

Cllr. David Healy  
Green Party/ Comhaontas Glas  
Howth/Malahide Ward 54,  
Páirc Éabhóra  
Beann Éadair  
Co. Bh.Á.C. D13 DY28  
[david.healy@cllrs.fingal.ie](mailto:david.healy@cllrs.fingal.ie)  
[www.davidhealy.com](http://www.davidhealy.com)  
17th December 2024

An Bord Pleanála  
64 Sráid Mhaoilbhríde  
Baile Átha Cliath 1  
D01 V902

Re: Observations on ABP-321299-24, Fingal County Council F24A/0794E

A chairde,

I would like to make the following observations on the above application:

The Council's decision in relation to the application is correct. The proposal should not involve the demolition of the existing house and the loss of important local trees; instead it should sensitively fit additional housing into the site without major negative impacts on the landscape of the site itself nor on the residential amenity of neighbours.

There have been good models in many locations for the development of additional residential units in the large gardens of old large houses. One particularly successful example in the vicinity is Woodside, on Balkill Road and Windgate Road.

The application is required by the Fingal Development Plan to address the sustainability of the proposal to demolish the existing house, as follows:

*"Where demolition is proposed, the applicant must submit a demolition justification report to set out the rationale for the demolition having regard to the embodied carbon of existing structures as well as the additional use of resources and energy arising from new construction relative to the reuse of existing structures."*

The sustainability analysis needs to be carefully examined to evaluate it against the Development Plan obligation. What has been offered is a brief summary of the output of a Life Cycle Assessment. The full scope and assumptions of the analysis need to be made available. The summary presented raises some significant issues which need to be addressed to understand the conclusions reached.

1. The analysis refers to the refurbished house being made “heat pump ready” and even references the policy in the National Retrofit Plan to use heat pumps to decarbonise buildings as part of retrofit.

However, while it mentions three times that the new build option will use heat pumps, it doesn’t specify the heat source for the refurbished building. On the other hand, the overwhelming size of the “oil-based fuels” circle on p.18 hints that the building will be heated by an oil-based fuel. There’s no clarity on this, not to mind a discussion or explanation in the sustainability report.

It is possible that what is being offered is a comparison of, on the one hand, a “heat pump ready” retrofitted building heated by fossil fuel heating and on the other hand, newly built buildings with heat pumps. If that is the case, it would severely skew the comparison.

2. The analysis assumes the inclusion of photovoltaic panels on the option of replacement houses but presumably not on the refurbished house. This is also not discussed or explained and would further skew the comparison.
3. It appears that an option of extension as well as refurbishment of the existing house was also considered. This should have been reported on as well.
4. The analysis seems to have been restricted to the operational and embodied carbon dioxide emissions. It needs to also consider the impacts of waste production, and the various criteria associated with increased materials use other than greenhouse gas emissions, (including biodiversity and water impacts.)

Given the essential importance of reducing the environmental impact of buildings, reflected in the Development Plan as well as national policy, I urge the Board to require the submission of the full sustainability analysis already done and to require that that analysis also cover sustainability aspects other than greenhouse gas emissions, including the generation and transport of waste from the demolition option. The Board may wish to have regard to the RICS standard, Whole life carbon assessment for the built environment, Global 2nd edition, Version 3, August 2024.<sup>1</sup>

In conclusion, with a refusal so strongly based in a number of elements of the Fingal Development Plan, it is something of a surprise to see an appeal of this decision. I urge the Board to uphold the Council’s original decision and to additionally explicitly refuse on the

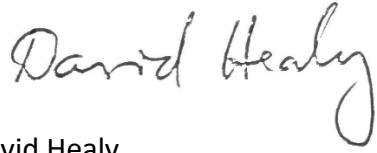
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<sup>1</sup>[https://www.rics.org/content/dam/ricsglobal/documents/standards/Whole life carbon assessment PS Sept23.pdf](https://www.rics.org/content/dam/ricsglobal/documents/standards/Whole%20life%20carbon%20assessment%20PS%20Sept23.pdf)

grounds of unsustainable and unnecessary demolition in line with the Fingal Development Plan.

Thank you for considering the above observations.

Best regards,

A handwritten signature in black ink, reading "David Healy". The script is cursive and fluid, with the first name "David" and last name "Healy" clearly distinguishable.

David Healy