

**Cllr. David Healy**  
Howth / Malahide Area  
Green Party/Comhaontas Glas  
Fingal County Council  
Main St.  
Swords  
Co. Dublin  
[www.davidhealy.com](http://www.davidhealy.com)  
[david.healy@cllrs.fingal.ie](mailto:david.healy@cllrs.fingal.ie)  
+353 87 6178852  
**25<sup>th</sup> August 2023**

**An Bord Pleanála**  
64, Marlborough St,  
Dublin 2

**Re: Deer Park Hotel Application F22A/0372 Appeal**

A chairde,

Please find below my grounds of appeal in relation to the above application.

I agree with the principle of a hotel use of the site and welcome the intention to upgrade and improve of the existing hotel. However, there are a number of elements of the application which are concerning.

**1. Demolition justification report**

In my initial observations 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 request or response.

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.”

This hasn’t happened. The demolition justification report should use Life Cycle Assessment of the alternatives, i.e. the demolition option as well as a range of refurbishment options. That Life Cycle Assessment needs to follow the standard EN15978 and covering the same scope for all alternatives considered, including all building elements. (Given that electricity grid is expected to decarbonise in the next decade the SEAI’s forecast on the carbon intensity of the grid each year should be used where electricity is the energy source.)

**2. 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. These paths give access to the Hotel, the Golf Course and the Castle, as well as to Aideen's Grave, the dolmen to the east of the Hotel.

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:



^ 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

However, recent experience and correspondence from the new owners with regards to fences and gates have created confusion and considerable concern.

This is both a matter of access to amenity land and to places of natural and historic heritage, and a pedestrian permeability issue for customers and staff of the Castle, Hotel and Golf Course. In line with the policies of the Development Plan on both these access topics, the decision on this application should ensure pedestrian accessibility between the hotel and the neighbouring town and residential areas and with the other amenity lands in Howth.

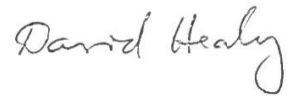
### 3. Duplicate access road

I strongly support Fingal County Council's decision to refuse permission for the proposal for an additional major access road in both this application and in F22A/0046.

I attach the acknowledgement of my initial observations on this applicaitonn.

Thank you for considering my appeal.

Best regards,

A handwritten signature in cursive script that reads "David Healy". The signature is written in black ink and is positioned below the text "Best regards,".

Cllr. David Healy