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

**Re: Observations on ACP-323581-25 (formerly ABP-317883-23), Fingal County
Council F22A/0372**

A chairde,

Thank you for the opportunity to make observations on the additional submissions by the applicant. As I said in my original appeal, I agree with the principle of a hotel use of the site and welcome the intention to upgrade and improve the existing hotel. These observations relate to the issues in my original appeal.

1. Demolition

I am pleased to see that subsequent to the remittal of the appeal to the Commission, the applicant has submitted a demolition justification report and that it is made up of the two essential elements required by the Fingal Development Plan, i.e. it sets out architectural options for retention as well as demolition and it offers a life cycle analysis comparing between the options.

I lack the relevant specialist expertise to evaluate these technical documents so I can't make any detailed comment on their substance, beyond the fact, as mentioned above, that they appear to address the analytical questions required to be addressed by the Development Plan. However, I would emphasise that the Commission must ensure that it brings the necessary expertise to its consideration of the demolition justification report.

The Development Plan provisions on demolition create a need for the planning system to engage with life cycle analysis, a discipline which has typically not been central to spatial planning. However, it is required by the text of the Plan. It is also essential in practice for the planning system to take on the task of integrating sustainability objectives into its decisions. While many other elements of reducing the embodied carbon impacts of the built environment can be tackled in building regulations etc., questions of demolition require the integration of a range of factors including comparisons based on life cycle analysis. Therefore, I urge the Commission to ensure that it brings the necessary expertise in life cycle analysis and architecture to its analysis.

2. Pedestrian permeability

As I said in my original appeal:

“Howth Demesne and the Deer Park Hotel are currently accessed by foot from a number of longstanding 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.”

The Inspector’s report on ABP-317883-23 mentioned this ground of appeal but entirely failed to engage with it.

The Fingal Development Plan is very strong on permeability, for example:

“Policy CMP14 – Permeable Neighbourhoods

“Implement the provisions of the Design Manual for Urban Roads and Streets 2019 (DMURS) and the DMURS Interim Advice Note – Covid 19 Pandemic Response 2020 in relation to the delivery of safe streets and overall best practice design and promote the principle of filtered permeability in new developments to ensure that all pedestrian entrances are opened as soon as any new development is occupied where feasible and seek opportunities to improve permeability in existing developed areas in accordance with NTA’s Permeability Best Practice Guide.”

This reflects a similar emphasis found in the Eastern and Midland Regional Strategy, including the following Guiding Principle:

“New development areas, including peripheral areas, should be permeable for walking and cycling and the retrospective implementation of walking and cycling facilities should be undertaken in existing neighbourhoods, in order to give a competitive advantage to these modes. Where possible, developments shall provide for filtered permeability.”

Good permeability for this hotel is important for a number of reasons:

- The hotel is a short walk from the built-up area of Howth. Currently, with the hotel accommodating refugees from Ukraine, there is a busy pedestrian route from the hotel to the town, used by hotel residents as well as by local residents accessing the golf course. Assuming the reopening of the hotel in line with the permission when the refugee crisis is over, we can expect pedestrian traffic back and forward to the town made up of three main groups: hotel employees, hotel residents availing of the amenities of the town, and local residents availing of the amenities of the hotel and golf course.
- Howth Demesne, which is in the buffer zone of the Howth Special Amenity Area Order, hosts Aideen’s Grave, an important National Monument. It is important that access to the Monument is maintained.
- As recognised by Tetrarch in their Masterplan (quoted in their appeal F22A/0046), it is very desirable to have pedestrian permeability through the Demesne.

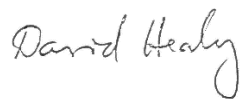
The Commission has an opportunity, by condition, to ensure pedestrian permeability in this development, within the landholding of the applicant. I suggest that a condition should be drafted to require access a) to the Tramway at Grace O’Malley Road, to the looped walks in the area near the GAA/ Bog of the Frog, to Offington, and to Old Castle Avenue, with the details to be agreed with the Council, and specifying that the exact routes are to be flexible in line with the management needs of the Demesne.

3. Duplicate Access Road

I fully support Fingal County Council's analysis and the ABP Inspector's analysis of this element of the proposal in ABP-317883-23. I urge the Commission to refuse permission for it for the reasons stated in my appeal.

Thank you for considering the above observations.

Best regards,

A handwritten signature in black ink that reads "David Healy". The signature is written in a cursive style with a large, looped 'D' and a trailing flourish.

Cllr. David Healy