



Planning Appeal Online Observation

Online Reference
NPA-OBS-003802

Wdy 26/8 = 23/9

LRD40
✓ FR 25/08

Online Observation Details

Contact Name
roxanne white

Lodgement Date
20/09/2024 11:52:26

Case Number / Description
320660

Payment Details

Payment Method
Online Payment

Cardholder Name
roxanne white

Payment Amount
€50.00

Processing Section

S.131 Consideration Required

☒ Yes — See attached 131 Form

☐ N/A — Invalid

Signed


EO

Date

25/9/24

Fee Refund Requisition

Please Arrange a Refund of Fee of

€

Lodgement No

LDG-075016-24

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_3Q14RqB1CW0EN5FC0eaNTFhW

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

S.37

File With

SECTION 131 FORM

A ppeal No.

ABP—

Defer Re O/H

☐

Having considered the contents of the submission dated/received
from _____ I recommend that section 131 of the Planning
and Development Act, 2000 be/not be invoked at this stage for the following reason(s):

Section 131 not to be invoked at this stage.

☐

Section 131 to be invoked — allow 2/4 weeks for reply.

☐

Signed

EO

Date

Signed

SEO/SAO

Date

M

Please prepare BP — Section 131 notice enclosing a copy of the attached submission.

To

Task No

Allow 2/3/4 weeks

BP

Signed

EO

Date

Signed

AA

Date

Roxanne White
Couleen
Baily
County Dublin

17 September 2024

An Bord Pleanála
64 Marlborough Street
Dublin 1
D01 V902

Planning Application ABP-320660-24 LRD0035/S3
Lands Adjoining Howth Demesne Deer Park, Howth, Co Dublin

The proposed development will consist of:

- I. two offset buildings ranging in height from 3-5 storeys providing 135 residential units comprising:
 - a) 63 one-bedroom units*
 - b) 72 two-bedroom units**
- II. a public open space of 1,676 sq.m and communal open space with an area of 890 sq.m;*
- III. the provision of 63 surface car parking spaces, including 4 accessible parking spaces and 13 EV spaces;*
- IV. the provision of 410 bicycle parking spaces, including 342 secure bicycle spaces and 68 visitor spaces;*
- V. partial demolition of 3 sections of the existing demesne northern boundary wall, which front Howth Road to facilitate vehicular access in the northwestern corner and two separate pedestrian/cyclist access points along the centre and eastern side of the northern boundary wall;*
- VI. restoration and refurbishment of the remaining extant northern and eastern demesne boundary wall;*
- VII. undergrounding and relocation of existing ESB overhead lines and diversion of existing distribution gas pipe around the site;*
- VIII. works to facilitate bicycle infrastructure upgrades and services connections along Howth Road: and*
- IX. ESB substation, kiosk, rooftop solar photovoltaics, waste storage and plant rooms, drainage, boundary treatment, public lighting, and all ancillary site and development works;*

Dear Planners

I write under the Planning acts to note my observations and objections to aspects of the proposed planning application.

I ask for REFUSAL of this application; due to the proposal conflicting with objectives from the Fingal Development Plan.

Furthermore, the plans submitted for this site location, are inappropriate due to the proximity to and impact to:

- Architectural Conservation Areas,
- Howth SAAO and Buffer zone,
- Local Protected Structures and Historic structures,
- Protected views,
- Removal of significant trees,
- Removal of a 'wildlife corridor' from the heathland SAC vegetation on the hills of Howth, through deciduous woodland, grasslands, to the seashore and another SAC.

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1) Refusal of application by Fingal County Council

Fingal County Council refused this application for the following two reasons:

1. Having regard to its scale, form, massing and overall height, the proposed development would fail to respond to the baseline environment and surrounding historical and natural environment of the site which is located within a designated Highly Sensitive Landscape, the Buffer Zone for the Howth Special Amenity Area Order, adjoins Howth Castle Architectural Conservation Area and lands zoned for High Amenity in the Fingal County Development Plan 2023-2029, is part of the historic demesne lands of Howth Castle, a Protected Structure, and is in the vicinity of a number of other Protected Structures. The proposed development would be wholly inconsistent with the established character of this area, would be seriously injurious to the visual amenities of the area and would be detrimental to the character, setting and special interest of a number of protected structures including Howth Castle and St. Marys Church. The development would be contrary to Policy CSP22-Howth and Objective HCAO24 of the Fingal County Development Plan 2023-2029 and to the 'Urban Development and Building Heights Guidelines for Planning Authorities', 'Sustainable Residential Development and Compact Settlement Guidelines', and the 'Architectural Heritage Protection Guidelines for Planning Authorities' which were issued under Section 28 of the Planning and Development Act 2000, as amended. The proposed development would set a poor precedent for other similar development and would be contrary to the proper planning and sustainable development of the area.

