

# NAVY BANK PROJECT, POINT ROAD, DUNDALK, CO. LOUTH



Comhairle Contae **Lú**  
**Louth** County Council

## FLOOD RISK ASSESSMENT REPORT

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**NAVY BANK PROJECT AT  
POINT ROAD, DUNDALK, CO.LOUTH**

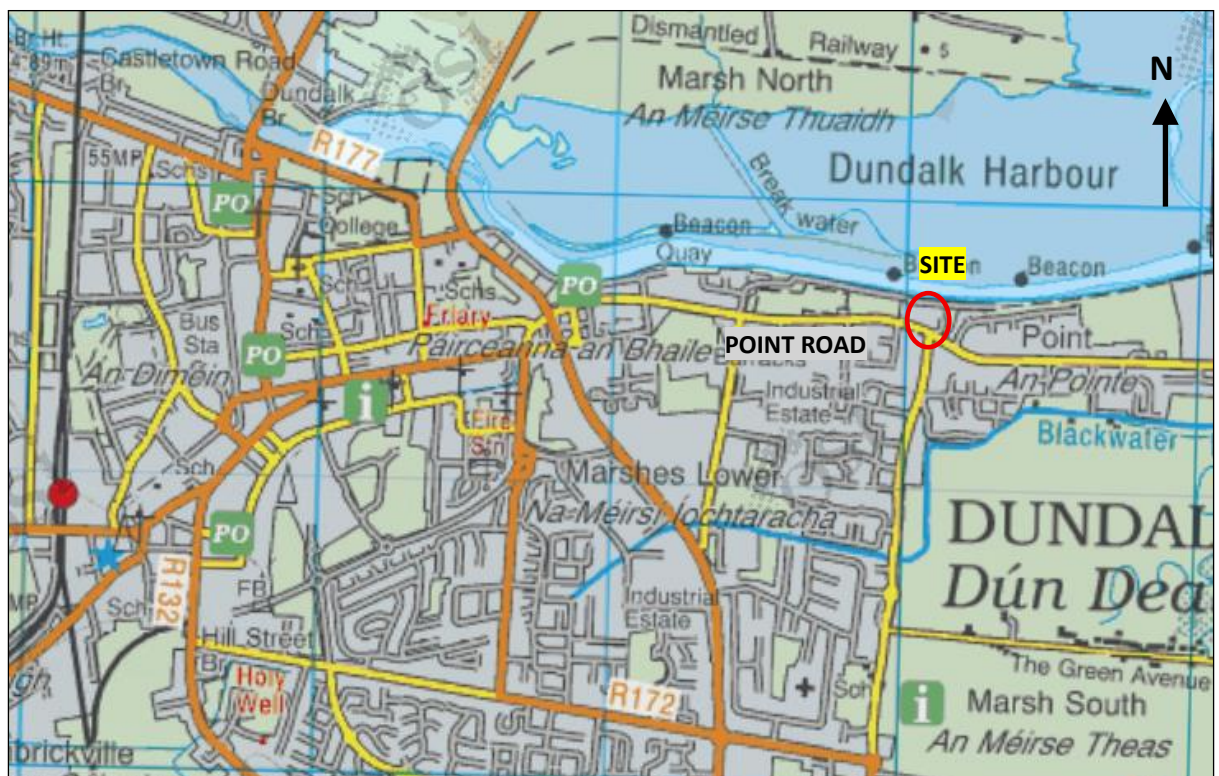
**FLOOD RISK ASSESSMENT**

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## 1.0 DETAILS OF THE PROPOSED DEVELOPMENT

