

**Property
Industry Ireland**

ibec

BCAR - Recommendations for Reform

May 2018

**Prepared by Property Industry Ireland BCAR Working
Group for attention of Department of Housing**

Executive Summary

Note: This report has been researched and compiled for the attention of the Department of Housing.

There are several key reforms which must be considered in order to improve our system of building controls in Ireland. This document seeks to outline some of the key areas for development and reform. It is the view of PII however that while there are many things about the current system of building control in Ireland that may be changed, the decision to engage the private sector in building controls has been a positive one.

As part of the research for this document, we have reviewed several studies and publications about international best practice in building control regulation, as well as gathering the experiences of the various contributors and industry practitioners. In particular, we have referenced the World Bank Group's **Good Practices for Construction Regulation and Enforcement Reform (2013)** report throughout this document, as it is an excellent source of international research on this topic.

This report, where speaking about private-sector involvement in building controls, The World Bank Group have been quoted as saying,

"In countries undertaking reforms, regulators seek to reach better regulatory outcomes by leveraging private-sector resources and specialized skills. In doing so, they shift gradually away from strict public-enforcement practices toward practitioner-focused strategies through new forms of collaboration with private building professionals... No single path leads to successful collaboration, but all significant reform experiences worldwide have involved some delegation to private building professionals or some form of joint responsibility at various levels of the permitting process".

This report also found that this partnering was not simply a positive trend, it was an optimal path forward,

"In short, far from deregulating, best-practice countries have all introduced a measure of private sector solutions at the different process stages, with the goal of increasing efficiency and providing consistent, high-quality services and delivery".

Building Control (Amendment) Regulations 2014 (BCAR) has indeed begun this process of engaging the private sector in the solution, but there is certainly room for improvement and this document suggests some steps which may be taken to enhance the current system.

Risk-based Approach - Further Integration

The Code of Practice for Inspecting and Certifying Buildings or Works states that stakeholders must take a “risk-based approach” when certifying buildings. This is extended to the local authority also when conducting their own investigations. There is however a distinct lack of collaboration between Assigned Certifiers and local authorities. In PII’s opinion, the opportunity for knowledge-sharing and developing a sophisticated understanding of risk is currently being missed.

Furthermore, the World Bank (2013) report states that;

Regulators usually pursue three main objectives when introducing modern risk-based management into construction permitting systems:

- 1. First, they seek opportunities for process streamlining to make the most cost-effective use of scarce control resources.*
- 2. Second, they try to shift the risk, responsibility, and liability back to the design sector, where private designers and engineers have the skills, competencies, and experience to function without controls or with limited controls.*
- 3. Third, they attempt to improve a wide range of regulatory outcomes from public health and safety to compliance with energy and water efficiency standards and urban planning requirements.*

The BCAR process may need to go further in streamlining the process to free up existing resources e.g. local authority building control officers (point 1). They have succeeded in shifting risk and liability to the design and construction sector (point 2) but they may need to bring in additional regulatory solutions in order to improve public health and safety (point 3).

BCAR does capture a risk classification by building type using consequence classes, which is often typical for sophisticated building control systems. However, there is currently no requirement for increased levels of due diligence or oversight on higher risk building types, which is unusual. There is some guidance on systems such as this in the Eurocodes EN 1990, which sets out the nature of the risk and determines the level of oversight and inspection required. Such measures have been utilised in the Netherlands and Macedonia to reduce state controls and bureaucracy on smaller lower consequence class buildings. Such an approach would focus resources on higher risk buildings and ensure greater consistency and pragmatism in the implementation of building regulations.

