

Cllr. David Healy  
Howth/ Malahide Area  
Fingal County Council,  
Swords,  
Co. Dublin

8<sup>th</sup> July 2021

An Bord Pleanála,  
Marlborough St.,  
Dublin 1

**Re: TA06F.310413, Deer Park, Howth**

A chairde,

I refer to the above application and make the following observations:

The development is in breach of the Fingal County Development Plan and the Howth Special Amenity Area Order, and I recommend that the application be refused.

The site has a long-standing residential zoning and, along with all or most of the community, I consider that zoning to be appropriate. The understanding of that zoning has always been for residential development of a scale similar to the adjoining housing which is one and two stories high.

The current application, while relying on the zoning in the Development Plan is in breach of many of the other requirements of the plan, as has been set out by Fingal County Council planners both in pre-application consultations and in response to the application.

In particular, it would have a severe negative impact on views from the Special Amenity Area Order. It would also negatively change the context both of the Howth Castle gateway and of the entrance to the town of Howth.

The application would have a particularly severe negative impact on the adjoining housing, overlooking single-storey and two-storey houses.

The application documentation demonstrates that it would both block sunlight from these neighbours and also fail to provide adequate daylight and sunlight to apartments within the proposed complex. It is a clear overdevelopment when a site

in such an open location fails to provide enough natural light to units within the development .

I can see a case being made for a medium density development on the site of two stories height beside the existing housing, rising to three stories but with the height at the east being such as to not take away from the context of the gateway to Howth Castle.

Item 25 of the SHD application from says that the application encloses "a statement as to how the proposed Strategic Housing Development has sought to comply with the principles of Universal Design (to encourage access and use of the development regardless of age, size, ability or disability)." I can't find this on the developers' website or the Council's website and Fingal County Council officials whom I have asked haven't been able to identify it to me. It may be that the information supplied to the public is incomplete. As you know, the County Development Plan (p.59) requires compliance with these principles:

"In all cases, development must be in accordance with the principles of universal design."

If the statement of compliance with Universal Design principles exists, it should be made available to the public. If it doesn't exist, the Board should find a way for this issue to be addressed by the applicant including providing for public participation and input from Fingal County Council in relation to how the applicant proposes to comply with the principles of Universal Design.

I urge the Board to refuse this application.

Best regards,

David Healy