

Planning Department
Louth County Council,
Town Hall,
Crowe Street,
Dundalk,
Co. Louth
23rd December 2020

RE: Louth County Council Development Plan 2021 - 2027- Submission

Lands at Castle Road Dundalk, Rear of Houses on Castle Road, Previously used as Cash and Carry and Builders Yard

Subject of Submission – Request to change Zoning on lands from Residential to Zoning G1 Community Uses

LAST DATE FOR SUBMISSIONS – 23rd December 2020

Dear Sir / Madam,

I, Tom Muckian wish to lodge this submission in respect of lands located to the east of Castle Road between the residential dwellings on Castle Road and Realt Na Mara National School on Mill Street. The lands are bounded to the north by a Lidl store and its car park. The lands were previously used for a Cash and Carry and a Builders Yard. At present the only access to the land is through a shared Right of Way off Castle Road. This existing access is common ground and is a shared Right of Way for all the dwellings along the eastern side of Castle Road and Mill Street.

Any proposed residential development of these lands would give rise to serious concerns comprising,

- Flood risk,
- Traffic and pedestrian safety,
- Overlooking,
- Impact on residential amenity,
- Impact on archaeology and cultural heritage,
- Impact on environmental and ecological considerations



Figure 1 – Showing lands outlined in Red

Flood Risk

The lands in question are located within a Flood Zone as identified under the current Development Plan. At present the proposed zoning allows for submissions, proposing to develop the lands for residential uses. This type of residential development is inappropriate for a flood zone area and will likely lead to increased flood risk on adjoining lands. The Development Plan states that only Port or River related developments should be allowed on any flood plain lands. It should be noted that Planning permission was previously refused at the site under Reg. Ref. 14/208 for flood risk and drainage reasons.

Traffic and pedestrian safety

Any proposed residential development of the lands will rely on a single combined entrance for vehicles and pedestrians that is shared with a right of way for Castle Road and Mill Street, and meets a junction with St. Brigid's Terrace, to the west of Castle Road. Castle Road is already extremely busy, serving as a key route for 7 local schools. Any development of the site which depends solely on this access will have a serious impact on traffic and pedestrian safety in the area. As this existing access is located between two existing dwellings which are located within an Architectural Conservation Area (ACA), it is not at all clear how this access can be upgraded to allow safe, sustainable development of the site and it should be noted that any changes to the entrance will require the express consent of the owners who have a right of way on this entrance. Residents in the area have already expressed significant concerns about proposed residential development of these lands.

In a broader context there are already two extremely dangerous intersections along Castle Road at Seatown/Mill Street and St Mary's Road. Many near fatal traffic incidences have occurred here despite the existence of traffic lights on one of the junctions and steel pedestrian railings had to be installed on another junction. Any development of these lands must not be allowed to worsen the existing traffic congestion already being experienced in this part of town.

Overlooking

Previous applications to develop lands in the area has involved proposals for high rise, high rise developments. It is presumed that the cost of development of the site given the infrastructural constraints of the site require this type of high rise development to make the site feasible. However any high rise development on this land will result in overlooking of adjacent properties. This overlooking will have a significant negative impact on the adjacent Castle Road and Mill Street properties. It will also result in overlooking of the adjacent school yard at Realt na Mara.

Impact on residential amenity

The adjacent residential properties on Castle Road are located in an ACA (Architectural Conservation Area). It is difficult to see how the significant level of site works required to develop

the lands (particularly if development is of a high rise nature) will not have a significant impact on the amenity value of the existing dwellings. Negative structural impact on old dwellings, displaced surface water (due to being located in a flood plain) and negative impact of construction and ongoing traffic will all significantly impact on the residential amenity of the residents on Castle Road and Mill Street. Any development of this site must respect the existing amenity value of the existing residents.

Impact on archaeology and cultural heritage

The lands are overlooked by the Franciscan Tower which is located at the junction of Castle Road and Mill Street and is a Protected Structure. The area is rich in archaeological material and the site formed part of the former Franciscan Monastery and likely was a graveyard. The Tower is the most significant historical monument in Dundalk and any development of the site should be sympathetic to the historical nature of the adjacent area.

Impact on environment and Ecological Considerations

The Franciscan Tower is a known Bat nesting site and the southern portion of the lands to the rear of Mill Street is an existing wet land. Serious consideration should be given as to how to develop these lands and any development should respect the existing environmental and ecological status of the lands

In summary any development of these lands will need to respect the existing nature of the site, the ACA, the adjacent Realt na Mara school, the Franciscan Tower, the site constraints and the existing residential amenity of the properties along Castle Road and Mill Street. I do not feel that give the issues outlined above that high density residential development of the site is a suitable zoning for these lands.

A rezoning of the lands to allow for Community uses would be a much more sensible and sympathetic zoning for these lands.

The adjacent Realt na Mara School could be facilitated with a possible future expansion of the school for buildings or associated playing fields. A zoning that respects the historic nature of the area would also allow the development of the site or a portion thereof for an interpretative centre devoted to the site of the historic Franciscan Monastery. This type of development would be much less intrusive and have a much reduced impact on the residential amenity of existing dwellings.

The adjacent nature of Realt na Mara school would also greatly improve the permeability of the site for access and development given the length of the shared boundary with the lands. It would lead to a more integrated development of the lands and be more sustainable, while at the same time causing no long term increase in traffic congestion in the area.

Yours faithfully,
Tom Muckian