Contents

Executive Summary	1
Key Policies Affecting Robust Regulatory Outcomes.....	4
1. Building Codes	4
2. Independent Third-Party Review	6
3. Professional Standards & Oversight Mechanisms.....	8
4. Liability and Insurance Systems.....	10
5. Conflict Resolution Mechanisms	11
Summary of Recommendations.....	12
About Property Industry Ireland	14

Key Policies Affecting Robust Regulatory Outcomes

1. Building Codes

Building codes are an essential part of a functioning building control system. Many of our standards and Technical Guidance Documents (TGD) are primarily focussed on residential construction and some require updating, which is underway in many cases. What is arguably less consistent is the interpretation and enforcement of building codes and codes of practice by different local authorities. This can cause confusion and increase risk on projects, which in turn can add unnecessary cost and delays.

The group recommends that a national “Building Control Authority” or similar entity be established to:

- set clearer guidelines on national standards and codes
- assist with the enforcement process (similar to Health and Safety Authority)
- manage a licensed national Assigned Certifier scheme (similar to Private Security Authority)
- act as the arbitration body on disputes with respect to building control
- provide training and support to local authority building control
- centralise knowledge-sharing
- liaise with other international building control bodies and
- integrate new innovations in a more streamlined manner

The current position is that queries on such issues are answered on a case-by-case basis by the Building Standards division of the Dept. of Housing, Planning and Local Government (DHPLG) and through the office that administers the Building Control Management System (BCMS), which is based in the Local Government Management Agency (LGMA). However, with the exception of the FAQ facility on the BCMS website, that has been provided by the office that deals with the BCMS aspects of Building Control administration, there is no formal record of precedent or interpretation for Building Regulation standards themselves. It would be beneficial that these interpretations are clarified, in the promotion of a culture of compliance around building standards, this and the general issue of the ongoing administration of Building Control must be provided on a firm administrative footing.

In this context it is useful to compare two instances of the upgrading of regulation in public administration that have direct relevance to construction – Health & Safety (H&S) and Building Control (BC).

- The significant upgrade in H&S resulting from the Safety, Health and Welfare at Work Act, 1989. The act established the HSA which was responsible for administering the new regulatory regime and to report to the Minister for Business, Enterprise and Innovation.
- In the case of Building Control, the most significant administrative change derived from the Building Control Amendment Regulations (BCAR 2014 and 2015) was the introduction of the system of online registration for commencement and completion of buildings that has resulted in the creation of a national database that forms the basis for upgraded Building Control Registers for each Building Control Authority (BCA) function for all 31 local authorities.

The core difference between both was that

- Prior to the upgrade for H&S there was solely a small industrial inspectorate unit (Factory Inspectors) in the parent Department. The Act required the establishment of a national agency, not a distributed network. Local government had no prior precedent role in that area.
- Prior to the upgrade for Building Control, an oversight function was already established within every local authority under the Building Control Act of 1990, which required the authority to assign appropriate staff and other resources to that function. Before this, some Local Authorities had Building Bye-Laws governing standards.

As matters have transpired the changes brought about on foot of the revised regulations (BCAR) have influenced and continue to influence significant change through an improved focus on building standards. It is very much in the public interest that this work, supporting increased compliance with standards through the optimum means, including the communication of best practice, to all stakeholders, is administered most efficiently and effectively.

The location of the central administration for BCMS, currently in the LGMA, is under review with a view to the transfer of that function as a shared service within one local authority similar to other precedent shared services in that sector – central payroll, waste permits, water basin management, housing assistance payment etc. administrative systems. In that context it is critical that any such service be configured and resourced in like manner to that which might pertain were the service provided through a single-purpose regulatory authority as has been the case for H&S. The functioning of the BCMS to date has been remarkably successful, given the level of resources that were possible to be provided at its introduction during the severe restrictions on resourcing that were mandated due to the economic downturn. Much of this is due to the dedication of the core group who supported and guided its development before and since the BCMS went live in March 2014. However, it is not sustainable to continue to operate on this basis.

The BCMS is administered by the National Building Control Project – the latest iteration of the group continually involved since the BCMS was conceived. This group comprised from the outset of representatives of the DHPLG Building Standards division, the LGMA representing the local authorities, nominees of the staff who deliver the service in the BCAs – Building Control Officers and Fire Officers Association – and nominees of the construction industry and professions.

