



Development	Construction of a 2 storey extension, refurbishment of dwelling, existing dwelling will be connected to the proposed extension at lower ground floor level.
Location	The Ends, Bally, Carrickbrack Road, Howth, Co. Dublin.
Planning Authority	Fingal County Council
Planning Authority Reg. Ref.	F19A/0344
Applicant(s)	Monterey Ros Limited
Type of Application	Permission
Planning Authority Decision	Refusal
Type of Appeal	First Party
Appellant(s)	Monterey Ros Limited
Observer(s)	Roxanne White RKD Architects Michael O'Neill Town Planning Hillwatch
Date of Site Inspection	30 th of January 2020
Inspector	Angela Brereton

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DECISION QUASHED

1.0 Site Location and Description

- 1.1. The application site has an area of c.1.08ha and is located on the southern side of Carrickbrack Road, Howth, Co. Dublin. There is an existing centrally located dwelling on site which is accessed via a narrow private roadway from Carrickbrack Road. The private access road is elevated in parts and the ramp slopes downward in a serpentine/spiral fashion due to the steep slope of the site and forms part of the access to the dwelling known as 'The End'.
- 1.2. This habitable dwelling comprises an unusual single storey type structure with roof garden which was designed by renowned Architect Andrew Devane. It has been previously extended with similar type single storey extensions on either side and a conservatory and decking at the rear. The dwelling is currently occupied and used for living accommodation. While there are few windows on the northern elevation, the southern elevation commands views of the sea. The rear garden area is accessed by steps and is at a lower level. The site slopes steeply downwards and there is a pathway to the Cliff Walk.
- 1.3. There is an existing single storey structure in the north-western corner of the site, adjacent to the vehicular entrance known as 'The Shack'. The interior has been fitted out as living accommodation but does not appear to be currently inhabited. There is a small platform used for parking in front of this which adjoins the access ramp.
- 1.4. The site is steeply sloped from north to south. There is a ground differential of c.36m between the entrance gates and the Howth Cliff Walk which features in the southern portion of the site. There is a steep path from the house to this walk. The subject site features a number of mature trees particularly in the northern portion of the site. Views across the site from the road and path are limited by the mature pine planting. In view of its setback and lower level, the house is not visible from the road.
- 1.5. There are large detached buildings to the east and west of the site (a dwelling 'Journey's End' and a convent/retreat house 'Stella Maris', respectively). The latter is currently for sale. These are set further forward and are built in closer proximity to Carrickbrack Road than the subject dwelling which is well set back from the road and screened by mature trees. The junction with Thormanby Road is to the east.

2.0 Proposed Development

2.1. This is to comprise the following:

- (i) Construction of a two storey residential extension (734sq.m) to the north of the existing dwelling, consisting of 2no. en-suite bedrooms and gym at lower ground floor, and lounge, piano room, living/dining/kitchen area, boot room, family study, family kitchen, laundry room, snug/cinema, and office at ground floor level, 2no. car parking spaces to be provided
- (ii) Refurbishment of the existing dwelling to include the provision of 3no. en-suite bedrooms with walk-in robes, reinstatement of the original roof garden. The existing dwelling to be connected to the proposed extension at lower ground floor level;
- (iii) The replacement of existing non-original sunroom with bronze metal clad structure with side windows and bi-fold doors. Provision of outdoor terrace area on roof of existing dwelling to include seating and dining area and hot tub;
- (iv) SuDS and foul drainage, landscaping, boundary treatments and all associated works necessary to facilitate development.

2.2. Documents submitted with the application include the following;

- Planning Report – Hughes Planning & Development Consultants
- Infrastructure Report – O'Connor Sutton Cronin
- Appropriate Assessment Screening Report – EPH Services
- Tree Survey Report – Independent Tree Surveys
- Carragh Garden Design – Landscape Architect
- Sheehan and Barry Architects – Conservation Architects
- Architectural and Drainage Drawings by Cheah Rothe

3.0 Planning Authority Decision

3.1. Decision

On the 26th of September 2019, Fingal County Council refused planning permission for the proposed development for the following 3no. reasons:

- 1. The existing dwelling, 'The End', is a late 20th Century designed by renowned Irish architect Andrew (Andy) Devine, of Robinson Keefe Devane. The End is considered to be an innovative building of its time and of architectural merit associated with a renowned Irish architect and as such it is considered that every effort should be made to protect the integrity of the existing dwelling. The proposed extension by reason of it's design, scale, location and unsympathetic interventions, would have a significant negative impact on the character and architectural integrity of the existing house and would be contrary to Objective CH37 and CH38 of the Fingal DP 2017-2023 and would be contrary to the proper planning and sustainable development of the area.*
- 2. The subject site is located within the Howth Special Amenity Area Order. Proposals for an extension and redevelopment within the Howth SAAO are subject to more restrictive policies in order to protect the special amenity of the area and the sensitivity of the surrounding landscape. Having regard to the proximity of the subject site to the Cliff Path Way, from where it is an objective of the Fingal DP 2017-2023 to protect views, it is considered that to permit an extension of this scale would give rise to a significant negative visual impact upon the surrounding sensitive lands and would be contrary to the proper planning and sustainable development of the area. The proposed development would set an undesirable precedent for similar unsympathetic excessively large extensions to the dwelling located within this sensitive landscape.*
- 3. Having regard to the lack of adequate information submitted with respect to the surface water drainage the applicant has failed to comply with the Sanitary Services Acts 1878-1974 (as amended) and the proposed development would therefore be prejudicial to public health.*

A note was included with the Council's decision which advised: *The Planning Officer has no objection in principle to the redevelopment and provision of an extension to the existing dwelling albeit on a significantly reduced scale than that currently proposed. However, any revised development must take due cognisance of the location of this site in this sensitive landscape and the architectural significance of the existing dwelling. Any proposal for the subject site should include the retention of the dwelling (The End) and that the design of any proposed changes or new build needs to be based on a thorough site assessment of the lands and architectural heritage assessment and analysis of the existing buildings.*

3.2. Planning Authority Reports

3.2.1. Planner's Report

The Planner had regard to the locational context of the site, planning history and policy and to the interdepartmental reports and the submissions made. Their Assessment included the following:

- The existing dwelling is considered by the County Architect, the Conservation Officer and the Planning Officer to be of architectural merit and significance.
- It is intended to assess some of the houses/buildings designed by Andrew Devane for possible inclusion in the RPS.
- A number of amended designs were presented pre-planning none of which was satisfactory.
- It was outlined that the existing spiral staircase accessing the roof is a feature of significance.
- The proposal would be overly large and dominant and will impact adversely on the existing house and on views including from the Cliff Walk within the high amenity area.
- A Tree Protection Plan that includes the entire site and An Arboricultural Impact drawing should have been submitted.
- The Water Services Section note that the applicant has submitted insufficient information with regard to both the foul sewer and surface water drainage.

