

Apartment Owners' Network

Representing the owners of apartments and houses in managed estates

BY EMAIL

buildingstandards@housing.gov.ie

25 July 2019

Dear Sirs,

Re: Public Consultation on the additional guidance to Technical Guidance Document B, 2006 (Fire Safety)

We refer to the above consultation, which opened on 25 June 2019, and we welcome the opportunity to contribute to the consultation process.

We note that the Minister for Housing and Urban Development, Mr. Damien English T.D., intends to provide additional guidance in relation to open plan flats, and extended corridors in buildings containing flats. This material is *“to ensure the delivery of quality and durable housing solutions that will meet the needs and expectations of consumers in a manner that is safe and sustainable.”*.

We welcome new measures to improve fire safety in flats and apartments, and to provide consistency and certainty to industry and local authorities, by way of guidance at a national level.

Our observations/comments

We note that by its nature Technical Guidance Document B, 2006 (Fire Safety) is specialist technical material. We therefore expect that professionals such as fire safety consultants, Chartered Fire Engineers, etc. will provide suitable expert responses as to the technical content of the additional guidance.

While not strictly observations/comments on the new measures, in order further to improve fire safety in apartments/multi-unit developments, we advocate adoption of the recommendations of the following recent reports-

1. *“Safe as Houses? A Report on Building Standards, Building Controls & Consumer Protection.”*, Oireachtas Joint Committee on Housing, Planning and Local Government (December 2017).
2. *“Fire Safety in Ireland - Report Of The Fire Safety Task Force”*, Department of Housing, Planning and Local Government (May 2018), as its recommendations refer to owners' management companies (“OMC”):
 - a. Fire services to offer training to directors of apartment OMCs on key life safety issues.
 - b. Efficient and timely recovery of service charges in apartment blocks needs to be facilitated, so that funding is available to maintain, enhance and replace fire protection facilities.

3. *“Owners’ Management Companies – Sustainable apartment living for Ireland”*, Paul Mooney (June 2019), jointly commissioned by the Housing Agency and Clúid Housing.

Conclusion

We note that submissions and comments on the additional guidance are due to be submitted on the “Templates for Submissions”. However, we trust that the views expressed in the present format will be given due consideration by the Department in the wider context of fire safety in residential accommodation, particularly in apartments/multi-unit developments.

You might in due course confirm safe receipt of this submission in time for the deadline of 23 August 2019.

Yours faithfully,

*[*Sent by email and accordingly bears no signature]*

Bryan Maher
Director

*Cc by email: Minister for Housing and Urban Development Mr. Damien English, T.D.
Minister for Housing, Planning and Local Government Mr. Eoghan Murphy, T.D.*