It is paramount now that:

- a firm foundation in terms of governance is established,
- ongoing resourcing is secured,
- training and monitoring of competence are continually promoted,
- the issue of interpretation and guidance is firmly established in that body, and
- strategic action is continually considered

so as to safeguard against any diminution of the promotion of a compliance culture industry-wide in the interest of consumers and public safety.

It is solely on the precedent collaborative basis that has characterised the development of the BCMS from the outset that the future administration of this important facet of regulatory oversight can have the necessary integrity to sustain compliance with building standards in the interests of all.

Recommendation: Assign a Lead Authority responsible for ensuring a consistency of approach across the country with regard to building codes. Such a body could act as a governing body for Local Authority Building Control, providing guidance and training, as well as making key interventions such as issuing enforcement action where needed.

The BCMS Project Board needs to be supported and invested in to deliver enhanced compliance outcomes.

2. Independent Third-Party Review

Independent Third-Party Review is a mainstay of any functioning building control system. This is defined as follows;

“Third-party review of building design and construction refers to review of building plans and inspections during and after construction conducted by a technical expert independent of the building designer, contractor, or owner. The independent expert is a third party, with the owner considered the first party and the designer and contractor considered the second party.”

At present BCAR allows the Assigned Certifier to be the first party and in a great number of instances the role is conducted by the designer i.e. second party. By definition, neither the Building Owner, Designer nor Builder can be impartial in certifying their own works. This does not mean that we need to pass the role of third party inspection back to the public sector. In many jurisdictions (25 out of 27 EU states) the private sector is engaged in delivery of building control inspections.

In most jurisdictions the risk level or “consequence class” of a building or building type dictates the appropriate level of oversight required during design and construction. Higher risk building types e.g. large apartment blocks, stadia, high-rise offices, shopping centres, require rigorous third-party design and construction oversight. Whereas lower risk buildings or “buildings where people rarely go” e.g. ESB sub-stations, can be certified by the builders or designers. The Eurocodes offer some clear guidance on how such a consequence class-based system can work. The Dutch fire certification system, which is run by the Centre for Crime Prevention and Safety (CCV) is based on similar principles and it ensures that high risk buildings are inspected and reviewed thoroughly.

The Irish system only offers two tiers for new buildings; the full rigour of BCAR or the BCAR opt-out solution which was introduced for one-off homes. The latter option is believed by all contributors to be sub-optimal, not least because of the risk it poses to future purchasers. There is no evidence that one-off home building results in lower risk and the unintended consequences of this policy may result in future failures.

Lack of BCAR engagement on large-scale fit-outs

It was also noted by our contributors that a very large percentage of “new build” commercial fit-outs are currently circumventing the BCAR process altogether. The crux of this matter is that many fit-out projects are deemed not to require new fire safety certificates, which is the primary trigger for the BCAR certification requirement. Projects which do not require a new fire safety certificate, rarely pass through the new system of building regulations, instead relying on the now defunct “opinion of compliance”. The problem is that the requirement to apply for a new fire safety certificate is no indication of the scale or indeed risk associated with the works.

There are examples of buildings with “Cat A” fit-outs to several floors and not to others, with substantial deferred works. However, Assigned Certifiers are signing these buildings off as complete. This action determines whether or not subsequent fit-outs require BCAR (assuming a fire safety certificate is not required). If Assigned Certifiers noted deferred works and omitted compliances on phased or partial Completion, the fit-out works would require their own commencement and completion certificates.