- The application should include details relative to the access and entrance layout to the site (now the subject of concurrent appeal).
- It is not considered that the development would be likely to have significant effect individually or in combination with other plans or projects on any European Sites in the vicinity.
- They concluded that the proposed extension would be excessive and detrimental to the architectural merit of the existing dwelling, the surrounding landscape and to the visual amenity currently enjoyed from the Cliff Path Walkway. Also, that the proposal in its current form contravenes Objectives CH37 and CH38 of the Fingal DP 2017-2023 and would be contrary to the proper planning and sustainable development of the area.

3.3. Other Technical Reports

Water Services Department

They recommended that Additional Information be submitted relative to the provisions of a Site Characterisation Form and the proposed wwrts to comply with EPA COP standards. Also relative to further details of surface water drainage.

Parks Division

This notes that the submitted tree protection plan only relates to the location of the proposed dwelling and not the entrance or construction access route. They ask for additional information including a Tree Protection Plan for the entire site, and an Arboricultural Impact drawing to be submitted and construction related details.

Conservation Officer

They provide a description of 'The End' noting its design by architect Andrew Devane and consider that the existing building is of architectural merit and significance and should be retained. They have regard to the existing and proposed and note the need for an architectural heritage assessment and analysis of the existing buildings. They do not consider the proposed extension design and layout acceptable and provide it will have an adverse impact on the design concept of the existing dwelling.

Architects Department

They make a number of recommendations which they provide should be read in conjunction with those of the Conservation Officer. They are concerned that no real rationale has been provided for the size of the very large extension. That this proposal is an inappropriate response to an exceptional site. Also, there is a lack of clarity in the information submitted.

Transportation Planning Section

They have no objections to the proposed development but consider that the applicant should include the details of the access ramp and entrance layout - Reg.Ref. F19A/0126 (concurrent appeal ABP-305480-19 refers) by way of F.I as these works would be required to facilitate the current application.

3.4. Prescribed Bodies

Irish Water

They have no objections subject to conditions

3.5. Third Party Observations

A number of Submissions have been received including from RKD Architects and Roxanne White. These have been considered in the Planner's Report and are considered further below relative to the Third Party Observations.

4.0 Planning History

4.1. The following is noted relevant to the subject site:

- Reg.Ref. F97B/0577 – Permission granted in March 1998 for a two roomed extension to the existing dwelling on the subject site.
- Reg.Ref. F18A/0635 – Permission was sought (Nov 2018) for the demolition of the existing single storey dwelling and garage on site (1.08ha) to be replaced with a two storey over basement detached family home with two garage structures, minor widening of the existing entrance onto Carrickbrack Road, setting back of gates to improve safety, connection to on site

wastewater treatment, suds drainage, on site landscaping and all associated site development works.

The application was subsequently withdrawn on the 21st of December 2018.

4.2. Also, of note is the concurrent application on the subject site:

- Reg.Ref. F19A/0126 – Permission was granted subject to conditions by the Council for in summary the demolition of existing garage and construction of a garage, alterations to driveway, front boundary wall/fencing, driveway.

This is currently subject to Third Party appeal - Board Ref. ABP-305480-19 relates.

Surrounding Area

A list is given of replacement residential and extensions in the locale in the Planning Report submitted with the application and in the First Party Appeal and this includes the following:

'Journey's End' (now 'Due South'), 64 Carrickbrack Road, The Baily, Howth

- Reg.Ref. F13A/0177 - Permission granted by the Council in February 2014 for development (Significant Additional Information) comprising the demolition of an existing 3 storey partially complete dwelling structure and the construction of a new 3 storey dwelling house.

5.0 Policy Context

5.1. Fingal County Development Plan 2017-2023

Land Use Zoning

The site is covered by two separate land use zonings in the Fingal DP. The northern part of the site being the part of the site on which the proposed works are located is zoned 'RS'- Residential where the Objective is: *To provide for residential development and protect and improve residential amenity.* The vision for this zone is: *To ensure that any new development in existing areas would have a minimal impact on and enhance existing residential amenity.* Residential use is permitted in principle on this site.

The southern part of the site, being the part on which the existing dwelling is located is zoned 'HA' – High Amenity, the Objective of which is: *To protect and enhance high amenity areas. The vision for this zone is: To protect these highly sensitive and scenic locations from inappropriate development and reinforce their character, distinctiveness and sense of place. In recognition of the amenity potential of these areas opportunities to increase public access will be explored.* Residential uses are permitted in principle in this zone subject to compliance with the Rural Settlement Strategy.

Heritage, Design and Layout – Extensions

Objective CH19 - *Review the Record of Protected Structures on an on-going basis and add structures of special interest as appropriate, including significant elements of industrial, maritime or vernacular heritage and any twentieth century structures of merit.*

Objective CH37 - *Seek the retention, appreciation and appropriate revitalisation of the historic building stock and vernacular heritage of Fingal in both the towns and rural areas of the County by deterring the replacement of good quality older buildings with modern structures and by protecting (through the use of Architectural Conservation Areas and the Record of Public Structures and in the normal course of Development Management) these buildings where they contribute to the character of an area or town and/or where they are rare examples of a structure type.*

Objective CH38 - *Require that the size, scale, design, form, layout and materials of extensions to vernacular dwellings or conversions of historic outbuildings take direction from the historic building stock of Fingal and are in keeping and sympathetic with the existing structure.*

Objective PM46 seeks to – *Encourage sensitively designed extensions to existing dwellings which do not negatively impact on the environment or on adjoining properties or area.*

Section 12.4 provides the Design Criteria for Residential Development and includes regard to Extensions.

Objective DMS42 seeks to – *Encourage more innovative design approaches for domestic extensions.*

Landscape Character

The appeal site lies within a Coastal Landscape Character Type and on the prominent headland of Howth, which is also the subject of a Special Amenity Area Order (1999). Policies of the plan provide for residential development at a density of 1 dwelling per hectare in the vicinity of the site and to protect and preserve trees, woodlands and hedgerows on the site. Views from the footpath to the south and east of the site are identified as protected views.

