



An
Coimisiún
Pleanála

Inspector's Report

PL-501148-DF-26

Development	Demolition of structures, construction of extension with all associated works
Location	Roslyn, 19 Claremont Road, Howth
Planning Authority	Fingal County Council
Planning Authority Reg. Ref.	F26A/0042E
Applicant	Emer Wilson
Type of Application	Permission
Planning Authority Decision	To refuse permission
Type of Appeal	First Party
Appellants	Emer and Paul Wilson
Observers	Hillwatch
Date of Site Inspection	18 th June 2026
Inspector	Trevor Rue

Table of Contents

1.0 Site Location and Description	3
2.0 Proposed Development	3
3.0 Planning Authority Decision	5
4.0 Planning History.....	8
5.0 Policy Context.....	9
6.0 EIA Screening.....	14
7.0 The Appeal	15
8.0 Assessment	19
9.0 AA Screening.....	22
10.0 Water Framework Directive	23
11.0 Recommendation	23
12.0 Reasons and Considerations	24
13.0 Conditions	24
 Appendix A: Form 1 - EIA Pre-Screening	 26

1.0 Site Location and Description

- 1.1. The application site is at the northern end of the Howth Peninsula, about 1.7 kilometres to the west of the town centre. It has a stated area of 0.320 hectares and comprises the curtilage of a substantial detached four-bedroom Victorian dwelling house known as Roslyn. The dwelling is south-facing and has two storeys and a sunken basement. It has flat-roofed extensions to east and west.
- 1.2. The site includes a gated courtyard to the west of the dwelling. On the northern side of the courtyard, behind the western extension to the dwelling, there is a single-storey building which contains a double garage and a store. The finished floor of this building is at a similar level to the lower ground floor of the western extension. The roof of the building forms a terrace which is accessed from that extension. The stated gross floor space of the existing buildings on the site is 500 square metres.
- 1.3. The site is separated from Burrow Beach, which lies immediately to the north, by a stone wall and has direct pedestrian access to the beach via two sets of steps. The site includes an access driveway from the northern side of Claremont Road. Treelines and walls are present on the site's eastern, southern and western perimeter. A two-storey building is located to the south, between the site and the road. The site forms part of a residential area between Claremont Road and Burrow Beach, within which there is a variety of dwelling types and sizes.

2.0 Proposed Development

- 2.1. It is proposed to carry out modifications to the existing buildings, including:
 - demolition of the eastern and western side annexes and one of the garages, with a combined floor space of 177 square metres;
 - removal of selected external and internal walls;
 - removal and reconfiguration of lower ground, ground and first floor levels; and
 - reconfiguration of the internal floor layouts.
- 2.2. It is also proposed to construct a single-storey extension of 216 square metres to the north of the existing dwelling. A new entrance door would be provided in the western elevation, leading to a spacious entrance hall. The net effect of the development would be to increase the gross floor space of buildings on the site to 539 square metres. The

proposal also includes hard and soft landscaping and associated site and development works above and below ground.

2.3. The application was accompanied by an **architect's design statement**, which provided the following additional information about the proposed development:

- Floor heights would be adjusted to lift the level of the basement to allow it to be damp proofed and give it better access to light and air. A new concrete floor would provide the structural stability needed for the works without requiring intrusive underpinning and would also deliver essential radon protection in what is a high-radon area. The roof would be preserved and most of the existing house reduced from three storeys to two.
- The rear roof plane would be extended to a low eaves addressing the sea. The extent of the proposed additional structure was determined by the position of the existing garage and roof terrace and by the established building line of the houses to the west of the site. The most intensively used spaces of Roslyn – the kitchen and dining areas – would be re-sited to the new ground-floor rear extension and additional bedrooms would be contained at the lower level.
- The existing walls would be stripped to reveal their rubble-stone structure and painted internally. Externally, the masonry would be lined in wood-fibre insulation and lime render, with a change in relief and texture implying a base at the lower level. Windows, doors, insulation and electrical and mechanical systems would be upgraded to improve operational efficiency and reduce reliance on the grid. The roof of the proposed rear extension would be dressed in slate to match the existing. Fenestration would be white and simple in detail.
- The existing roof terrace above the garage would be reduced in extent to afford more privacy to neighbours and to the occupants of Roslyn itself. This would free up space for screen planting along the western boundary wall.
- A new driveway would redirect the entrance, making space for new planting along the site boundary. New paths and steps would improve the access of the steep topography to the north of the site. A sustainable urban drainage system would be installed, supporting a more ecologically diverse landscape.

2.4. The application was also accompanied by a **civil engineering planning report**, which contained the following information:

- The application site is outside any documented flood zones. The site borders the tidal extents of Burrow Beach on the Irish Sea. The dwelling has a freeboard of 1.6 metres above the long-term flood level of 4.0 metres. The site is not considered to be at risk from coastal flooding.
- Foul drainage from the existing house is discharged to a combined public sewer on the north-western boundary of the site. It is proposed to maintain this connection to the public system but to segregate the drainage within the site, thus greatly reducing the discharge to the public sewer. Surface water would be disposed of on site. The driveway and hard standings would receive permeable finishes to allow direct percolation of rainfall to ground. An infiltration trench would be located beside the driveway.