2. Having regard to the overall scale and height of the proposed development with the transitions in height from the west of the site which is predominantly single storey, it is considered that the proposed development would be visually dominant within the immediate context in addition to being significantly intrusive on the skyline and on approach into and out of Howth village and when viewed from the surrounding areas, the landscape character of which being 'coastal' and being categorised as having an exceptional landscape value, with the objective being to protect skylines, horizons and ridgelines from development and to preserve the landscape types. The proposed development would be incongruous with the streetscape in which it would be proposed to integrate with and would contravene Objective GINHO55 – Protection of Skylines of the Fingal Development Plan 2023-2029 and Objective GINHO56 whereby the Visual Impact Assessment submitted was considered inadequate to fully assess the proposed development, and therefore materially contravene the RS and HA Zoning Objective of the site.

The submitted documentation for the grounds of appeal includes:

- Item (1) a summary of appeal documents
- Item (2) an appendix of views that is dated Nov 2023
- Item (3) a supplementary LVIA notice from August 2024
- Item (4) a drawing of part of the building and trees from August 2024
- Item (5) a conservation response from August 2024

In my opinion there is not much new evidence presented in the appeal and no redesign following the FCC Decision.

I cannot support the argument by the Applicant that this design is suitable for the site and surrounding areas. One of the arguments presented, if I understand correctly, is the inference that as this 'RS' Residential zoned area of the site, does not have to be 'sensitive' to the surroundings or views. All of the coastal landscapes in Howth (this includes all of Howth, not just SAAO and Buffer zone) are described as 'highly sensitive coastal landscape', of 'exceptional value' in the FCC Development Plan regardless of being 'RS' zoned. This site is also considered sensitive, and exceptional, due to its proximity to protected and historic structures, distinct vegetation (trees, grasslands and heath) and protected views and for being within SAAO Buffer zone protection.

The height and slope of the site will make the five (5) floor buildings even higher and larger in bulk and mass. The adjoining residential development, in the same 'RS' zone, is typically two floors in height and on a lower topography.

The gates of Howth Castle are small, when compared to a five (5) floor building, and will lose their attractiveness, as the proportions of gates and tree lined avenue adjacent to these blocks of buildings, will be impacted, dwarfed and visually damaged. The gates and avenue are attractive, in part due to their imposing linear proportions; and this will be spoiled by an incongruous bulky mass in close proximity. The same issue of this proposals bulk, will arise for views of St. Marys Church or features within Howth ACA or those of the Rhododendron Garden or Muck Rock. Though there are not 'SAAO' protected views on the Howth road, 'RS' zoning and the FCC Development Plan requires buildings to fit into the landscape and topography, rather than obscure views and block the horizon.

Another design of apartments or houses at this site could be more suitable. This would require space between any buildings and more space near the Castle gates and/or a lower height on the buildings to the east of this site. It would be better if there was a visible separation between the various 'blocks' from the south and north of the site.

The argument presented in the appeal suggest that high or higher apartments approved outside of 'RS' zoning, such as those at the 'TC' Town Centre Techcrete site; should be used as precedent; rather than the 'RS' zone objectives, at this specific site. I can't support the argument that a different zone, with different objectives, should be in place for this 'RS' site. I support the current planning approach, used by all planning authorities, where each planning zone has a distinct area, and each zone has its own requirements and a boundary with (a) different zone(s). If you could apply planning objectives from another nearby zone to adjacent zones, then in effect we would end up with just one planning zone.

Here is part of the Chief Executives orders comments about the 'TC' Town Centre zone nearby, referenced in the application as a possible reason that this proposal should be accepted:

It is the opinion of the Planning Authority that the design response is not one which is reflective of the baseline environment and to draw comparison with the Claremont site on the northern side of the road, currently under construction which was a brownfield site with a Town Centre zoning is incomparable. The LVIA needs to be extended to include views from Muck Rock Hill, however notwithstanding same, it is evident from the CGIs that the development will be visually obtrusive and detrimental to the area.

The development as proposed is not acceptable.

The visual images presented, in the submitted documentation, in my opinion, **suggest that the design will impact the environment and protected views from the SAAO and ACA.** I can't agree with the argument listed in the appeal, that the photomontages show what could have 'a positive effect on the landscape'.

One of the problems with this design proposal is the bulk of the buildings when combined with the height. Despite being separate buildings, they appear as one 'block' in the photo montages presented. Additionally, the 'block or blocks' obscure the horizon and skyline of trees, and heathland to the south. When looked at this site from the sea side (northern side) there is a 'block' of apartments obscuring the horizon and skyline; and when looked at from areas of protected views (hills of Howth to the south) and Howth Castle Avenue, again it will look like one block of apartments, which in places may obscures the sea, and skyline.