The Coastal Landscape Character Type is considered to be highly sensitive to development (Table LC01) and the plan sets out principles to guide development in such areas and landscape character assessment policy objectives NH33-NH39 (see attachments). Essentially the objectives seek to preserve the uniqueness of landscape character type and ensure that development reflects and reinforces this character.

Objective NH36 is concerned that new development would not impinge in any significant way on highly sensitive areas or detract from the scenic value of the area.

Identified views and prospects are afforded protection under objective NH40 of the Plan. Special Amenity Areas, including the Howth Special Amenity Area, are afforded protection under policy objectives NH44 in accordance with the relevant Order.

Objective RF51 - *Ensure that the development of any coastal site through the extension or replacement of existing buildings or development of any new buildings is of an appropriate size, scale and architectural quality and that it does not detract from the visual amenity of the area or impact negatively on the natural or built heritage.*

Natura 2000 sites are afforded protection under policy objective NH15 of the Fingal County Development Plan.

Howth Development Plan Objectives

Objectives Howth 1- 6 refer and of note are:

Objective Howth 1 – *Ensure that development respects the special historic and architectural character of the area.*

Objective Howth 4 – *Protect and manage the Special Amenity Area, having regard to the associated management plan and objectives for the buffer zone.*

5.2. Howth SAAO, 1999

The appeal site falls within a defined 'Residential area within the Special Amenity Area' (see Map A of Order). Further, the following features are identified for protection in the vicinity of the site (Map B of the Order):

- Footpaths to the south and east of the site,
- Mature trees in gardens, to the north and south of the proposed dwelling,
- A proposed natural heritage area to the south and east of cliff walk.
- Heathland and maritime grassland, south east of cliff walk.

Schedule 1 of the Order sets out a number of objectives for the enhancement of the Special Amenity Area. Objective 1.1 includes to manage the area in order to conserve its natural and cultural assets and protect the amenity of local residents.

Schedule 2 of the Order sets out objectives for the preservation of the character or special features of the area, these include, to preserve views from public footpaths and roads (Objective 2.1), to preserve woodland (Objective 2.5) and to preserve the wooded character of existing residential areas (Objective 2.6).

Schedule 3 of the Order sets out objectives in respect of development in residential areas, as defined in Map A. These include to protect residential amenity, to protect and enhance the attractive and distinctive landscape character of the areas and to ensure that development does not reduce the landscape and environmental quality of adjacent natural, semi-natural and open areas.

5.3. Natural Heritage Designations

Regard is had to the relevant and proximate Natura 2000 sites in the AA Screening Section below. This includes in Table 1 details of the Proposed Natural Heritage Sites in the area.

5.4. EIA Screening

Having regard to the nature and scale of the proposed development and the nature of the receiving environment there is no real likelihood of significant effects on the environment arising from the proposed development. The need for environmental impact assessment can, therefore, be excluded at preliminary examination and a screening determination is not required.

6.0 The Appeal

6.1. Grounds of Appeal

Hughes Planning & Development Consultants have submitted a First Party Appeal on behalf of the Applicant against the Council's reasons for refusal. This includes regard to the proposed development and locational context of the site, planning history and policy. Their grounds of appeal include the following:

Proposed Development

- The application was submitted in response to the pre-panning consultation and the specific direction of the PA on the protection of the existing dwelling and location of the extension.
- The existing dwelling will form an integral part of the proposed development and will integrate seamlessly with the proposed extension.
- It is proposed to reinstate several of the features of the original house and they refer to the Conservation Report submitted.
- A detailed description is given of the proposed development and reference is had to the architectural drawings and design evolution document prepared by Cheah Rothe and the Infrastructure Report and associated drawings, prepared by O'Connor Sutton Cronin and Associates.

Grounds of Appeal

In response to the reasons for refusal Section 5.0 of the First Party Appeal Submission considers the proposed development and includes regard to the following headings:

Architectural Merit of Existing House

- They do not refute the importance of Andrew Devine's work in Irish architecture, most of which was carried out under the banner of RKD Architects. They note fine examples of his work.
- They submit that The End is not one of the finest examples of RKD's work in Ireland and, therefore, it is not of great architectural merit as described by Fingal County Council for several reasons and they provide details of these.
- They provide examples of what they consider his greater works. They provide that a building designed by a known and well-regarded architect does not mean it is a building of architectural importance.
- They consider it unfair to refuse permission based on the importance of the structure when in fact so little of the original structure exists. They include figures and drawings showing existing and proposed.
- They have regard to the extensive redevelopment of Journey's End, also designed by Andrew Devine on the adjoining site to the east.
- The End is not a protected structure, nor is it located within an ACA and the Planning Authority should not have treated it as such.
- The most recent recording of additional protected structures carried out by the Council in 2016 did not include The End.
- They submit that the Applicant has complied with Objectives CH37 and CH38 of the Fingal CDP 2017-2023 in full.

Applicant's Design Interventions

- The Applicant started the pre-panning process before purchasing the site in 2017. They refer to and provide details of pre-planning meetings/consultations carried out.
- The Applicant has worked with the design team to comply with advice given by Fingal County Council. The proposed design has been reduced in scale significantly in order to achieve a design which is suitable to the site.

Consideration of Previous Applications for RKD Designed Buildings

- As part of the planning application they engaged the services of a Conservation Architect to direct and design the proposed extension as well as assess the existing structure on site.
- They note examples of other what they consider to be more note-worthy and prominent buildings designed by Andrew Devane.
- They consider that the existing building has been heavily altered over the years and have regard to previous extensions.
- The Planning Authority have shown great inconsistency in their handling of structures designed by Andrew Devane. They consider that the Applicant has been unfairly treated by the P.A. in their assessment of the proposed development.
- The existing elevated driveway, which is the subject of a separate appeal, is extremely dangerous and does not suit a family home.

Howth SAAO – Protected Views

- They have regard to the Visual Impact Assessment submitted and provide that it accurately reflects the impact of the proposed development on this section of coastline.
- They note that their site visit found that the existing dwelling The End is not readily visible from the Cliff Path. Neighbouring dwellings that have been recently approved are much more visible. They include photographs.