2.5. An **appropriate assessment screening report** was submitted with the application. It identified 19 European (Natura 2000) sites [of nature conservation importance] within 15 kilometres of the application site. It concluded, following analysis and evaluation of the relevant information, that the development, either alone or in combination with other plans or projects, would not have any direct or indirect significant effects on any European site in light of its conservation objectives and best scientific knowledge and that no reasonable scientific doubt remains in relation to this conclusion.

3.0 Planning Authority Decision

3.1. Decision

3.1.1. On 18th March 2026, Fingal County Council decided to refuse permission, giving the following reason:

The design of the proposed development is considered to be inappropriate and, if permitted, would not sufficiently respect the existing dwelling on site, its historical features and design characteristics. The extension would erode the distinctive character of the existing dwelling and the character of the area at this sensitive location. It is considered that the proposed development would be unsympathetic to the special features and vernacular character of the existing building. As such, the

proposed development would seriously injure the visual and general amenities of the area and would contravene the provisions of the Fingal Development Plan 2023-2029, especially Objectives SPQHO104 and DMSO190 and Policy HCAP22. The proposed development if permitted in this form, would therefore be contrary to the proper planning and sustainable development of the area.

3.2. Planning Authority Reports

3.2.1. A **planning officer's report** typed on 16th March 2026 provided the reasoning for the authority's decision. The main points were as follows:

- The site is in a sensitive location and can be seen from Burrow Beach to the north. It comprises a large plot with a sizeable front garden. The site cannot be seen from Claremont Road to the south. The row of houses that front the road conceal the dwelling from public view.
- The existing dwelling would be engulfed within the proposed extension, practically resulting in a replacement dwelling. More importantly, all features and design characteristics of the existing structure would be removed and the essence of the historic value of the property would be lost. The extended roof slope to the rear (north) of the building would result in a loss of proportion. The proposed modifications are not sympathetic to the existing structure and would impact negatively on the character of the area.
- The site could accommodate a large-scale extension and it is understood that modifications are necessary to upgrade and modernise the dwelling. The applicant should engage with the planning authority and the Conservation Officer to strike a balance between retaining the character, proportions and characteristics of the existing Victorian structure and providing a retrofitted and energy-efficient dwelling for its occupants.
- The application site is located within 100 metres of coastline which is vulnerable to erosion. The applicant should be requested to demonstrate compliance with the Development Plan provisions relevant to coastal erosion.
- There is no realistic pathway between the application site and any European (Natura 2000) site. Having regard to the nature, scale and location of the

proposed project in comparison with the existing baseline, it is considered that there is no likelihood that the project, individually or in combination with another plan or project, would have a significant effect on any European site during construction or operation. This assessment was reached without taking into account mitigation measures intended to avoid or reduce any impact on European sites.

3.2.2. The Council's **Water Services Department** had no objection, subject to conditions.

3.2.3. The report of the Council's **Conservation Officer Section** contained the following advice:

- While the existing house is not currently a Protected Structure and is not within an Architectural Conservation Area (ACA), it is a historic building with an attractive architectural composition.
- The house dates from the mid to late 19th Century. It is two-storey-over-basement, three-bay dwelling with a hipped slate roof, projecting eaves with timber brackets, and central double chimney stacks. The timber-panel entrance door is covered by a large canopy that assists in balancing out the proportions of the front elevation. To the west of the entrance door is a large canted bay window. The sales brochure for the property shows surviving historic decorative features internally that appear to be primarily in the principal room of the entrance-level ground floor. There have been amendments and additions during the 20th century that are not of any particular merit.
- The development currently proposed would remove all the distinctive features of the front elevation such as the canted bay, the entrance steps and canopy, and the entrance door itself, which would be converted to a window opening. All the openings to the property would be enlarged and contemporary glazing patterns inserted. The masonry walls would be externally insulated, which would increase their depth and require the removal of the timber brackets. The side walls to the front would be demolished. The extension to the rear would connect directly into the rear roof slope, altering the form of the roof and the legibility of the original footprint. The internal floors would be removed to facilitate a raised basement level. This would get rid of all the surviving internal

historic decorative features of fireplaces, plasterwork and historic joinery such as stairs, shutter surrounds and doors.

- The building would basically be gutted with all historic features stripped away from the exterior and interior, leaving a shell that would then be modified with contemporary glazing patterns to the openings, resulting in a house that would read as a new-build modern interpretation of a historic house rather than a sensitive and considered refurbishment and extension of a Victorian residence.
- The proposed development is not acceptable as it would erase almost all of the character of the existing building. There is scope within the property and site for updating and extending the building, but it needs to be more sensitively designed to retain historic detailing, features and proportions to the front elevation and seek to keep much of the surviving internal historic features and plan of the principal ground floor rooms. Any extension to the rear or side needs to carefully consider the formation of the junction with the historic house and be subservient in scale. It should sit below the existing eaves line to avoid impacting this feature and allow the original form and footprint of the house to remain legible.

3.3. Third Party Submission

- 3.3.1. The Council received a submission from Hillwatch, the substance of which was repeated in its observations at appeal stage.