A view from near the Muck Rock area, where there are protected views, is below. This is a classic postcard view of Howth Castle, Irelands Eye and Lambay. The impact to this view is not clearly shown in the submitted documents:



An old aerial view of the Castle and this site (that may be somewhat similar to views from Ben of Howth direction):



There are objectives in the FCC Development Plan that protect ACA's, the SAAO and SAAO Buffer zone from adjacent development that negatively impact or damage these areas. **These objectives against 'damaging development' and others that 'protect a sense of place'; actually protect the historic wall, regardless of whether it is outside the Howth ACA area or not.** I can't agree with any entrances being made to break the boundary wall to Howth road, and if there must be an 'entrance', rather than several proposed, then the details should be presented in full for consideration by the planners.

There should not be lighting in this 'HA' area, as the FCC light pollution objectives; and lights from the apartments should be limited, for example by additional trees. There is no precedent for 'HA' areas having reinforced grass on underground digging for infrastructure cables or pipes. Such features are normally mandated to be within the RS area of any site. Construction is normally mandated to be outside the 'HA' zone in entirety, where zones are located within one site or ownership.

The FCC position is that views should be protected in the long term, as the lifetime of the building and short term features such vegetation, or tree should not be overly relied upon for screening. This makes sense, as trees die before their maturity due to multiple factors beyond control of the property owners: for example, trees die due to storms, drought, waterlogging, fire, disease and vandalism. I support this position by FCC that trees, despite taking hundreds of years to reach maturity, can die in a short period of time, no longer fulfilling screening requirements or expectations.

Here is a statement in the Chief Executives Order that suggests the proposal should have more screening:

Furthermore, over reliance appears to be given to screening by mature trees which are on lands outside the applicant's control. While trees may aid integration or subordination of a building, such features should not be relied upon for screening, instead the building should be of an appropriate scale and mass relative to the site and surrounding features. Similarly, the creation of an excessive hard urban edge adjoining the High Amenity zoned lands is not an acceptable interface between the sensitive zonings.

2) Zoning

This area is zoned 'RS' and 'HA'. There are repeated arguments presented in the appeal and application that this should somehow be a special 'light' or 'softer' version of 'RS' requirements, due to adjacent areas such as Techcrete being zoned as 'TC' Town and District Centre.

I agree with the observations submitted to FCC for this planning application and with the FCC Decision, that this 'RS' zoning remains in place, regardless of the sites proximity to a different zone, and any approved planning permissions on that site. Furthermore, due to the site being within the SAAO Buffer zone and proximal to the SAAO, further requirements are mandated for 'the 'RS' and 'HA'.

I suggest that residential design in this site should:

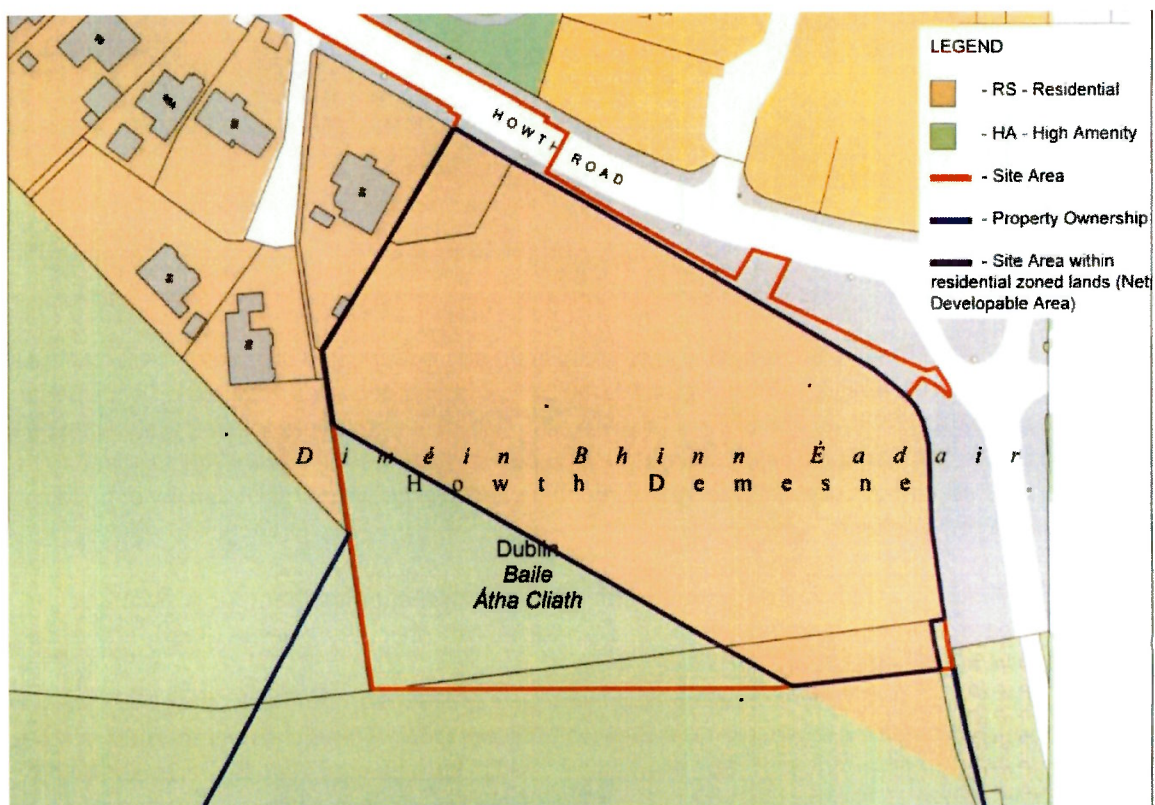
- Blend in with the typically two storey houses to the west of the site
- Leave a gap between any new buildings and the trees and Castle gates to the east
- Not overwhelm other structures like St Marys Church
- Leave all or 99% of the southern wall unbroken
- Be comprised of individual buildings which have visible gaps between them
- Not be too large in mass, bulk or height, so fits within the existing exceptional landscape