Emerging Built Form, Character of the Surrounding Area

- The precedent has been set for larger dwellings facing the coastline (Figure 69 refers). Table 1 provides a listing of planning applications relative to site and floor areas. Details of these are given of recent permissions in the area.
- They consider that the proposed dwelling at The End is not over bearing or over scaled. It is similar to some of the developments in the area in that it does not impact on protected views.
- Given the smaller scale of the proposed development, its interaction with the topography and that fact that it seeks to retain the existing dwelling, it is

submitted that the extension and refurbishment at 'The End' should be granted permission.

Surface Water Drainage

- They submit that a letter prepared by O'Connor Sutton Cronin Consulting Engineers supports a previous drainage report submitted by the Applicant (Appendix E refers).
- It is submitted that the issue of surface water drainage has been adequately dealt with and any further concerns could have been raised by way of F.I. They ask that additional information is sought by way of condition.

Conclusion

- They conclude that the proposal is acceptable and in accordance with planning policies and objectives, would ensure the survival of the existing house, and would not detract from the residential amenity and character of the area.
- They have submitted a number of Appendices providing background details and in support of their proposal. These include a Planning Dialogue showing various design concepts. A Design Statement has also been submitted.
- In response to the Council's decision to refuse, they have instructed their design team to prepare an alternative design option for consideration by the Board (Appendix F refers). Revised drawings have been submitted.

6.2. Planning Authority Response

This includes the following:

- The application was assessed against the policies and objectives of the Fingal DP 2017-2023, also, those of the Howth SAAO and existing government policy and guidelines.
- The proposal was assessed having regard to the development plan zoning objective as well as the impact on adjoining neighbours and the character of the area.

- Having reviewed the grounds of appeal they remain of the opinion that the proposal would be detrimental to the architectural merit of the existing dwelling, the surrounding landscape and the visual amenity from the Cliff Walkway from which it is an objective of the Fingal DP to protect views.
- The footprint and scale of the existing dwelling sits sensitively into the landscape and is of architectural merit and significance. It is the intention of the PA to ensure that the The End be included in future reviews of the RPS given its significance.
- It is the opinion of the County Architect, the Conservation Officer and the Planning Officer that the subject dwelling is of architectural merit and significance. They are of the opinion that the dwelling forms an important part of the historic building stock and vernacular heritage of Fingal. As such they consider that Objective CH37 of the Fingal DP applies.
- The proposal does not fully reflect the advice given as pre-planning stage. The applicant was further advised that a redesign would be required based upon the findings of additional contextual analysis.
- To permit an extension of this scale would have a significant negative impact on protected views from the Cliff Walk and surrounding landscape. The proposed development does not comply with SAAO policy and objectives.
- The dwellings/extensions referred to as examples of precedent are located closer to the road and present different issues and do not form part of a house with such a unique local individual context.
- The First Party Appeal does not provide any information that would warrant a reversal of the decision of the PA to refuse planning permission. They ask the Board to uphold their decision.
- In the event that their appeal is successful, they ask that provision be made for inclusion of a Section 48 Development Contribution condition.

6.3. Observations

Third Party Observations have been received from the following:

- Roxanne White
- RKD Architects
- Michael O'Neill Town Planning
- Hillwatch

These Observations all raise concerns about the proposed development and for convenience they are grouped together under the following headings:

Architectural Significance of The End

- The architectural significance of 'The End' designed by renowned architect Andrew Devane is discussed by RKD Architects who consider that this has not been addressed in the subject application.
- They consider that 'The End' satisfies the special interest criteria as set out in Part IV of the Planning and Development Act 2000 under the headings: architectural, historical, artistic, cultural and technical.
- It is important to consider the whole of the site. Insufficient assessment of the Architectural Heritage importance of the site has been undertaken.
- Concerns about the adverse impacts on the re-ordering of the design and layout of 'The End'. Details of this are given relative to the impact on various significant features and including the interior which should be retained.
- The proposed extension is excessive, would detract from the design of The End and is not subordinate in either scale or size to the original house. The proposal should reflect the vernacular house types in Howth.
- In compliance with the Objectives of the Howth SAAO the proposal should not be larger than 20% of the original house.
- It would appear as a replacement house and would completely overwhelm the existing house and not be in character with it or with the area. The End is an exceptional design and should be preserved and designated as a protected structure.

Impact of Trees and Landscape

- An Aerial photo is included showing the differences between the previous denser tree cover and the current situation.
- They query as to why so many trees are marked for removal without direct replacement. There is a need to preserve the trees to protect the character of the site. They note the need for a Landscape Architect to be employed.
- Concerns about tree removal and protection – construction works will impact adversely on trees on site.

Impact on the Character of the Area and Howth SAAO

- The location in the Howth SAAO (1999) has not been given due consideration in the design of the proposed development on site.
- The proposal would not comply with Policy 3.4.2 of the SAAO i.e Design guidelines which apply to new development including extensions.
- The proposed development is in material contravention of the Fingal DP and a breach of the Objectives of the Howth SAAO and should be refused on these grounds. Support for the Council's reasons for refusal
- This is the only house in Bally, the south side of Howth, so close down to the sea on the Cliff Path built for 70 years, so it is special and unique. There are no other houses located midway on site in the High Amenity zone that have got permission for such large extensions.
- It would impact adversely on protected views from the Cliff Walk and from Dublin Bay. Regard is had to visual images submitted.
- It would set an undesirable precedent. Many of the examples of other build noted by the Applicant are not relevant to the subject application site.
- It will impact adversely on the High Amenity zone, and 'Other Areas of Special Amenity Area' and the character of the area.
- It will impact adversely on Ecology and Bird Life. Sufficient consideration has not been given to the impact on these issues and the proximate Natura 2000 sites.

Drainage

- This proposal has inadequate water drainage and septic tank detail, which is significant noting its location within the HA zone and SAAO.
- Sufficient detail has not been given to the design of the drainage system and to the impact on trees on the site.
- There is a need to ensure that it does not lead to pollution issues relative to the proximity of Dublin Bay and a local swimming beach nearby.

Other issues

- Lack of clarity in the details submitted.
- Details relative to the impact of construction works need to be submitted.
- If the Board decides to permit conditions are needed relative to landscaping and to limit light pollution considering the locational context of the site.