4.0 Planning History

4.1 Application Site

- 4.1.1. None recorded

4.2. Adjacent Sites

- 4.2.1. **F14A/0023:** On 2nd September 2014, permission was granted to demolish a single-storey pitched-roof dwelling (242 square metres) and outbuildings and to construct three flat-roofed dwellings with first-floor balconies at 18B Claremont Road (immediately to the west of the present application site).

- 4.2.2. **F20A/0147:** On 18th November 2020, permission was granted for front, rear, side and roof extensions and changes to fenestration at Crag Lodge, 21B Claremont Road (to the east of the present application site).
- 4.2.3 **F21A/0193:** On 6th July 2021, permission was granted for a log cabin at Taobh Coille, 21A Claremont Road (immediately to the east of the present application site).
- 4.2.4. **F22A/0142:** On 10th August 2022, permission was granted to demolish and replace a non-original single-storey house extension and to erect a new single-storey house at Seafield House, 18A Claremont Road (immediately to the west of the present application site).
- 4.2.5. **F23A/0168:** On 6th June 2023, the Council decided to grant permission for modifications to the previously approved development at Crag Lodge. Following a third-party appeal (**317343**), An Bord Pleanála granted permission on 3rd April 2024.

5.0 Policy Context

5.1. Development Plan

- 5.1.1. Sheet 10 of the Fingal Development Plan 2023-2029 indicates that the application site is subject to a RS – Residential zoning, whose objective is to provide for residential development and protect and improve residential amenity. The vision for this zoning, set out in Section 13.5 of the Plan, is to ensure that any new development in existing areas would have a minimal impact on and enhance existing residential amenity.
- 5.1.2. Objective SPQHO41 of the Plan is to promote measures to reduce vacancy and underuse of existing building stock and to support the refurbishment and retrofitting of existing buildings. Objective SPQHO43 is to promote the use of contemporary and innovative design solutions subject to design respecting the character and architectural heritage of the area. Objective SPQH044 states that the Council will encourage the retention and retrofitting of structurally sound, habitable dwellings in good condition as opposed to demolition and replacement and will also encourage the retention of existing houses, such as cottages, that, while not Protected Structures or located within an ACA, do have their own merit and/or contribute beneficially to the area in terms of visual amenity, character or accommodation type.

- 5.1.3. Policy SPQHP41 of the Plan is to support the extension of existing dwellings with extensions of appropriate scale and subject to the protection of residential and visual amenities. Likewise, Objective SPQHO45 is to encourage sensitively designed extensions to existing dwellings which do not negatively impact on the environment or on adjoining properties or area.
- 5.1.4. Objective SPQHO104 is to discourage the demolition or replacement of vernacular rural buildings and encourage their sensitive restoration and/or conversion where they contribute to the character of the area.
- 5.1.5. Policy CAP9 of the Plan is to support high levels of energy conservation, energy efficiency and the use of renewable energy sources in existing buildings, including retrofitting of appropriate energy efficiency measures in the existing building stock.
- 5.1.6. Sheet 15 of the Plan (Green Infrastructure 2) shows the application site in an area within 100 metres of coastline vulnerable to erosion.
- 5.1.7. Section 9.7.1 of the Plan states that coastal development must take account of the changing and dynamic nature of the coast and the need for coastal protection. Development will only be permitted where the Council is satisfied that the development will not add to the requirement, if any, for any coastal defence works in the area over the lifetime of the development. This text is repeated in Section 14.18.4.
- 5.1.8. Section 9.7.1 goes on to say that provision must also be made for the retention of existing soft defences such as beaches, sand-dunes, salt marshes and estuary lands. Development should be set back a sufficient distance from soft defences and erodible coastline to allow for natural processes, such as erosion and flooding, to take place in these areas. A number of areas of coastline at risk from coastal erosion have been identified in the county based on current information and experience. In these areas there will be a presumption against new development unless it can be shown, based on best available scientific information, that the likelihood of coastal erosion over the lifetime of the development is minimal. This will ensure that no new development takes place in areas likely to be subject to coastal erosion in the future.
- 5.1.9. Objective GINHO74 is to strictly control the nature and pattern of development within coastal areas and ensure that it is designed and landscaped to the highest standards and sited appropriately so as not to detract from the visual amenity of the area. Development shall be prohibited where the development poses a significant or

potential threat to coastal habitats or features, and/or where the development is likely to result in altered patterns of erosion or deposition elsewhere along the coast. Objective GINHO75 is to prohibit development along the coast outside existing urban areas where such development could not be adequately safeguarded over the lifetime of the development without the need to construct additional coastal defences.