- Not require the removal of trees, such as pines
- Provide supplementary tree planting parallel to the Castle avenue trees

There are policies and objectives of in the Fingal development Plan to protect the SAAO and Buffer zone from development within and adjacent to them; such as Policy CSP23 - To protect the Howth Special Amenity Area Orders (SAAO), including the Buffer zone, from residential and industrial development intended to meet urban generated demand.

Regarding the High Amenity area, there should not be electric lighting in this 'HA' area, for any reason. The FCC light pollution objectives define this 'HA' area as being intrinsically dark; and lights from the apartments should be limited so not to damage this area, for example by additional trees. Likewise for external walkways and residential 'open areas', their lighting should not pollute the 'HA' area.

The submitted maps of landscaping, if I understand correctly, have made part of the 'HA' area into what looks like an urban or suburban open space type garden. This type of development is not allowed in 'HA' areas at all, and 'even more NOT allowed' in this 'HA' zone within the SAAO Buffer zone.





There is no precedent for 'HA' areas having reinforced grass on underground digging for infrastructure cables or pipes. Such features are normally mandated to be within the RS area of any site. Construction is normally mandated to be outside the 'HA' zone in entirety, where zones are located within one site or ownership. The 'HA' spatial area should not be included and counted as square metre space to be used in the 'RS' Residential site area to satisfy residential planning requirements of density of buildings and open space requirements.

The 'HA' High Amenity area has a statement in the FCC Development plan that 'public access to 'HA' areas should be explored. I have not been able to identify whether this potential requirement has been addressed in this application.

I have not found where 'maintenance' of the HA area is documented. This is clearly important, so that the objectives and policies are met. For example, it would be expected that this area is 'wild' or managed as a 'wild area'. That might mean no cutting of grasses, or no cutting in spring and summer and no use of chemicals, such as sprays. I would ask for conditions as such should this application be granted, otherwise there may be a tendency for the 'HA' and 'RS' landscape areas of the site to become similar and managed under the same processes, planted using the same species and landscaped with the same paths or benches.

I also support the Chief executives Order that suggests the 'boundary' between Residential and High Amenity areas of the site should be reworked:

Furthermore, over reliance appears to be given to screening by mature trees which are on lands outside the applicant's control. While trees may aid integration or subordination of a building, such features should not be relied upon for screening, instead the building should be of an appropriate scale and mass relative to the site and surrounding features. Similarly, the creation of an excessive hard urban edge adjoining the High Amenity zoned lands is not an acceptable interface between the sensitive zonings.

Part of the FCC Chief Executives Order, expresses concern about the proposal and states that it will be incongruous in this 'RS' Residential zoned area:

The proposal as presented is considered unacceptable due to the proposed scale, mass and height of the buildings which would be disproportionately incongruous to the established character of the area. It is contended and as stated in report received from the Conservation Office, that the sensitive context of the site should direct the type of development that could be accommodated while protecting the historic setting and established character which is required by HCAP12, HCAP18, HCAP19, HCAO24, DMSO183 and direction within Table 14.21 on sensitive design approaches as set out in the Fingal Development Plan 2023-2029.

The Planning Authority remain of the view that the proposed development by virtue of the excessive height and overall scale with deep plan, specifically on approach into the village represent a stark and abrupt difference with the established setting which results in buildings that would be unduly dominant and visually intrusive upon the setting of the site in relation to Howth Castle and that of the gateway into the village itself and if permitted would radically change the existing environment to the detriment.