7.0 Assessment

7.1. Principle of Development and Planning Policy

- 7.1.1. The site is covered by two zonings, being Residential on the northern part and High Amenity to the south. The existing house is within the lower part of the site within the High Amenity zone. However, works proposed in the current application comprise an extension to the rear of the existing house and are confined primarily to that part of the site that is zoned residential.
- 7.1.2. The single storey house on the subject site, is known as 'The End' and was designed by renowned Architect Andrew Devine and is located well set back from the public road within the high amenity zoning. This is not included on the Record of Protected Structures, nor is the site located within an Architectural Conservation Area (ACA). There are however, a number of preserved views in the area. Also, of importance is that the site is located within the Howth Special Amenity Area Order (SAAO) and the southern part within Howth Head SAC, and proximate to other Natura 2000 sites. The relevant policies and objectives are noted in the Policy Section above. Therefore, while the proposed development as an extension to the existing house is

acceptable in principle this is a very sensitive site and it is important that any development proposed would respect this and not detract from the character and amenities of the area.

- 7.1.3. The First Party contend that the proposal is acceptable and compliant with the zoning objective, policies and objectives as set out in the Fingal CDP and the Howth SAAO as well as Regional and National Planning Guidelines. That it will ensure the survival of the existing house and will provide a high level of amenity for future residents, while preserving adjacent residential amenities and maintaining the character and special amenity of the area.
- 7.1.4. Regard is had to the documentation submitted and to the issues/concerns raised by the Council in their reasons for refusal and in the Observations made. These include relative to the planning history and conservation, to the impact of the proposed design and layout including on the existing house, impact on the environment and trees and landscaping, visual amenity/views and on the Howth SAAO and relevant to drainage and impact on Natura 2000 sites in this Assessment below.

7.2. **Regard to Background and Conservation issues**

- 7.2.1. There is concern that the site at Carrickbrack Road is a crucial part of the legacy of the Architect Andrew Devane and that the remnants of his interventions on site should be protected and conserved as significant contributions to the canon of Ireland's twentieth century heritage. The Council's Conservation Officer provides that the existing building is of architectural merit and significance. They note that while 'The End' is currently not a Protected Structure, it is an innovative building of its time associated with the Irish Architect Andrew Devine. It is noted that three of his architecturally designed buildings 'Journey's End', 'The Shack' and 'The End' are next door to each other and enrich the local area. Also, that consideration should be given so that they become special features or features of interest in Howth SAAO.
- 7.2.2. There is concern that the scale, design and layout proposed addition of a 734sq.m extension to 'The End' would be seriously detrimental to the more simplistic form and smaller scale of the existing modest albeit previously extended structure and to architectural heritage of this area of Howth Head. Also, that the proposal will impact adversely on 'The Shack' at the entrance to the site and existing access route to the

property which includes the concrete elevated roadway (subject to concurrent appeal ABP-305480-19). That the proposed extension will envelope, conceal and overwhelm the existing house.

7.2.3. The Planning Report submitted provides that the proposed extension is able to stand alone on its own architectural merits while many of the original features of the existing house, have been maintained. They note the original plan was more compact in size but the house has been altered over time with the addition of matching extensions on either side in the style of the original house. While mirroring the original external finishes and form they do amend the original concept and layout. Changes have also been made to the fenestration of the building and to the simplistic interior design. They consider that any changes or new build needs to be based on a thorough site assessment of the lands and architectural heritage assessment and analysis of existing buildings. Also, as far as possible that existing features both internal and external which add to the character and overall design character need to be retained.

7.2.4. The County Architect is concerned about the proposed scale of the extension and considers that the existing house designed by a known Architect is a relative rarity in the domestic architecture of the County and note that the Conservation Officer has described its place in the architectural heritage of Fingal. They consider that there is no real rationale or concept evident for such a large-scale extension. The relationship between the proposed extension and existing house is described as strained and an inappropriate response to the requirement to extend the existing house appropriately. An Architectural Heritage Impact Assessment should have been submitted. That the protection of late C20th architectural heritage is of importance in establishing and maintaining a record of cultural heritage of the County.

7.2.5. The Conservation Report by Sheehan & Barry Architects includes a description of the historic background of the site. This notes that Devane was influenced by Frank Lloyd Wright and designed numerous new houses and alterations in the Howth area. 'The End' was constructed on the subject site c.1983 and the influence of his developed style with curved forms, upturned concrete roof sections and roof planting is obvious. They provide that the proposed new additions will have a positive impact on the proposed development including some reinstatement of original features.

They conclude that the proposed extension is an acceptable design response in the context of the existing building and its setting, design and materials.

- 7.2.6. The First Party grounds of Appeal considers the Architectural Merit of the Existing House. They submit that it is not one of the finest examples of Andrew Devane's work (carried out under RKD Architects). They provide that the house as it stands has been significantly modified by subsequent extensions, including the side extensions and rear conservatory and various components of the original house have been altered or omitted (they include figures 24 and 25 showing this). They consider it is unfair to refuse permission based on the importance of the structure when so little of the original exists.
- 7.2.7. However, I would consider that visually that the side extensions reflect the symmetry, curved nature, height and scale and were in character with the existing house. They did not present a completely different design concept as does the current proposal which will appear much larger and dwarf the existing house. The Council's refusal considers that the proposal would be contrary to Policies CH37 and CH38 (as quoted in the Policy Section above) of the Fingal DP 2017-2023. These have regard to retention of Historic Building Stock and sympathetic extensions to vernacular dwellings. Therefore, while there is scope for an extension to the original house it should comply with these Objectives.

7.3. Design and Layout

- 7.3.1. The proposed development comprises the restoration/refurbishment of the existing dwelling (210sq.m) and the construction of a two-storey extension (734sq.m) to the north of the existing dwelling. This will lead to a dwelling of c.945sq.m. The alterations include the removal of the centrally located external spiral staircase, a replacement sunroom and an outdoor terrace on the roof.
- 7.3.2. Details submitted note that the proposed extension will comprise two stories and will connect to the north of the existing dwelling. The lower ground floor for the proposed extension will have a floor area of 267sq.m and will comprise 1no. bedroom with walk-in wardrobe and en-suite, 1no. bedroom with en-suite and a gym. A lift along the spiral staircase will be used to connect the main garden and roof garden, which they provide further preserves the original features of the existing dwelling. As shown

on the drawings (figures 15.0 and 16.0 of the Appeal submission relate) the circulation area will provide access to the rooms at lower ground floor as well as the existing dwelling. It is noted that the existing dwelling is single storey and does not have lower ground floor accommodation.