- 5.1.10. Objectives GINHO76 and DMSO163, which are identically worded, are to prohibit new development outside urban areas within the areas indicated on Green Infrastructure Maps, which are within 100 metres of coastline at risk from coastal erosion, unless it can be objectively established based on the best scientific information available at the time of the application, that the likelihood of erosion at a specific location is minimal taking into account, *inter alia*, any impacts of the proposed development on erosion or deposition and the predicted impacts of climate change on the coastline.
- 5.1.11. Section 10.5.2.5 of the Plan says that built heritage is not confined to buildings, features and items designated as Protected Structures or located within Architectural Conservation Areas. Scattered throughout the countryside and within the towns and villages of Fingal is an extensive stock of modest older buildings and structures, some of which have been designed by an architect or engineer while others are vernacular structures built to no formal plans using traditional building types and materials. While not all older buildings may be of sufficient special interest to be designated Protected Structures, generally their form, scale, materials, detailing and planned layout contribute positively to the rural landscape or to the historic villages and towns of Fingal, adding architectural interest, historic character and visual amenity.
- 5.1.12. Policy HCAP22 of the Plan is to seek the retention, appreciation and appropriate revitalisation of the historic and vernacular building stock, and 20th Century built heritage of Fingal in both the urban and rural areas of the county by deterring the replacement [of] buildings with modern structures and by protecting (through the use of Architectural Conservation Areas and the Record of Protected Structures and in the normal course of development management) these buildings where they contribute to the character of an area and/or where they are rare examples of a structure type, a distinctive piece of architecture or have an innate value (see also Table 14.26).
- 5.1.13. Section 14.10.2 of the Plan states that the need for housing to be adaptable to changing family circumstances is recognised and acknowledged and the Council will

support applications to amend existing dwelling units to reconfigure and extend as the needs of the household change, subject to specific safeguards. The design of extensions must have regard to the character and form of the existing building, its architectural expression, remaining usable rear private open space, external finishes and pattern of fenestration. Additionally, careful consideration should be paid to boundary treatments, tree planting and landscaping.

5.1.14. Section 14.10.2.2 states that side extensions will be evaluated against proximity to boundaries, size, visual harmony and impacts on residential amenity. External finishes shall generally match the existing. Section 14.10.2.3 states that ground-floor rear extensions will be considered in terms of their length, height, proximity to mutual boundaries and quantum of usable rear private open space remaining. The proposed extension should match or complement the existing dwelling house. Section 14.10.2.4 states that first-floor rear extensions will be considered on their merits and will only be permitted where the planning authority is satisfied that there will be no significant negative impacts on surrounding residential or visual amenities.

5.1.15. Section 14.19.5 of the Plan states that the retention and reuse of vernacular buildings and other non-protected built heritage assets that contribute to the distinctive character of the rural or urban areas of Fingal is supported and encouraged by the Council. The majority of these buildings tend to have been constructed using traditional methodologies and materials such as lime, stone, mud, thatch, slate and timber. These materials allowed for moisture to be absorbed and released easily, for the building to “breathe” and so the ventilation of internal spaces performs an important function. Interventions that may be appropriate for modern construction practices, such as impermeable building products or air-tight spaces, could have unintended harmful consequences for the historic or traditional constructed building stock.

5.1.16. Objective DMSO190 of the Plan states that where development is proposed for a site that contains a vernacular or historic building, 20th Century building of merit and/or structures that contribute to the distinctive character of the rural or urban areas of Fingal, then the scheme should have regard to the direction in Table 14.26.

5.1.17. Table 14.26 of the Plan sets out the following principles:

- Appropriate materials and methods are to be used to carry out repairs to the historic fabric of older buildings.

- Any proposed changes need to be sympathetic to the special features and character of the existing building by respecting the existing setting, form, scale and materials.
- Proposals for extensions to vernacular buildings or the historic building stock should not erode the setting and design qualities of the original structure which make it attractive and should be in proportion or subservient to the existing building.
- Original building features or materials should be retained including windows, doors, roof coverings, boundary treatments and site features (such as stone walls, hedges, railing, gates, gate piers, cobbles and courtyards).
- Direction for the design of new insertions in historic towns and villages or for extensions to existing older or vernacular buildings should be taken from the historic building stock of the area but can be expressed in a contemporary architectural language.

5.2. Natural Heritage Designations

5.2.1. The European (Natura 2000) sites within 15 kilometres of the application site are:

- Baldoyle Bay Special Area of Conservation (SAC), immediately adjacent to the north, designated for mudflats and sandflats, annuals colonising mud and sand, and salt meadows;
- North Dublin Bay SAC, about 1 kilometre to the south west, designated for mudflats and sandflats, annual vegetation of drift lines, annuals colonising mud and sand, salt meadows, shifting dunes, fixed coastal dunes, humid dune slacks and petalwort;
- Howth Head SAC, about 1.2 kilometres to the east, designated for vegetated sea cliffs and dry heaths;
- Ireland's Eye SAC, about 1.9 kilometres to the north east, designated for perennial vegetation of stony banks and vegetated sea cliffs;
- Rockabill to Dalkey Island SAC, roughly 2.1 kilometres to the east, designated for reefs and harbour porpoise;

- Malahide Estuary SAC, about 5.1 kilometres to the north, designated for mudflats and sandflats, annuals colonising mud and sand, salt meadows, shifting dunes and fixed coastal dunes;
- South Dublin Bay SAC, about 7.7 kilometres to the south west, designated for mudflats and sandflats, annual vegetation of drift lines, annuals colonising sand and mud and embryonic shifting dunes;
- Lambay Island SAC, about 10.8 kilometres to the north east, designated for vegetated sea cliffs, harbour porpoise, grey seal and harbour seal;
- Rogerstown Estuary SAC, about 11.2 kilometres to the north, designated for estuaries, mudflats and sandflats, annuals colonising mud and sand, salt meadows, shifting dunes and fixed coastal dunes;
- North West Irish Sea Special Protection Area [for birds] (SPA), immediately adjacent to the north;
- North Bull Island SPA, about 1 kilometre to the south west;
- Baldoyle Bay SPA, about 1.1 kilometres to the west;
- Ireland's Eye SPA, about 1.7 kilometres to the north east;
- Howth Head Coast SPA, about 2.2 kilometres to the east;
- Malahide Estuary SPA, about 5.8 kilometres to the north;
- South Dublin Bay and River Tolka Estuary SPA, about 6.5 kilometres to the south west;
- Lambay Island SPA, about 10.5 kilometres to the north east;
- Rogerstown Estuary SPA, about 10.7 kilometres to the north; and
- Dalkey Islands SPA, about 12.4 kilometres to the south.

