireland includes *"Increase the provision of social and affordable housing."* This was also a part of Recommendation 3 in 2019.

According to Census 2016 nearly 80% of apartments in Ireland are rented. Approximately 20% are social rented (housing association or local authority). Nearly 60% are rented privately, with a proportion of those tenancies underpinned by public or social rent supports. In this way it may be seen that the health of OMCs, structures binding together apartments and managed estates, is key to the success of a proportion of social/public housing stock.

We submit that investment in the sector, in the ways outlined in the response to Question 1, should be reflected in the NRRP.

- Recommendation 3 in 2020 is-
"Continue to provide support to companies, notably small and medium-sized enterprises, especially through measures ensuring their liquidity. Front-load mature public investment projects and promote private investment to foster the economic recovery. Focus investment on the green and digital transition, in particular on clean and efficient production and use of energy, sustainable public transport, water supply and treatment, research and innovation and digital infrastructure."

With regard to investment projects, and private investment, the 2019 Housing Agency/Clúid Housing report states³-

"...the view could be taken that cumulative OMC turnover is in excess of €270m. Almost all of this income is re-invested in electricity charges, insurance, management fees, gardening, cleaning, waste management services, building contractors and other trades. OMC trade is an important factor to many small companies and professional service providers in the country."

This indicates that investment in the managed estate/apartments sector, in particular the retrofitting of Ireland's older stock of apartment buildings, is highly aligned with Recommendation 3. It is also aligned with Government policy for higher density residential living, and reduction of urban sprawl.

Conclusion

We appreciate the opportunity to participate in this consultation process. Please contact us if you have any queries.

Yours faithfully,

[*sent by email and not signed]

Bryan Maher
Director

³ Owners' Management Companies - Sustainable Apartment Living for Ireland, page 26