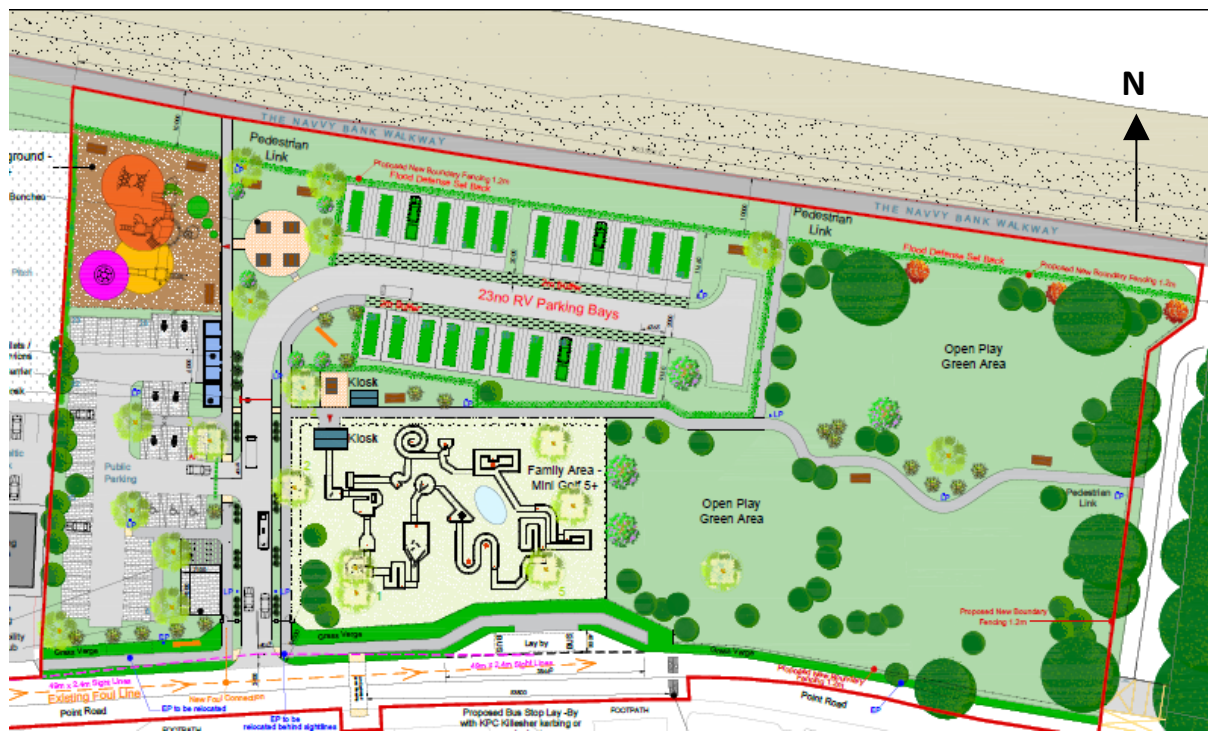
- 1.1 Louth County Council propose to construct a public recreational park on the site of an existing pitch and putt course at the Point Road, Dundalk. The location of the site within the general Dundalk area is shown on Fig.1.1, while an aerial view of the site and surrounding area is shown on Fig.1.2.
- 1.2 The facility shall offer a range of amenities including:
- family mini golf course
  - children's playground
  - open play area
  - RV parking bays (23 bays)
  - picnic area
  - toilets
  - mobility hub
  - car parking area
  - ev charging parking spaces
  - bicycle parking
- 1.3 The development shall also provide improvements to the Point Road including new bus stop, uncontrolled pedestrian crossing point and traffic calming measures
- 1.4 The main vehicular and pedestrian access to the site shall off the Point Road. An additional pedestrian linkage shall be provided between the facility and the Navy Bank walkway.
- 1.5 The proposed site layout is shown on Fig. 1.3