5.3.2. The application site is not in, or within 15 kilometres of, any Natural Heritage Area (NHA). There are nine proposed NHAs in Fingal, which are identified on Green Infrastructure Map 2 (Sheet 15) of the Development Plan. The nearest of these areas to the application site is Sluice River Marsh.

6.0 Environmental Impact Assessment Screening

6.1. The proposed development is not a class for the purposes of EIA as per the classes of development set out in Schedule 5 of the Planning and Development Regulations 2001, as amended (or Part V of the 1994 Roads Regulations). No mandatory

requirement for EIA therefore arises and there is also no requirement for a screening determination. Refer to Form 1 in Appendix 1 of report.

7.0 The Appeal

7.1. Grounds of Appeal

7.1.1. The appellants' evidence, which included statements by their town planning consultants, their architects and their historic buildings consultant, may be summarised as follows:

- The appellants purchased 19 Claremont Road in 2018. They committed to a long-term programme of investment, with the ambition of transforming a habitable but severely underperforming dwelling into a high-quality, energy-efficient family home that fully realises the potential of its setting.
- The existing dwelling has a poor building energy rating of E2. It suffers from extensive damp and water ingress, evidenced by blistered paintwork and plaster. Its inefficient building form, exacerbated by poor-quality side annexes and inadequate insulation, results in significant heat loss and high running costs. The proposed works would create a more compact and thermally efficient envelope, consistent with national and local policy objectives promoting the retrofit and upgrade of existing housing stock.
- The proposed works are necessary to ensure the long-term suitability of the dwelling for family occupation, providing a more coherent layout and a sequence of spaces better suited to evolving family life, while maintaining the essential character of the dwelling. The net effect is a modest increase in gross floor area with increased separation distances from neighbouring properties.
- The planning authority has incorrectly applied Policy HCAP22 and Objectives SPQHO104 and DMSO190 to a dwelling that is not a Protected Structure, not in an Architectural Conservation Area and not subject to any heritage designation. It is not a rare example of a structure type or a distinctive piece of architecture and thus is not included in the National Inventory of Architectural Heritage. It cannot reasonably be classified as a vernacular rural structure. It has not been identified, in the Development Plan or elsewhere, as a 20th

Century building of merit. The proposal does not involve replacement of the existing dwelling with a modern structure. Even if the threshold conditions were engaged, it has had full regard to Table 14.26 of the Plan.

- The proposed development accords with relevant policies and objectives of the Plan, including Policy SPQHP41 and Objective SPQHO45 (which support dwelling extensions of appropriate scale that protect residential and visual amenities); Objectives SPQHO41, SPQHO43 and SPQHO44 (which encourage refurbishment, retrofitting and retention of existing dwellings and promote innovative design solutions that respect the character and architectural heritage of the area); and Section 14.10.2 (which provides guidance on residential extensions with regard to scale, height, proximity to boundaries and the quantum of private open space retained).
- The planning authority has failed to identify with any specificity what “vernacular character” or “historical features” are present in the building that are so significant as to justify refusing permission. The Conservation Officer’s opinion regarding the internal character of the dwelling was based on assumption, as access inside the house was not requested. The proposed internal works are exempted development. The planning authority has no power to refuse permission for, or impose conditions on, works to the interior of a non-protected property. The Conservation Officer’s concerns in this regard are irrelevant.
- There are few original features within the house. There is a plain run cornice in the main living room, which lacks any high degree of decoration, but for the most part the rooms do not have cornices. There are some relatively simple chimneypieces and it is planned to relocate these in the house. The architraves at the doors are narrow and plain, consistent with later alterations.
- Photographic evidence of the physical condition of the three extensions proposed for demolition was submitted with the appeal. The western extension has a failing felt flat roof causing active damp ingress. The northern extension displays significant structural failure, with steel posts and straps installed as emergency remedial measures to support a visible parapet fracture; its porous terrace surface is causing significant water ingress to the spaces below. The rear gable wall of the eastern extension exhibits structural failure as a result of

deteriorated roofing and failed cement flashings. The high-level sliding window does not conform to contemporary building regulations for protection from falling. These structurally compromised, poorly performing additions are causing active harm to the original building. Their removal would not be an act of erasure but an act of necessary and urgent building conservation.