- 7.3.3. The ground floor of the proposed extension will have a floor area of 467sq.m. It will comprise an office, boot room, formal lounge, piano room, living/dining/kitchen area, family kitchen, snug/cinema, laundry room, family study, cloak room and 2no. WCs. The main entrance and entrance hall will be located to the north of the proposed extension. Entrances are to be provided in the kitchen and dining room to allow access to the terraced area.
- 7.3.4. The Design Statement provides that the external finishes include painted rendered walls, timber cladding and bronze metal or polyester powder coated bronze aluminium windows. High level automated louvre windows are to be used to control solar heat gains/recovery. Also, that landscaping/planting will be used to conceal and soften the basement and level terrace.
- 7.3.5. The existing single storey house is generally 3.3m in height but if the tank on the roof is included the height reaches 4.2m. There is concern that an extension with an increased ridge level of 6m would be readily visible from a number of points along the cliff walk. In addition, having regard to the highly protected landscape surrounding the subject site that the scale of the proposed extension is inappropriate. It will appear overly large and dominant in the landscape and not subordinate to the existing house.
- 7.3.6. The First Party provide that the character of the existing house designed by architect Andy Devane is to be retained. Features include the curved walls upon entry to the dwelling. They also note that following pre-planning consultation with the Council, the design team has revised the design of the proposed development significantly resulting in a smaller floor area, the omission of a swimming pool and the omission of an extra floor. Therefore, the plans submitted are of a smaller scale than was originally intended.
- 7.3.7. It is provided that the proposed development will reinstate the roof terrace on the existing dwelling, further preserving the character of the dwelling. A hot tub is to be included on the roof terrace. Observations note that the applicant's proposal to

reinstate the roof garden is misleading in that Devane never intended that the roof be used as a garden terrace. They provide that the entire roof surface was planted with broad coverage ground plants and was not to be used as an amenity for sitting, dining or bathing, which would be detrimental to the design of the existing house.

- 7.3.8. It is noted that the sunroom is an addition to the original dwelling. While not in character with the existing dwelling it is relatively unobtrusive. It appears in poor repair and I would have no objection to its demolition provided any replacement would be in character with the existing house. The First Party provide that the existing sunroom to the rear of the dwelling, is a later addition and is to be replaced with a bronze metal clad structure with side windows and bi-fold doors and will overlook Dublin Bay. The Observers are concerned that the proposed bronze clad sunroom would not be in character with the existing house. Also, that it will be seen as a feature in the landscape from the Cliff Walk. I would be concerned that it would not be in character with the simplicity of the existing house.
- 7.3.9. Details submitted relative to the design of the existing house note that the spiral stair access is designed as a central feature and is used to access the plant room while simultaneously forming an architectural statement at the entrance to the house. As part of the proposed development the spiral staircase is to be relocated to the south east corner of the proposed lower ground floor extension and is to serve as the main point of connection between the main garden and the roof garden. I would consider that this will have an impact on the integrity of the design of the existing house where it is seen as a focal central feature from the access drive.
- 7.3.10. The Observers are concerned that the relocation of the external staircase and loss of the plantroom feature would take from the character of the existing house. Also, that the internal re-ordering of the existing house would eradicate existing elements of Devane's original design and layout. Regard is had to the elevations submitted with the application and note is had of the extensive nature of the extension relative to the existing house. RKD Architects are concerned that the proposed extension will obliterate the northern elevation of the house, including the removal and inappropriate relocation of the concrete spiral staircase, removal of the circulate roof plantroom, and removal of internal partitions. While the retention and re-use of The End is provided for in this application it is considered that the size, scale, design, form, and layout of the proposal is not in keeping with or sympathetic to the existing

dwelling. The proposed extension of this scale and complexity would detract from the architectural heritage/significance and simplicity of 'The End'.

7.4. Regard to Re-Design Proposals

- 7.4.1. It is provided that as part of the First Party Appeal response to the Council's decision to refuse permission in Reg.Ref.F19A/0344, which to a significant degree relates to the scale of the extension, the applicant instructed his design team to prepare an alternative design option for consideration of the Board (Appendix F relates). A Design Statement dated October 2019 and revised drawings have been submitted. These show floor area removed from the original application. I would consider that if the Board decides to permit that the removal of the proposed ground floor library area and piano room (c.100sq.m as shown on the floor plans submitted) which forms part of the more visually prominent eastern elevation, which juts further out than the footprint of the existing house would visually be preferable. This also shows the retention of the spiral staircase. If the Board decides to permit, I would recommend that this be conditioned.
- 7.4.2. However, it does not address the issue of the impact of the scale of the overall design on the character of the existing house and of the surrounding area. The design of the 'extension' overwhelms the existing house and creates a much larger structure. It is not an appropriate scale and would be contrary to Objectives CH38 (when seen in context of the existing house) and RF51 (appropriate development on a sensitive coastal site) and should be refused on the grounds that it is completely at odds with the scale and character of the existing house.
- 7.4.3. While the concept of an extension to the rear of the existing house may be acceptable, this should be lower profile than the current proposal and not extend further than the width of the footprint of and be connected to but set back at ground floor level from the existing house. This would also have the advantage of having less of an impact on the trees to the east of the site. Regard needs to be had to an appropriate design and layout, which would not detract from the character of the existing house or surrounding area. I would consider that this would be best addressed in a new application.

7.5. Tree Protection and Landscaping

- 7.5.1. There are concerns that the proposed development, including construction works will impact adversely and damage the trees on the site. Photographs have been submitted with the Observations showing the changes to the site in recent times, relevant to the removal of trees, particularly to the north and east of the house to facilitate the proposed extension and associated access works. Objective PM64 of the Fingal CDP seeks to: *Protect, preserve and ensure the effective management of trees and groups of trees.*
- 7.5.2. A Tree Survey Report relative to the existing trees on site and Arboricultural Impact of the new development has been submitted. Full details of the individual trees assessed are listed in the Tree Survey Schedule in the appendices of the Report. This notes that there is extensive tree coverage in the northern part of the site, with further clusters of trees in the south eastern and south western corners of the site. Preliminary tree management recommendations are made relative to the proposed works. It also notes that there is scope to plant a significant number of new trees on the site. A Landscape Plan has been prepared and regard is had to the drawing submitted. A Landscape Architect is to be appointed to oversee landscaping of the site and the conservation of the existing landscape.
- 7.5.3. It is submitted that the proposed development, upon completion will maintain a significant number of existing trees and green area. It is noted that the main area of trees is located to the north and east of the existing house. A Tree Survey Report and assessment of trees on the northern part of the site where there will be a greater impact on trees was submitted as part of the concurrent application for the widening of the entrance, access ramp and replacement garage Ref.ABP-305480-19 refers. It is noted that Condition no. 3(v) of the Council's permission included a tree bond.
- 7.5.4. The Parks Division requested that Additional Information be submitted to include a Tree Protection Plan for the whole site, and Arboricultural drawing that clearly illustrates the number of trees to be removed to accommodate the proposed development and any temporary works – such as the proposed platforms. They have regard to individual trees and note that Tree T2879 is included within the line of tree protection fencing. They advise that given the maturity of this tree and the proposal to remove tree T2863 it should be within the protective fencing as the optimum

protection measures. Also, that details of the layout of drains, soakaway and attenuation areas and other utility outside of the root protection area be revised. Construction related parking and storage areas in relation to root protection area should be included.