I suggest that the 'RS' area of the site could have a landscape design that is more sympathetic to the locality and proximity to Howth Castle. For example, the 'RS' landscaping could have an orchard or agricultural area for vegetables, as this site is proximal to current and previous horticulture near the Castle. Likewise, beech hedges, once famous at the walled garden, could be incorporated into the design, so there is a link in proposed landscape plan to the historical legacy of the locality and the remnants of this vegetation that currently exist within the ACA.

3) ACA, NIAH listed & Protected Structures

Here is part of the FCC Chief Executives Order, that expresses concern about the proposal, with regard to the historical local character of the place:

In Section 2.8 of the Urban Development and Building Heights: Guidelines for Planning Authorities (2018) it is stated that:

"Historic environments can be sensitive to large scale and tall buildings. In that context, Planning Authorities must determine if increased height buildings are an appropriate typology or not in particular settings".

The Planning Authority consider that due to the sensitive setting of the site and the importance of this historic environment that this is not an appropriate location for large-scale and/or tall buildings. 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.

Another part of the FCC Chief Executives Order, that expresses concern about the impact of the proposed structure to Boundary wall and Howth Castle gates. I share this concern as I think this proposal will impact the boundary wall (by breaking into it for several access routes and 'over shadow' the gates by the buildings bulk, mass and height).

It is recognised that the portion of these lands that directly border the Howth Road are zoned residential and therefore some form of development will be permitted, however the issues as previously raised in the opinion report is the scale and massing and how this radically changes the existing environment to its detriment. The gateway forming the entrance to Howth Castle is a protected structure, specifically identified within the entry of RPS No. 566 for Howth Castle and the character formed by the tree-lined entrance, the random rubble masonry boundary walls and the highly stylised gate design is a fundamental part of the sense of place of Howth, contributing significantly to the attractiveness and character of the settlement. The entrance area to Howth Castle, as it currently exists, serves as the landmark for the entry point to Howth.

4) Protected views

Views are protected under multiple requirements, whether as part of policies or objectives of the FCC Development Plan, the SAAO or the SAAO Buffer zone requirements. The SAAO even mandates the protection in general of views looking 'outwards or outside' the SAAO area, besides documenting specific paths and roads with protected views.

Here is part of the FCC Chief Executives Order that expresses concern about the proposal with regard to the site and how the proposal may impact views and protected views. I agree with the assessment by FCC about the views and their influence on the character of Howth village:

The section of land that is the subject of the proposed development sits behind the estate boundary wall that fronts onto the Howth Road/Dublin Road on the western side of the current entrance to the castle, with its 19th century ornamental gate piers. While there has been low scale residential development from the mid-20th century along the southern side of the Howth Road up to the western boundary of the proposed site, the subject lands have never been built on. Their open nature behind the estate wall facilitates views of the mature trees of Howth Castle demesne and Muck Rock on the Hill of Howth, giving a distinctive character to the entry point to Howth village.

While the subject site is not contained within the boundaries of the Architectural Conservation Area for Howth Castle, this greenfield site enclosed by historic estate/demesne wall has views southwards from the Howth Road of mature trees of Howth Castle estate and Muck Rock. The mature trees and limited low-scale development on the southern side of the Howth Road along with the historic structures of St. Mary's Church and the entrance gates to Howth Castle contributes significantly to the localised distinctive character of the entry to Howth Village.

Here when walking on the beach, Howth road, Howth Castle grounds or Howth heathland hills there are multiple views that capture different historic features from different viewpoints. The views open up as you traverse the area, rather than being blocked by specific structures. This proposal would limit vistas from most directions, but especially the north-south or south-north directions. People, whether locals or tourists, get enjoyment from looking up at the hill from below and looking down at the sea from above. These views across and above Howth Castle and its ground are largely unchanged for over a hundred of years and this is a legacy that many of the policies and objectives protect.

5) Flooding, erosion, rising sea levels and risk to infrastructure

The infrastructure associated with the one hundred and thirty-five (135) proposed units passes through the Sutton Cross area. This includes the road and DART transport links, the fixed telephone line, electricity supply, fresh water and foul sewage connection to the existing Irish Water sewage network.