- The proposed development would respond positively and sensitively to the character of the existing dwelling and area. The existing tiled hipped roof would be retained in its entirety, including the chimneys and expressed deep eaves, thereby maintaining the roof profile as viewed from the public realm. The new cat-slide extension to the north would be finished in natural slate to match the existing. The proposed rear veranda and masonry spandrel panels offer contemporary echoes of the existing eaves and decorative window surrounds.
- The property's northern boundary abuts Burrow Beach, part of the public coastal amenity of Claremont Strand. The rear elevation is partially visible from the beach, the strand and the wider coastal path but it is plain, incoherent and unremarkable. It has a low ratio of window to walling. While there are rendered architraves round the windows, picked out in a darker colour, this is not a particularly attractive elevation.
- Recent planning permissions granted in the immediate vicinity of the application demonstrate that the planning authority has consistently supported well designed residential development in this coastal setting. The proposed modifications to Roslyn are more modest. The refusal of this application is inconsistent with the established pattern of decision making.
- The proposed works represent a contemporary architectural response. The as-lodged scheme seeks to retain and restore what is best about the original structure, including its hipped roofline, its chimneys and its essential massing; while removing what detracts from it and adding a rear extension that would improve the dwelling's relationship with the beach and the sea. The properties to the west of Roslyn are contemporary buildings or extensions to buildings and the proposed extension would have a similar horizontal emphasis to blend in with the prevailing style of its neighbours.

- While the appellants consider the as-lodged scheme entirely appropriate, an Option B scheme, illustrated by 18 drawings, was prepared in response to the planning authority's stated concerns. It proposes to retain a greater quantum of the existing building fabric, most notably the front oriel window and the decorative side wings of the house. As the proposal includes alterations to the floor levels, the levels of the windows on the front elevation would need to change and the oriel window would be removed carefully and reinstated in a suitable revised position.
- The Option B scheme remains architecturally coherent and the additional fabric retention does not compromise the quality or energy-performance ambitions. It balances the appellants' functional and sustainability objectives with retention of the most characterful elements of the front elevation. The appellants are willing to accept a condition requiring the development to be implemented in accordance with the Option B scheme should the Commission consider it a more appropriate basis for a grant of permission.

7.2. Planning Authority Response

- 7.2.1. The planning authority stated that it remains of the opinion that the proposed development would not sufficiently respect the existing dwelling, its historical features and design characteristic. It could not assess the full extent of Option B under the appeal process. It requested the Commission to uphold its decision. In the event that the appeal is successful, provision should be made for applying a financial contribution and/or any special development contributions required in accordance with the Council's Development Contribution Scheme.

7.3. Observations

- 7.3.1. Pursuant to Article 28(1)(n) of the Planning and Development Regulations 2001, the Commission, being of the opinion that the proposed development might have significant effects in relation to nature conservation, requested the Heritage Council, the Department of Housing, Local Government and Heritage, and An Taisce to make submissions or observations. No response was received.

- 7.3.2. In its observations, Hillwatch fully supported refusal of the application. It said that the house in question is in a prominent position overlooking Burrow Beach. While not a Protected Structure, it is an important part of Howth's vernacular architecture. Its current quiet Victorian style blends into the background but the proposed new façade facing the beach would not. A redesign is necessary to lessen the visual impact.

8.0 Assessment

8.1. Issues

- 8.1.1. Having inspected the site and considered in detail the documentation on file for this first-party appeal, it seems to me that the main planning issues are:
- whether the proposed development is acceptable in an area within 100 metres of coastline vulnerable to erosion; and
 - the effect of the development on the character of the dwelling and the surrounding area.

8.2. Coastal Erosion

- 8.2.1. Although the planning officer recommended that the applicant be requested to demonstrate compliance with the Development Plan's provisions relevant to coastal erosion, it is apparent that the Council did not make a further information request to that effect. As this potentially important matter was left unresolved, I consider it below.
- 8.2.2. Section 9.7.1 of the Plan establishes a presumption against new development in areas of coastline at risk from coastal erosion. The phrase "new development" is not further explained but I take it to mean new buildings rather than alterations and extensions to existing buildings. Since the application site is located in an urban area, the prohibitions against development set out in Objectives GINHO75, GINHO76 and DMSO163 do not apply. The Council did not cite coastal erosion as a reason for refusal and must therefore have been satisfied, having regard to Objective GINHO74, that the proposed development would not pose a significant or potential threat to coastal habitats or features and that it is unlikely to result in altered patterns of erosion or deposition elsewhere along the coast. This analysis leads me to conclude that it would not be justifiable to withhold permission on grounds of coastal erosion.

