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Fingal County Council
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By email to <planning.submissions@fingal.ie>

Re: Deer Park Hotel Application F22A/0372 Additional Information

A chairde,

I refer to my previous observations on this application. It remains the case that I welcome the upgrading of the existing hotel and the improvement of but there are a number of elements of the application which are concerning. I have the following additional observations.

1. New access road

Nothing in the additional information received demonstrates a need for an additional road through this sensitive landscape or changes any of the considerations highlighted in previous observations and Council reports. I strongly support the decision to refuse permission for this road under the parallel application F22A/0046 (currently under appeal to An Bord Pleanála.) It is vital that permission is refused for this element of the application.

2. Demolition and replacement

In my previous obligations I pointed to the need for “the applicant to set out the options and make the case for full demolition and replacement.” This issue wasn’t addressed in the Additional Information.

In the new Fingal Development Plan 2023-2029, this is now an obligation:

“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.”

3. Pedestrian permeability

Howth Demesne and the Deer Park Hotel are currently accessed by foot from a number of long-standing access points, including paths through the Rhododendron Gardens and paths connecting from the Tramway including the historic “Church walk” between Howth Church and Howth Castle, which was retained during the construction of Grace O’Malley Road in 1950s.

The previous and new owners have maintained a public commitment to public access to the Demesne. This has recently been demonstrated in the new owners' appeal to An Bord Pleanála against some of the conditions in F22A/0046, which included this extract from their Masterplan: historic and visual impact in this area.



^ Extract of Howth Castle Estates masterplan illustrating the proposed wider Greenway masterplan and the proposed connections to the surrounding fabric of Howth Peninsula. These future links allow for clear connectivity between Howth and Sutton as well as within the grounds of the estate

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However, recent experience and correspondence from the new owners with regards to fences and gates have created confusion and considerable concern. In line with the policies of the Development Plan, the decision on this application should ensure pedestrian accessibility between the hotel and the neighbouring town and residential areas.

Thank you for considering the above observations.

Best regards,

David Healy

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