For “shell and core” or “Cat A” finished office blocks there is no requirement for full BCAR certification but only for a short form commencement notice without documentation where there has been full completion with no deferred works and full compliance with the building regulations. These buildings are generally not fit, nor intended, for occupation or use at the time of handover, but can be certified as compliant with the building regulations. Where there are substantial works which might be part of this fitout but do not require a revised fire safety certificate there is no requirement for BCAR. **The result of this approach is that new projects with construction works in excess of €30m in**

construction value have been constructed and occupied without having passed through the rigour of the new BCAR system. There is a need for consistency in this area as Design Teams are being advised in some regions that a revised fire safety certificate and BCAR is required and in other regions that it is not required.

The World Bank Report states;

“To a very large degree, a functioning third-party review mechanism determines the ability of a construction permitting system to produce robust regulatory outcomes. No reforms should be undertaken at the cost of weakening this crucially important element of building control.”

BCAR has engaged the design and construction community with building regulations very successfully, but without independent oversight, the new system is likely to see similar failures. Minor adjustments to the current system could produce major reforms. It is important to note that currently Ireland is the only country in the developed world where a designer or builder may certify their own works, without independent oversight.

Recommendations: *The Department should consider introducing a risk matrix to the BCMS which could be used to dictate the appropriate level of rigour and oversight needed to ensure compliance, for example for housing developments*

- i. For projects below 100 housing units, no full independence from the design team is required*
- ii. For projects 100 housing units plus (i.e. would be subject to strategic housing development fast-track planning), an assigned certifier should be appointed who is independent of the design team*

The Department should also revisit S.I. No, 365 of 2015 to assess the appropriateness of this measure.

This change would dictate that higher risk projects would require fully impartial Assigned Certifiers, whereas truly lower risk projects e.g. ESB Sub-stations may be omitted from the BCAR process altogether. Moreover, the Department should consider means of triggering BCAR for largescale projects which are not solely reliant on the requirement of a fire safety certificate. The Department should consider introducing guidelines similar to the HSA’s AF1 form for indicating a project’s scale e.g. where a project is planned to last longer than 30 working days or exceed 500 person-days, the project should be notified on the BCMS as being subject to BCAR. The Department should also issue clearer guidance (or practice notes) on the need to clearly state “omitted works” for partial or phased completions e.g. shell and core offices.

*A minor change to the BCAR documentation and Code of Practice would be a major step in securing impartial certification on higher-risk projects. On such projects, it should not be permissible that a qualified professional holds the role of Assigned Certifier on a project where the professional, their firm or a subsidiary of their firm have been engaged to provide design or construction services. This would involve a change to the code of practice and a declaration which would need to be added to the undertaking signed by the Assigned Certifier. **It would cost virtually nothing and it would effectively end self-certification in its truest form.** An example of how impartiality could be identified is through the certifiers participation in the licensed national assigned certifier scheme.*

3. Professional Standards & Oversight Mechanisms

1. Ireland is particularly reliant on the expertise of private sector designers and specialist subcontractors. However, instances of mandatory credentials and/or licensing to trades are incredibly low for most specialist trades in our industry. While construction has evolved and innovated enormously over the past few decades, we have done little to regulate specialist trades in order to bridge skills gaps. The licensing and training of specialist contractors is of immediate and direct concern. Product innovation and building standards evolve constantly, yet we do not have any checks and balances in place to ensure that those who construct specialised systems such as fire stopping, insulation and ventilation systems are adequately trained to do so. This is perhaps the greatest risk to building regulations compliance and the area in need of most reform.
2. Ireland has set a high standard of qualification for professionals to act as Assigned Certifier and Design Certifier but this could be refined further to ensure that applicants have amassed the relevant experience to certify buildings. As such, a licensed scheme for Assigned Certifiers, run by the national Building Control Authority would be a welcome reform. Assigned Certifiers should be subjected to annual/biennial audit and required to demonstrate competence, due diligence, impartiality and record-keeping to an auditor from the Building Control Authority. The scheme could be self-financing if Assigned Certifiers were required to pay an annual licensing fee, which could be proportionate to the entity/company's turnover.
3. The testing of products and systems for use in the Irish construction industry would benefit hugely from increased oversight and governance at national level. There has been an influx of innovative new products in recent years, which are often poorly understood and misapplied. This has created fear and misinformation in the market, which is having a knock-on effect for Irish artisan producers and manufacturers who can no longer become specified on projects. Designers are less likely to specify new or innovative products due to the perceived risk and lack of clarity around product certification, which has a knock-on effect on costs, as competition is reduced. Government must increase their involvement in the area of product certification, in order to reduce uncertainty, promote safety in design and competition in the industry.
4. The state is one of the largest procurers of construction goods and services. The current procurement strategy for critical infrastructure such as schools, hospitals and social housing favours a "most economically advantageous tender" approach. This often sets a 70:30 or indeed an 80:20 ratio for price to quality respectively. This ratio promotes a culture of low-quality design and construction, with few firms able to trade successfully in this area. We have already seen the negative impact of this strategy with multiple fire safety issues in our schools. The government should seek to revise this procurement model and redistribute the ratio in such a manner that rewards quality and innovation. Until the Irish government takes a leadership position and creates a sophisticated demand for construction firms, we will continue to see poor professional standards on site.

