

The Society of
Chartered 
Surveyors

Fingal Development Plan 2011 – 2017

June 2010

CB/ld

8th June 2010

Mr. David O'Connor,
County Manager,
Fingal County Council,
Grove Road,
Blanchardstown,
Dublin 15.

Re: Fingal Development Plan 2011 – 2017

Dear Mr. O'Connor,

On behalf of the Society of Chartered Surveyors, I would like to affirm our interest in being involved in the review of the Fingal County Development Plan.

By way of brief background, the Society of Chartered Surveyors represents over 2,000 qualified chartered surveyors and a further 1,000 graduate trainees who are undergoing their assessment of professional competence in order to achieve the gold standard of chartered status. Members of the Society are typically professionals employed in the land, property and construction markets through private practice, in central, regional and local government, in public agencies, in academic institutions, in business organisations and in non-governmental organisations.

The broad areas of expertise within the SCS include:

- Quantity Surveying
- Building Surveying
- Valuations surveying
- Planning & Development
- Geomatics & Land surveying

The Society would make the following observations but is generally supportive of the strategic policy and objectives contained within the draft plan. The Council is to be complimented on the clarity and legibility of the draft document.

INFRASTRUCTURE:

We wish to highlight the importance of the Metro North and Metro West projects which will ensure that the metropolitan areas of Fingal are linked with each other, the city centre and the airport. Without completion of both projects there will be leakage of investment from the county or an imbalance within the county. An interim objective could be included for the completion of Metro West within the county boundary, connecting the new Dunboyne rail line to the airport and another key infrastructure project Sports Campus Ireland at Abbotstown, within the timeframe of the Development Plan (2017). The Society would suggest that an objective also be included to encourage interim and complementary investment in the Quality Bus Corridor Network and local bus services

While economic development has slowed in recent years the SCS considers that the objectives for upgrade of Ringsend Waste Water Treatment Plant, the construction of the orbital sewer and the upgrade of treatment plants in the northern county should be pursued to improve the quality of treatment of existing waste and to increase capacity to allow for future developments at any upturn.

ENTERPRISE AND EMPLOYMENT

The SCS notes the introduction of an objective to develop the Metro Economic corridors and the introduction of supporting zoning class ME. A further development of this initiative may be to develop specific design standards including a height strategy to ensure appropriate density, form and design. The S.49 levy scheme along this corridor is further mentioned below.

DECONSTRUCTION

Deconstruction is the systematic disassembly of a building in order to maximize the salvage of reusable building materials first and to recycle materials second. Salvaging reusable building materials reduces the amount of construction waste routed to landfills and reduces the demand on virgin resources. Deconstruction and salvage are more labour and time intensive than standard

demolition and many developers opt simply to demolish existing structures rather than incur the delay deconstruction and salvage will impose.

Applications for private developments could be granted a demolition permission prior to the granting of the actual planning permission in relation to the scheme. The new permitting process would allow early site access to applicants who agree to remove a structure through deconstruction rather than through a standard demolition process. This would allow contractors and developers to commence deconstruction and disassembly in advance of commencement of the actual construction. The developer would be taking a risk on the grant of permission by deconstructing prior to grant of the final planning but it would allow the option of disassembly without the usual time constraints which occur in the normal building process.

This will provide developers more time to deconstruct an existing structure and increase the salvage of reusable building materials. The deconstruction option may be used if a complete planning application has been submitted (rather than granted); and a Waste Management Plan has been submitted to outline the intended reuses and strategy for disposal of the waste. The Waste Management Plan should show the following targets are achieved:

- A minimum of 20% of the building materials, by weight and excluding brick and concrete, will be reused.
- A minimum of 50% of the building materials, by weight and excluding brick and concrete, will be reused, recycled or beneficially used.
- 100% of brick and concrete will be reused, recycled or beneficially used.

Upon completion of deconstruction, a final Waste Management Report should be required identifying the actual rates of salvaged and recycled materials.

DESIGN FOR DISASSEMBLY

The principles of *Design for Disassembly* (DfD) should be integrated into the design and construction methods for proposed developments as part of the planning application. DfD requires a consideration of how the elements and components of a building can be disassembled without damaging them so that the component, element or material can be re-used and its value retained when the building is altered, refurbished or completely disassembled. This will save a large amount

of construction and demolition waste going to landfill. It would also retain the value of the building for the owner when it reaches the end of its useful life or undergoes any degree of change. The SCS proposes that a report outlining how these principles are achieved should form part of a planning application in all developments in excess of say, 10 housing units and commercial developments in excess of 1,000 m².

‘To promote the reuse of building materials, recycling of demolition material and the use of materials from renewable sources. In all developments in excess of 10 housing units and commercial developments in excess of 1,000 m² a Design for Disassembly report should be submitted showing how the building materials can be deconstructed and disassembled without damage to allow for reuse.’

HEIGHT POLICY

The impact of taller buildings on vistas is a contentious issue, but one that needs to be resolved without stifling development in an already depressed market. The visual impact of taller buildings should be assessed on a case by case basis, specific to the individual site in question to establish the effect on the environs (both close to the site and also across the relevant townscape in terms of roofline).

The City of London addressed this issue by identifying a series of protected vistas and publishing a supplement to the London Plan, which provides planning guidance on high-rise development proposals. “**The London View Management Framework**” provides technical guidance to built environment professionals on the use of Qualitative Visual Assessment techniques and the Management of Protected Vistas by Geometric Definition. This approach has the merits of clearly identifying strategic views, vistas and townscapes that are important to the natural and built environment and providing a wide and objective means of assessing the potential impact of a development proposal.

High rise structures are appropriate for many reasons such as marking regeneration, gateways, location to high density transport centres or prestige. Apart from the visual impact of high-rise buildings and high-rise clusters on the urban and regional skyline, there are also urban and regional implications for public infrastructure capacity.

The 'Height Strategy' for Fingal should be clearly set out, be consistent in terms of overarching policy and provide a rational point of guidance for the design parameters which we believe must be successfully applied to intensified development throughout the city. This Height Policy should be alert to and flexible towards the optimum utilisation of landbanks which become available within the existing urban fabric. In particular where thresholds of site size are achieved, which can allow for a fuller spectrum of land uses to be delivered on site, and where proximity to good quality public transport is available, the final policy must continue to be supportive of design led solutions to successful intensification and height at these locations.

URBAN DESIGN AND GREEN INFRASTRUCTURE

The introduction of sustainable and green infrastructure objectives are laudable. For instance rainwater harvesting should be standard in all medium and large scale developments. However the effect build on costs of these more onerous design standards together with significant additional financial contributions (S.49 schemes) along the Metro routes could lead to development becoming uneconomic in the very place it is to be promoted.. The SCS would suggest that an economic analysis of the cumulative effect of these objectives and levies be undertaken.

Should the Council wish to discuss any of the above issues in greater detail please do not hesitate to contact the undersigned.