**Fig.1.1 – Location Map – General**



**Fig.1.2 – Aerial View of Site & Surrounding Area**

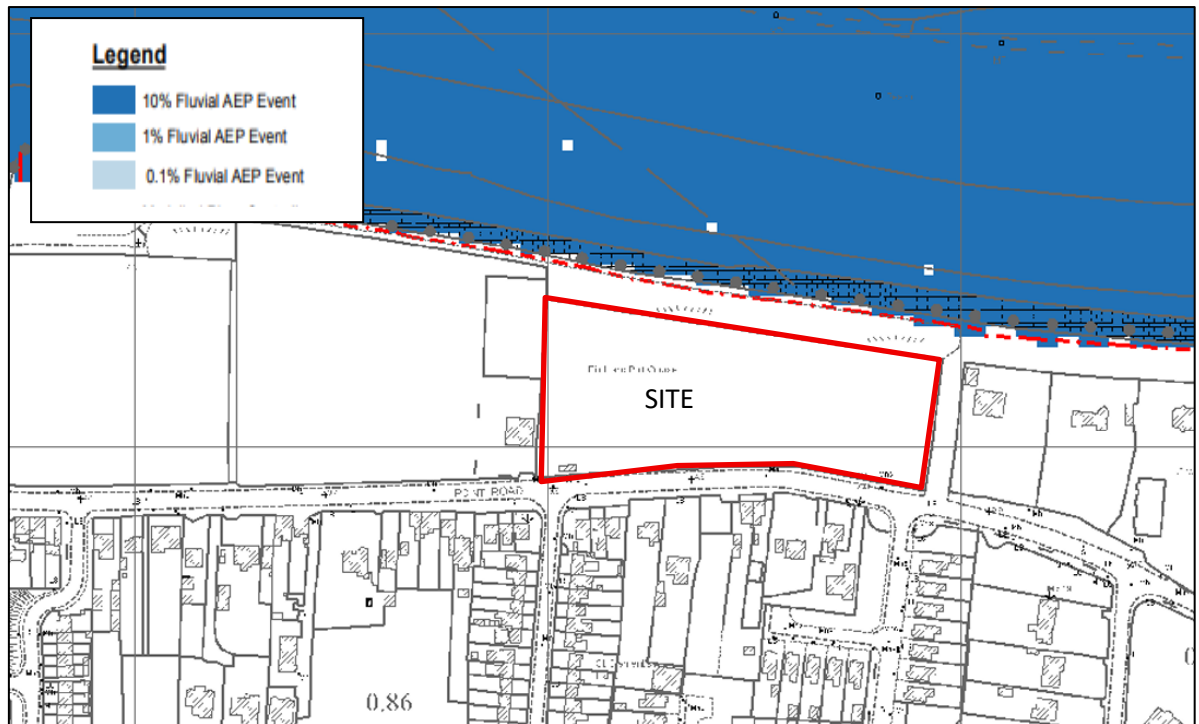


**Fig.1.3 – Proposed Site Layout (Extract from Drg. No. LCC-NVY-DRG-3.0 (Rev.1))**

## 2.0 LIKELIHOOD/EXTENT OF FLOODING

- 2.1 The proximity of the site to Dundalk Bay and the Castletown River estuary introduces the likelihood of the site being subject to coastal and/or fluvial flooding.
- 2.2 The most accurate up-date data on the likelihood of and extent of coastal and fluvial flooding in the Dundalk area are
- Fluvial Flooding – The Neagh Bann CFRAM Study AFA Fluvial Flood Maps (2016)
  - Coastal Flooding – The National Coastal Flood Hazard Mapping (2021) – NCFH Map
  - Dundalk Flood Relief Scheme – Updated Flood Mapping (2026)
- 2.2 The AFA Fluvial Flood Map indicates that the subject site is not susceptible to fluvial flooding under any scenario up to and including a 0.1% AEP event (1 in 1000 year) as shown on Fig 2.1.
- 2.3 The NCFH Maps show the site to be susceptible to coastal flooding under a range of flood events as follows:
- *10% AEP event (1 in 10 year)* – the southern portion of the site will be susceptible to flooding – Fig.2.2(i)
  - *0.5% AEP event (1 in 200 year)* – the majority of the site will be susceptible to flooding – Fig.2.2 (ii)
  - *0.1% AEP event (1 in 1000 year)* – full site will effectively be susceptible to flooding – Fig.2.2 (iii)
- 2.4 The Dundalk FRS Mapping shows:
- the site not to be susceptible to fluvial flooding under a combined 0.1% AEP Fluvial Flood event and a 50% AEP Coastal Flood Event (Fig.2.3(i))
  - most of the site to be susceptible to coastal flooding under a 0.5% AEP event with waves (Fig.2.3(ii))
- 2.5 In general, the data sources offer similar evidence of the site not being susceptible to fluvial flooding but being susceptible to coastal flooding. The similarity of the output from the different data source offers validity of the accuracy of the data.
- 2.6 The site can, based on the likelihood of coastal flooding, be classified as lying within a Coastal Flood Zone A as defined in the OPW Flood Guidelines for Planning Authorities (the Guidelines)
- 2.7 The Flood Zone A classification of site is confirmed by its inclusion the area identified as Flood Zone A in the Zoning and Flood Zoning Map for Dundalk which forms part of the Louth County Development Plan 2021-2027 (as varied) and the Dundalk Local Area Plan (2025-2031) – Fig 2.4