Recommendations:

- I. *Conduct risk assessment of the Irish contracting industry and identify "High-risk Trades". Use CIRI or a similar entity to introduce mandatory requirements for companies seeking to operate within these trades. Mandatory requirements which are implemented nationally to not generally increase costs in the long run, rather they set a level playing field and mitigate risk.*
- II. *Introduce minimum education and experience requirements for Assigned Certifiers. Set up a licensed national certification scheme. Assigned Certifiers should pay to take part*

in the licensed scheme and be audited for compliance (at a minimum) once every two years. (similar to the Private Security Authority).

- III. Create a national test laboratory to streamline the testing and certification of products for use the Irish construction sector AND/OR establish close links with an approved laboratory such as BRE and engage with national manufacturers to subsidise the testing and certification of new construction products*
 - IV. Government agencies should revise their procurement strategies with a view to creating a more sophisticated demand for construction services. This measure would have huge economic impact, ensuring that contractor's compete on more than just price, thereby raising professional standards on site.*
-

4. Liability and Insurance Systems

Liability and Insurance Systems ensure accountability of practitioners in the construction industry and ideally should protect consumers. However, Ireland is over-reliant on Professional Indemnity Insurance as a means of providing consumer protection. Moreover, our liability regime is overly complex and often misunderstood. The fear of legal uncertainty has created delays and impacts in the ability of professionals to make pragmatic decisions. Joint and several liability or the “1% rule” means that even when a party is found to be only 1% responsible, they can be held liable and required to pay the full amount of any settlement. This ensures that the plaintiff is eventually compensated, but often this takes a long time to resolve and resolutions are not found within an appropriate timeframe to provide consumer protection. France and many other jurisdictions employ minimum period of liability for builders and designers, which are backed up by mandatory insurance schemes. The Spinetta Law of 1978 is an excellent and effective case in point.

Government has a precedent for insisting on mandatory insurance in the motoring sector. This decision was taken in order to protect the general public. It is time that we followed the example set by many other jurisdictions and insist upon Latent Defects Insurance for medium to high density residential buildings. One-off units and small, lower consequence-class developments could be omitted from such a scheme.

Recommendations:

Pass legislation which makes Latent Defects Insurance (LDI) or similar a mandatory requirement for residential buildings and social infrastructure buildings e.g. schools, hospitals etc. Establish an EU tender to set up a government framework of LDI insurers, who compete on a “like for like” basis. This is the optimal method of protecting consumers, as LDI ensures a rapid resolution and expedite remediation works. The alternative is a complex and costly journey through our court system and the likely displacement of families

5. Conflict Resolution Mechanisms

Conflict resolution is not straight forward under BCAR. This is principally due to the localisation of the dispute resolution process. Many practitioners have noted differences of opinion between two building control officers operating within a single Local Authority. As such, when a contractor has a dispute with an Assigned Certifier with respect to a building control matter, the mechanism for dispute resolution is overly reliant on the knowledge level and consistency of the local officer.