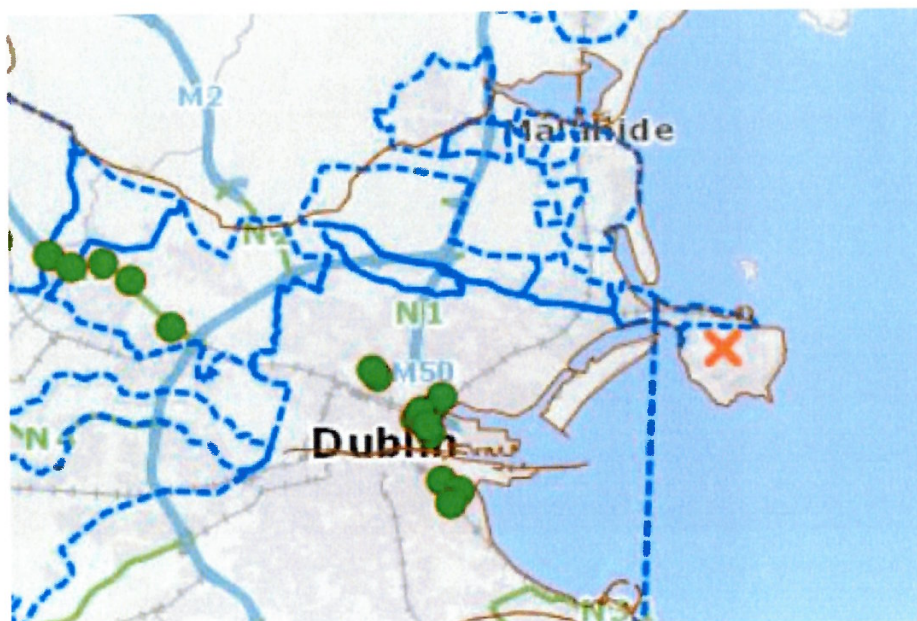
The Sutton Cross area, in places only 1m above sea level and at its highest is about 2M above sea level. These overground poles and underground pipes were not built to withstand an area of coastal erosion and to be maintained under water, from flooding of storms, tides or increased sea level.

This application documents the proximity of the site to the Howth road, with its transport links and to the Howth DART station. Though this application site is above 2m in height, these transport links are not of the same height above sea level. The number of car parking spaces has been designed based on public transport being able to allow movement of people, bicycles, vehicles and trains across the Sutton area. The accessibility may be there now; but won't remain (without considerable structural works) should sea level rise above 1 to 2 metres, during the lifetime of the building. Building sea defences would be necessary for much of the east coast of Ireland, not just this area of Sutton and Howth. It is unlikely that all the existing coastline can be protected, due to the length of coastline and scale of works necessary.

The Geological Survey of Ireland have stated in November 2023 that they expect the increase in sea level, observed now to be 2cm a year (in Howth & Sutton) to continue and/or increase, **predicting a 50cm sea level rise by 2050, about twenty years after the proposed apartments would be completed.** Since these proposed apartments would be expected to be in place for at least one hundred (100) years, I suggest there may be no long-term viable infrastructure solution in place for the lifecycle of the apartments.

The OPW (Office of Public Works) have overall responsibility for this issue of coastal management for climate change (high rainfall, flooding, coastal erosion and rising sea level.) Irish Water and FCC would be significantly involved in any future solution.

This is what an OPW report 'Flood Risk Management Plan' for The Liffey and Dublin Bay from **2018** reports for this area:



7.4.13 Sutton & Howth North AFA Measures

Description of the Proposed measure

Potentially viable flood relief works for Sutton & Howth North that may be implemented after project-level assessment and planning or Exhibition and confirmation might include physical works, such as a combination of wave return walls and flood defence walls with an average and maximum height of 1.1m and 2.4m respectively. The potentially viable flood relief works, which at this stage of assessment are deemed to be preferred, are set out in Appendix G, noting that these will be subject to project-level assessment and possible amendment.

In 2018 the OPW suggested walls of 1.1m and 2.4m would be required, in a large area that runs from Baldoyle, across Sutton Cross area to Howth Harbour. Some of the data in the years after 2018 is worse with respect to rising sea levels and coastal erosion along this part of Howth, than the data prior to 2018. This is in part due to increased high intensity rainfall and storms. 2023 was a particularly bad year for erosion along parts of the Burrow and Claremont beaches. North of Howth there are areas where the coast is being eroded by about three (3) metres a year and in other cases, areas can lose this amount of shoreline overnight in a bad storm.

Here is the DART line near Claremount, an area close to the site of the application. Erosion of sand dunes is significant here in the last two years. Again, the placement of poles and ropes to stop people walking on the dunes and increasing erosion, is ineffective due to the height of sea level, tides and storms. This sand dune is maybe 3m high and offers no protection to the DART and half of it has been eroded in two years.





I note that the FCC Development Plan states that the number of new apartments in the lifetime of the plan (2023-2029) is mandated to be under five hundred (500) units and that this number has already been exceeded. This number is based on multiple factors and considerations; and includes traffic and access to and from Howth via Sutton Cross. Future flooding and erosion of the area at Sutton Cross is a potential reason to maintain development of apartments within the approved number, ie, not to exceed five hundred (500).