**Fig.2.1 – Extract from OPW AFA MAP – Predicted Fluvial Flooding**



(i) 10% AEP  
(1 in 10 year)



(ii) 0.5% AEP  
(1 in 200 year)



(iii) 0.1% AEP  
(1 in 1000 year)

***Fig.2.2 – Extracts from Coastal Flood Maps (NCFH Map 2021)***



***Fig.2.3 – Extracts from Dundalk FRS Flood Maps (2026)***





***Fig.2.4 – Extract for Zoning and Flood Zone Map***

(Louth County Development Plan 2021-2027 (as varied) & Dundalk Local Area Plan (2025-203))

### **3.0 APPROPRIATENESS OF THE PROPOSED DEVELOPMENT**

#### **(i) *General Flood Risk Policy as set out in the The Planning System and Flood Risk Management Guidelines ('The Flood Guidelines')***

3.1 The Flood Guidelines define Flood Risk as follows:

$$\text{Flood Risk} = \text{Likelihood of Flooding} \times \text{Consequences of Flooding}$$

3.2 The flood zone classification of a site offers a measure of the likelihood of flooding at the site

3.3 The consequence of flooding depends on the proposed development type. Table 3.1 of the Flood Guidelines break developments into three categories: Highly Vulnerable, Less Vulnerable and Water Compatible and provides a list of the type of development included under each category.

3.4 The key objective is to avoid the high flood risk associated with placing a highly vulnerable development in area with a high likelihood of flooding, for example placing a housing development in a Flood Zone A would be inappropriate. Instead, any development within a flood zone should be restricted to less vulnerable developments in order to decrease the flood risk to an appropriate level. The key objective is to match the development type with the Flood Zone classification of the site.

3.5 Guidance on appropriate or inappropriate combinations of development types and the likelihood of site flooding is provided in Table 3.2 of the Flood Guidelines.

| Vulnerability class                                                       | Land uses and types of development which include*:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|---------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Highly vulnerable development (including essential infrastructure)</b> | <p>Garda, ambulance and fire stations and command centres required to be operational during flooding;</p> <p>Hospitals;</p> <p>Emergency access and egress points;</p> <p>Schools;</p> <p>Dwelling houses, student halls of residence and hostels;</p> <p>Residential institutions such as residential care homes, children's homes and social services homes;</p> <p>Caravans and mobile home parks;</p> <p>Dwelling houses designed, constructed or adapted for the elderly or, other people with impaired mobility; and</p> <p>Essential infrastructure, such as primary transport and utilities distribution, including electricity generating power stations and sub-stations, water and sewage treatment, and potential significant sources of pollution (SEVESO sites, IPPC sites, etc.) in the event of flooding.</p> |
| <b>Less vulnerable development</b>                                        | <p>Buildings used for: retail, leisure, warehousing, commercial, industrial and non-residential institutions;</p> <p>Land and buildings used for holiday or short-let caravans and camping, subject to specific warning and evacuation plans;</p> <p>Land and buildings used for agriculture and forestry;</p> <p>Waste treatment (except landfill and hazardous waste);</p> <p>Mineral working and processing; and</p> <p>Local transport infrastructure.</p>                                                                                                                                                                                                                                                                                                                                                                |
| <b>Water-compatible development</b>                                       | <p>Flood control infrastructure;</p> <p>Docks, marinas and wharves;</p> <p>Navigation facilities;</p> <p>Ship building, repairing and dismantling, dockside fish processing and refrigeration and compatible activities requiring a waterside location;</p> <p>Water-based recreation and tourism (excluding sleeping accommodation);</p> <p>Lifeguard and coastguard stations;</p> <p>Amenity open space, outdoor sports and recreation and essential facilities such as changing rooms; and</p> <p>Essential ancillary sleeping or residential accommodation for staff required by uses in this category (subject to a specific warning and evacuation plan).</p>                                                                                                                                                           |