It is generally considered best practice to have a dedicated national body which would effectively adjudicate on such matters. Procedural fairness is seen to be something of a lottery at present with as many different interpretations as there are individuals to hold them.

Recommendations:

The establishment of a Lead Authority for building control could serve to provide a consistent approach to technical disputes and adjudicate on complex conflicts. This would avoid local or regional interpretations having an inappropriate influence over technical disputes and improve confidence in the Building Control system

Summary of Recommendations

1. Assign a Lead Authority responsible for ensuring a consistency of approach across the country with regard to building codes. Such a body could act as a governing body for Local Authority Building Control, providing guidance and training, as well as making key interventions such as issuing enforcement action where needed.

The BCMS Project Board needs to be supported and invested in to deliver enhanced compliance outcomes.

2. The Department should consider introducing a risk matrix to the BCMS which could be used to dictate the appropriate level of rigour and oversight needed to ensure compliance, for example for housing developments
 - i. For projects below 100 housing units, no full independence from the design team is required
 - ii. For projects 100 housing units plus (i.e. would be subject to strategic housing development fast-track planning), an assigned certifier should be appointed who is independent of the design team

The Department should also revisit S.I. No, 365 of 2015 to assess the appropriateness of this measure.

This change would dictate that higher risk projects would require fully impartial Assigned Certifiers, whereas truly lower risk projects e.g. ESB Sub-stations may be omitted from the BCAR process altogether. Moreover, the Department should consider means of triggering BCAR for largescale projects which are not solely reliant on the requirement of a fire safety certificate. The Department should consider introducing guidelines similar to the HSA's AF1 form for indicating a project's scale e.g. where a project is planned to last longer than 30 working days or exceed 500 person-days, the project should be notified on the BCMS as being subject to BCAR. The Department should also issue clearer guidance (or practice notes) on the need to clearly state "omitted works" for partial or phased completions e.g. shell and core offices.

A minor change to the BCAR documentation and Code of Practice would be a major step in securing impartial certification on higher-risk projects. On such projects, it should not be permissible that a qualified professional holds the role of Assigned Certifier on a project where the professional, their firm or a subsidiary of their firm have been engaged to provide design or construction services. This would involve a change to the code of practice and a declaration which would need to be added to the undertaking signed by the Assigned Certifier. It would cost virtually nothing and it would effectively end self-certification in its truest form. An example of how impartiality could be identified is through the certifiers participation in the licensed national assigned certifier scheme.

3.
 - I. Conduct risk assessment of the Irish contracting industry and identify “High-risk Trades”. Use CIRI or a similar entity to introduce mandatory requirements for companies seeking to operate within these trades. Mandatory requirements which are implemented nationally to not generally increase costs in the long run, rather they set a level playing field and mitigate risk.
 - II. Introduce minimum education and experience requirements for Assigned Certifiers. Set up a licensed national certification scheme. Assigned Certifiers should pay to take part in the licensed scheme and be audited for compliance (at a minimum) once every two years. (similar to the Private Security Authority).
 - III. Create a national test laboratory to streamline the testing and certification of products for use the Irish construction sector AND/OR establish close links with an approved laboratory such as BRE and engage with national manufacturers to subsidise the testing and certification of new construction products
 - IV. Government agencies should revise their procurement strategies with a view to creating a more sophisticated demand for construction services. This measure would have huge economic impact, ensuring that contractor’s compete on more than just price, thereby raising professional standards on site.
4. Pass legislation which makes Latent Defects Insurance (LDI) or similar a mandatory requirement for residential buildings and social infrastructure buildings e.g. schools, hospitals etc. Establish an EU tender to set up a government framework of LDI insurers, who compete on a “like for like” basis. This is the optimal method of protecting consumers, as LDI ensures a rapid resolution and expedite remediation works. The alternative is a complex and costly journey through our court system and the likely displacement of families.
5. The establishment of a Lead Authority for building control could serve to provide a consistent approach to technical disputes and adjudicate on complex conflicts. This would avoid local or regional interpretations having an inappropriate influence over technical disputes and improve confidence in the Building Control system