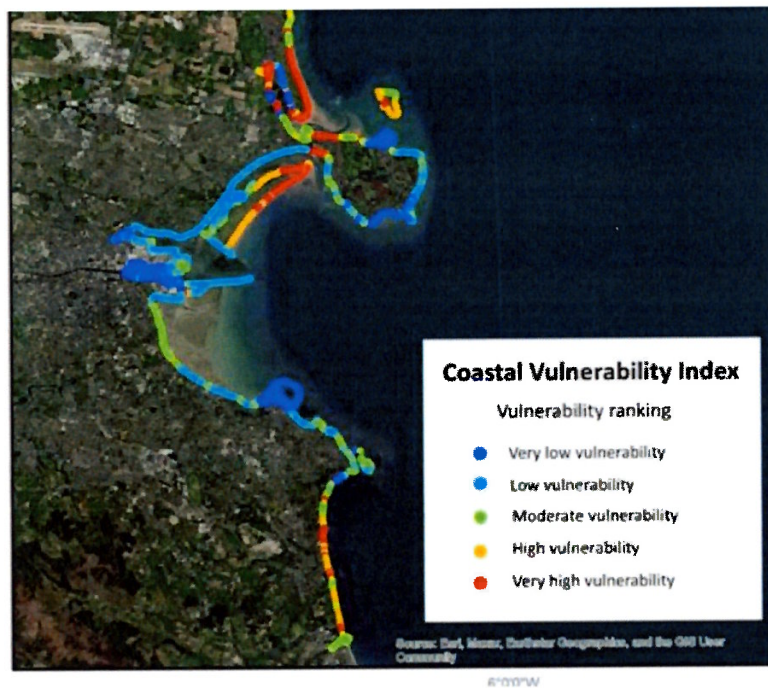
Here is an example of Burrow Beach erosion in 2023:



The fence posts and rope were put in place to limit footfall on the sand dunes, with the aim of reducing erosion. In fact, the sea level during storms eroded above the previous high tide and storm surge limit many times in 2023.

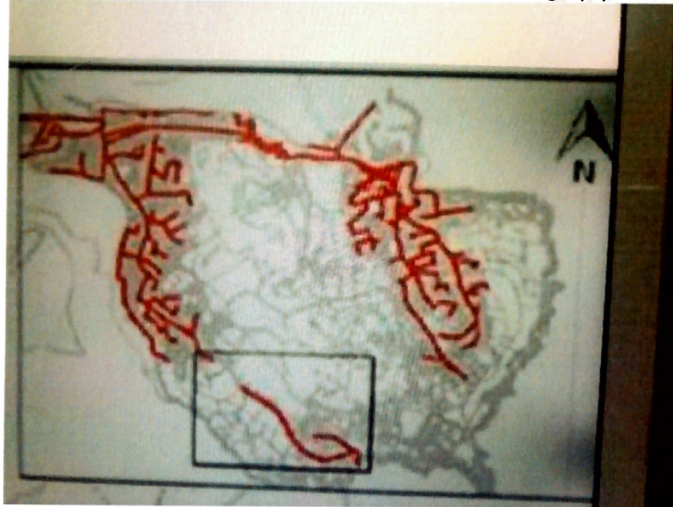


Here is a Geological Survey project map showing Sutton coastline as Very High Vulnerability (see the areas marked in red):



The areas marked in red are approximately those shown in the photos above.

Here is an Irish Water map of some of the sewage pipes in Howth and Sutton area:



There is a recent Irish 'Report of the Inter-Departmental Group on National Coastal Change Management Strategy' published on 26 October 2023 by the Office of Public Works (OPW), which documents challenges to Ireland's coasts, and aims to provide a basis for a long-term integrated strategy for integrated coastal change management. Before this report the approach by County Councils was based on a more engineering 'only' solution of building walls and rock armour or sea defences as the main solution.

See <https://www.gov.ie/en/publication/9a967-report-of-the-inter-departmental-group-on-national-coastal-change-management-strategy/>

One of the Strategic pillars, Strategic Pillar (3) is for Developing management response to coastal change and describes different approaches to coastal erosion and sea level rise:

Do nothing	No active intervention, allowing natural processes to take over with areas of land being lost to the sea over time
Hold the line	Build or maintain coastal defences to protect a coast line against the impacts of coastal change
Managed realignment	Landward realignment of existing coastal defences, or an existing coastline, to a new, more sustainable alignment accounting for the impacts of coastal change
Managed retreat	Co-ordinated movement of people and infrastructure away from risks and allow the coastline to retreat
Advance the line	Defences are built out at sea e.g. tidal barrage, land reclamation

Extracts from the Report for Pillar 3:

