



Large-scale Residential Development Appeal Observation

Online Reference
LRD-OBS-006253

D 23/19
22040
FK, 20/9

Online Observation Details

Contact Name
Ciara Ní Laoi

Lodgement Date
17/09/2024 14:31:50

Case Number / Description
320660

Payment Details

Payment Method
Online Payment

Cardholder Name
Ciara Ni Laoi

Payment Amount
€50.00

Fee Refund Requisition

Please Arrange a Refund of Fee of

€

Lodgement No

LDG— 074863-24

Reason for Refund

Documents Returned to Observer

Yes No

Request Emailed to Senior Executive Officer for Approval

Yes No

Signed

EO

Date

Finance Section

Payment Reference

ch_3Q01VSB1CW0EN5FC0kaoWmTO

Checked Against Fee Income Online

EO/AA (Accounts Section)

Amount

€

Refund Date

Authorised By (1)

SEO (Finance)

Authorised By (2)

Chief Officer/Director of Corporate Affairs/SAO/Board Member

Date

Date

(

HILLWATCH.

c/o "Seabarm"

Strand Road
Sutton, Co Dublin
17/09/2024

An Bórd Pleanála

ABP Reference : Ref 320660-24
Planning Reference : LRD0035/S3

Lands Adjoining Howth Demesne Deer Park Howth

We wish to state our strong support for the decision of Fingal County Council to refuse permission for this development.

This is a highly sensitive site, being part of the historic Howth Castle Demesne, and it forms the entry point to Howth village. We echo the Planning Authority's view that *'...the statutory designations and land zoning that border and include part of the site of Protected Structures, Special Amenity Area Buffer and High Amenity Lands all serve to emphasise that this is a special and unique place and so any development within the residential zoned section should not be overly dominant in scale or massing and should be appropriate to the historic local character of the place..'*

The visual impact of this proposal is clear, even in the appellants own submission. This is very evident at the approach to Howth, where the initial view of Howth Hill would be completely blocked. Although not currently a specifically protected view, it is a hugely important one, and the sudden leap from low residential scape to an urban landscape is particularly jarring.

Contrary to the claim that *"...site and its surrounding contextthe approach to Howth village is visually poor with a low quality of public realm cannot be considered of exceptional landscape value..."*, the photographs below clearly demonstrate that this is not the case.





Additionally, as shown below, the approach road from Corr Bridge has a very pleasant aspect, consisting of stone walls, mature trees with 2-storey houses set well back.



While the appellant makes continuous reference to the Techrete development to make its own case, it cannot be considered in any way comparable or relevant, as critically, Techrete was a brownfield site with a Town Centre Designation, not a Residential zoning.

We have attached an analysis of the large-scale apartment developments on Howth peninsula, which have already been granted planning permission since 2018. Of the 923 units, only 50 no are 3-bedroom. 95% of the apartments are one or two bedroom (see attached list). These have either been built or are under construction and have already entailed several material contraventions of the Development Plan, which allowed a total figure of only 492 units.

- Objective SP6 H030 of the current Fingal County Council Development Plan (2023-2029) states that, in accordance with Fingal housing strategy, the council "seeks to encourage the creation of attractive mixed use and sustainable residential communities which contain a wide variety of houses and apartment types, sizes, tenures, typologies"

- Elsewhere in a separate section of the development plan called Apartment Development Standard (No 14. ()) it is stated that "...it is important to ensure that no housing type dominates..." Policy CAP, Chap 3 "promotes high quality residential development incorporating a range of typologies and tenure options. If granted this proposed development of one and two bedroom apartment would add to the already large number of this type of dwelling granted on the Howth peninsula.

We are of the opinion that this development of 63no 1-bedroom and 72no 2-bedroom units does not fulfil the development plan objectives quoted above, does not address the shortage of affordable family homes in Dublin, and will not contribute to the sustainable long-term development of Howth community.

We would therefore state that the addition of a further 135 one and two bedroom apartments does not comply with stated objectives of the current Fingal County Council Development Plan quoted above. In fact, the proposed 135 new apartments on top of the 923 already granted since 2018 would bring the total to 1,058, which is a 110% or over twice the number allowed for in Howth in the Development Plan!

It is our opinion that more small apartments, possibly for rent, are not what Howth needs. What is required are family sized units to meet the needs of the local community. This proposal contains NONE. There is no objection in principle to development on this site, but it is critical that the proposal be redesigned to one that does not encroach on High Amenity lands, that enhances and complements Howth Castle ACA, Howth village and environs, contributes to a community life, rather than harming its unique qualities and historical integrity.

We therefore urge you to uphold Fingal CC's decision and refuse this appeal.

Yours sincerely
Jacqueline Feeley

FOR HILLWATCH

UNITS GRANTED PLANNING PERMISSION HOWTH : FINGAL DEVELOPMENT PLAN 2018-2023

<u>Planning Ref</u>	<u>Address</u>	<u>Units</u>	<u>3 Bed</u>	<u>2 Bed</u>	<u>1 Bed</u>	<u>Studio</u>	<u>Occupancy Based on minimum of 1 per bedroom</u>	<u>Parking</u>	<u>Bikes</u>	<u>Open Space Deficit SQ.M</u>
F19A/0405	Osprey, Kilrock Road	<u>8</u>		8			16	12		300
F17A/0615 SHD006/19	Santa Sabina	<u>155</u>	9	117	29		290	168	270	1300
O6F.306102	Techrete	<u>512</u>	10	276	222	4	808	439	1335	17100
F21A/0386	Greymount Dunggriffin Road	<u>32</u>	6	21	5		65	41	81	0
F22A/0477	Dunluce Main Street Howth	<u>36</u>		22	4		48	37	68	1300
ABp305828-19 SHD/094/19	Baily Court/Edros	<u>180</u>	25	89	62	2	319	144	426	6667.5
GRANTED / UNDER CONSTRUCTION		<u>923</u>	<u>50</u>	<u>533</u>	<u>322</u>	<u>6</u>	<u>1546</u>	<u>841</u>	<u>2180</u>	<u>26667.5</u>
LRD0035/S3	Deerpar, Howth (Application)	<u>135</u>		72	63		207	63	410	3413
TOTAL INCLUDING DEER PARK		<u>1058</u>	<u>50</u>	<u>605</u>	<u>385</u>	<u>6</u>	<u>1753</u>	<u>904</u>	<u>2590</u>	<u>30080.5</u>