**Extract from Table 3.1 of Flood Guidelines**

|                                                                    | Flood Zone A       | Flood Zone B       | Flood Zone C |
|--------------------------------------------------------------------|--------------------|--------------------|--------------|
| Highly vulnerable development (including essential infrastructure) | Justification Test | Justification Test | Appropriate  |
| Less vulnerable development                                        | Justification Test | Appropriate        | Appropriate  |
| Water-compatible development                                       | Appropriate        | Appropriate        | Appropriate  |

**Extract from Table 3.2 of Flood Guidelines**

(ii) **Application of Policy to the Subject Development**

3.6 The subject development falls into two development type classifications as defined in Table 3.1 of the Flood Guidelines as follows:

- The playground, Mini-Golf, Open play area together with the associated facilities (car parking, toilets) falls into the category of 'Amenity open space, outdoor sports and recreation and essential facilities such as changing rooms' and can be classified as a '**water-compliant development**'.
- The RV parking element of the facility falls under development description type 'land and buildings used for holiday or short-let caravans and camping, subject to specific warning and evacuation plan' and can be classified as a '**less vulnerable development**'

3.7 Table 3.2 determines that the placing of these development types within a Flood Zone A can be deemed as follows:

- 'Appropriate' in the case of the Playground, Mini-Golf, Open Play Area
- 'Appropriate subject to satisfaction of the Justification Test' - in the case of the RV parking area

|                                                                    | Flood Zone A       | Flood Zone B       | Flood Zone C |
|--------------------------------------------------------------------|--------------------|--------------------|--------------|
| Highly vulnerable development (including essential infrastructure) | Justification Test | Justification Test | Appropriate  |
| Less vulnerable development                                        | Justification Test | Appropriate        | Appropriate  |
| Water-compatible development                                       | Appropriate        | Appropriate        | Appropriate  |

Play Ground, Mini Golf etc.

RV Parking Area



- 3.8 It is necessary to demonstrate that the RV Parking element of the development satisfies the Justification Test – Development Management. An assessment of the RV Parking element of proposed development under each of the Development Management Justification Test Criterion

***(iii) Assessment of the RV Parking Facility under the Development Management Justification Test***

**3.9 Criterion No.1**

*The subject lands have been zoned or otherwise designated for the particular use or form of development in an operative development plan, which has been adopted or varied taking into account these Guidelines*

The site is located within lands zoned as H1 -Open Space' in the Louth County Development Plan 2021-2027 (as varied) and in the Dundalk Local Area Plan (2025-2031) .

The planning objective for this land-use zoning is 'to preserve, provide and improve recreational amenity and open space'.

It is considered that the proposed RV parking area fully meets this objective

**3.10 Criterion No.2**

- (i) The development proposed will not increase flood risk elsewhere and, if practicable, will reduce overall flood risk*

It is not proposed to materially raise existing ground levels to construct the RV Parking Facility. The proposed development shall not result in a loss of floodplain or displacement of flood water onto other lands.

The proposed access road and RV parking bays shall be constructed using a grass concrete paving system which shall allow for direct infiltration of rain into the underlying sub-soil. The absence of impermeable surfaces shall ensure that the proposed development does not generate any surface water run-off with potential to augment flood water flows

- (ii) The development proposed includes measures to minimize flood risk to people, property, the economy and the environment as far as is reasonably possible*

- the risk to persons is extremely low as no static or permanent accommodation is being provided on the site. Persons can easily and quickly drive away from the site and will not be forced to remain on site due to lack of alternative accommodation or to protect their property.
- Coastal flood events are not unexpected or unpredictable events and are always preceded by well publicised and broadcasted advance warnings of high tides etc. especially to Local Authorities and other key service providers.