8.3. Effect on Character of Dwelling and Area

- 8.3.1. This appeal relates to a large dwelling on a large site in a very attractive coastal location. The dwelling commands splendid views across Burrow Bay and towards Ireland's Eye. Its front elevation, which includes wing walls, an oriel window and a covered entrance door, is impressive. The front of the dwelling cannot, however, be seen from public viewpoints and its appearance is marred by unappealing extensions on its eastern and western sides. The rear elevation, the top part of which is visible from the beach behind a boundary wall, is inoffensive but somewhat understated. Internal inspection confirmed that the building has a severe damp problem, particularly on the lower ground floor. Decoration is for the most part plain.
- 8.3.2. Policy CAP9 of the Plan supports the retrofitting of appropriate energy efficiency measures in the existing building stock. Objectives SPQHO41 and SPQHO43 also support retrofitting. While a target energy rating is not stated in the appellants' evidence, the proposed development is clearly intended to bring about a substantial improvement on the current E2 rating. I am convinced, following inspection of the property, that measures to provide proper insulation are long overdue.
- 8.3.3. The chosen retrofitting strategy involves demolishing the side annexes; lifting the level of the basement to allow it to be damp proofed; preserving the roof; retaining the eaves level; altering floor levels; altering window and door openings; stripping and relining the existing walls; and upgrading insulation and electrical and mechanical systems. I have no reason to suppose that this strategy would not achieve a substantial improvement in energy efficiency. I therefore conclude that the proposed development would be consistent with the provisions of the Plan relating to retrofitting.
- 8.3.4. The appellants' dwelling, Roslyn, is not a Protected Structure. It is not in an ACA. It is not a 20th Century building and does not have the characteristics of a vernacular building, including those mentioned in Sections 10.5.2.5 and 14.19.5 of the Plan. I consider that, due to its limited visibility, its detracting features and the ordinariness of its interior, it does not make a significant contribution to the distinctive character of Howth. While the front elevation has architectural merit, the overall building is not a rare example of a structure type or a distinctive piece of architecture. In my estimation, the innate value of the building is modest.

- 8.3.5. The Council's reason for refusal was mainly based on Objectives SPQHO104 and DMSO190 and Policy HCAP22. Objective SPQHO104 is not engaged as the proposed development does not involve the demolition or replacement of a vernacular rural building. I consider that the Council's reliance on this objective was misplaced. Policy HCAP22 and Objective DMSO190 are applicable only to buildings judged to be of innate value and to contribute to the distinctive character of the urban area. Given the reservations I have expressed about Roslyn, I do not attach significant weight to these provisions of the Plan or to Table 14.26 to which they refer.
- 8.3.6. The eastern and western side annexes are in poor condition and detract from the appearance of the dwelling. I am satisfied that their demolition would be an aesthetic benefit. Upon the removal of the annexes, the wing walls would no longer provide enclosure for buildings behind.
- 8.3.7. It is apparent that the proposed development would radically change the front façade of the dwelling by removing the canted bay, removing the entrance door and canopy, and altering the openings and glazing pattern. I agree with the Conservation Officer that the resultant dwelling would read as a new-build modern interpretation of a Victorian house. That is an inevitable consequence of the chosen retrofitting strategy.
- 8.3.8. Objective SPQHO43 of the Development Plan is to promote the use of contemporary and innovative design solutions provided they respect the character and architectural heritage of the area. I consider that the proposed contemporary design solution is appropriate for this building, which does not enjoy the policy protection afforded to acknowledged built-heritage assets. As the front elevation cannot be seen from outside the site, I am not persuaded that the proposal demonstrates a lack of respect for the character and architectural heritage of the area.
- 8.3.9. The Conservation Officer expressed concern about the loss of surviving internal decorative features – fireplaces, plasterwork and historic joinery such as stairs, shutter surrounds and doors. However, my inspection confirmed the appellants' evidence that there are in fact few original features within the dwelling. Bearing in mind that the dwelling is not a Protected Structure, I do not consider that this concern warrants the withholding of planning permission.
- 8.3.10 Section 14.10.2 of the Plan requires the design of extensions to have regard to the character and form of the existing building, its architectural expression, external

finishes and pattern of fenestration. The proposed single-storey rear extension would significantly alter the form, footprint and rear presentation of the dwelling. The roof of the extension would slope down from the existing roof, though at a slightly different angle, with the result that the side elevations would be asymmetrical. The shape of the enlarged dwelling would not be particularly elegant when seen from east and west within the site. However, the proposed side elevations would be an improvement over those that currently exist, marred as they are by the unsightly annexes.

8.3.11. The rear elevation of the dwelling as extended would be significantly closer to the beach than at present. It would be unmistakably modern in appearance with a preponderance of glazing. Stylistically, it would not look out of place beside the neighbouring buildings to the west. Should permission be granted, a condition could be attached requiring details of the external finishes to be agreed before development commences. Taking all the foregoing matters into account, I conclude that the Council's reason for refusal has not been sustained.

8.3.12. Having studied the Option B proposals, I see no good reason why they could not be admitted for consideration by the Commission. The proposals do not derogate from the description of development provided on the application form and involve less interference with the fabric of the building than the original scheme. However, I am not convinced that retention of the wing walls is a necessary requirement to make the development acceptable. I note, moreover, that the proposed Option B southern elevation seems to indicate that the shape of the upper part of the oriel window would have to be modified to fit it in vertically. It seems to me that this attempt to insert a Victorian feature into a contemporary façade is unlikely to produce a satisfactory composition. In my view, the original scheme is acceptable and should be permitted.

9.0 Appropriate Assessment Screening

9.1. For the reasons set out below, I concur with the conclusions of the applicant's appropriate assessment screening report and with the planning officer's view that there is no need for an appropriate assessment.

9.2. Having considered the nature, location and small scale of the proposed development, the nature of the receiving environment as a built-up urban area, the nature of the foreseeable emissions therefrom, the availability of public piped services to

accommodate the foul effluent arising therefrom and the absence of any known hydrological link between the application site and any European site, I am content on the basis of objective information that the development is not likely to have a significant effect on any European site, either alone or in combination with other plans or projects. I therefore conclude that the carrying out of an appropriate assessment under Section 177V of the Planning and Development Act 2000 is not required.