- 7.5.5. The area of the proposed extension contains the southern part of the existing access drive and more open green area and has less tree cover than the northern part of the site. If the Board decides to permit as many as possible of the existing trees should be retained including the trees to the east. Further details relative to this issue need to be submitted. It is recommended that if the Board decide to permit that landscaping and tree protection measures be conditioned.

7.6. Impact on the Howth SAAO

- 7.6.1. There is concern that the site location within the Howth SAAO has not been given due consideration in the design of the proposed development. That the extension of this scale in this location is clearly at variance with the objectives of the SAAO and would have a significant negative impact both on the views from the footpath and from Dublin Bay. As noted in the Policy Section above Maps A and B provide the objectives of the SAAO relevant to the surrounding area and the subject site. It is of note that Policy 3.4.2 of the Howth SAAO includes: *An extension to an existing building should generally match the character of the existing structure. New buildings should be as inconspicuous as possible.*
- 7.6.2. The Planning Report submitted with the application provides that the proposed two storey extension is considered an appropriate response to this site. It is submitted that the proposed extension is not overbearing on the landscape and does not detract from the amenity of the existing dwelling and neighbouring dwellings in the vicinity of the site. Also, that the proposed extension has utilised the topography of the site to create a design which will work with the landscape, stepping back from the existing dwelling. It is contended that the proposed development will positively contribute to the maintenance and amenity of the existing residential dwelling and is an appropriate design response.
- 7.6.3. The First Party Appeal provides that as shown in the Visual Impact Assessment submitted as part of the application, that proposed development is only partially

visible from certain points along the Cliff Path and will not impact adversely on the amenity of the area. They note other more visible dwellings in the area including Journey's End to the east for example. It is noted that these are further set back and that photographs were taken in a period where the vegetation appears denser and in leaf. In the winter period there are more views/glimpses of the houses in the area.

7.6.4. The existing house in view of its locational context, low profile, topography and screening by trees and landscaping is not very visible from the Cliff Walk. However, the proposed extension will alter this and will appear more dominant in the surrounding landscape and from Dublin Bay. It is considered that proposed extension is too large, too high, too close to the cliff path and will impact adversely on trees and habitats on site. The issue is that the scale and design of the proposed extension which will in view of the topography be on a higher level to the rear and east of the existing house and would not be sympathetic to the character of the existing house and will be more visible in the landscape.

7.7. Precedent

7.7.1. It is submitted that a precedent has been set for large multi-level dwellings along Carrickbrack and Thormanby Road. The First Party Appeal provides details of these and considers that in comparison to recently approved developments in the immediate vicinity of the subject site, that the proposed development at The End, respects the character and amenity of the area. They provide that as such a precedent has been set and that the proposed extension to the dwelling at The End is not overbearing or over scaled in this context. Furthermore, it is submitted that it will conserve the original dwelling at The End, turning it into a liveable house.

7.7.2. However, it is important that this proposal would not create an undesirable precedent for similar large scale 'extensions' to small dwellings in the high amenity area and in the SAAO. The concern is that the proposal is completely out of scale with the original house and is seriously detrimental to its character. It is noted that The End currently has a low site coverage given the size of the dwelling. While other larger scale dwellings, including of relative recent construction are noted within the area, it is considered that their setting and orientation is different and that they are not readily comparable to the subject application. The existing scenario presents a low

profile house designed by a renowned architect set within the topography of the site. I would be concerned that the proposed development is excessive and does not respect the design and character of the existing house and would appear more dominant in the landscape. While it is of importance not to set an undesirable precedent, each case must be considered on its merits.

7.8. Access Issues

7.8.1. The Council's Transportation Planning Division refers to the concurrent application Reg. Ref. F19A/0126 (ABP-305480-19 refers) relevant to the access to the subject site, where permission is sought separately in summary for the demolition of existing garage (structure) and construction of a garage, alterations to driveway, front boundary wall/fencing, driveway. They consider that these should have been included as part of the current application by way of additional information as these works would be required to facilitate the current application. In this respect it is of note as to the interdependence of the applications and as to whether it would give a more holistic approach to include both aspects of the development in the context of a single application.

7.9. Construction Management

7.9.1. The proposal which will include excavations will involve considerable Construction Works on the site. Regard is had to the location in the SAAO and proximate to trees. Note is also had to the construction methods and the use of the platforms. An Outline Construction Management Plan has been submitted. This also relates to the concurrent application relative to the access. If the Board decides to permit, I would recommend that a condition relative to Construction Management be included.

7.10. Drainage issues

7.10.1. An Infrastructural Report has been submitted with the application by O'Connor, Sutton, Cronin (OCSC). This notes that the existing drainage is shown via a series of manholes falling with the terrain from top to bottom. This is carried via a c.300mm dia. surface water pipe which terminates to a manhole at the south eastern portion of the site, discharging to the sea. The proposed storm drainage will follow the same

principle with a new series of manholes to collect both roof drainage and impervious area around the new structure's footprint.