This shall allow Louth Co. Co and other state bodies to make appropriate advance preparation to mitigate the impact of such flooding on persons and property  
In the case of the RV Parking Facility a simple but effective measure would be to simply keep the facility closed during periods when a yellow, orange or red coastal flood warning is in operation

- the environment damage of flooding of the RV Parking site is low given that no environmentally sensitive infrastructure (e.g. on site wastewater treatment system) is being provided. The proposed toilets shall be linked to the public sewer network, any flooding shall not enter the foul sewer network and cause any overflow once all manhole covers are standard sealed type
- the economic damage of flooding of the site is also low given the absence of any permanent structures within the RV Parking area and shall generally be limited to damage to the surface of grass concrete paving system

*(iii) The development proposed includes measures to ensure that residual risks to the area and/or development can be managed to an acceptable level as regards the adequacy of existing flood protection measures or the design, implementation and funding of any future flood risk management measures and provisions for emergency services access*

The proposed development shall not impact on the operation or management of the existing flood protection embankment (the Navy Bank)

The proposed development has been set back from the Navy Bank to leave sufficient land available to allow for further coastal protection works to be provided under the Dundalk Flood Relief Scheme.

The construction of these additional flood protection measures is currently estimated to commence in 2030 and be completed by 2033 under the Project 2040 National Critical Infrastructure Programme.

The works are being designed to offer protection against future 0.5% AEP (1 in 200 year) flood events with appropriate allowance for climate change.

The completion of these works shall significantly reduce the likelihood of the site being subjected to flooding

The site layout provides a direct link between the RV parking area and the public road network for vehicles to evacuate the site or for emergency vehicles to access the site.

The need for an emergency vehicle to access the site during a flood event is low given that persons shall not remain on the site during a flood event

*(iv) The development proposed addresses the above in a manner that is also compatible with the achievement of wider planning objectives in relation to development of good urban design and vibrant and active streetscapes*

Motor Homes/RVs/Camper Vans are an increasingly popular mode of transport for tourists particularly for those attracted to destinations, such as Co. Louth, that promote themselves as a short stage active holiday location.

There are no proper secure locations within Dundalk Environs for overnight parking of these vehicles. As a result, motor homes are regularly parked throughout in inappropriate locations.

The proposed development shall address this deficiency by providing a serviced RV parking facility in proximity of the town centre and a range of recreational facilities.

The development shall allow Louth County Council to meet Policy Objectives TOU 32 and TOU 29 as follows:

| Policy Objective |                                                                                                                                                                                                                                      |
|------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>TOU 32</b>    | To support the provision of camper van facilities at appropriate locations in the County subject to any facilities being acceptable in terms of location, visual impact, and compliance with any environmental assessments required. |

| Policy Objective |                                                                                                                                                                                                                                                                                                                                                     |
|------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>TOU 29</b>    | To encourage new caravan parks and camping sites to locate within existing settlements which are appropriately screened and which are served by an adequate and acceptable road network and foul drainage. In exceptional circumstances caravan and camping sites may be permitted in previous worked sites, forest or woodland or demesne setting. |

- 3.11 Overall it is concluded that the proposed RV Parking facility satisfies the Development Management Justification Test. This element of the development can therefore be deemed 'appropriate' within a Flood Zone A

#### **4.0 SUMMARY AND CONCLUSION**

- 4.1 The site of the proposed development has been identified as a coastal Flood Zone A
- 4.2 The majority of the proposed development is classified as a 'water compatible' land-use and is deemed 'appropriate' within a Flood Zone A
- 4.3 The RV Parking Facility element of the development is classified as a 'less vulnerable' land-use and is deemed 'appropriate' within a Flood Zone A subject to satisfying the Justification Test
- 4.4 It has been demonstrated that the RV Parking Facility satisfies all criterion set out the Justification Test – Development Management subject to site specific warning and evacuation plans being in place.
- 7.7 It is the overall conclusion of this assessment that the proposed development, subject to flood warning and site evacuation plans being in place, shall:
- not represent an unacceptable flood risk to persons, property or the environment.
  - not exacerbate existing flooding or cause flooding in the immediate vicinity or wider area.
- 7.8 No allowance has been made in this assessment for the upgrading of the existing coastal flood defences to cater for future 0.5% AEP flood events (1 in 200 year) as proposed under the Dundalk Flood Protection Scheme. It is however clear that the completion of these works shall significantly reduce the likelihood of the subject site and further reduce the residual flood risk at the site
- 7.8 In summary, the proposed development can be deemed to be 'appropriate' from a flood risk perspective and to fully comply with the Flood Guidelines and the flood risk policies set Louth County Development Plan 2021-2027

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