10.0 Water Framework Directive

- 10.1. The application site is located about 20 metres from the Irish Sea. The proposed development comprises the demolition of structures and an extension to a dwelling. No water deterioration concerns were raised in the planning appeal.
- 10.2. I have assessed the development and have considered the objectives as set out in Article 4 of the Water Framework Directive (WFD) which seek to protect and, where necessary, restore surface and ground water waterbodies in order to reach good status (meaning both good chemical and good ecological status), and to prevent deterioration. Having considered the nature, scale and location of the project, I am satisfied that it can be eliminated from further assessment because there is no conceivable risk to any surface and/or groundwater water bodies either qualitatively or quantitatively.
- 10.3. The reasons for this conclusion are the nature and modest scale of the works and the lack of hydrological connections to waterbodies
- 10.4. I conclude on the basis of objective information that the proposed development will not result in a risk of deterioration on any water body (rivers, lakes, groundwaters, transitional and coastal) either qualitatively or quantitatively or on a temporary or permanent basis or otherwise jeopardise any water body in reaching its WFD objectives and consequently can be excluded from further assessment.

11.0 Recommendation

- 11.1. I recommend to the Commission that planning permission be granted, subject to the conditions set out below.

12.0 Reasons and Considerations

12.1. The existing building is not a Protected Structure, is not in an Architectural Conservation Area, is not a 20th Century building and does not have the characteristics of a vernacular building. Having regard to the relevant provisions of the Fingal Development Plan 2023-2029, it is considered that, subject to compliance with the conditions set out below, the proposed retrofitting proposals and contemporary design solution are acceptable at this location and would not seriously injure the amenities of the area. The proposed development is therefore in accordance with the proper planning and sustainable development of the area.

13.0 Conditions

1.	The development shall be carried out and completed in accordance with the plans and particulars lodged with the application, except as may otherwise be required in order to comply with the following conditions. Where such conditions require details to be agreed with the planning authority, the developer shall agree such details in writing with the planning authority prior to commencement of development and the development shall be carried out and completed in accordance with the agreed particulars. Reason: In the interest of clarity.
2.	Surface water drainage arrangements shall comply with the requirements of the planning authority for such services and works. Prior to the commencement of development, the developer shall submit proposals for the disposal of surface water from the site for the written agreement of the planning authority. Reason: To prevent flooding and in the interest of sustainable drainage.
3.	Details of the materials, colours and textures of all the external finishes of the proposed development shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. Reason: In the interest of visual amenity.

4.	The site shall be landscaped in accordance with a comprehensive scheme of landscaping, details of which shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. Reason: In the interests of residential and visual amenity.
5.	The developer shall pay to the planning authority a financial contribution in respect of public infrastructure and facilities benefiting development in the area of the planning authority that is provided or intended to be provided by or on behalf of the authority in accordance with the terms of the Development Contribution Scheme made under Section 48 of the Planning and Development Act 2000. The contribution shall be paid prior to the commencement of development or in such phased payments as the planning authority may facilitate and shall be subject to any applicable indexation provisions of the Scheme at the time of payment. Details of the application of the terms of the Scheme shall be agreed between the planning authority and the developer or, in default of such agreement, the matter shall be referred to An Coimisiún Pleanála to determine the proper application of the terms of the Scheme. Reason: It is a requirement of the Planning and Development Act 2000 that a condition requiring a contribution in accordance with the Development Contribution Scheme made under Section 48 of the Act be applied to the permission.

I confirm that this report represents my professional planning assessment, judgement and opinion on the matter assigned to me and that no person has influenced or sought to influence me, directly or indirectly, following my professional assessment and recommendation set out in my report in an improper or inappropriate way.



TREVOR A RUE

Planning Inspector

24th June 2026

Appendix A: Form 1 – EIA Pre-Screening

Case Reference	PL-501148-DF-26
Proposed Development Summary	Demolition of structures and extension to dwelling
Development Address	19 Claremont Road, Howth, Co. Dublin
	In all cases check box /or leave blank
1. Does the proposed development come within the definition of a 'project' for the purposes of EIA? (For the purposes of the Directive, "Project" means: - The execution of construction works or of other installations or schemes, - Other interventions in the natural surroundings and landscape including those involving the extraction of mineral resources)	☒ Yes, it is a 'Project'. Proceed to Q2.
2. Is the proposed development of a CLASS specified in Part 1, Schedule 5 of the Planning and Development Regulations 2001 (as amended)?	
☒ No, it is not a Class specified in Part 1. Proceed to Q3	
3. Is the proposed development of a CLASS specified in Part 2, Schedule 5, Planning and Development Regulations 2001 (as amended) OR a prescribed type of proposed road development under Article 8 of Roads Regulations 1994, AND does it meet/exceed the thresholds?	
☒ No, the development is not of a Class Specified in Part 2, Schedule 5 or a prescribed type of proposed road development under Article 8 of the Roads Regulations, 1994.	No Screening required.
4. Has Schedule 7A information been submitted AND is the development a Class of Development for the purposes of the EIA Directive (as identified in Q3)?	
No ☒	Pre-screening determination conclusion remains as above (Q1 to Q3)

Inspector:



TREVOR A RUE

Date: 24th June 2026