About Property Industry Ireland

Our vision:

A sustainable Irish Property Industry which is creative, responsive, competitive and well-integrated in meeting the socio-economic needs of all the stakeholders in the built environment

Our mission:

To be the trusted partner and provider of “evidence based” information, policies and strategies for the property industry at National level, to the Oireachtas, Government, Local Authorities and Agencies, and for the benefit of the people of Ireland.

Our objectives are to:

1. Be the Leadership Forum in the Industry for the discussion on National Property Issues
2. Develop, propose and support a National Property Strategy, policies and solutions to issues for the benefit of the nation as a whole
3. Be a research led organisation, which collates and commissions relevant and innovative research on Ireland's construction sector in order to promote & sustain a competitive economy
4. Be the go-to organisation for Government and the Oireachtas on all aspects of property
5. Work with all stakeholders in the industry to restore it to a sustainable position in the economy
6. Increase membership through demonstrating the achievements and outcomes in relation to national strategy and policy

PII Council:

Tom Phillips, Tom Phillips + Associates (Chairman)
Aidan O'Hogan, Property Byte Ltd.
Patricia O'Brien, BHK Solicitors
Tony Reddy, Reddy Architecture + Urbanism
Padraic Whelan, Deloitte
Michael O'Flynn, O'Flynn Group
Jim Gallagher, Lafferty
Mark FitzGerald, Sherry FitzGerald
Michele Connolly, KPMG Corporate Finance
Ivan Gaine, Sherry FitzGerald
David O'Connor, David O'Connor Consulting
David Clarke, Goodbody Stockbrokers

Policy Committee Chairs:

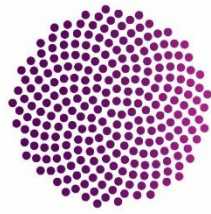
Executive Committee –
Michael O'Flynn, O'Flynn Group
Technical and Construction Issues –
Jim Gallagher, Lafferty
Planning and Development –
John Spain, John Spain Associates
Funding Initiatives –
Paddy McElligott, Activate Capital
Market Supply and Demand –
Ivan Gaine, Sherry FitzGerald

Executive:

David Duffy, Director
David Howard, Policy Executive

Recent publications:

- The Property Industry – Rebuilding Ireland's Economy (2011)
- Development of infrastructure Bonds (2011)
- Real Estate Investment Trusts for Ireland (2012)
- Putting the Residential Property Market on a Sustainable Footing (2012)
- Planning a better future: a report on reform of the Irish Planning System (2012)
- Towards a National Property Strategy (2013)
- Delivering Ireland's Property Needs (2014)
- A National Spatial and Development Plan for Ireland (2014)
- The Cost of Construction in Ireland: A European comparison (2014)
- Investing in Social Housing (2014)
- Housing Manifesto (2015)
- Policy Reform to Increase the Delivery of New Housing (2016)
- Delivering Rebuilding Ireland: PII Pre-Budget 2017 Submission (2016)
- Tax Treatment of Rental Income (2017)
- Rental Strategy Response (2017)
- Pre-Budget 2018 Submission (2017)
- Submission to Rebuilding Ireland Review (2017)
- Property Industry Ireland (PII) response to Draft Ireland 2040 – Our Plan National Planning Framework (2017)
- Brexit and Ireland's Property Sector (2018)



**Property
Industry Ireland**

ibec

Property Industry Ireland
84 - 86 Lower Baggot Street
Dublin 2 Ireland
info@propertyindustry.ie
01 605 1666
www.propertyindustry.ie