- 7.10.2. The existing foul drainage is outlined as ultimately discharging to a septic tank then further into an area reserved for percolation/infiltration. The proposed foul drainage will follow the same principle and connect into the existing foul network. The existing foul drainage from the garage will remain undisturbed and tie-in to the proposed foul drainage around the structure. They submit that full details will be submitted for review of the Council's Water and Drainage Department prior to construction. Appendix A of their Report includes a copy of the Proposed Drainage Layout drawing.
- 7.10.3. The Drainage Plan submitted with the application shows the indicative location of the existing storm and foul lines and provides that they will be left undisturbed and tie in to the proposed drainage around the house i.e proposed storm outlet and proposed foul treatment respectively. The proposed location of the Foul Treatment Unit is shown to the south of the existing dwelling and it is provided that the treatment unit is to discharge to soakaway subject to confirmation. This also notes that the existing pipe is to be removed. This drawing provides approximate and indicative locations and full drainage details are not given.
- 7.10.4. The Council's Water Services Section noted that the applicant needs to submit a Site Characterisation Form carried out in accordance with the EPA Code of Practice for Wastewater treatment and Disposal Systems Serving Single Dwellings (October 2009). Also, that the on-site treatment plant be in accordance with the said COP. They recommended the use of green infrastructure where possible to collect, convey and treat surface water runoff. They provide that attenuation tanks do not provide the same benefits and should only be used as a last resort where availability of space is significantly constrained. Given the sensitive setting of the development, but also having consideration of the shallow bedrock which is anticipated, the applicant was requested to revise his design whilst considering the drainage objectives of the Fingal DP.
- 7.10.5. The First Party submit that this information should have been sought by the Council by way of an F.I request. They refer to a letter prepared by O'Connor Sutton Cronin Consulting Engineers which supports a previous drainage report submitted by the

Applicants (Appendix E of their Appeal Submission refers). This includes that steps have been taken to complete the Site Characterisation Form and that percolation tests are ongoing. They provide that Klargester have been appointed to design an appropriate drainage system. They note that having regard to SuDS that they will implement a green roof system to the roof of the garage. Due to site constraints around the property they have limited options for SuDS, and that an attempt will be made to utilise the trees north of the property as a bio-retention pit, which will reduce flooding and provide a treatment benefit to the surface water runoff. Work is not to be carried out within the root network or the trees, storm water will be guided where the trees are located. They provide that storm water from the roof of the property will be diverted through down pipes to the trees.

7.10.6. It is noted that Water Services provide that records indicate the route of the existing 300mm diameter sewer appears to clash with the proposed new development. Also, that a wayleave of 6m minimum must be maintained. In response OCSC note that survey information shows the 300mm diameter sewer pipe running down the side of the dwelling and then travelling away from the dwelling to the discharge point at the sea. This is shown on the drawing submitted and the location of the existing septic tank within the slope downwards to the south of the dwelling. They highlight on the drawing attached, both the 300mm pipe and the existing septic tank. They request that the issues raised relevant to drainage be the subject of further information or be conditioned.

7.10.7. I would consider that sufficient details have not been submitted with this application or Appeal submission to determine the suitability of the proposed system. However, it must be noted that the proposal should serve to upgrade the current position, which would be positive. Regard must also be had to the suitability of the proposed drainage system and the location of the waste water treatment system within the High Amenity zoning and the Howth SAAO, proximate to beaches and Dublin Bay. Therefore, the Council's reason for refusal relative to insufficient information relative to drainage would need to be addressed to ensure the suitability of the proposed system, relative to the proposed development.

7.11. Screening for AA

7.11.1. The subject site is located on a coastal location close to several sensitive Natura 2000 sites. An Appropriate Assessment Screening Report has been prepared by EHP Services. In summary this report found that the proposed development does not pose a threat to Natura 2000 sites in the vicinity of the site.

7.11.2. Natura 2000 sites which lie in the vicinity of the appeal site are shown in the attachments and include:

- Howth Head SAC (site code 000202), lies immediately south of cliff walk, south of the appeal site.
- Howth Head Coast SPA (site code 004113), lies c. 400m to the east of the appeal site.
- Rockabill to Dalkey Island SAC (site code 003000), c.100m to the south of the appeal site.

7.11.3. The AA Screening Report provides that the proposed development is neither directly connected to nor necessary to the management of the Natura 2000 sites. A description is given of the changes to the site relevant to the subject application. It is noted that Howth Head SAC is within the southern part of the subject site. However, the house on the site is existing and the proposed development relative to the subject application, does not impact on this area of the site. The potential for direct, indirect or secondary impacts upon any the Natura 2000 sites within a 15km radius is assessed. In summary, the Report found that the proposed development will not have adverse effects on the Natura 2000 sites in the vicinity of the proposed development. It is provided that as a result a Stage 2 AA was deemed unnecessary.

7.11.4. It is reasonable to conclude that on the basis of the information on the file, which I consider adequate in order to issue a screening determination, that the scale and nature of the proposed development, individually or in combination with other plans or projects would not be likely to have a significant effect on European Site Nos. Howth Head SAC (site code 000202), Howth Head Coast SPA (site code 004113), Rockabill to Dalkey Island SAC (site code 003000), or any other European site, in view of the site's Conservation Objectives, and a Stage 2 Appropriate Assessment and submission of a NIS is not therefore required.

8.0 Recommendation

8.1. I recommend that permission be refused for the reasons and considerations below.

9.0 Reasons and Considerations

1. The existing dwelling, 'The End', is a late 20th Century house designed by Irish architect Andrew Devane of Robinson Keefe Devane. The End is considered to be an innovative and significant building of its time that provided a symmetry and contributed to the local vernacular and is well integrated into its locational setting. The proposed extension by reason of its scale, bulk, height, design, location and unsympathetic interventions would dominate and have a significant negative impact on the architectural integrity of the existing dwelling. As such it would be contrary to Objectives CH37 and CH38 and PM46 of the Fingal Development Plan 2017-2023 and to the proper planning and sustainable development of the area.
2. The subject site is located within the Howth Special Amenity Area Order where more restrictive policies apply to provide for sympathetic development to protect the special amenity of the area. The design of the proposed extension would be contrary to Policy 3.4.2 (extensions) of the said Order in that it would not be inconspicuous or in character with the existing structure. It would appear more visually dominant than and would not enhance the character of the existing building in this sensitive landscape. It would set an undesirable precedent and negatively impact on views from the Cliff Walk and from the coastal area. As such it would be contrary to Objectives RF51 and NH40 of the Fingal Development Plan 2017-2023 and to the proper planning and sustainable development of the area.
3. It is considered that insufficient information has been submitted to relative to surface and foul water drainage systems to ensure that the proposal would be in accordance with current standards for such works and would not be prejudicial to public health. As such it would be contrary to the proper planning and sustainable development of the area.

Angela Brereton

Angela Brereton
Planning Inspector

11th of February 2020

DECISION QUASHED