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An Bord Pleanála,
Marlborough St.,
Dublin 1

Re: TA06F.313133 Site at Balcadden Road and Former Bailey Court Hotel, Main St., Howth, Co. Dublin

A chairde,

Please find below my observations on the above application.

In principle, the development of this site, combined from some other sites and which has been the subject of a few SHD applications, is welcome. The urban form chosen, a new pedestrianised street between Main St. and Balcadden Road, is particularly welcome.

However, some elements of the application directly contradict others and if granted as is, it will not be clear what permission has been granted for, or members of the public looking at the application will have been misled.

Specifically, the street frontage on Main St. show in the photomontages is of a continuous footpath along the front of the new development area. The drawings, however, show an entrance road leading to underground car parking in the development.

In addition, the development applied for has a number of elements which are in conflict with important elements of the Fingal Development Plan (FDP).

This site has a specific objective in the FDP:

“Ensure the layout, scale, height and design respects the high amenity status of the surrounding area, the Martello Tower and the village character.”

This reflects the site’s context, including

- part of it falling within the Howth Architectural Conservation Area, which also includes the Martello Tower to the north of the site,
- the status of the Martello Tower and former castle site on Tower Hill as
 - a Recorded Monument and
 - a Protected Structure, and
- the protection of views in all directions all around Tower Hill

The photomontages demonstrate that the development will obstruct the views from the Martello Tower southwards and southwestwards over the core of Howth. It will impinge on views of Tower Hill from many areas of Howth, including from along the length of Balscadden Road and seriously detract from the historical background of the Martello Tower as a lookout point.

The development should be reduced substantially in height to fit in to this highly sensitive natural and cultural landscape. Note that such a reduction would also make the development more consistent with the population targets for Howth in the Core Strategy of the County Development Plan.

The excavation of underground carparking areas is the source of great local concern, including in relation to the risks of disruption of underground streams through the moraine, and in relation to the stability of the loose glacial deposits on the site and adjoining roads and lands. The excavation will lead to great local disamenity, with extensive truck movements, associated exhaust and soil particulate pollution, and safety risks on local streets and roads. The car parking is not necessary for the development which is in the core of a historic village, well served by public transport.

The development should be amended to remove the car parking or reduce it substantially. This would be consistent with the intention of the current Fingal Development Plan which seeks to reduce car parking in areas well served by public transport and which is proposed to be given a more detailed implementation in the next Fingal Development Plan which is at public consultation at the moment.

In addition, but especially if the excavation is permitted, conditions should be imposed to mitigate the road safety and air pollution impacts including that all trucks be Euro VI compliant¹ and that they meet the Direct Vision Standard.²

The building replacing the Baily Court Hotel is significantly better than that proposed in the previous application but it still could be more consistent with the Architectural Conservation Area which it is at the centre of.

I am paying a €20 fee under protest as the Board has been unable to identify for me any statutory basis for the imposition of a fee for the making of an observation on a Strategic Housing Development Application.

Thank you for considering the above observations.

Is mise, le meas,

Cllr. David Healy

¹ <https://ec.europa.eu/environment/air/sources/road.htm>

² <https://tfl.gov.uk/info-for/deliveries-in-london/delivering-safely/direct-vision-in-heavy-goods-vehicles>