Strategic Pillar 3

Recommendation 8 – Short-term measures

- a) In already identified vulnerable locations, local authorities and State agencies should continue to engage with local communities to help ascertain the most appropriate interventions. Policy issues arising should be brought to the Interdepartmental Steering Group for consideration and action.
- b) Local authorities, in statutory plans, including the LA Climate Action Plans required under the Climate Act, should continue to identify potentially vulnerable locations that could be affected by coastal change. It is recommended that statutory plans in such cases put in place spatial policies to limit development in the interests of not increasing the amount of development and consequent population at risk from imminent coastal change.
- c) The CAROs should continue to engage in skills training associated with improving and deepening the local authority and State agencies capability to respond to the effects of coastal change. This training should include both the impact of coastal change on coastal and underwater archaeology and the impact of coastal defences and other measures on archaeological sites.
- d) The CAROs should continue in association with State agencies, particularly the OPW and Geological Survey Ireland (GSI), to carry out appropriate research and evidence gathering to inform the establishment of a long-term programme of response to coastal change.

Recommendation 9 – Coastal Change Management Planning

- a) The Interdepartmental Steering Group should initiate a pilot programme to identify the most effective risk management response option(s)/method(s) within a defined policy framework and prepare a pilot coastal change management plan.
- b) The Interdepartmental Steering Group should apply the defined policy framework to potentially at-risk coastal cells and sub-cells around the country and, in consultation with local communities

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Strategic Pillar	Recommendation
	<p>and other stakeholders prepare a rational set of coastal change management plans.</p> <p>c) Arising from suitable risk based analysis, each relevant sector and organisation to identify appropriate measures to address the risk e.g. structural or non-structural measures or relocation of existing infrastructure to a less vulnerable location.</p>

Here point (b) clearly states that Local Authorities, such as Fingal County Council, are mandated to put plans in place to limit development so as

- **NOT (to) increasing the amount of development and consequent population at risk from imminent coastal change** and point (c)
- **to put plans in place to move existing infrastructure to a less vulnerable location.**

In terms of this proposal, besides **road and DART access**, the **electricity, sewage, water and fixed telephone lines all are vulnerable at Sutton Cross area.**

OPW/FCC and all associated organisations don't yet have a plan, for managing erosion and rising sea levels at Sutton and the associated infrastructure.

The issue of rising sea levels may not impact the infrastructure of these proposed units for at least twenty-five (25) or fifty (50) years or more. Just that if no action is taken before sea level rises and coastal erosion increases, the impact will be severe to people living in these proposed units and to the environment should untreated sewage be released into the environment.

In summary the OPW stated in October 2023 that Local Authorities, such as Fingal County Council, are mandated to put plans in place to limit development so as to:

- **NOT increase the amount of development and consequent population at risk from imminent coastal change**
- **Put plans in place to move existing infrastructure to a less vulnerable location**

This application is for 135 homes. I note there are conditions listed for connection to Irish Water infrastructure, to enable the proposed buildings to have connections.

It is a matter for planners as to how far ahead, viable infrastructure for homes should be in place, or planned. **I ask for consideration as to whether any planning applications, that rely on infrastructure in vulnerable locations (to erosion and sea level rise), should be subject to appropriate conditions, should the infrastructure be impacted by sea level rise, flooding or erosion.**

6) Ecology, trees and biodiversity

The Chief Executives order refers to input from the FCC parts Department that describes the proposals impact as 'unacceptable':

Parks and Green Infrastructure

Following review of the proposed development by the Parks and Green Infrastructure Division, the report concludes that the proposed development conflicts with several landscape objectives and may generate significant negative impacts on existing & future residential amenities, biodiversity and the designated Special Amenity landscape (Howth SAAO). It is noted that the proposal encroaches into the High Amenity zoning and proposes tree removals within the Howth SAAO buffer zone in order to accommodate temporary works, which is unacceptable.

The five (5) pines required to be removed by this proposal should be retained and further tree planting mandated as a condition, should this proposal be granted.

I suggest previously that there should be a greater distance between the proposed buildings and the trees parallel to Castle avenue, with further tree planting and retention of a 'wildlife corridor' on the easter side of the site and preferably again on the western side of the site, both running approximately north south. This would mitigate some of the negative impact of building on this grassland site.

7) Light pollution and window glass glare

Fingal Objective LP01 "Require that the design of lighting schemes minimize the incident of light spillage or pollution into the surrounding environment. New schemes shall ensure that there is no unacceptable adverse impact on neighbouring residential or nearby properties, visual amenity, and biodiversity in the surrounding areas."

Should this application be granted I ask for conditions to limit light pollution by day and night. For example, low glare glass in all east, south and west facing windows, as the High Amenity area to the north and north-west of the units would be impacted by light pollution from this five floor high building.

Furthermore, I ask that tree planting or other measures to limit night-time light pollution into the High Amenity area of the site and to the adjacent grasslands and golf course.

In summary, I ask that this application is REFUSED.

Fee of 50 Euro paid.

Yours sincerely

Roxanne White